

# Sulfur Dioxide Data Requirements Rule

## 2019 Annual Review

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Environmental Services Division  
Air Quality Bureau  
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Des Moines, IA 50319

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## Executive Summary

The Iowa Department of Natural Resources (DNR) prepared this report to satisfy the annual data review requirements of the *Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS)*. The Data Requirements Rule (DRR) is a federal rule promulgated by the U.S. Environmental Protection Agency (EPA) on August 21, 2015.

The DRR mandates that air agencies document in a report due July 1 each year the recent annual SO<sub>2</sub> emissions of sources in each area where modeling of actual emissions served as the basis for designating that area attainment. The air agency must also provide a recommendation regarding whether additional modeling is needed to determine if each such area continues to meet the 2010 1-hour SO<sub>2</sub> NAAQS. These are ongoing requirements that must be addressed every year, unless the modeling results for an area meet certain criteria that exempt it from further review.

This is the third annual report for the DRR prepared by the DNR. The areas in Iowa that must be evaluated are Louisa County and Pottawattamie County. The DRR-listed source in Louisa County is MidAmerican Energy Company's (MidAmerican) Louisa Generating Station (LGS). The DRR-listed source in Pottawattamie County is MidAmerican's Walter Scott Jr. Energy Center (WSEC).

Based on documented reductions in annual SO<sub>2</sub> emissions, the DNR concludes that additional modeling is not needed to determine that Louisa and Pottawattamie Counties continue to attain the 2010 1-hour SO<sub>2</sub> NAAQS.

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# 1. Introduction

On August 21, 2015 ([80 FR 51051](#)), the U.S. Environmental Protection Agency (EPA) published the *Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS)*. This rule, referred to as the Data Requirements Rule (DRR), includes provisions in 40 CFR 51.1205(b) that require the air agency to submit a report to EPA documenting SO<sub>2</sub> emissions in areas where modeling of actual SO<sub>2</sub> emissions served as the basis for designating the area attainment for the 75 part per billion (ppb) 2010 1-hour SO<sub>2</sub> NAAQS ([75 FR 35519](#), June, 22, 2010). The report must include an assessment of the cause of any emissions increases from the previous year and a recommendation regarding whether additional modeling is needed to characterize air quality to determine whether an area meets or does not meet the 2010 1-hour SO<sub>2</sub> NAAQS. The first such report is due by July 1 of the calendar year after the effective date of an area’s initial designation. Thereafter, the report must be submitted annually, by July 1 of each year.

## 1.1. Affected Areas

This stand-alone report is the third report prepared by the Iowa Department of Natural Resources (DNR) pursuant to the ongoing data review provisions of the DRR. There are two areas in Iowa that must be addressed at this time, Louisa County and Pottawattamie County, whose locations are indicated in Figure 1-1. These two counties were among those designated during the third round of SO<sub>2</sub> designations ([83 FR 1098](#), January 9, 2018) and they each contain one facility that was identified by the DNR pursuant to 40 CFR 51.1203(a) as a source that had actual annual SO<sub>2</sub> emissions of at least 2,000 tons and was not located in a nonattainment area. The applicable source in Louisa County is MidAmerican Energy Company’s (MidAmerican) Louisa Generating Station (LGS). In Pottawattamie County, the applicable source is MidAmerican’s Walter Scott Jr. Energy Center (WSEC). The dispersion modeling conducted by the DNR that supported the attainment designations for these two areas was based, in part, on the use of actual emissions.

