



Catherine E. Heigel, Director

Promoting and protecting the health of the public and the environment

July 1, 2016

Carol Kemker, Acting Director
Air Pesticides and Toxics Management Division
US EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street SW
Atlanta GA 30303-8909

Re: South Carolina SO₂ Air Quality Compliance Approaches for Applicable Facilities Under the 1-hour 2010 Sulfur Dioxide (SO₂) National Ambient Air Quality Standard (NAAQS) Data Requirements Rule (DRR)

Dear Ms. Kemker:

On August 21, 2015, the Environmental Protection Agency (EPA) published in the *Federal Register* the final rule: Data Requirements Rule for the 1-hour SO₂ Primary National Ambient Air Quality Standard (80 FR 51052). This rule establishes an applicability threshold, a timeline for implementation, and a protocol for maintaining the NAAQS in future years. As part of this rule, state agencies must identify approaches they expect to use to characterize those facilities within their jurisdiction which are subject to ambient air characterization as specified by the DRR by July 1, 2016. Identified facilities would undergo evaluation of ambient air SO₂ concentrations using modeling or monitoring, or be subject to permitted SO₂ emission limits to determine attainment status of the 1-hour SO₂ NAAQS. Facilities which are to be included in the attainment determination are those that had actual SO₂ emissions at or above 2000 tons per year (TPY) based on the most current national emissions inventory (NEI). As required by the DRR, on January 15, 2016, the South Carolina Department of Health and Environmental Control (SCDHEC) submitted a list of 8 applicable facilities which must characterize SO₂ concentrations or be subject to permit limits¹.

All applicable facilities in SC identified to be subject to the DRR plan to comply with the rule's requirements with either air quality dispersion modeling or permit limits. Appendix A lists all applicable facilities and identifies the compliance method which will be used to meet the requirements of the DRR. Title V operating permits are currently being drafted for two of three facilities complying with the DRR through a federally enforceable permit limit, but the mechanism for compliance is listed in Appendix A. A final Title V operating permit for the remaining facility is included as Appendix B. All facilities meeting the emission limits of the DRR will do so by a federally enforceable permit which will be effective no later than January 13, 2017. Modeling protocols are included in this submission for those facilities which will be demonstrating compliance through dispersion modeling as Appendices C-F. No additional SO₂ monitors will be established to comply with the DRR in South

¹"South Carolina List of Applicable Facilities Under the 1-hour 2010 Sulfur Dioxide (SO₂) National Ambient Air Quality Standard (NAAQS) Data Requirements Rule (DRR)." January 15, 2016.

Carolina. Corresponding modeling analyses and final permits will be submitted by January 13, 2017, as required by the rule.

Should you have any general questions or concerns regarding this information, please contact Robert Brown of my staff by telephone at (803) 898-4105 or e-mail at brownrj@dhec.sc.gov. Should you have specific questions regarding the attached modeling protocols, please contact John Glass of my staff by telephone at (803)-898-4074 or e-mail at glassjp@dhec.sc.gov.

Sincerely,



Rhonda B. Thompson, P.E., Chief
Bureau of Air Quality
SC DHEC

- cc: Myra Reece, Director of Environmental Affairs, SC DHEC
Henry Porter, Assistant Bureau Chief, Bureau of Air Quality, SC DHEC
Scott Davis, Chief, Air Planning & Implementation Branch, EPA Region 4
Rick Gillam, Modeling Section, EPA Region 4
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Heather Ceron, Chief, Air Permitting Section, EPA Region 4
Lynorae Benjamin, Chief, Air Regulatory Development Section, EPA Region 4
Twunjala Bradley, Air Regulatory Development Section, EPA Region 4
Brad Akers, Environmental Engineer, Air Regulatory Development Section, EPA Region 4

Appendices:

Appendix A - Compliance Methods for Facilities within the Jurisdiction of South Carolina Applicable to the Data Requirements Rule

Appendix B - Title V Operating Permit for Duke Energy Lee Steam Station

Appendix C - Modeling Protocol for Santee Cooper Cross Generating Station

Appendix D - Modeling Protocol for SCE&G Wateree Station and International Paper – Eastover Mill

Appendix E- Modeling Protocol for Alumax of South Carolinas INC (Alcoa Mt. Holly/ Century Aluminum of SC)

Appendix F- Modeling Protocol for Resolute FP US INC

Appendix A
Compliance Methods for Facilities within the Jurisdiction of South Carolina Applicable to the Data Requirements Rule

Facility Name	Permit Number	Compliance Method	Additional Information
SCE&G McMeekin Station 2000 North Lake Drive Lexington, SC 29212	1560-0003	Permit Limit	Facility undergoing a fuel change. Permit condition will limit fuel allowed to be combusted and coal will be eliminated as a fuel option. Facility-wide potential to emit will be under 2000 TPY potential SO ₂ emissions. Condition will be reflected in a minor NSR construction permit or Title V renewal permit.
Santee Cooper Cross Generating Station 553 Cross Station Road Pineville, SC 29468	0420-0030	Dispersion Modeling	Modeling protocol enclosed
SCE&G Wateree Station Highway 601 Eastover, SC 29044	1900-0013	Dispersion Modeling	Modeling protocol enclosed Title V permit amendments will be necessary to limit sulfur content and reflect controls used.
International Paper-Eastover Mill 4001 McCord's Ferry Road Eastover, SC 29044	1900-0046	Dispersion Modeling	Modeling protocol enclosed

Alumax of South Carolina INC (Alcoa Mt. Holly/Century Aluminum of SC) Highway 52 North Goose Creek, SC 29445	0420-0015	Dispersion Modeling	Modeling protocol enclosed
Resolute FP US INC 5300 Cureton Ferry Road Catawba, SC 29704	2440-0005	Dispersion Modeling	Modeling protocol enclosed
Duke Energy Carolinas LLC, W.S. Lee Steam Station Lee Station S-4-178 Pelzer, SC 29669	0200-0004	Permit Limit	Facility has undergone a fuel change. The current permitted SO ₂ emissions are below 2000 TPY (see enclosed permit)
WestRock CP LLC (formerly Rocktenn) Paper Mill Road P.O. Box 100544 Florence, SC 29501-0544	1040-0003	Permit Limit	Permit condition limiting facility-wide SO ₂ emissions to less than 2000 TPY, 12-month rolling total.* The condition will be reflected in a construction permit or Title V permit renewal.

*Condition will limit facility-wide emissions to less than 2000 tpy using the recordkeeping, monitoring, testing, calculations and verifications specified in SC R 61-62.5 Standard No. 7 (PSD) section aa (Plantwide Applicability Limit (PAL)).