

MISSOURI COALITION FOR THE ENVIRONMENT

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July 3, 2003

Chief, Planning Section
Air Pollution Control Program
Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102-0176

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MISSOURI DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL PROGRAM

To Whom it May Concern;

The Missouri Coalition for the Environment submits the following in comment on the Departments proposed **8 Hour Ozone Boundary Recommendation**. These comments focus solely on the recommendations that pertain to the St. Louis Metropolitan Statistical Area.

Established in 1969 the Coalition for the Environment is Missouri's oldest citizen advocacy environmental organization. Our mission is to "preserve, protect and enhance an environment that is livable, *healthful*, and sustainable...".

When Congress passed the Clean Air Act in 1970 and as the Act has been amended in subsequent years the primary goal of the Act has been the protection of human health. The selection of "air quality criteria" and the establishment of ambient air quality standards were, and still are, driven by the desire to protect human health with an "adequate margin of safety".

As science, technology and knowledge have grown through the years our understanding of what is necessary to protect human health with an "adequate margin of safety" has expanded. A recent bibliography compiled by the American Lung Association (www.lungusa.org/air) identifies hundreds of studies examining the links between poor air quality and degraded human health. The decision to move from an allowable level of 120 parts per billion for any one hour period (the "1 hour standard") to one allowing for only 80 parts per billion for any 8 hour period (the "8 hour standard") was solely based on health considerations.

Although the St. Louis region has made, and has been awarded an all be it shaky claim to have met the 1 hour emission standards, much work remains. The region continues

to receive a grade of "F" from the American Lung Association and according to the St. Louis Regional Asthma Consortium the number of children with asthma in the St. Louis metropolitan area is three times the national average. Already this year the St. Louis area has experienced 11 yellow and 4 orange ozone days. The only reason these numbers are not higher has been the number of rainy, overcast days experienced this spring.

Health is the basis for the standard. Air quality related health concerns are still of primary import in St. Louis. Logic would dictate that protection of health should have been the explicit, overt, driving factor in the application of criteria, analysis and recommendations for the establishment of an 8 hour boundary designation. Having attended nearly all of the so called "public input sessions" hosted by the staff of the Department of Natural Resources, the Coalition sadly reports that this was not the case.

EPA established 11 criteria against which to evaluate an area for inclusion or exclusion in the boundary. These criteria are applicable nationwide. However, it is reasonable to assume that, by virtue of the nature and source of a problem in a particular area, some criteria should carry more weight than others. For example; if it is known in an area that the primary source of air pollution is mobile sources, then presumably the criteria related to vehicle miles traveled would carry more weight in determining whether or not an area should be included in a boundary. The recommendation does not characterize the nature of the air pollution problem in the St. Louis region (even though data do exist to generally identify not only the sources of pollution, but also the reduction impacts of previously implemented controls). Any realistic assessment of the 11 criteria would have begun with a clear statement of the nature of the current condition.

Further, those criteria, to varying degrees, presumably impact human health. However, the language of the recommendation does not reflect any attempt to evaluate those criteria or establish their relative import in relation to health concerns for the St. Louis region. It is clear from the comments submitted, and the language of the report that no effort was made to process information or evaluate county profiles in relation to their impact on existing health condition in the region.

Since no evidence was presented (either at the public workshops or through the language of the submitted recommendation) to establish any relationship between the proposed recommendation and the achievement of better health conditions for the citizens of the region, the Coalition can not, at this time, assess the validity of the boundary recommendation.

The Coalition is dismayed that the Department missed an opportunity with the boundary designation process. Representative from five outlying counties entered the dialogue with no clear appreciation for the relationship between the implementation of the 8 hour standard and the quality of life and health in the region. Representative from those same counties left the process with no clear appreciation for the relationship between the implementation of the 8 hour standard and the quality of life and health in the region.

Unless and until all parties in the region understand and accept that these measures are first and foremost designed to improve health and quality of life- and not to thwart economic growth, restrict personal freedom or increase the cost of living- we will continue to see decisions about boundary designations, standard implementation and control application being driven by political battles and external lobbying efforts that focus on everything but the health of our citizens.

The Coalition for the Environment urges the Department, the Commission and the Governor to evaluate and present their recommendation, and the rationale for it, in a clear, consistent and transparent fashion and to insure that all measures and considerations are couched in terms of protection of human health.

Sincerely,

A handwritten signature in black ink, appearing to read "Bea Covington". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Bea Covington
Executive Director

Dunbankin Farm

Jim and Lu Clark
16421 Dunbankin Road
Ste. Genevieve, Missouri 63670

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JEFFERSON CITY
MISSOURI

June 20, 2003

Chief, Planning Section
Air Pollution Control Program
Post Office Box 176
Jefferson City 65102-0176

Ste. Genevieve is the oldest community west of the Mississippi River. It is the distinctive site of the largest grouping of vertical log homes in the Western Hemisphere.

You do not pass through Ste. Genevieve on your way to somewhere else. Ste. Genevieve is an end destination for tourists. The unnecessary derogatory labeling of Ste. Genevieve as a non-attainment zone strikes at the very heart of our major industry.

St. Louis is the center of the non-attainment zone. Their clean-up efforts need more time. Dilution is not the solution.

Jim Clark
Lu Clark

*Frank
Hasek*

RCGA Testimony Concerning Proposed Boundaries for the Eight-Hour Ozone Nonattainment Area

The United States Environmental Protection Agency (EPA) established a one-hour National Ambient Air Quality Standard (NAAQS) for ozone in 1979. The St. Louis region worked diligently to meet that standard from 1979 until last summer when the region met the standard. The EPA formally acknowledged that progress in May of 2003 when it designated the region as in attainment for the one-hour ozone NAAQS.

On July 17, 1997, the EPA promulgated a new eight-hour ozone NAAQS. The most recent ozone data for the St. Louis region indicate that some monitoring sites within the region exceed this new ozone eight-hour NAAQS. Therefore, the region will likely be designated as not attaining this eight-hour NAAQS and it will be necessary to establish the limits of the nonattainment area for the new eight-hour NAAQS.

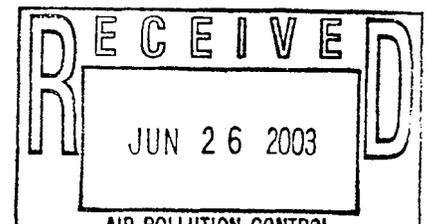
The EPA, as directed by Section 107(d) of the Clean Air Act has asked that the governor of Missouri make recommendations regarding the boundaries of any area not attaining the eight-hour ozone NAAQS.

As a first step in complying with this request, the Missouri Department of Natural Resources (DNR) has consulted with a broad based group, including the St. Louis Regional Chamber and Growth Association (RCGA). Based on those consultations and the data and technical analyses compiled by the DNR, the DNR developed their recommendation regarding a proposed boundary for the St. Louis eight-hour ozone nonattainment area.

The RCGA has reviewed the DNR proposal and commends the agency for its work in producing the recommendation. The RCGA concurs with the DNR recommendations; although, as outlined below, there are differences in the way RCGA views the information presented by the DNR.