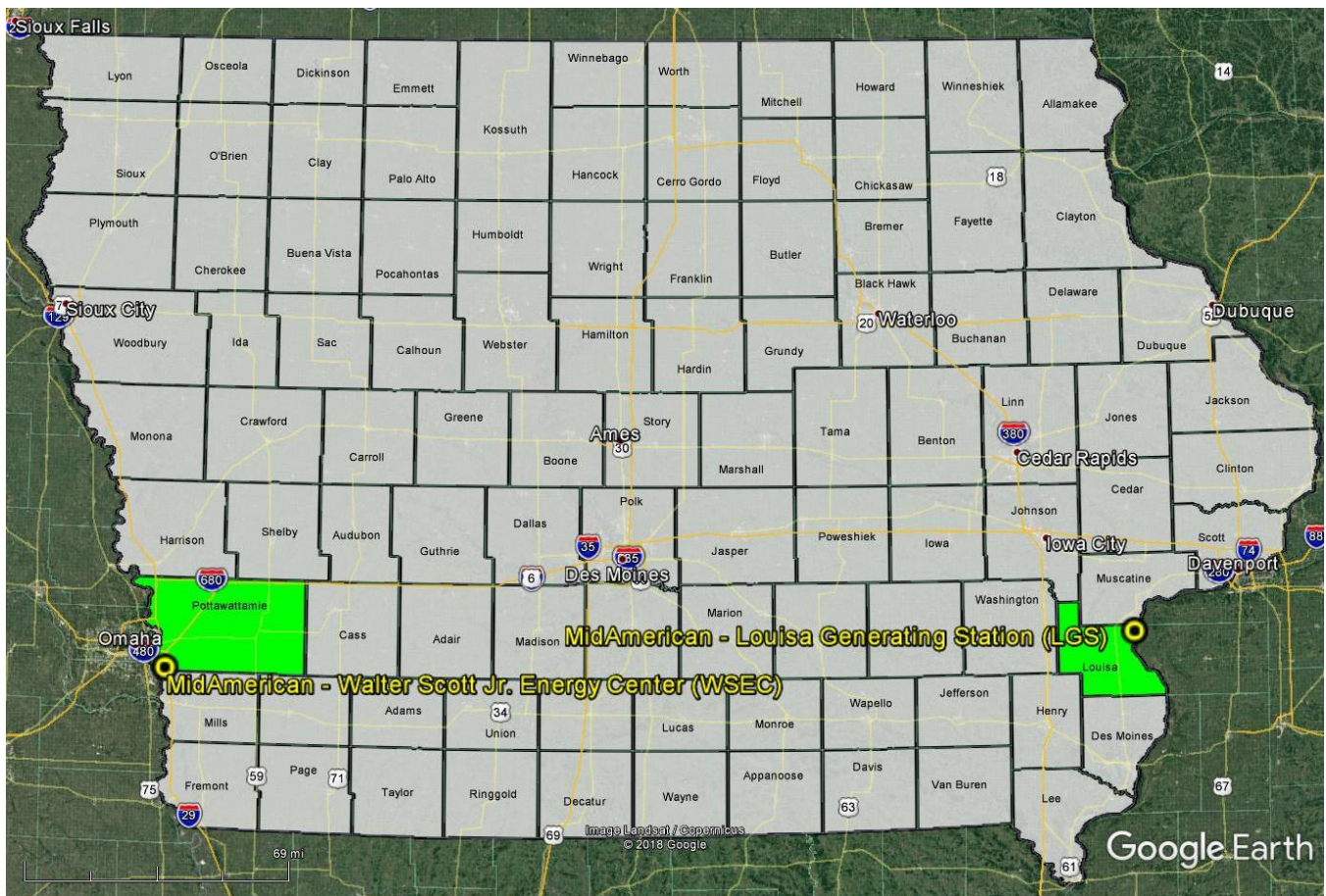


Figure 1-1. Locations of Louisa and Pottawattamie Counties and their DRR-listed sources.

## 1.2. Unclassifiable Areas

The DNR also relied on dispersion modeling that used actual emissions to recommend an attainment designation for Linn County during the third round of designations. However, EPA finalized a designation of unclassifiable for Linn County and thus the DRR's ongoing data review provisions do not apply to this area. Although Woodbury County is also currently designated unclassifiable for the 1-hour SO<sub>2</sub> NAAQS, the ongoing data review provisions of the DRR will not apply should EPA act on the Governor's January 5, 2017, request to redesignate Woodbury County to attainment because the modeling supporting that request is based on federally enforceable maximum permitted allowable emission limits, and not actual emissions.

## 1.3. Exempted Areas

The sources and areas assessed in the DNR's first and second DRR reports were Interstate Power and Light's (IPL) Burlington Generation Station in Des Moines County and IPL's Ottumwa Generating Station in Wapello County. These areas are now exempt from further review and therefore are not discussed in this report. New modeling conducted for the 2018 report for Burlington Generating Station met the exemption criteria of 40 CFR 51.1205(b)(2) and new modeling for Ottumwa Generating Station met the exemption criteria of 40 CFR 51.1205(c). Since the [2018 report](#)<sup>1</sup> not only describes that modeling in detail, but also reviews the history of the DRR, identifies the DRR-listed sources in Iowa, and includes a summary of the first three rounds of designations for the 2010 1-hour SO<sub>2</sub> NAAQS, that information will not be repeated in this report.

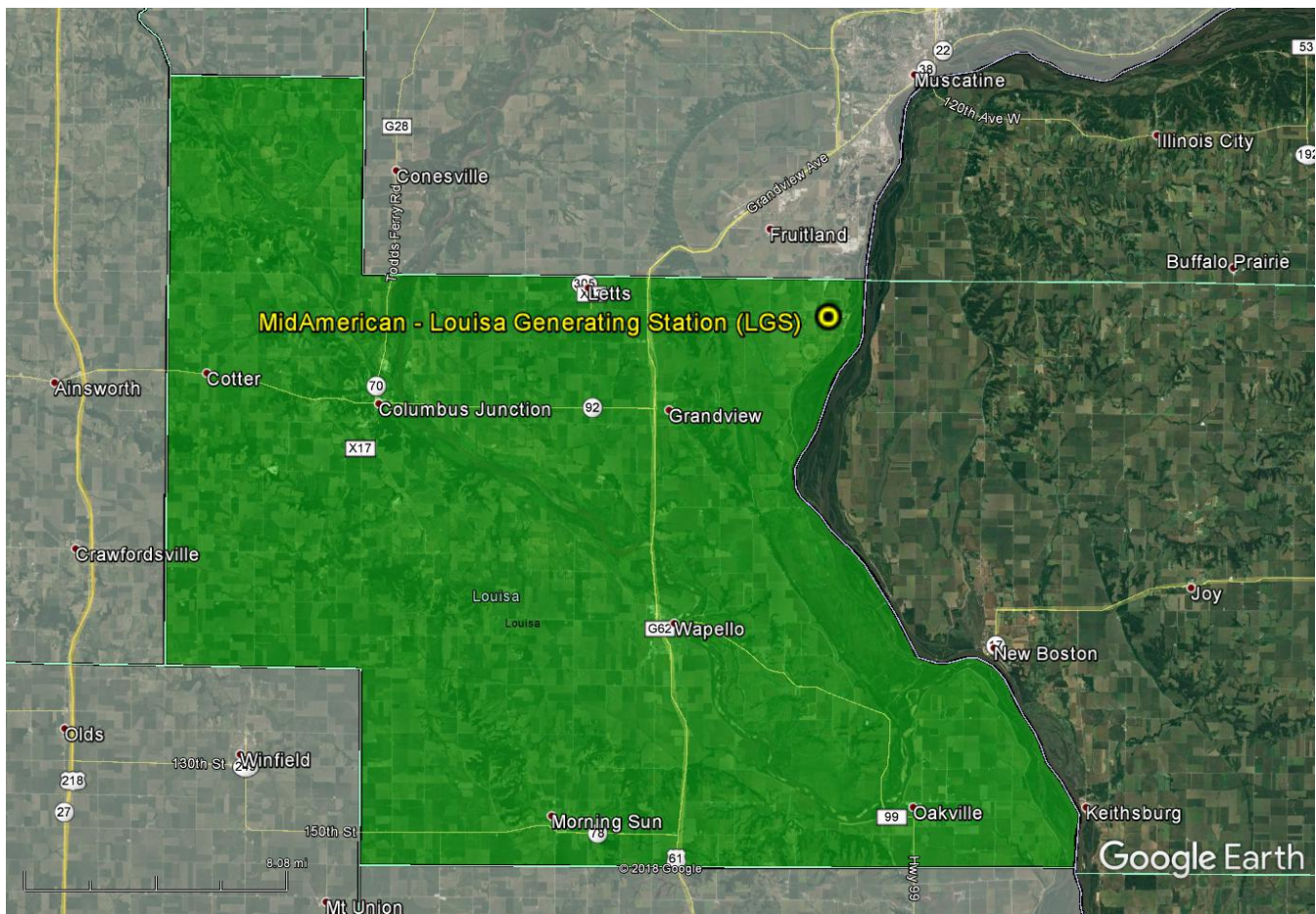
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<sup>1</sup> The 2018 report, the 2017 report, and additional information related to the DRR are available on the DNR's [Air Quality Implementation Plans](#) website, in the "Designation Recommendations" section, under the "2010 SO<sub>2</sub> (Includes Muscatine 1-hour SO<sub>2</sub> Nonattainment Area)" subsection.



