



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

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JAN 15 2015

Mr. Mark Hague  
Acting Regional Administrator  
U.S. EPA, Region VII  
11201 Renner Boulevard  
Lenexa, KS 66219

Dear Mr. Hague:

The Missouri Department of Natural Resources' Air Pollution Control Program (air program) hereby submits the attached list of sources with actual 2014 emissions greater than 2,000 tons per year (tpy) of sulfur dioxide (SO<sub>2</sub>). These sources will undergo further evaluation per the guidelines in the SO<sub>2</sub> Data Requirements Rule (DRR) as published in the Federal Register on August 21, 2015. This submittal satisfies the DRR requirement for states to submit a list of sources with SO<sub>2</sub> emissions greater than 2,000 tpy in the most recent quality assured emission year. For Missouri, the most recent quality assured emission year is 2014. A subsequent submittal, detailing evaluation specifics for each identified source in the enclosed table, will be submitted no later than July 1, 2016, per DRR requirements.

The air program considered two additional sources for inclusion on the enclosed list: Ameren Rush Island Energy Center (Rush Island) and Doe Run Buick Resource Recycling Facility (Buick).

Rush Island's 2014 actual SO<sub>2</sub> emissions are greater than 2,000 tons. Rush Island is not included on Missouri's DRR list because it is located in an existing nonattainment area for the 1-hour SO<sub>2</sub> standard. Further, emissions from Rush Island have already been addressed through the Jefferson County SO<sub>2</sub> nonattainment area plan submitted to EPA in May 2015. Modeling analyses submitted with this plan show that there are no modeled violations in the nonattainment area. These analyses were based on and reflect actual conditions in the nonattainment area. In addition, the plan and associated agreement (between Ameren and the air program) established new emission limitations and monitoring requirements for Rush Island. Compared to the DRR monitoring schedule, this placed Rush Island on an accelerated schedule for collecting monitoring data that can be used to evaluate air quality around the source. The SO<sub>2</sub> monitors, sited in accordance with EPA's monitoring technical assistance document, began operation in December 2015, more than a year before the DRR's deadline for installing new monitors for designation purposes. The agreement also requires Rush Island to immediately address exceedances of the standard. For these reasons, Rush Island is not included on Missouri's list.



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Buick is included on Missouri's list even though their 2014 actual SO<sub>2</sub> emissions were reported as less than 2,000 tons. Buick's 2014 reported emissions are currently being reviewed for accuracy which may result in a change in Buick's annual emissions. Further analysis of actual emissions is necessary to verify the reported emissions; however, confirmation of reported emissions is not complete prior to this submittal. Due to the uncertainties surrounding Buick's emissions data and the proximity of the reported emissions to the 2,000 ton threshold, the air program decided to include Buick on the list of sources for further evaluation per the DRR.

Thank you for your attention to this matter. If you have any questions regarding this submittal, please contact Ms. Emily Wilbur with the Missouri Department of Natural Resources' Air Pollution Control Program at P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

A handwritten signature in black ink that reads "Kyra L. Moore". The signature is written in a cursive style with a large, stylized initial "K".

Kyra L. Moore  
Director

KLM:akc

Enclosures:

Table of Sources with 2014 Annual SO<sub>2</sub> Emissions Greater than 2,000 Tons

c: Missouri Air Conservation Commission  
File# 2010-SO2-5-DRR

Enclosure

Table of Sources with 2014 Annual SO<sub>2</sub> Emissions Greater than 2,000 Tons

Plant Name	FID	Annual Actual Emissions (tons)
		2014
AMEREN MISSOURI-LABADIE ENERGY CENTER*	0710003	33,091
NEW MADRID POWER PLANT-MARSTON	1430001	16,672
THOMAS HILL ENERGY CENTER POWER DIVISION-THOMAS HILL	1750001	16,575
AMEREN MISSOURI-MERAMEC ENERGY CENTER	1890010	11,702
KANSAS CITY POWER AND LIGHT CO-MONTROSE GENERATING STATION	0830001	8,604
SIKESTON POWER STATION*	2010017	6,651
EMPIRE DISTRICT ELECTRIC CO-ASBURY PLANT	0970001	6,318
NORANDA ALUMINUM INC-NEW MADRID	1430008	5,323
UNIVERSITY OF MISSOURI (MU)-COLUMBIA POWER PLANT	0190004	5,171
KCP AND L - GREATER MO OPERATIONS-SIBLEY GENERATING STATION*	0950031	4,847
MISSISSIPPI LIME COMPANY-STE. GENEVIEVE	1860001	3,285
CITY UTILITIES OF SPRINGFIELD-JOHN TWITTY ENERGY CENTER	0770039	3,021
ANHEUSER-BUSCH INC-ST. LOUIS	5100003	2,867
BASF CORPORATION-HANNIBAL PLANT	1270001	2,560

Plant Name	FID	Annual Actual Emissions (tons)
		2014
INDEPENDENCE POWER AND LIGHT-BLUE VALLEY STATION	0950050	2,105
DOE RUN BUICK RESOURCE RECYCLING FACILITY	0930009	1,649**

\*Per the final DRR, sources identified in the March 2015 (federal) consent decree should be included on the list of sources required for characterization under the final DRR.

\*\*Doe Run Buick's 2014 reported emissions are currently being reviewed for accuracy which may result in a change in the annual actual emissions for this facility.