In its review of the information presented by the DNR, the RCGA considered principles that it believes are important and relevant to how this decision is ultimately made... The boundary designation should:

- Provide a framework for achieving and maintaining air quality that meets the eight-hour ozone NAAQS.
- Put appropriate emphasis on sources that have an impact in the St. Louis region,
- Be based on solid technical information, and
- Be consistent with applicable EPA requirements and guidance.



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Concerning Proposed
Boundaries for the Eight-Hour Ozone Nonattainment Area

EPA's March 8, 2000 guidance on nonattainment area boundaries specifies that analysis factors should include:

- Emissions and air quality in adjacent areas (including adjacent Consolidated Metropolitan Statistical Areas [C/MSAs])
- Population density and degree of urbanization including commercial development (significant difference from surrounding areas)
- Monitoring data representing ozone concentrations in local areas and larger areas (urban or regional scale)
- Location of emission sources (emission sources and nearby receptors should generally be included in the same nonattainment area)
- Traffic and commuting patterns
- Expected growth (including extent, pattern and rate of growth)
- Meteorology (weather/transport patterns)
- Geography/topography (mountain ranges or other air basin boundaries)
- Jurisdictional boundaries (e.g., counties, air districts, existing one-hour nonattainment areas, Reservations, etc.)
- Level of control of emission sources
- Regional emission reductions (e.g., NO_x SIP call or other enforceable regional strategies)

DNR collected data on these factors, included it in their analysis and used it to support their recommendations in defining the St. Louis 8-hour ozone nonattainment area.

Clearly, the ultimate decision involves complex consideration of these numerous factors. EPA has not provided explicit guidance on the relative importance of these factors or how they should be weighted in developing the recommendation. Therefore the final choice is one that will require careful evaluation and considerable judgment.

However, the EPA guidance does state that:

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"...EPA believes it is best to consider controls on sources over a larger area due to the pervasive nature of ground level ozone and transport of ozone and its precursors. Thus, EPA recommends that the Metropolitan Statistical Area or the Consolidated Metropolitan Statistical Area (C/MSA) serve as the presumptive boundary for eight-hour NAAQS nonattainment areas. We believe this approach will best ensure public health protection from the adverse effects of ozone pollution caused by population density, traffic and commuting patterns, commercial development, and area growth... In addition the 1990 Amendments established the C/MSA as the presumptive boundary for ozone nonattainment areas classified as serious, severe and extreme."

This portion of the guidance suggests that the nonattainment boundary recommendation should take into account the presence of sources within a metropolitan area that would have the greatest impact on the attainment strategy. Based on the data collected by the DNR their recommendation is consistent with EPA guidance. In addition based on the recently proposed 8-hour ozone implementation rule (June 2, 2003: 68 Fed. Reg. 32802) the St. Louis area will most likely be classified as a Marginal 8-hour ozone area further supporting DNR's recommendation of excluding some the counties in the St. Louis MSA. This is clearly consistent with EPA guidance because, according to the 1990 amendments, the C/MSA is only presumptive for serious, severe and extreme nonattainment areas.

Another factor that should also be considered as part of this designation process is pending and proposed rules and legislation. The U.S. Congress is currently considering legislation (Clear Skies Act) that will significantly reduce ozone precursors on a national scale. In addition, EPA intends by the end of 2003 to propose and by 2005 to finalize a regional transport rule (RTR) that will cover sources not included in the Clear Skies legislation including utility sources if the Clear Skies legislation fails to pass. The intention of these initiatives is to reduce regional transport of ozone and its precursors so that the states can concentrate on locally produced problems. The Missouri DNR's recommendation is consistent and complements these initiatives.

DNR's recommendation is further supported when the impact of national rules which have not yet been fully implemented is considered. Such rules will also have significant impact in reducing emissions from outside the current nonattainment area boundary. A discussion is presented below, taken directly from EPA's Notice of Proposed Rulemaking dated May 13, 2003 on the 8-hour ozone standard:

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"National rules

For the States to be successful in developing local plans showing attainment of standards, EPA must do its part to control the sources that are more effectively and efficiently controlled at the national level and to ensure that interstate transport is addressed through SIPs or other means. We already have issued key national and regional control requirements for motor vehicles, power plants and other sources that will enable many areas to meet the 8-hour standard in the near term.

Current emissions standards for new cars, trucks and buses are reducing motor vehicle emissions of VOCs (sometimes referred to as hydrocarbons) and NO_x as older vehicles are retired. Other rules are reducing emissions from several categories of non-road engines. EPA's Tier 2 motor vehicle emission standards, together with the associated sulfur in gasoline requirements, will provide additional benefits nationally within the time period of many 8-hour ozone nonattainment areas' anticipated attainment dates (65 FR 6698, February 10, 2000). Also, we published the heavy-duty diesel rule on January 18, 2001 (66 FR 5002), which will contribute to reductions needed to meet the 8-hour ozone standard in areas with later attainment dates.

In the eastern U.S., dramatic reductions in NO_x emissions from power plants and large industrial sources will occur by May 2004 under our rules to reduce interstate transport of ozone pollution in the East. These rules are the NO_x SIP Call, published October 27, 1998 (63 FR 57356), and the Section 126 Rule, published January 18, 2000 (65 FR 2674).

Also, under the requirements of section 183(e) of the CAA, we are contemplating either Federal rules or control techniques guidelines (CTGs) for controlling VOCs from 15 additional categories of consumer and commercial products. The CTGs assist States in determining required controls for facilities in nonattainment areas. The 15 categories are in addition to 6 CTGs already published under this provision of the CAA (consumer products, architectural coatings, automobile refinishing coatings, aerospace coatings, wood furniture coatings, and shipbuilding and ship repair coatings). These additional rules or CTGs are expected to be completed over the next few years.

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Control measures targeting hazardous air pollutants (HAPs) also result in control of VOCs and, in some cases, NO_x. Under section 112 of the CAA, EPA was required to identify and list categories of industrial facilities that emit significant quantities of one or more of 188 HAPs and establish maximum achievable control technology (MACT) standards for each category of sources. Because most of the organic HAPs are also VOCs, in many cases, control of organic HAP emissions also achieves reductions in VOC emissions. Rules for most of the listed MACT categories have been promulgated. Although many of the earlier promulgated rules have already resulted in emissions reductions of VOCs, the more recent rules will not begin achieving reductions until the compliance date, which is generally 3 years following promulgation. Therefore, the amount of reductions achieved through control of HAPs that are VOCs will continue to grow over the next several years.

We see the potential for significant further emissions reductions from power plants and non-road engines at the national level. The Administration has proposed nationwide legislation, the "Clear Skies Act" (CSA), to reduce power plant emissions of NO_x nationwide, as well as sulfur dioxide and mercury. We are also proposing a national rule that would significantly reduce NO_x emissions from non-road diesel-powered equipment. These non-road sources constitute an important fraction of the NO_x emissions inventory."

The DNR, however, included comments within the recommendation about potential major sources currently being permitted that are outside of the St. Louis one-hour maintenance area and eight-hour MSA. The proposed recommendation suggests that, if these sources are built, the nonattainment area should possibly include the county where these potential new sources would be located. This suggestion is not consistent with EPA guidance. In the current air quality permitting process, these sources have to employ Best Available Control Technology, as these sources either have been or likely will be permitted prior to the effective date; it's unlikely that these sources would be subject to further control. Existing sources in nonattainment areas are subject to RACT, which is less stringent than BACT. For the sources that MDNR refers to in its technical support document, our understanding is that the existing requirement for installation of BACT will be the same regardless of how the nonattainment area boundary is drawn. Because of these circumstances, the possibility of construction of these potential sources should not be considered as a reason for the county to be included in the eight-hour nonattainment area.