## 2. Louisa County Review

MidAmerican Energy Company's Louisa Generating Station (LGS, facility ID 58-07-001) is the only source in Louisa County meeting the applicability requirements of the DRR. It was identified by the DNR in a letter to EPA dated December 15, 2015, as a source that had actual annual SO<sub>2</sub> emissions of at least 2,000 tons and was not located in a nonattainment area. At that time the 2014 emissions data were the most recent available and LGS's reported annual SO<sub>2</sub> emissions were 8,783 tons. Louisa Generating Station is an electric generating facility (power plant) with one coal-fired boiler having a maximum rated capacity of 8,000 MMBtu/hr. According to the Energy Information Agency's (EIA) 2017 Form EIA-860 data, LGS serves a generator with a nameplate capacity of 811.9 megawatts (MW) that began operating in 1983. The location of LGS is indicated in Figure 2-1.



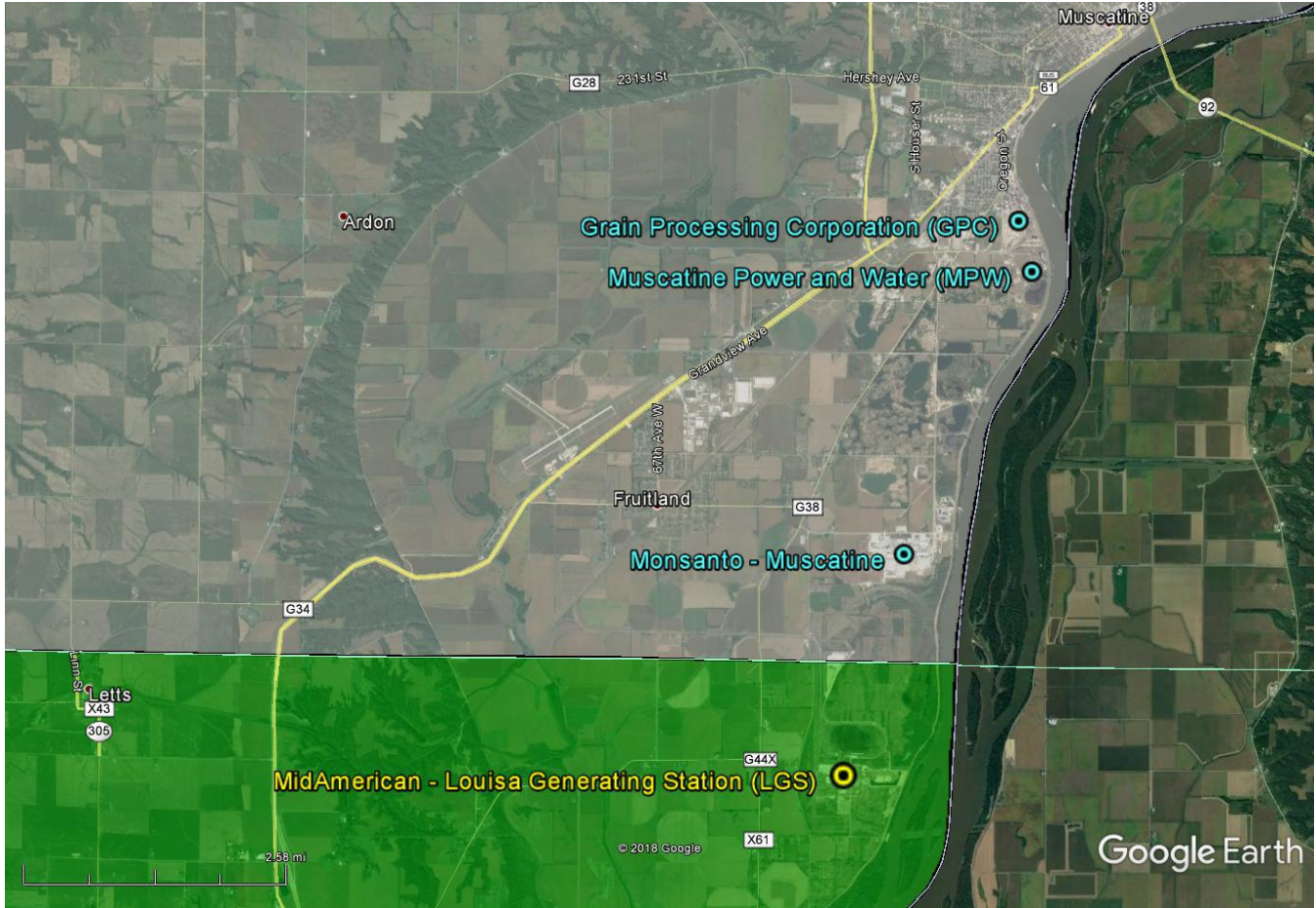
**Figure 2-1. Location of MidAmerican's Louisa Generating Station. Louisa County is shaded in green and other counties in Iowa are shaded in white. Counties in Illinois are unshaded.**

The largest SO<sub>2</sub> source at LGS is the coal-fired boiler. Two auxiliary boilers are also potential SO<sub>2</sub> sources, but under normal operation they are fired by natural gas and emit relatively little SO<sub>2</sub>. The facility's emergency generator is an intermittent source that was excluded from the modeling analysis that supported the attainment designation. Its exclusion was justified pursuant to Section 5.5 of EPA's draft "SO<sub>2</sub> NAAQS Designations Modeling Technical Assistance Document" (referred to as the "Modeling TAD," most recently updated August 2016). A detailed description of the modeling analysis that supported the attainment designation for Louisa County is available in the DNR's [revised technical support document](#) (TSD)<sup>2</sup> for the third round of SO<sub>2</sub> designations.

