



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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**MAR 17 2016**

Craig A. Wright, Director  
Air Resources Division  
Department of Environmental Services  
29 Hazen Drive  
P.O. Box 95  
Concord, NH 03302-0095

Dear Mr. Wright:

On behalf of the U.S. Environmental Protection Agency (EPA), I would like to thank you for your January 5, 2015 submittal identifying sources to be characterized under the sulfur dioxide (SO<sub>2</sub>) Data Requirements Rule (DRR).<sup>1</sup> I am writing to respond to your submittal and provide additional information about the next steps in this source characterization effort, which will result in important data that states and the EPA will use to protect public health.

On August 21, 2015, the EPA finalized the DRR, which requires state air agencies to characterize ambient SO<sub>2</sub> levels in areas with large sources of SO<sub>2</sub> emissions to help implement the 1-hour SO<sub>2</sub> National Ambient Air Quality Standard (NAAQS). Under the DRR, state air agencies must, at a minimum, model or monitor air quality around sources that emit 2,000 tons per year (tpy) or more of SO<sub>2</sub> and that are not located in an area already designated nonattainment. For a source listed because it emitted more than 2,000 tpy, an air agency may avoid this requirement by adopting federally enforceable emission limits by January 13, 2017, that ensure that the source will emit less than 2,000 tpy of SO<sub>2</sub>.

Under the DRR implementation schedule, state air agencies were required to submit to the EPA by January 15, 2016, a list that identifies all sources within its jurisdiction with SO<sub>2</sub> emissions of 2,000 tpy or more during the most recent year for which emissions data are available. Air agencies or the EPA may also include additional sources on a state's source list with SO<sub>2</sub> emissions below 2,000 tpy to ensure that air quality around such sources is appropriately characterized.

The EPA has reviewed your agency's submittal and concurs with the list of sources provided. Specifically, you stated that New Hampshire has no sources that have actual emissions of 2,000 tpy or more. Nonetheless, you have listed the two sources listed in the table below as requiring further air quality characterization under the DRR. The EPA concurs with these additions, and is not adding other sources to the list at this time.

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<sup>1</sup> "Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS); Final Rule," 80 *Federal Register* 51052, August 21, 2015.

Source	County	2014 SO <sub>2</sub> Emissions
Schiller Station	Rockingham	1,242
Newington Station	Rockingham	312.4

Data source: Clean Air Markets Division, Air Markets Program Data


The next key milestone for purposes of DRR implementation is July 1, 2016, the date by which each air agency must identify, for each listed source, the approach it will use to characterize air quality in the respective area (air quality modeling or ambient monitoring). For sources that an air agency decides to evaluate through air quality modeling, the DRR requires the air agency to submit to the EPA Regional Administrator a modeling protocol by July 1, 2016, and the completed modeling analysis by January 13, 2017.

My staff appreciates the ongoing consultation between our agencies as you prepare to finalize the modeling protocol originally submitted to us on November 13, 2015. We look forward to continued dialogue with you and your staff as you prepare to fulfill the commitment made to us in your October 23, 2015 Response to Order. To assist in this process, we are available to discuss any technical issues that you may have concerning the modeling analysis that you are submitting to meet that commitment.

Please note that a copy of each state air agency's submittal and a compiled national list of sources subject to DRR requirements are posted on EPA's SO<sub>2</sub> implementation website at [www3.epa.gov/airquality/sulfurdioxide/implement.html](http://www3.epa.gov/airquality/sulfurdioxide/implement.html). We also plan to post this letter on that site in the near future.

Again, thank you for your letter and for your efforts to implement this important standard. For additional information concerning the DRR, please visit our SO<sub>2</sub> implementation website listed above. For additional information regarding designations under the SO<sub>2</sub> standard, please visit our website at [www.epa.gov/so2designations](http://www.epa.gov/so2designations). Should you have any questions, please do not hesitate to call me, or have your staff contact Leiran Biton of my staff at 617-918-1267 or [biton.leiran@epa.gov](mailto:biton.leiran@epa.gov).

Sincerely,



H. Curtis Spalding  
Regional Administrator