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Boundaries for the Eight-Hour Ozone Nonattainment Area

A decision to change the nonattainment boundary from one-hour maintenance boundary should be guided by the principle that any change should bring substantial emissions reduction and improve the ozone levels in the St. Louis region. For this reason, we support DNR's recommendation regarding the eight-hour ozone nonattainment boundary.

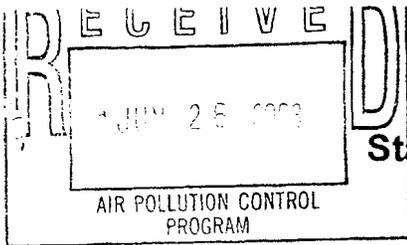
While we appreciate DNR's concern about the impact of new major sources on the St. Louis region, we recommend that this concern be expressed in a different way. Any future major new source that could have a significant adverse impact on the region should receive special attention – whether the DNR learns of it now or some time in the future. Therefore, we also urge that DNR immediately begin an evaluation of its present new source review requirements for major new sources that would be located outside the nonattainment area but potentially have a significant impact on the nonattainment area. We suggest that this be done through an inclusive process such as the process used to develop the nonattainment boundary recommendation.

In summary, we urge the DNR to:

- Recommend to the EPA that the eight-hour nonattainment area be identical to the nonattainment area that was in place for the one-hour ozone standard,
- Immediately take steps to establish a broad-based workgroup to review the existing New Source Review requirements outside of the nonattainment area with the goal of making recommendations regarding changes (if appropriate) to protect the St. Louis Region's air quality from impacts that might threaten the attainment and maintenance of the ozone air quality standard, and
- Work with the EPA and St. Louis regional representatives to assure that nationally promulgated controls are effective in improving the region's air quality.

Once again we want to thank DNR for having an open process to address these very important issues. We look forward to working with DNR in implementing the new requirements to achieve the eight-hour standard, and to keeping the Commission periodically informed of the status of these efforts.

Thank you.



**Statement before the Missouri Air Conservation
Commission**

**Missouri Air Conservation Commission Meeting regarding
the recommendation on the 8-hour ozone standard boundary**

June 26, 2003

Presented by:
Marv Harman, Director
Ste. Genevieve County Office of Economic Development
Ste. Genevieve, Missouri

Mr. Chairman and members of the Commission, my name is Marv Harman. I am the Director of the Ste. Genevieve County Office of Economic Development. Thank you for the opportunity to be here today and to comment on the 8-hour ozone standard boundary recommendation. I would like to commend the thorough and careful process the Commission is taking as it considers adoption of the boundary recommendation document as proposed by Department of Natural Resources staff. I am pleased that the DNR staff has recommended that Ste. Genevieve County should not be included in the St. Louis non-attainment zone. I wholeheartedly support this decision and hope that the Commission will make the same determination in its recommendation to the governor.

I am here today representing the county's office of economic development and the Ste. Genevieve County Chamber of Commerce, including small business owners who oppose any inclusion of the county in an expanded St. Louis non-attainment area. I am joined by

several others from Ste. Genevieve County who have traveled here today for this important meeting, all of whom have taken time away from their business today to show support for the county's position. And I can also say that there are many other small business owners who could not take time off to be here, but are, nonetheless, united in opposition to including Ste. Genevieve County.

As Economic Development Director for Ste. Genevieve County, my highest priority is to preserve the county's existing economic base and to work hard to encourage employers to locate to our county so that economic growth opportunities and job creation in our community continues.

But, as you can imagine, our challenges to attract high quality employers that offer good-paying jobs, are many. Including Ste. Genevieve County in the St. Louis area non-attainment zone would only make matters worse for us in our efforts to improve the livelihoods of citizens in the region. Our community already is at a disadvantage in attracting economic development because we don't have the benefits, incentives, and resources that larger metropolitan areas like St. Louis have.

In fact, more than 30 percent of our workforce must commute outside of Ste. Genevieve County to work at jobs in other counties. The office of Economic Development spends a great deal of time looking for ways to keep and increase the number of jobs in our community so people can stay closer to home and improve their quality of life.

Inclusion in a St. Louis ozone region would make it even more difficult for the county to attract the needed investment to keep people working in the county.

Yet, because we are fairly close to the St. Louis area, we still must compete with it in attracting businesses. Frankly, the one advantage we might have at this point is that we don't have the onerous regulations that come with being in the non-attainment area. In other words, being outside the non-attainment zone levels the playing field somewhat, and it increases our ability to compete with St. Louis and the surrounding communities for business and economic development opportunities.

The fact of the matter is that, by its nature, the industry and the vehicles in Ste. Genevieve County do not create many emissions – certainly not enough to have any statistical impact on the St. Louis area. We do not have a lot of large employers, not by St. Louis standards anyway, and as DNR has concluded, bringing Ste. Genevieve County into an expanding non-attainment area will do nothing to address air quality issues in the St. Louis metropolitan area. We're simply not big enough to have an impact either way.

Most people who live in Ste. Gen. County are attracted to its rural setting and its relatively sparse population. Of the counties under consideration, Ste. Genevieve has the lowest population and projections show that we will not have significant population growth in the next 20 years. Consequently, traffic counts show that Ste.

Genevieve has the lowest volume of all the counties. Our residents spend less time in their cars and drive fewer miles on average than drivers in the other counties. In fact, we have only 11 gas stations. St. Louis would gain nothing in terms of reducing ozone levels by forcing additional vehicle emissions inspections and costly emission control technologies on the vehicles and gas stations in Ste. Gen. County.

I commend MDNR's recommendation and the responsible approach they have taken in determining whether or not Ste. Genevieve County should be included in this expanded area. As a matter of fairness and good public policy, we respectfully request that this commission follow the recommendations of MDNR and continue to reject any arguments to include Ste. Genevieve County in any potential expanded non-attainment zone for St. Louis. Again, thank you for allowing me to be here today. I appreciate the opportunity to participate in this process and to express the views of those of us who live and work in Ste. Genevieve County.



CITY OF STE. GENEVIEVE

165 S. FOURTH STREET

STE. GENEVIEVE, MISSOURI 63670

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FAX: (573) 883-8105

† † † †

June 19, 2003

Mr. Jim Kavanaugh
Chief, Planning Section
Missouri Air Pollution Control program
P.O. 176
Jefferson City, MO 65102

Dear Air Quality Commissioners:

As a small business owner - my businesses are the Stay & Play Day Care Facility and the Sirros Restaurant, and also as the Marketing Director of BiltBest Windows, and as the Mayor of the City of Ste. Genevieve, I am writing to express my support for the recent recommendation by the Missouri Department of Natural Resources (MDNR) to not include Ste. Genevieve County in a proposed expanded ozone "nonattainment" area for St. Louis. I commend the department's decision and encourage the Missouri Air Conservation Commission and Governor Holden to accept this recommendation as they review this matter.