<sup>2</sup>2010 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Standard, Round 3 Designations Recommendations and Data Requirements Rule, Technical Support Document, Iowa DNR, dated December 19, 2016, and revised 4/3/2017. That TSD is available on the DNR's [Air Quality Implementation Plans](#) website, in the "Designation Recommendations" section, under the "2010 SO<sub>2</sub> (Includes Muscatine 1-hour SO<sub>2</sub> Nonattainment Area)" subsection.



As described in more detail in that TSD, the SO<sub>2</sub> emissions from facilities within 10 km of LGS were evaluated to identify additional sources to model. Three facilities within the Muscatine 1-hour SO<sub>2</sub> nonattainment area were included in the modeling analysis as a result. Those facilities are located in Muscatine County and include Grain Processing Corporation (GPC, facility ID 70-01-004), Muscatine Power and Water (MPW, facility ID 70-01-011), and Monsanto – Muscatine (Monsanto, facility ID 70-01-008), shown in Figure 2-2. No additional relevant SO<sub>2</sub> sources were found by extending the search to areas within 10-20 km of LGS.



**Figure 2-2. Location of GPC, MPW, and Monsanto in relation to Louisa Generating Station. Louisa County is shaded green and Muscatine County is shaded white. Counties in Illinois are unshaded.**

The facilities and their sources included in the modeling analysis that supported the attainment designation for Louisa County were the same as those included in the modeled attainment demonstration for the Muscatine 1-hour SO<sub>2</sub> nonattainment SIP.<sup>3</sup> Additionally, the modeling for Louisa County utilized the same stack parameters and, with the exception of one emission point, the same federally enforceable maximum permitted allowable emission limits used in the Muscatine 1-hour SO<sub>2</sub> attainment demonstration. The one exception was Boiler #8 (EP-195) at Monsanto, whose modeled emission rate of 159.1 lb/hr was determined using the results of a stack test conducted on September 2, 2015.

The coal-fired boiler at LGS was modeled using its 1-hour critical emission value of 4,270.89 lb/hr. This value was derived from its 30-day rolling-average federally enforceable maximum permitted allowable emission limit using methods consistent with Section V.D.2 of EPA’s April 23, 2014, *Guidance for 1-Hour SO<sub>2</sub> Nonattainment Area SIP*

<sup>3</sup> A copy of the May 17, 2016, [Muscatine 1-hour SO<sub>2</sub> Nonattainment SIP](#), and its appendices, can be found on the DNR’s [Air Quality Implementation Plans](#) website, in the “Implementation Plans for Nonattainment and Maintenance Areas” section, under the “Muscatine 1-hour SO<sub>2</sub> Nonattainment Area” subsection.

Submissions memorandum. The two auxiliary boilers at LGS were modeled using their federally enforceable maximum permitted allowable emission limits of 0.06 lb/hr. The emission rates for LGS, and the associated results of the modeling analysis that supported the attainment designation for Louisa County, are summarized in Table 2-1 and Table 2-2, respectively, and described in more detail in the TSD referenced in footnote 2.

**Table 2-1. Louisa Generating Station modeled SO<sub>2</sub> emission rates.**

Model ID	Unit Description	Modeled Emission Rate in lb/hr
EP01	Main Boiler (coal-fired)	4,270.89 (critical emission value)
EP02	Auxiliary Boiler 1 (natural gas)	0.06 (permit limit)
EP03	Auxiliary Boiler 2 (natural gas)	0.06 (permit limit)

**Table 2-2. Summary of the model predicted concentration (µg/m<sup>3</sup>) for the LGS analysis.<sup>4</sup>**

Maximum Model Design Value	Background Concentration	Total Concentration	2010 1-Hour SO <sub>2</sub> NAAQS	Meets NAAQS
186.86	7	194	196	Yes

## 2.1. Emissions Assessment

When modeling of actual SO<sub>2</sub> emissions serves as the basis for designating an area attainment, the provisions of the DRR in 40 CFR 51.1205(b) require that the state document the annual SO<sub>2</sub> emissions of each applicable source in each such area and provide an assessment of the cause of any emissions increase from the previous year. Only emissions from Monsanto’s Boiler #8 need to be evaluated pursuant to this review. All other SO<sub>2</sub> sources at Monsanto, and all the sources at LGS, MPW, and GPC, were modeled based on their federally enforceable maximum permitted allowable emission limits.

For an affected source, the DRR requires a review of its most recent two years of annual SO<sub>2</sub> emissions, which currently would be 2017 and 2018. However, the DNR has found that evaluating only this data does not provide sufficient information to determine if additional modeling is needed, because it excludes the actual emissions data that was modeled to support the attainment designation. A more informative review that complies with the requirement of the DRR can be conducted for Monsanto’s Boiler #8 by comparing its 2017 and 2018 emissions, and also including in the review its emissions going back through the 2012-2014 modeled timeframe.

Although Monsanto is unique because the modeled emission rate of 159.1 lb/hr for Boiler #8 was obtained from a 2015 stack test, and not continuous emission monitoring system (CEMS) data, that stack test represented the best source of actual emissions information available at that time for that source, and was suitably representative of the 2012-2014 years modeled. To facilitate the necessary emissions review, the 159.1 lb/hr modeled emission rate is easily expressed as an annualized value because this source was modeled as operating continuously. Assuming a nominal 8760 hours of operation per year yields an annualized SO<sub>2</sub> emission rate of 696.9 tons. As shown in Figure 2-3, this exceeds all the reported SO<sub>2</sub> emission rates for this source from any year within the 2012-2017 timeframe, and greatly exceeds its 2018 emissions. Between 2017 and 2018 the SO<sub>2</sub> emissions from Monsanto’s Boiler #8 decreased by 99.9%, the results of a requested fuel switch from coal to natural gas. Natural gas combustion began on November 3, 2017, and thereafter the use of coal in this unit is prohibited by air construction permit number 82-A-092-P12.

<sup>4</sup> This modeling analysis, like the modeled attainment demonstration described in the Muscatine 1-hour SO<sub>2</sub> nonattainment SIP, included seven scenarios, depending upon which boilers (Units 7, 8, and 9) are operating at MPW. The results shown here reflect the scenario which produced the highest modeled impact (only Unit 7 operating).



