



STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
DIVISION OF AIR POLLUTION CONTROL  
WILLIAM R. SNODGRASS TENNESSEE TOWER  
312 ROSA L. PARKS AVENUE, 15<sup>TH</sup> FLOOR  
NASHVILLE, TENNESSEE 37243

January 15, 2016

Heather McTeer Toney  
Regional Administrator  
USEPA, Region 4  
61 Forsyth Street, SW  
Mail Code: 9T25  
Atlanta, GA 30303-8960

RE: Identification of Applicable SO<sub>2</sub> Sources Pursuant to 40 CFR 51.1203

Dear Ms. McTeer Toney:

On August 21, 2015, U.S. EPA promulgated the Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS) in the Federal Register (the Data Requirements Rule). The Data Requirements Rule, at 40 CFR 51.1203, requires air agencies to submit a list of applicable SO<sub>2</sub> sources<sup>1</sup> identified pursuant to §51.1202 by January 15, 2016. 40 CFR 51.1202 states that the Data Requirements Rule applies to air agencies whose jurisdiction contains one or more applicable sources of SO<sub>2</sub> that 1) have annual actual emissions of 2000 tons/year or more, or 2) have been identified by the air agency or by the EPA Regional Administrator as requiring further air quality characterization. §51.1202 also states that identification of sources shall be based on the most recently available annual SO<sub>2</sub> emissions data.

The most recent annual SO<sub>2</sub> emissions data that is currently available is 2014 emissions data from EPA's Air Markets Program Data (AMPD) for Electric Generating Units (EGUs) and 2014 emissions data reported in accordance with EPA's Air Emissions Reporting Rule (AERR) for both EGUs and non-EGUs<sup>2</sup>. Based on this data, the sources shown in the table below had actual emissions above 2000 tons/year in 2014 and are thus applicable SO<sub>2</sub> sources pursuant to the Data Requirements Rule.

Facility Name	Location	2014 SO <sub>2</sub> emissions (tons) <sup>3</sup>
Tennessee Valley Authority – Gallatin Fossil Plant	Sumner County	19,439
Tennessee Valley Authority – Johnsonville Fossil Plant	Humphreys County	17,535
Tennessee Valley Authority – Allen Fossil Plant	Shelby County	9,758
Tennessee Valley Authority – Cumberland Fossil Plant	Stewart County	9,395

<sup>1</sup> Applicable sources exclude sources in areas that have already been designated nonattainment for the 2012 SO<sub>2</sub> NAAQS. For Tennessee, this includes Eastman Chemical Company in Sullivan County.

<sup>2</sup> In the preamble to the final rule at 80 FR 51067 EPA states "By January 15, 2016, the EPA would expect that 2014 data will be available for all EGU sources, and 2015 data may be available for many EGUs in accordance with the requirements of the Acid Rain program and other emission trading programs that require data certification soon after the end of the year." Complete 2015 data was not available for Tennessee sources as of the date of this submittal.

<sup>3</sup> 2014 emissions obtained from AMPD

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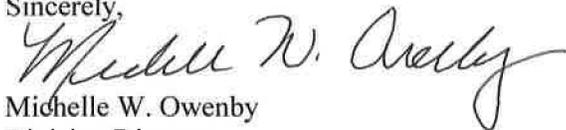
The Tennessee Division of Air Pollution Control has not identified any other sources that require further air quality characterization in accordance with the Data Requirements Rule.

It should be noted that on September 16, 2015, the Tennessee Department of Environment and Conservation (TDEC) submitted a designation recommendation of "Attainment" for the area around the TVA Gallatin Fossil Plant in regards to the 1-hour SO<sub>2</sub> standard in accordance with the March 2, 2014, consent decree between the Sierra Club and Natural Resources Defense Council and the U.S. EPA. In addition, TDEC submitted additional information, including a five-factor analysis, to support its recommendation of attainment based on estimated future actual emissions following the installation of flue gas desulfurization (FGD) systems on all four EGUs at the facility. The FGD systems are required to be installed and operated on or before April, 2016. A permit application, including supporting dispersion modeling, to establish enforceable SO<sub>2</sub> limits on the Gallatin EGUs was submitted to EPA Region 4 via email on January 6, 2015.

Additionally, units five through ten at TVA's Johnsonville Fossil Plant have already been retired and the remaining units one through four are required to be retired by the end of 2017. Furthermore, TVA has announced that all three coal-fired units at the Allen Fossil Plant will be retired by June 2018 and replaced with natural gas combined cycle units.

Should you have any questions, please contact Jimmy Johnston of my staff at 615-253-7319 or james.johnston@tn.gov.

Sincerely,



Michelle W. Owenby  
Division Director  
Air Pollution Control

c: Bob Rogers, Shelby County Health Department, Pollution Control Section  
Beverly Bannister, EPA Region 4  
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Scott Davis, EPA Region 4  
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