Including Ste. Genevieve County will not help solve St. Louis' ozone problems. As you are aware, in 2000 the state of Missouri went through a similar process of recommending if additional counties should be included in the St. Louis nonattainment zone. Importantly, Ste. Genevieve was not included in the zone because doing so would not have made a significant difference in meeting the federal clean air requirements. Nothing has changed since then to alter Ste. Genevieve's designation in 2003.

Very little of the air pollution in the St. Louis region, perhaps as little as two percent, comes from Ste. Genevieve County. Our county is extremely rural, and as such, we have fewer emissions sources producing less pollution. These emissions do not have a significant impact on the pollution levels in St. Louis. That is why we have a very strong case for not being included in the nonattainment area.

Thank you for your attention to this request. Again, I commend MDNR's initial recommendation and it is my hope that EPA will accept the decision of our state agency and avoid this unreasonable designation.

Sincerely,


Richard Greninger
Mayor

cc: The Hon. Christopher "Kit" Bond, U. S. Senate
The Hon. Jim Talent, U.S. Senate
The Honorable Richard Gephardt, U.S. House of Representatives
The Hon. Bob Holden, Governor
State Senator Harry Kennedy
Representative Kevin Engler, Representative Wes Wagner, Representative Dan Ward.

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June 19, 2003

Mr. Jim Kavanaugh
Chief, Planning Section
Missouri Air Pollution Control program
P.O. 176
Jefferson City, MO 65102

Dear Air Quality Commissioners:

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Sincerely,

Darryl Roth
Alderman Ward 2

cc: The Hon. Christopher "Kit" Bond, U. S. Senate
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The Honorable Richard Gephardt, U.S. House of Representatives
The Hon. Bob Holden, Governor
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Representative Kevin Engler, Representative Wes Wagner, Representative Dan Ward.

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June 19, 2003

Mr. Jim Kavanaugh
Chief, Planning Section
Missouri Air Pollution Control program
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Jefferson City, MO 65102

Dear Air Quality Commissioners:

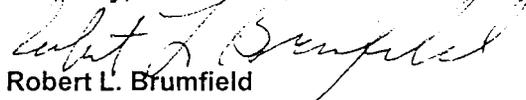
As a small business owner - my business is Brumfield Automotive, an auto repair shop and as a City elected Alderman, I am writing to express my support for the recent recommendation by the Missouri Department of Natural Resources (MDNR) to not include Ste. Genevieve County in a proposed expanded ozone "nonattainment" area for St. Louis. I commend the department's decision and encourage the Missouri Air Conservation Commission and Governor Holden to accept this recommendation as they review this matter.

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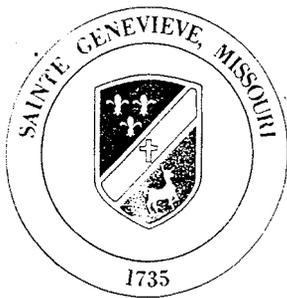
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Sincerely,


Robert L. Brumfield
Alderman Ward 4

cc: The Hon. Christopher "Kit" Bond, U. S. Senate
The Hon. Jim Talent, U.S. Senate
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June 20, 2003

Mr. Jim Kavanaugh
Chief, Planning Section
Missouri Air Pollution Control program
P.O. 176
Jefferson City, MO 65102

Dear Air Quality Commissioners:

It is my understanding that the Missouri Department of Natural Resources (MDNR) recently announced that the St. Louis "nonattainment" zone should not be expanded to include Ste. Genevieve County. I wholeheartedly support this decision and hope that when the Missouri Air Conservation Commission, Governor Holden, and U.S. Environmental Protection Agency (EPA) reviews this matter, they will come to the same conclusion.

By its nature, Ste. Genevieve does not create much air pollution. Many of the people who live here are attracted to its rural location and its relatively small population. Generally, our residents spend less time in their cars and drive fewer miles on average than drivers in the other counties that state and federal officials are considering to include in this expanded area. Additionally, our county has fewer gas stations and very few industrial facilities compared to these other counties. All of these factors result in a low level of emissions that has very little impact on the air quality in St. Louis.

Including Ste. Genevieve in the nonattainment area will not help St. Louis solve its ozone problems and will only serve to create hardships for the businesses and residents of our community. This would unfairly place restrictions and add new requirements onto automobiles, gas stations, and businesses that produce air emissions. Ste. Genevieve is a community that is looking to carefully grow and attract economic development and these restrictions clearly would hurt that effort.

Again, I agree with the decision by the MDNR to not include Ste. Genevieve in the St. Louis nonattainment zone. It is my hope that the EPA will adopt this recommendation as it finalizes this review process.

Sincerely,

Wallace Roth
Wallace Roth
Alderman, Ward 3

cc: The Hon. Christopher "Kit" Bond, U. S. Senate
The Hon. Jim Talent, U.S. Senate
The Honorable Richard Gephardt, U.S. House of Representatives
The Hon. Bob Holden, Governor
State Senator Harry Kennedy
Representative Kevin Engler, Representative Wes Wagner, Representative Dan Ward.

RECEIVED
JUN 23 AM 10:24
CITY OF STE. GENEVIEVE
MAYOR'S OFFICE



CITY OF STE. GENEVIEVE

165 S. FOURTH STREET

STE. GENEVIEVE, MISSOURI 63670

TELEPHONE: (573) 883-5400

FAX: (573) 883-8105

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+

+

June 20, 2003

Mr. Jim Kavanaugh
Chief, Planning Section
Missouri Air Pollution Control program
P.O. 176
Jefferson City, MO 65102

Dear Air Quality Commissioners:

I am writing in support of the decision by the Missouri Department of Natural Resources (MDNR) to recommend against having Ste. Genevieve County included in an expanded "nonattainment" area for St. Louis. I urge the Air Conservation Commission and the Governor to support MDNR's decision to not include our county.

Ste. Genevieve City and County clearly does not meet the criteria for inclusion in the ozone non-attainment area. Such an inclusion would unfairly penalize the county and all of its residents for ozone problems we did not create. Our county does not create much air pollution for the simple reason that we are a rural area with a relatively small population. This results in fewer emissions sources producing less pollution. Additionally, from a geographic standpoint, it makes little sense to include Ste. Genevieve County. The county is located farther from the St. Louis nonattainment area than the other counties that have been considered for inclusion in this designation.

It is clear that including Ste. Genevieve County in the nonattainment zone would unfairly penalize the community and all of its residents for ozone problems we did not create. Inclusion into this area would limit business expansion and discourage new business development, thereby discouraging job growth and economic opportunities. The MDNR made the right decision in announcing that Ste. Genevieve County should not be included in the St. Louis zone. It is my hope that when the MACC and the Governor reviews this matter, it will come to the same conclusion. Thank you for your attention to this issue.

Sincerely,

Joe Dearing
City Administrator

cc: The Hon. Christopher "Kit" Bond, U. S. Senate
The Hon. Jim Talent, U.S. Senate
The Honorable Richard Gephardt, U.S. House of Representatives
The Hon. Bob Holden, Governor
State Senator Harry Kennedy
Representative Kevin Engler, Representative Wes Wagner, Representative Dan Ward.