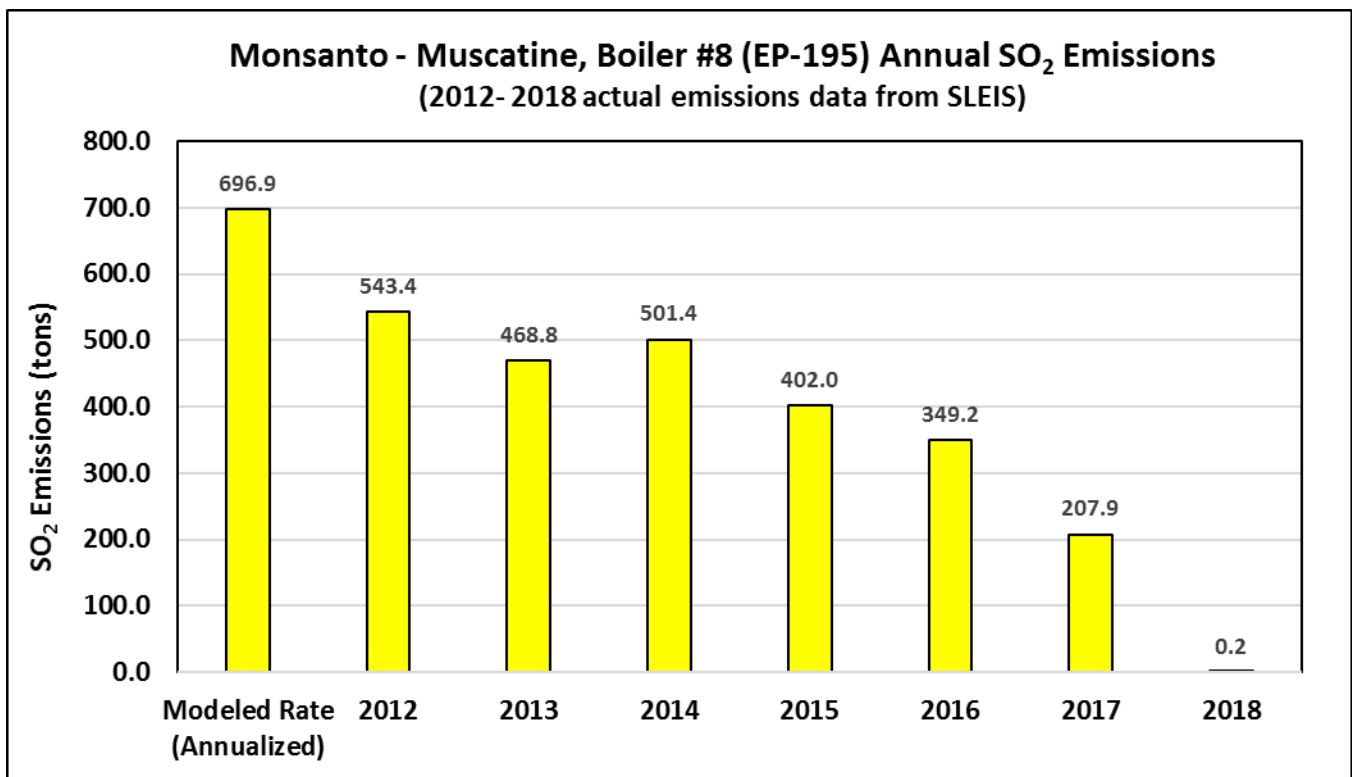


Figure 2-3. Annualized modeled rate and actual 2012-2018 SO<sub>2</sub> emissions (tons per year) from Boiler #8 at Monsanto. Actual emissions data are from the DNR’s State and Local Emissions Inventory System (SLEIS).

