



1-Hour SO₂ NAAQS Implementation Meeting Notes Air Pollution Control Program

Thursday June 26, 2014

10:00 am – noon

Presentations – U.S. Environmental Protection Agency and the department’s Air Pollution Control Program posted at <http://www.dnr.mo.gov/env/apcp/airadvisory/apcpstakeholder.htm>

Summary of Discussion and Comments

Proposed consent decree (CD) between EPA, Sierra Club, and NRDC

- The timeline for implementing CD is based on when it is final, which is not a fixed date. Because CD indicates designations would occur prior to the data requirements rule designations, presumably monitoring would not be an option for sources covered by CD.
- The accelerated CD timeline is for sources meeting criteria in CD; other sources would be covered by data requirements rule.
- There are no specifics in the proposed CD about the role of the state in the designation process. EPA anticipates following a process similar to other NAAQS where states are allowed to comment on EPA’s proposed nonattainment boundaries via the “120-day letter” process.

New SO₂ Rule (10 CSR 10-6.261)

- Feedback on how low sulfur diesel and clean fuel requirements for piped fuel and single meter/ multiple equipment sources should be handled is welcomed.
- The final rule table is expected to have unit-specific limits and compliance strategies, and these will consider multiple equipment sources.
- Continuous Emissions Monitoring Systems (CEMS) are intended only for large units or stacks collecting emissions from several pieces of equipment. The language in the draft rule will be reviewed for clarity.
- 6.261 will include the final limits for addressing the 1-hour SO₂ NAAQS. Note that the program is still evaluating emission limits to address the initial nonattainment areas, and the preliminary draft version of the rule text includes “To Be Determined” placeholders at this point.
- At this early stage in the rule development process, interested stakeholders are encouraged to post comments, questions in Basecamp (a project management and sharing website). For access, please contact Wendy Vit.

Nonattainment Area Issues and Data Requirements Rule

- Discussion focused primarily on future phases of implementation as established in the proposed data requirements rule. The Air Program is already well underway in SIP development to address the state's two initial nonattainment areas (portions of Jackson and Jefferson Counties).
- After the primary lead smelter in Herculaneum ceased operations at the end of 2013, SO₂ concentrations at the nearby violating monitor reduced significantly. The Air Program is talking to EPA about options for best addressing this nonattainment area. Don't have three years of "clean data" at this violating monitor yet and no decisions have been made.
- Once the DRR is finalized by EPA, the Air Program will contact affected facilities to begin the dialogue on monitoring versus modeling approaches. By June 2015, the Air Program will need an agreement with facilities if they intend to use the monitoring approach. For sources proposing to monitor, modeling will be needed to identify the area of maximum impact for siting monitor.
- Items for facilities to work on now include: 1) consider taking a limit on allowable emissions and implementing it by Jan 2017 to avoid a nonattainment designation, 2) review and update modeling inputs from the emission inventory questionnaires (MHDRs, emission factors, and stack parameters), 3) notify Air Program of monitoring intentions by June 15th, and 4) consider installing an on-site meteorological tower to collect data for an attainment demonstration if you have site-specific concerns.
- How should a facility wanting to do its own modeling proceed? What emissions should be used and what radius of sources should be considered? There are no set guidelines as of yet, but likely the radius will be smaller than 50 km. Sources wishing to do their own modeling are encouraged to work closely with the Air Program.
- For sources wishing to monitor, does the independent audit have to be done third party? EPA requires the individuals and equipment to be different from the routine audits, and that may need to be third party. The department's audits, planned for once yearly, may cover one of the two annual independent audits.
- Clarification of what is meant by one NWS dataset per area—for a modeling evaluation of a single area with multiple sources, only one meteorological dataset can be used for modeling. The best available meteorological dataset that's most representative of the entire area should be chosen, not necessarily the dataset that best represents a single source within the area.
- Are emergency generators exempt for SO₂ like NO₂? In general, as long as a facility can document limited operation/use of a unit, it will not be included in the modeling inventory. Sources should discuss their specific situation with the Air Program.
- How does the model adjust SO₂ conversion to H₂SO₄? The conversion of SO₂ to H₂SO₄ in the atmosphere is only prevalent in urban conditions. AERMOD accounts for this conversion with the urban processing option by invoking a 4-hour half-life. We are

utilizing this option for Jackson County as it is considered urban. For more information, see page 22 of the Modeling TAD, <http://epa.gov/oaqps001/sulfurdioxide/pdfs/SO2ModelingTAD.pdf>