RECEIVED
JUN 23 2003
11:01 AM



CITY OF STE. GENEVIEVE

165 S. FOURTH STREET

STE. GENEVIEVE, MISSOURI 63670

TELEPHONE: (573) 883-5400

FAX: (573) 883-8105

+

+

+

+

June 19, 2003

Mr. Jim Kavanaugh
Chief, Planning Section
Missouri Air Pollution Control program
P.O. 176
Jefferson City, MO 65102

Dear Air Quality Commissioners:

As a former State Representative for many years representing Ste. Genevieve County, and as a small business owner - my business is the Show-Me Shop tourism related business, and as a City elected Alderman, I am writing to express my support for the recent recommendation by the Missouri Department of Natural Resources (MDNR) to not include Ste. Genevieve County in a proposed expanded ozone "nonattainment" area for St. Louis. I commend the department's decision and encourage the Missouri Air Conservation Commission and Governor Holden to accept this recommendation as they review this matter.

Including Ste. Genevieve County will not help solve St. Louis' ozone problems. As you are aware, in 2000 the state of Missouri went through a similar process of recommending if additional counties should be included in the St. Louis nonattainment zone. Importantly, Ste. Genevieve was not included in the zone because doing so would not have made a significant difference in meeting the federal clean air requirements. Nothing has changed since then to alter Ste. Genevieve's designation in 2003.

Very little of the air pollution in the St. Louis region, perhaps as little as two percent, comes from Ste. Genevieve County. Our county is extremely rural, and as such, we have fewer emissions sources producing less pollution. These emissions do not have a significant impact on the pollution levels in St. Louis. That is why we have a very strong case for not being included in the nonattainment area.

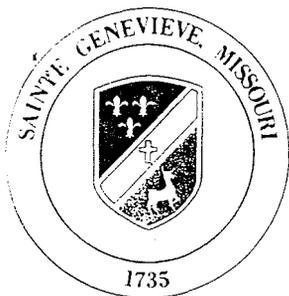
Thank you for your attention to this request. Again, I commend MDNR's initial recommendation and it is my hope that EPA will accept the decision of our state agency and avoid this unreasonable designation.

Sincerely,

Herbert C. Fallert
Alderman Ward 3

cc: The Hon. Christopher "Kit" Bond, U. S. Senate
The Hon. Jim Talent, U.S. Senate
The Honorable Richard Gephardt, U.S. House of Representatives
The Hon. Bob Holden, Governor
State Senator Harry Kennedy
Representative Kevin Engler, Representative Wes Wagner, Representative Dan Ward.

RECEIVED
JUN 23 2003
AIR POLLUTION CONTROL DIVISION



CITY OF STE. GENEVIEVE

165 S. FOURTH STREET

STE. GENEVIEVE, MISSOURI 63670

TELEPHONE: (573) 883-5400

FAX: (573) 883-8105

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+

June 20, 2003

Mr. Jim Kavanaugh
Chief, Planning Section
Missouri Air Pollution Control program
P.O. 176
Jefferson City, MO 65102

Dear Air Quality Commissioners:

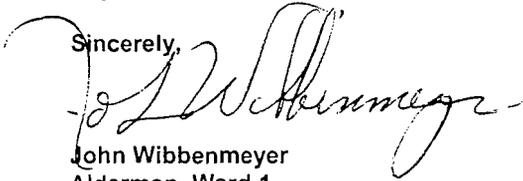
As a retired teacher with many years experience and as an elected City Alderman, I am calling on the Air Conservation Commission and the Governor to accept the recommendation of the Missouri Department of Natural Resources (MDNR) against including Ste. Genevieve County in an expanded "nonattainment" zone. I applaud the MDNR for its careful consideration of this issue and recommending against this unreasonable proposal.

It is my understanding that along with Ste. Genevieve County, the counties of Clinton and ST. Francois are under consideration to be included in the expanded nonattainment zone. In considering this designation, it makes the least sense to include our county. Of the three counties, Ste. Genevieve has the lowest population and projections show that our county will not have significant population growth in the next 20 years. Consequently, traffic counts show that Ste. Genevieve has the lowest volume of all three counties. If Ste. Genevieve is included in this nonattainment area, our residents would face additional vehicle emissions inspections and costly emission control technologies on their cars and at gas stations. Placing such restrictions on a region with such a low population would have minimal, if any, impact on the ozone levels in the St. Louis region.

Additionally, it makes the least sense to include Ste. Genevieve County from a geographic standpoint. The county is located farther from the core of St. Louis and the nonattainment area than the other counties. Ste. Genevieve remains an extremely rural county, with Bloomsdale, St. Mary, and Ste. Genevieve as the only incorporated communities.

There are more effective and responsible solutions to help St. Louis meet federal air quality requirement than imposing additional restrictions in Ste. Genevieve County. This proposal would place unnecessary restrictions on the businesses and residents of our community that have significant impacts on our quality of life. I urge the MACC to adopt the recommendations proposed by MDNR to not include Ste. Genevieve County in an expanded nonattainment zone for St. Louis. I appreciate your attention to this request.

Sincerely,


John Wibbenmeyer
Alderman, Ward 1

cc: The Hon. Christopher "Kit" Bond, U. S. Senate
The Hon. Jim Talent, U.S. Senate
The Honorable Richard Gephardt, U.S. House of Representatives
The Hon. Bob Holden, Governor
State Senator Harry Kennedy
Representative Kevin Engler, Representative Wes Wagner, Representative Dan Ward.

RECEIVED
JUN 23 2003
AIR QUALITY
COMMISSION

June 20, 2003

Mr. Jim Kavanaugh
Chief, Planning Section
Missouri Air Pollution Control Program
PO Box 176
Jefferson City, MO 65102

Dear Air Quality Commissioners:

As a small business owner - my business is Kathy's Something Special, a clothing store, and as the contract operator of the Local Missouri License Fee Bureau, and as former Mayor of the City of Ste. Genevieve, I am writing to express my support for the recent recommendation by the Missouri Department of Natural Resources (MDNR) to not include Ste. Genevieve County in a proposed expanded ozone "nonattainment" area for St. Louis. I commend the department's decision and encourage the Missouri Air Conservation Commission and Governor Holden to accept this recommendation as they review this matter.

Including Ste. Genevieve County will not help solve St. Louis' ozone problems. As you are aware, in 2000 the state of Missouri went through a similar process of recommending if additional counties should be included in the St. Louis nonattainment zone. Importantly, Ste. Genevieve was not included in the zone because doing so would not have made a significant difference in meeting the federal clean air requirements. Nothing has changed since then to alter Ste. Genevieve's designation in 2003

Our county is extremely rural, and as such, we have fewer emissions sources producing less pollution. These emissions do not have a significant impact on the pollution levels in St. Louis. That is why we have a very strong case for not being included in the nonattainment area.

Thank you for your attention to this request. Again, I commend MDNR's initial recommendation and it is my hope that EPA will accept the decision of our state agency and avoid this unreasonable designation.