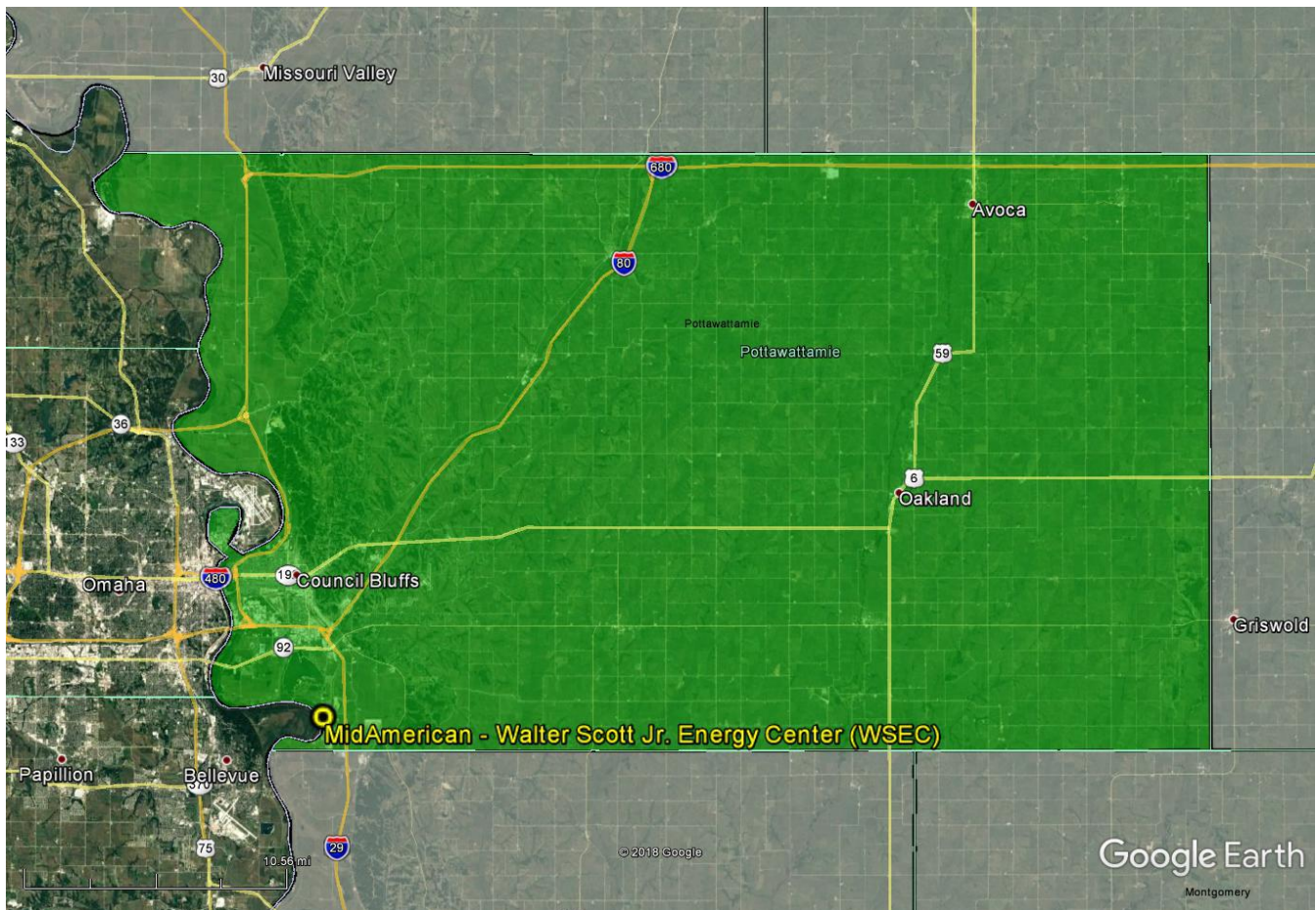
## 2.2. Recommendation

The state must provide a recommendation, pursuant to 40 CFR 51.1205(b)(1), regarding whether additional modeling is needed to characterize air quality in the area to determine whether the area meets or does not meet the 2010 1-hour SO<sub>2</sub> NAAQS. The modeling analysis that supported the attainment designation for Louisa County yielded a total maximum concentration of 194 µg/m<sup>3</sup> (see Table 2-2), meeting the 2010 1-hour SO<sub>2</sub> NAAQS. That analysis was based on Monsanto’s Boiler #8 combusting coal. Starting November 3, 2017, this unit is limited to burning only natural gas and therefore emits relatively little SO<sub>2</sub>. Given this, and that all other sources in that analysis were modeled based on their federally enforceable maximum permitted allowable emission limits, additional modeling is not needed to determine that Louisa County still meets the 2010 1-hour SO<sub>2</sub> NAAQS.<sup>5</sup>

<sup>5</sup> To the extent necessary, this conclusion is also applicable to that portion of Muscatine County designated attainment in the third round of the 2010 1-hour SO<sub>2</sub> NAAQS designations. While the modeling analysis for Louisa Generating Station was focused on Louisa County, the receptor grid did extend slightly into portions of south-central Muscatine County, in a region just west of the western edge of the nonattainment boundary. The receptors in this region were generally no closer than 8 - 10 km from an SO<sub>2</sub> source in the modeling analysis, and all yielded concentrations that met the 2010 1-hour SO<sub>2</sub> NAAQS.

### 3. Pottawattamie County Review

MidAmerican Energy Company's Walter Scott Jr. Energy Center (WSEC, facility ID 78-01-026) is the only source in Pottawattamie County meeting the applicability requirements of the DRR. It was identified by the DNR in a letter to EPA dated December 15, 2015, as a source that had actual annual SO<sub>2</sub> emissions of at least 2,000 tons and was not located in a nonattainment area. At that time the 2014 emissions data were the most recent available and Water Scott's reported annual SO<sub>2</sub> emissions were 13,749 tons. Walter Scott Jr. Energy Center is an electric generating facility (power plant) with two coal-fired boilers, identified as Units 3 and 4.<sup>6</sup> Unit 3 has a maximum rated capacity of 7,700 MMBtu/hr and, according to the Energy Information Agency's (EIA) 2017 Form EIA-860 data, it serves a generator with a nameplate capacity of 725.8 megawatts (MW) that began operating in 1978. Unit 4 has a maximum rated capacity of 7,675 MMBtu/hr and, according to the 2017 Form EIA-860 data, serves a generator with a nameplate capacity of 922.5 MW that began operating in 2007. The location of WSEC is indicated in Figure 3-1.



**Figure 3-1. Location of MidAmerican's Walter Scott Jr. Energy Center. Pottawattamie County is shaded in green and other counties in Iowa are shaded in white. Counties in Nebraska are unshaded.**

The largest SO<sub>2</sub> sources at WSEC are the two coal-fired boilers, Units 3 and 4. An auxiliary boiler is also a potential SO<sub>2</sub> source, but under normal operation it is fired by natural gas and emits relatively little SO<sub>2</sub>. The facility's emergency generator is an intermittent source that was excluded from the modeling analysis that supported the attainment designation. Its exclusion was justified pursuant to Section 5.5 of EPA's draft "SO<sub>2</sub>

<sup>6</sup> Two other coal-fired boilers at WSEC, identified as Units 1 and 2, were permanently shut down in 2015 and thus excluded from the modeling analysis that supported the attainment designation for Pottawattamie County. The DNR rescinded the air construction permits for Units 1 and 2 in a letter dated September 18, 2015.

NAAQS Designations Modeling Technical Assistance Document” (referred to as the “Modeling TAD,” most recently updated August 2016). A detailed description of the modeling analysis that supported the attainment designation for Pottawattamie County is available in the DNR’s [revised technical support document](#) (TSD)<sup>7</sup> for the third round of SO<sub>2</sub> designations.

As described in more detail in that TSD, the SO<sub>2</sub> emissions from facilities within 10 km of WSEC were evaluated to identify additional sources to model. No relevant SO<sub>2</sub> sources were found. The search was then extended to areas within 10-20 km of WSEC, and the Nebraska Department of Environmental Quality (NDEQ) identified two SO<sub>2</sub> sources. One source, Eppley Airfield, was excluded from the modeling analysis because its 2011 SO<sub>2</sub> emissions were only 36 tons and it was 18 km from WSEC. The other source, the Omaha Public Power District (OPPD) North Omaha facility, had SO<sub>2</sub> emissions large enough to warrant its inclusion in the modeling analysis.<sup>8</sup>

The larger (by electrical generating capacity) of the two coal-fired boilers at WSEC, Unit 4, was modeled using its 1-hour critical emission value of 909.8 lb/hr. This value was derived from its 30-day rolling-average federally enforceable maximum permitted allowable emission limit using methods consistent with Section V.D.2 of EPA’s April 23, 2014, *Guidance for 1-Hour SO<sub>2</sub> Nonattainment Area SIP Submissions* memorandum. The other coal-fired boiler, Unit 3, was modeled using its 2012-2014 actual hourly emission rates as measured using a continuous emission monitoring system (CEMS). The natural gas auxiliary boiler was modeled using its federally enforceable maximum permitted allowable emission limit of 0.21 lb/hr. The emission rates for WSEC, and the associated results of the modeling analysis that supported the attainment designation for Pottawattamie County, are summarized in Table 3-1 and Table 3-2, respectively, and described in more detail in the TSD referenced in footnote 7.

