



**AIR PROGRAM ADVISORY FORUM**  
**Thursday, September 16, 2010**  
**Meeting Notes**

Area Source Maximum Achievable Control Technology, or MACT, Standards

The department submitted a letter to EPA Region VII on August 24, 2010, stating that “until additional funding is obtained to support the increased work load associated with enforcement” of the newly promulgated MACT Area Source Standards, the department’s Air Pollution Control Program is not accepting enforcement authority for the area source requirements. Although we are not accepting delegation, we will still conduct the appropriate permitting duties associated with these standards. Therefore, if a source subject to one of the new Area Source MACTs is required to hold a Title V permit, the Area Source MACT will be part of the permit. However, any enforcement issues on these standards will temporarily be referred to EPA Region VII. Any questions regarding Area Source MACTs, please contact Lucy Thompson of the Air Pollution Control Program at [lucy.thompson@dnr.mo.gov](mailto:lucy.thompson@dnr.mo.gov) or 573-526-2414.

- EPA Contact for Reciprocating Internal Combustion Engines, or RICE, 40 CFR 63 Subpart ZZZZ –Eric Sturm; [sturm.eric@epamail.epa.gov](mailto:sturm.eric@epamail.epa.gov).
- Boiler MACT – The department submitted comments on the proposed federal rule. EPA expects to issue a final rule by the end of the year.

Indirect Heating Rule Workgroup

The draft text of the consolidated rule (10 CSR 10-6.405) is available for a 60-day comment period on the department’s “Rules in Development” webpage, [dnr.mo.gov/env/apcp/rulesdev.htm](http://dnr.mo.gov/env/apcp/rulesdev.htm), from Sept. 23 – Nov. 22. After this preliminary period and after the proposed rule text is filed and published in the Missouri Register, there will be another opportunity to comment during the proposed rulemaking open comment period and public hearing.

National Ambient Air Quality Standards, or NAAQS, Updates

Sulfur Oxides (SO<sub>x</sub>) – This new one hour standard is effective as of August 23, 2010. The program has prepared a summary of the SO<sub>x</sub> NAAQS and it is posted on the Air Forum webpage under the Sept. 16<sup>th</sup> meeting date.

- Nitrogen Oxides (NO<sub>x</sub>) – This new one hour standard is effective as of April 12, 2010. All monitors in the state are currently demonstrating compliance with the new standards. However, the new standard requires a new monitoring network along major roadways.
- SO<sub>x</sub> and NO<sub>x</sub> – Any permitting projects that trigger air dispersion modeling for SO<sub>x</sub> and/or NO<sub>x</sub> will need to model to demonstrate compliance with the new one hour standards.
- Ozone - The final ozone standard is expected to be issued in late October 2010. The program has held informational meetings on the new ozone standard for stakeholders in the Kansas City and St. Louis areas. We plan to schedule additional informational meetings in Springfield and Cape Girardeau in mid-



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November, after the new standard is announced. If time and planning allow, the program will try and include information on the new SO<sub>2</sub> standard at some of these meetings, especially the Springfield meeting.

Clean Air Transport Rule

EPA's comment period on this proposed rule closes October 1, 2010. The program is in the process of drafting our comments and will share them when they're final. As a reminder, we'd appreciate receiving draft comments from utilities in order to help us formulate our comments.

Greenhouse Gas (GHG) Tailoring Rule

The program is in the early stages of amending our construction and operating permit rules (10 CSR 10-6.060 and 6.065) to address new federal GHG permitting requirements. Draft text for these rulemakings is posted on our "Rules in Development" webpage, [dnr.mo.gov/env/apcp/rulesdev.htm](http://dnr.mo.gov/env/apcp/rulesdev.htm), for a 60-day public comment period, which runs through November 9, 2010.

The program has added additional changes to the operating permit rule, unrelated to the GHG portion, which would allow flexibility to publish public notices on the web as a cost-savings measure.

St. Louis Reasonably Available Control Technology, or RACT, rules

The pre-filing 60-day comment period for updates to the St. Louis RACT rules for industrial surface coating, printing, and solvent cleanup operations (10 CSR 10-5.330, 5.455, 5.340, 5.442) has closed. These proposed rules will be published in the Missouri Register in December and available for public comment for at least 30 days at that time.

Gasoline Dispensing Regulation (10 CSR 10-6.420)

The program distributed a draft of the rule text for the gasoline dispensing regulation (10 CSR 10-6.420) to the workgroup that provided input to this rulemaking. We received several comments from stakeholders expressing concerns with this draft text. We've decided to reconvene the workgroup to have further discussions on these issues before moving forward. We hope to have this workgroup meeting before the end of the year. For clarification, this rulemaking is still in the preliminary stages of the process; we haven't made the draft rule text available for 60-day comment and we haven't filed the proposed rule.

Emission Inventory Questionnaires, or EIQs

As a result of recent revisions to 10 CSR 10-6.110, several changes to emissions reporting will begin starting January 1, 2011. The new EIQ due date is April 1, with an automatic one-month extension to May 1 for MoEIS users. The emission fee payment deadline remains June 1. For 2010 emissions reporting, Part 70 permit holders are required to submit full EIQs and all other permit holders have the option of submitting a 1-page reduced reporting form, unless their emissions change by 5 tons or more. By



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the end of the year, we will be sending more information and clarification on these changes to facilities required to submit EIQs.

Due to the reduction in state funding for the local air agencies in the 2011 state budget, we worked with the four local agencies to reduce their work commitments with us to equate to the reduce funding. For the upcoming 2010 emissions reporting cycle, the department's Air Program will handle EIQs for sources in the Kansas City, St. Louis City, and Springfield jurisdictions, and St. Louis County will handle EIQs for their sources.

#### Air Pollution Control Program Updates

Stacy Allen is now the Emission Inventory Unit Chief, Bob Randolph has moved to the Air Quality Planning Section to assist with SO<sub>2</sub> issues, Terry Rowles has retired and Jeff Bennett is now the Executive Director of CENSARA, the Central States Air Resource Association. Paul Jeffrey, who was acting as the Compliance Enforcement Section Chief, has accepted a position with the Division of Environmental Quality as the Regional Office Liaison and Supervisor. For Compliance Enforcement questions, please contact Jim Kavanaugh.

#### Future Meetings

\*December 2, 2010 from 1 to 3 in Bennett Springs Conference Room

\* Meeting same day as Missouri Air Conservation Commission Meeting

#### Other Meetings of Interest

Small Business Compliance Advisory Committee Meeting – Nov. 10, 2010.

Parks Conference Room at 1659 E. Elm, Jefferson City, MO 65102.

Agenda and more information available at: [dnr.mo.gov/env/apcp/smbuscomm.htm](http://dnr.mo.gov/env/apcp/smbuscomm.htm).