Sincerely,



Kathleen M. Waltz
Kathy's Something Special
98 Merchant Street
Ste. Genevieve, MO 63670

cc: The Hon. Christopher "Kit" Bond
The Hon. Jim Talent
The Honorable Richard Gephardt
The Hon. Bob Holden
Representative Kevin Engler, Representative Wes Wagner, Representative Dan Ward

RECEIVED
JUN 23 11:23 AM '03
STATE OF MISSOURI
AIR QUALITY DIVISION



BOONSLICK REGIONAL
PLANNING COMMISSION

June 24, 2003

Missouri Department of Natural Resources
Chief, Planning Section
Air Pollution Control Program
PO Box 176
Jefferson City, MO 65102-0176

RE: Written Testimony on 8-Hour Ozone Boundary Recommendation

Dear Chief:

The Boonslick Regional Planning Commission Board of Directors has reviewed the recommendation of DNR regarding the designation of the 8-hour ozone boundary. The board concurs with the recommendation to not include Lincoln, Montgomery, and Warren County in the EPA designated 8-hour ozone boundary.

Enclosed with this letter is the reasoning behind this board's concurrence and the eleven factors that will be considered by EPA in establishing the 8-hour ozone boundary. This organization believes the data clearly establishes no reason for this area to be included in the 8-hour ozone boundary.

We appreciate the opportunity to offer these comments. If you have any questions regarding this matter please give me a call at (636)456-3473.

Sincerely,

Steve W. Etcher
Executive Director

P.O. BOX 429
122 EAST BOONESLICK RD.
WARRENTON, MO 63383
(636) 456-3473
FAX (636) 456-2329
www.boonslick.org

**BOONSLICK REGIONAL PLANNING COMMISSION
8-HOUR OZONE BOUNDARY DESIGNATION POSITION PAPER**

The Boonslick Regional Planning Commission Board of Directors, which represents 3 county and 24 municipal governments in Lincoln, Montgomery and Warren Counties in east-central Missouri, has reviewed the EPA guidance on designation of 8-hour ozone boundaries. The Commission concurs with the recommendation developed by DNR in 2003, with input from community stakeholders, and the recommendation by the State of Missouri in 2000 to not include Lincoln and Warren Counties in the 8-hour boundary designation. The Commission does not concur with the presumptive boundaries proposed by EPA which would include those counties designated within the MSA. The Commission has prepared a short response to the eleven factors that are considered in the modification and designation of the boundaries. The Commission will address the known elements as they pertain to not only, Lincoln and Warren counties, but Montgomery County as well.

A. Emissions and Air Quality

The table below shows the emissions and air quality for the region. As can be seen the air quality and emission sources within the Boonslick region are minimal compared to counties currently in the 1-hour boundary designation.

	1990	2000	1999 NOx (TPD)				1999 VOC (TPD)			
	population	population	Point	Area	Mobile	Total	Point	Area	Mobile	Total
MISSOURI										
ST. LOUIS	993,529	1,016,315	24.0	51.7	108.8	184.5	18.0	55.8	65.1	138.9
ST. LOUIS CITY	396,685	348,189	7.6	21.8	28.5	57.9	12.6	16.0	17.0	45.6
ST. CHARLES	212,907	283,883	63.0	16.2	24.5	103.7	6.6	13.0	14.7	34.3
JEFFERSON	171,380	198,099	35.1	6.7	17.7	59.5	3.2	7.3	10.6	21.1
FRANKLIN	80,603	93,807	33.6	9.4	12.4	55.4	3.6	5.4	8.3	17.3
Lincoln	28,892	38,944	0.4	1.4	4.0	5.8	0.4	4.2	2.5	7.0
Warren	19,534	24,525	0.4	1.1	4.4	5.9	0.5	4.0	2.8	7.2
Missouri MSA	1,903,530	2,003,762	164.1	108.4	200.3	472.8	44.8	105.8	121.0	271.6
St. Francois	48,904	55,641	1.3	1.5	5.2	8.0	0.3	5.5	3.2	9.0
Washington	20,380	23,344	0.1	0.4	2.2	2.7	0.2	2.4	2.2	4.7
Crawford	19,173	22,804	0.1	0.8	4.4	5.3	0.7	3.6	2.8	7.1
Pike	15,969	18,351	29.7	1.6	2.5	33.8	8.3	2.7	1.6	12.6
Ste. Genevieve	16,037	17,842	11.5	0.8	3.4	15.7	0.5	1.9	2.1	4.5
Gasconade	14,006	15,342	0.2	0.8	1.8	2.8	0.4	2.4	1.1	3.9
Montgomery	11,355	12,136	0.3	1.1	4.0	5.4	0.0	1.9	2.5	4.4
ILLINOIS										
MADISON	249,238	258,941	57.3	11.8	27.5	96.6	12.9	24.2	13.7	50.9
ST. CLAIR	262,852	256,082	4.7	10.4	26.0	41.0	4.4	21.2	13.0	38.6
MONROE	22,422	27,619	0.7	3.2	3.3	7.1	0.2	4.9	1.8	6.8
Clinton	33,944	35,535	8.4	4.6	3.8	16.7	0.4	7.6	3.0	11.0
Jersey	20,539	21,668	0.0	2.8	2.2	5.0	0.4	2.7	3.0	6.0
Illinois MSA	588,995	599,845	71.0	32.8	62.8	166.5	18.3	60.7	34.3	113.2

B. Population Density and Degree of Urbanization

The Boonslick region, by all definitions, is still considered a rural region. The counties of Lincoln and Warren are realizing growth due to outward migration, but the population density is still sparse. Lincoln County has population density of 61.8 persons per square mile, this equates to .096 persons per acre. Warren County has a population density of 56.9 persons per square mile, this equates to .089 persons per

acre. Montgomery County has a population density of 22.6 persons per square mile, this equates to .035 persons per acre. The U.S. Census Bureau defines an urbanized area as having more than 500 persons per square mile.

In contrast the other counties in the MSA are considerably more densely populated. St. Louis City has a population density of 5.622 persons per square mile (8.78 per acre), St. Louis County, has a population density of 2001 persons per square mile (3.13 per acre), and St. Charles County has a population density of 506 persons per square mile (.79 per acre).

The major communities within the region; Troy, Warrenton, Wright City, and Montgomery City have a higher density population but don't meet the standard definition of an urban area. The following table shows the population density for key cities in the region.

City	Population	Square Miles	Density/acre
Troy	6,737	5.95	1.77
Moscow Mills	1,742	1.87	1.45
Warrenton	5,281	7.34	1.12
Wright City	1,532	2.53	.94
Montgomery City	2,442	2.84	1.34

C. Monitoring Data

There are no fixed monitors within the Boonslick region.

D. Location of Emission Sources

The Boonslick region has limited emission sources that contribute to poor air quality. There are only a few large manufacturers within the region, the largest being only 800 employees, there are no power generation facilities within the region, congestion on the area roadways is minimal, and there are only a small number of industries clusters that are known to contribute to ozone pollution. A recent assessment by local governments reveals that there aren't even any dry-cleaning facilities in the region. The dry-cleaners in the region are merely collection and drop-off centers. The actual dry-cleaning is done at other facilities located outside the Boonslick region.

E. Traffic and Commuting Patterns

Traffic in the Boonslick region on the major corridors is considered heavy for a rural county, but would be considered light compared to roadways of similar designation in an urbanized area. The main roadways in the region and their ADT(at the busiest points) are listed below.

<u>Roadway</u>	<u>ADT</u>
Interstate 70	36,902
Highway 61	24,982
Highway 47 (Lincoln)	8,710
Highway 47 (Warren)	3,656
Highway 79	8,768
Highway 19	5,808

The Boonslick region has oft been considered as a “bedroom community”. A majority of the labor force within the region is employed outside of the county of their residence. The specific commuting numbers for each county are listed below. In relation to the effect on air quality in the St. Louis metropolitan area, the percentage of commuters may be high, but the volume is still considered relatively small. Only 14,000 people commute into St. Louis county, St. Louis city, and St. Charles County.