**Table 3-1. Walter Scott Jr. Energy Center modeled SO<sub>2</sub> emission rates.**

Model ID	Unit Description	Modeled Emission Rate in lb/hr
EP003	Unit 3 Boiler (coal-fired)	2012 – 2014 variable actual hourly (CEMS)
EP141	Unit 4 Boiler (coal-fired)	909.8 (critical emission value)
EP142	Auxiliary Boiler (natural gas)	0.21 (permit limit)

**Table 3-2. Summary of the model predicted concentration (µg/m<sup>3</sup>) for the WSEC analysis.**

Maximum Model Design Value	Background Concentration	Total Concentration	2010 1-Hour SO <sub>2</sub> NAAQS	Meets NAAQS
127.0	7	134	196	Yes

### 3.1. Emissions Assessment

When modeling of actual SO<sub>2</sub> emissions serves as the basis for designating an area attainment, the provisions of the DRR in 40 CFR 51.1205(b) require that the state document the annual SO<sub>2</sub> emissions of each applicable source in each such area and provide an assessment of the cause of any emissions increase from the previous year. Only emissions from WSEC Unit 3 need to be evaluated pursuant to this review. Unit 4 was modeled using its 1-hour critical emission value, which was derived from its federally enforceable maximum permitted

<sup>7</sup>2010 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Standard, Round 3 Designations Recommendations and Data Requirements Rule, Technical Support Document, Iowa DNR, dated December 19, 2016, and revised 4/3/2017. That TSD is available on the DNR’s [Air Quality Implementation Plans](#) website, in the “Designation Recommendations” section, under the “2010 SO<sub>2</sub> (Includes Muscatine 1-hour SO<sub>2</sub> Nonattainment Area)” subsection.

<sup>8</sup> The OPPD North Omaha facility was modeled using actual emission rates (CEMS data) for its two coal-fired boilers. However, its emissions need not be evaluated pursuant to this review because the North Omaha facility is 19 km from WSEC, it is located in Douglas County, Nebraska, and the NDEQ is using ambient air quality monitoring to characterize peak 1-hour SO<sub>2</sub> concentrations in the area of that source.

allowable emission limit. The auxiliary boiler is also exempt from review because it was modeled using its federally enforceable maximum permitted allowable emission limit.

For an affected source, the DRR requires a review of its most recent two years of annual SO<sub>2</sub> emissions, which currently would be 2017 and 2018. However, the DNR has found that evaluating only this data does not provide sufficient information to determine if additional modeling is needed, because it excludes the 2012-2014 actual emissions data that was modeled to support the attainment designation. A more informative review that complies with the requirement of the DRR can be conducted for WSEC Unit 3 by comparing its 2017 and 2018 emissions, and also including in the review its emissions going back through the 2012-2014 modeled timeframe.

The actual annual SO<sub>2</sub> missions from WSEC Unit 3 for the years 2012-2018 are shown in Figure 3-2. This information was obtained on April 29, 2019, using the Air Markets Program Data tool from EPA's Clean Air Markets Division (CAMD). Between 2017 and 2018 the SO<sub>2</sub> emissions from Unit 3 at WSEC decreased by 368 tons. This represents an emissions decrease of 4.3% and it is largely attributable to a 6.3% decrease in heat input combined with a 2.0% increase in the annual average emission rate, which rose from 0.352 lb/MMBtu in 2017 to 0.359 lb/MMBtu in 2018, as shown in Figure 3-3. While the 2017 to 2018 emissions decrease followed two previous increases, the annual SO<sub>2</sub> emissions from WSEC Unit 3 throughout the 2015-2018 timeframe were all lower than any rate from 2012-2014. Across the 2012-2014 modeled timeframe, this unit's SO<sub>2</sub> emissions averaged 9,166 tons, while the 2018 actual annual emissions from WSEC Unit 3 were 8,118 tons. This represents an emissions decrease of 1,048 tons, or 11.4%, and it is largely due to a reduction in heat input, and to a lesser degree a decrease in the unit's annual average emissions rates, which decreased from 0.368 lb/MMBtu, as averaged across the years 2012-2014, to 0.359 lb/MMBtu in 2018.

