



January 15, 2016

Carl Daly
 Air Program Director
 United States Environmental Protection Agency
 Region VIII
 1595 Wynkoop St.
 Denver, CO 80202-1129

RE: Sources within Montana Subject to 40 CFR 51 Subpart BB – Data Requirements for Characterizing Air Quality for the Primary SO₂ NAAQS.

Dear Mr. Daly:

As you are aware, the U.S. Environmental Protection Agency (EPA) promulgated a revision to the National Ambient Air Quality Standards (NAAQS) for sulfur dioxide (SO₂) on June 2, 2010 (75 FR 35520). Pursuant to 42 USC §7407(d)(1), Congress directs EPA to designate all areas of the Country as nonattainment, attainment, or unclassifiable with respect to a new or revised NAAQS. On August 21, 2015 EPA finalized and published the Data Requirements for Characterizing Air Quality for the Primary SO₂ National Ambient Air Quality Standards (NAAQS) at 40 CFR 51.1200 (Subpart BB). Specifically at 40 CFR 51.1200(2) an applicable source is defined as a stationary source that has actual annual SO₂ emission data of 2,000 tons or more or, has been identified by an air agency or by the EPA Regional Administrator as requiring further air quality characterization. Table 1 below is the 2014 Emission Inventory of all SO₂ sources within Montana.

TABLE 1

Montana Actual SO₂ Emissions

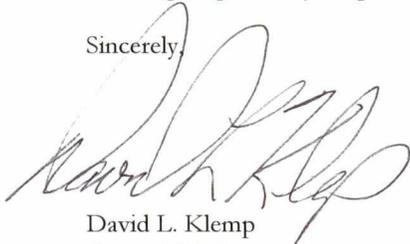
(source: Montana 2014 annual emissions inventory/Annual Emissions Reporting Requirement or AERR)

Emissions Source	Emissions (CY2014)	DRR Triggered? (2000 ton/yr*)
Rocky Mountain Power	382	N
Graymont Western US	175	N
Calumet Montana Refining Co.	32	N
USFS Malmstrom AFB	2	N
MDU – Miles City	0.038	N
MDU – Glendive	0.36	N
Oneok – Baker Plant	97	N
Holcim US	18	N
Ash Grove Cement Co.	362	N
Sidney Sugars	51	N
MDU – Lewis and Clark	1,046	N
CELP (Rosebud Power)	1,165	N
Talen Colstrip Units 1-4	10,110	Y
Western Sugar – Billings	123	N
Phillips 66 – Billings	88	N
CHS, Inc. – Laurel	239	NA – Existing NAA
ExxonMobil – Billings	659	N
MSCC - Billings	1,436	N
Talen JE Corette – Billings (offline)	1,433	NA – Existing NAA and permanently offline
YELP – Billings	1,525	N

Table 1 above clearly shows that Montana has only one source subject to the Data Requirements Rule (DRR), the Talen Energy coal fired electrical generating unit located at Colstrip in Rosebud County. This facility consists of 4 coal fired boilers permitted as a single source. The Talen facility is well over the 2,000 ton per year threshold established in the DRR. Montana will select the appropriate methodology for determining Rosebud County's SO₂ NAAQS designation and will inform EPA of its decision on or before July 1, 2016 as required in the DRR.

If you have any questions regarding this action, please contact Stephen Coe, the Department's Air Quality Bureau Senior Planning Engineer, by telephone at (406) 782-2689 x 209 or by email at scoc@mt.gov.

Sincerely,



David L. Klemp
Bureau Chief
Air Quality Bureau

Enclosure

cc: Adam Clark, Air Quality Planner, US EPA Region 8
Tom Livers, Director, Montana Department of Environmental Quality
Annette Williams Technical Support Services Program Manager, Air Quality Bureau MT, DEQ
Stephen Coe – Senior Planning Engineer, Air Quality Bureau, MT DEQ