Destination County	County of Origin	Number of commuters	% of labor force
St. Louis City	Lincoln County	702	3.8%
St. Louis County	Lincoln County	2,738	14.89%
St. Charles County	Lincoln County	5,529	30.07%
St. Louis City	Warren County	311	2.60%
St. Louis County	Warren County	1,972	16.46%
St. Charles County	Warren County	2,967	24.77%
St. Louis City	Montgomery County	-	-
St. Louis County	Montgomery County	231	4.26%
St. Charles County	Montgomery County	362	6.68%

F. Expected Growth

Population within Lincoln and Warren County has been increasing at significant rates during the past decade. From 1990 to 2000 the population in Lincoln County increased by 34.8% and in Warren County the increase was 25.6%. These two counties are considered in the ten fastest growing counties in the State of Missouri, based on percentage of growth, however, during this same period the population grew only by 10,000 in Lincoln County, and 5,000 in Warren County. The magnitude of the growth appears large but in real numbers the growth is moderate.

The population projections for the year 2025 for this region are as follows:

Lincoln County	55,260
Warren County	36,273
Montgomery County	13,095

G. Meteorology

The Commission concurs with the finding in the 2000 recommendation that Lincoln and Warren Counties would be considered a “downwind” county during the peak ozone periods. The winds during the spring and summer generally blow from the south, southwest, which would transport any emissions within these counties away from the St. Louis metropolitan area.

H. Geography/Topography

The geography and topography within the Boonslick region is mixed. The region has a balance of open plains, rolling hills, and woodlands. The topography has no specific characteristics that would contribute to or impact the ozone pollution.

I. Jurisdictional Boundaries

The Boonslick region has been designated as a region since 1966. The jurisdictional boundary conflicts between this region and the St. Louis metropolitan area are numerous. These boundary conflicts will make it even more difficult to coordinate and implement air quality standards. These conflicts alone are sufficient to make the local governments within this region apprehensive to say the least. Two of the most notable jurisdictional issues are:

- a. East-West Gateway/Boonslick RPC-These two organizations were designated by the Missouri General Assembly to represent their respective regions. East-West Gateway serves the St. Louis Metropolitan area and is designated as a metropolitan planning organization by the Federal Highway Administration. This designation gives East-West Gateway resources and authority not available to rural regions. Boonslick Regional Planning Commission is designated as a rural planning organization and has a reduced level of authority, compared to an MPO, and limited resources to address air quality planning. Lincoln and Warren Counties are members of the Boonslick Regional Planning Commission.
- b. Transportation Districts-Lincoln and Warren Counties are in District 3 of the Missouri Department of Transportation, located in Hannibal. The remainder of the St. Louis metropolitan area is in District 6 of the Missouri Department of Transportation, located in St. Louis. The Boonslick region's governments desire to remain in District 3. This boundary conflict reaches beyond just lines on a map. District 3 in Hannibal covers a broad rural area, and as such the issues they deal with are different than in the metropolitan areas. District 3 does not have an air quality planner as is required within District 6. Congestion is not a really pressing issue within the majority of the Boonslick region. Therefore, CMAQ issues are addressed at the headquarters of MoDOT in Jefferson City.

J. Level of Control of Emissions Sources

Additional information regarding this factor will be developed.

K. Regional Emissions Reductions

The emissions within the Boonslick region, according to the 2000 recommendation, are classified as low emissions density. The amount of emissions generated within the region is small. There are few large manufacturing facilities, there are no power generation facilities, and congestion on the roadways is minimal. If the region were to significantly reduce the emissions within this region it would have a minuscule, if even noticeable impact on the St. Louis region. Due to this region's inability to contribute significantly to the ozone reduction in the St. Louis metropolitan area it would not be practical to include this region in the boundary designation.

L. Conclusion

In conclusion, the unanimous opinion of local elected officials within the Boonslick region is to seek to a recommendation by the Governor that does not include Lincoln, Montgomery, and Warren counties in the 8-hour ozone boundary. The reason for this opinion is based upon the evidence presented above, plus the potential additional financial burden on residents and governments of this region. Our board concurs with the recommendation of the study taskforce to not include these counties in the 8-hour boundary.



BOONSLICK REGIONAL
PLANNING COMMISSION

June 24, 2003

Missouri Department of Natural Resources
Chief, Planning Section
Air Pollution Control Program
PO Box 176
Jefferson City, MO 65102-0176

RE: Written Testimony on 8-Hour Ozone Boundary Recommendation

Dear Chief:

The Boonslick Regional Planning Commission Board of Directors has reviewed the recommendation of DNR regarding the designation of the 8-hour ozone boundary. The board concurs with the recommendation to not include Lincoln, Montgomery, and Warren County in the EPA designated 8-hour ozone boundary.

Enclosed with this letter is the reasoning behind this board's concurrence and the eleven factors that will be considered by EPA in establishing the 8-hour ozone boundary. This organization believes the data clearly establishes no reason for this area to be included in the 8-hour ozone boundary.

We appreciate the opportunity to offer these comments. If you have any questions regarding this matter please give me a call at (636)456-3473.

Sincerely,

Steve W. Etcher
Executive Director

P.O. BOX 429
122 EAST BOONESLICK RD.
WARRENTON, MO 63383
(636) 456-3473
FAX (636) 456-2329
www.boonslick.org

**BOONSLICK REGIONAL PLANNING COMMISSION
8-HOUR OZONE BOUNDARY DESIGNATION POSITION PAPER**

The Boonslick Regional Planning Commission Board of Directors, which represents 3 county and 24 municipal governments in Lincoln, Montgomery and Warren Counties in east-central Missouri, has reviewed the EPA guidance on designation of 8-hour ozone boundaries. The Commission concurs with the recommendation developed by DNR in 2003, with input from community stakeholders, and the recommendation by the State of Missouri in 2000 to not include Lincoln and Warren Counties in the 8-hour boundary designation. The Commission does not concur with the presumptive boundaries proposed by EPA which would include those counties designated within the MSA. The Commission has prepared a short response to the eleven factors that are considered in the modification and designation of the boundaries. The Commission will address the known elements as they pertain to not only, Lincoln and Warren counties, but Montgomery County as well.

A. Emissions and Air Quality

The table below shows the emissions and air quality for the region. As can be seen the air quality and emission sources within the Boonslick region are minimal compared to counties currently in the 1-hour boundary designation.

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Jersey	20,539	21,668	0.0	2.8	2.2	5.0	0.4	2.7	3.0	6.0
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Warren County has a population density of 56.9 persons per square mile, this equates to .089 persons per

acre. Montgomery County has a population density of 22.6 persons per square mile, this equates to .035 persons per acre. The U.S. Census Bureau defines an urbanized area as having more than 500 persons per square mile.

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Wright City	1,532	2.53	.94
Montgomery City	2,442	2.84	1.34

C. Monitoring Data

There are no fixed monitors within the Boonslick region.