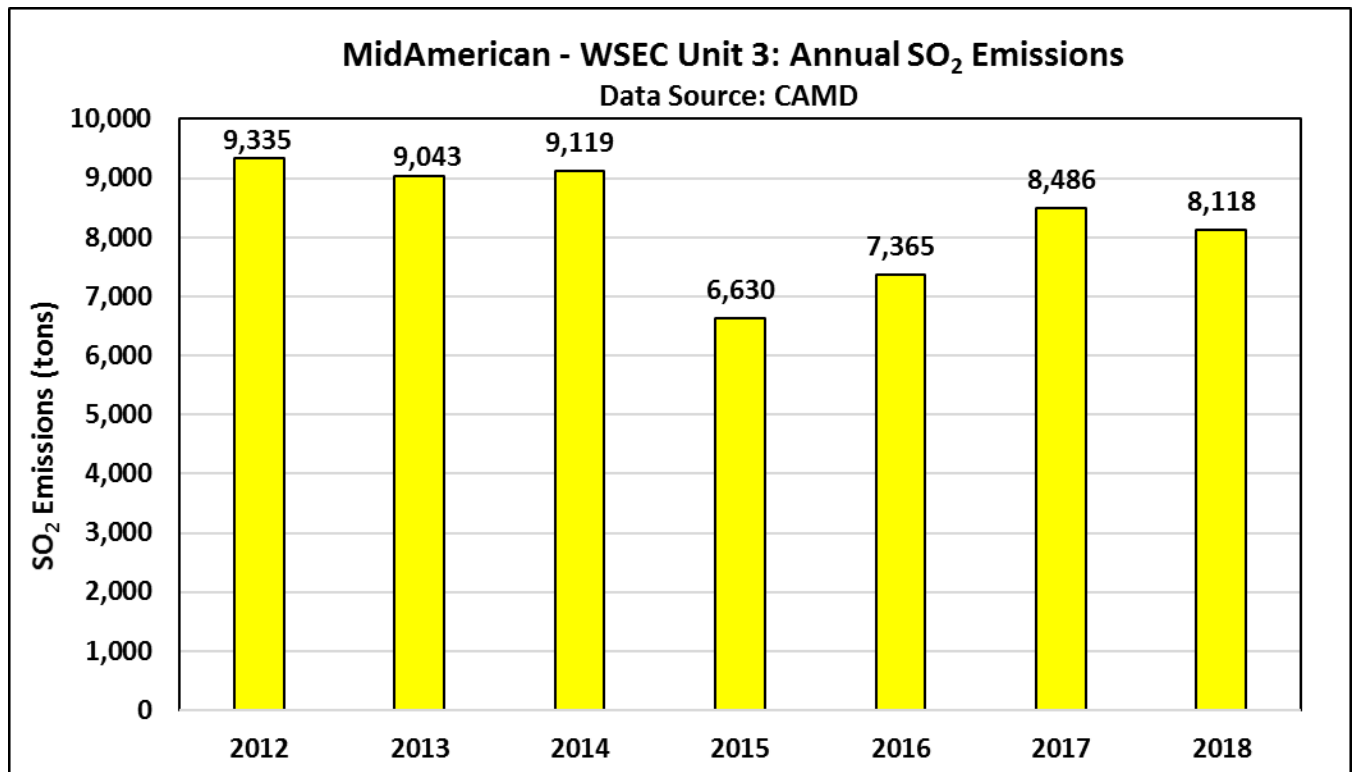


Figure 3-2. Annual 2012-2018 SO<sub>2</sub> emissions (tons per year) from Unit 3 at WSEC.



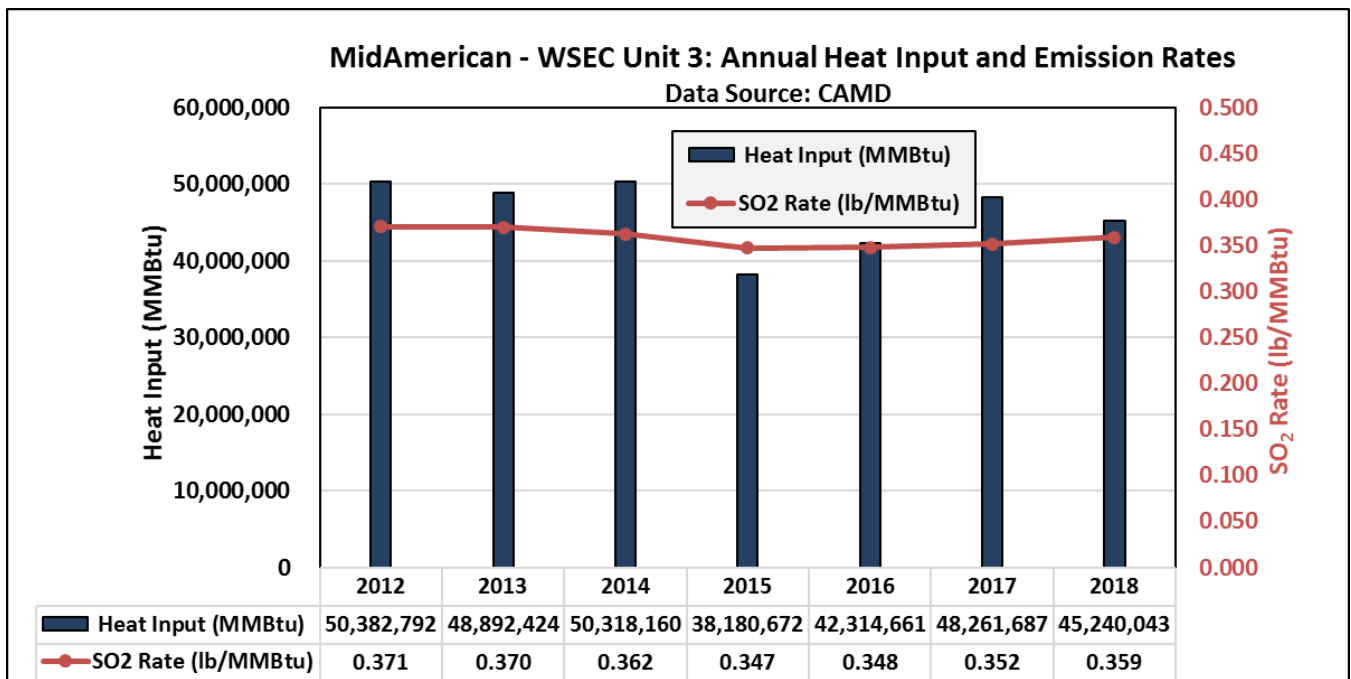


Figure 3-3. Annual 2012-2018 heat input (MMBtu) and SO<sub>2</sub> emission rates (lb/MMBtu) from Unit 3 at WSEC.

### 3.2. Recommendation

The state must provide a recommendation, pursuant to 40 CFR 51.1205(b)(1), regarding whether additional modeling is needed to characterize air quality in the area to determine whether the area meets or does not meet the 2010 1-hour SO<sub>2</sub> NAAQS. The modeling analysis that supported the attainment designation for Pottawattamie County used actual hourly emission rates from 2012-2014 for WSEC Unit 3 and yielded a total maximum concentration of 134 µg/m<sup>3</sup> (see Table 3-2), which is approximately 32% below the 2010 1-hour SO<sub>2</sub> NAAQS level of 75 ppb (~196 µg/m<sup>3</sup>). The 2018 annual SO<sub>2</sub> emissions from Unit 3 are approximately 4.3% lower than they were in 2017, and approximately 11.4% lower than the average of the 2012-2014 annual emissions. Given this, and that all other sources at WSEC were modeled based on their federally enforceable maximum permitted allowable emission limits, additional modeling is not needed to determine that Pottawattamie County still meets the 2010 1-hour SO<sub>2</sub> NAAQS.