D. Location of Emission Sources

The Boonslick region has limited emission sources that contribute to poor air quality. There are only a few large manufacturers within the region, the largest being only 800 employees, there are no power generation facilities within the region, congestion on the area roadways is minimal, and there are only a small number of industries clusters that are known to contribute to ozone pollution. A recent assessment by local governments reveals that there aren't even any dry-cleaning facilities in the region. The dry-cleaners in the region are merely collection and drop-off centers. The actual dry-cleaning is done at other facilities located outside the Boonslick region.

E. Traffic and Commuting Patterns

Traffic in the Boonslick region on the major corridors is considered heavy for a rural county, but would be considered light compared to roadways of similar designation in an urbanized area. The main roadways in the region and their ADT(at the busiest points) are listed below.

<u>Roadway</u>	<u>ADT</u>
Interstate 70	36,902
Highway 61	24,982
Highway 47 (Lincoln)	8,710
Highway 47 (Warren)	3,656
Highway 79	8,768
Highway 19	5,808

The Boonslick region has oft been considered as a “bedroom community”. A majority of the labor force within the region is employed outside of the county of their residence. The specific commuting numbers for each county are listed below. In relation to the effect on air quality in the St. Louis metropolitan area, the percentage of commuters may be high, but the volume is still considered relatively small. Only 14,000 people commute into St. Louis county, St. Louis city, and St. Charles County.

Destination County	County of Origin	Number of commuters	% of labor force
St. Louis City	Lincoln County	702	3.8%
St. Louis County	Lincoln County	2,738	14.89%
St. Charles County	Lincoln County	5,529	30.07%
St. Louis City	Warren County	311	2.60%
St. Louis County	Warren County	1,972	16.46%
St. Charles County	Warren County	2,967	24.77%
St. Louis City	Montgomery County	-	-
St. Louis County	Montgomery County	231	4.26%
St. Charles County	Montgomery County	362	6.68%

F. Expected Growth

Population within Lincoln and Warren County has been increasing at significant rates during the past decade. From 1990 to 2000 the population in Lincoln County increased by 34.8% and in Warren County the increase was 25.6%. These two counties are considered in the ten fastest growing counties in the State of Missouri, based on percentage of growth, however, during this same period the population grew only by 10,000 in Lincoln County, and 5,000 in Warren County. The magnitude of the growth appears large but in real numbers the growth is moderate.

The population projections for the year 2025 for this region are as follows:

Lincoln County	55,260
Warren County	36,273
Montgomery County	13,095

G. Meteorology

The Commission concurs with the finding in the 2000 recommendation that Lincoln and Warren Counties would be considered a “downwind” county during the peak ozone periods. The winds during the spring and summer generally blow from the south, southwest, which would transport any emissions within these counties away from the St. Louis metropolitan area.

H. Geography/Topography

The geography and topography within the Boonslick region is mixed. The region has a balance of open plains, rolling hills, and woodlands. The topography has no specific characteristics that would contribute to or impact the ozone pollution.

I. Jurisdictional Boundaries

The Boonslick region has been designated as a region since 1966. The jurisdictional boundary conflicts between this region and the St. Louis metropolitan area are numerous. These boundary conflicts will make it even more difficult to coordinate and implement air quality standards. These conflicts alone are sufficient to make the local governments within this region apprehensive to say the least. Two of the most notable jurisdictional issues are:

- a. East-West Gateway/Boonslick RPC-These two organizations were designated by the Missouri General Assembly to represent their respective regions. East-West Gateway serves the St. Louis Metropolitan area and is designated as a metropolitan planning organization by the Federal Highway Administration. This designation gives East-West Gateway resources and authority not available to rural regions. Boonslick Regional Planning Commission is designated as a rural planning organization and has a reduced level of authority, compared to an MPO, and limited resources to address air quality planning. Lincoln and Warren Counties are members of the Boonslick Regional Planning Commission.
- b. Transportation Districts-Lincoln and Warren Counties are in District 3 of the Missouri Department of Transportation, located in Hannibal. The remainder of the St. Louis metropolitan area is in District 6 of the Missouri Department of Transportation, located in St. Louis. The Boonslick region's governments desire to remain in District 3. This boundary conflict reaches beyond just lines on a map. District 3 in Hannibal covers a broad rural area, and as such the issues they deal with are different than in the metropolitan areas. District 3 does not have an air quality planner as is required within District 6. Congestion is not a really pressing issue within the majority of the Boonslick region. Therefore, CMAQ issues are addressed at the headquarters of MoDOT in Jefferson City.

J. Level of Control of Emissions Sources

Additional information regarding this factor will be developed.

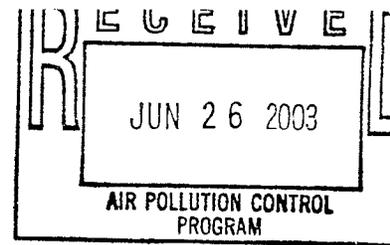
K. Regional Emissions Reductions

The emissions within the Boonslick region, according to the 2000 recommendation, are classified as low emissions density. The amount of emissions generated within the region is small. There are few large manufacturing facilities, there are no power generation facilities, and congestion on the roadways is minimal. If the region were to significantly reduce the emissions within this region it would have a minuscule, if even noticeable impact on the St. Louis region. Due to this region's inability to contribute significantly to the ozone reduction in the St. Louis metropolitan area it would not be practical to include this region in the boundary designation.

L. Conclusion

In conclusion, the unanimous opinion of local elected officials within the Boonslick region is to seek to a recommendation by the Governor that does not include Lincoln, Montgomery, and Warren counties in the 8-hour ozone boundary. The reason for this opinion is based upon the evidence presented above, plus the potential additional financial burden on residents and governments of this region. Our board concurs with the recommendation of the study taskforce to not include these counties in the 8-hour boundary.

Statement of Leland Daniels
United States Environmental Protection Agency, Region 7
June 26, 2002



My name is Leland Daniels and I am employed by the United States Environmental Protection Agency (EPA), located at 901 North 5th Street, Kansas City, Kansas 66101. I am here today to provide comments on behalf of the EPA.

After a review of the previous 1-hour ozone standard, we determined that it was not sufficiently protective of public health. In 1997, we promulgated a new national ambient air quality standard for ozone. It is commonly referred to as the 8-hour ozone standard. As a first step toward implementing this new ozone standard, we have asked states to recommend by July 15, 2003 which areas are attaining the 8-hour ozone standard and which areas are not attaining the standard. We will consider the state's recommendations when making a final determination. We intend to publish the final designations no later than April 15, 2004.

Because of the pervasive nature of ground-level ozone, our boundary guidance, dated March 28, 2000, states that the metropolitan statistical area, or MSA, is the presumptive boundary for a nonattainment area for those areas violating the standard or contributing to the air quality of the area. According to our guidance, the areas outside a MSA should be considered as well. During this summer, we will conduct a review of the state recommendations to determine that they are consistent with EPA's guidance, that the appropriate areas have been designated, that the area boundaries have been appropriately defined, that the recommendations are consistent with recommendations for other similar areas of the country. If we disagree with a

state's recommendation, we will inform the state in writing 120 days prior to publication of the final designations. Our intention is to send those letters to the states in October, 2003. The state would then have an opportunity to respond prior to our publishing the final designations.

Missouri has performed an evaluation and is currently recommending that the nonattainment boundaries for the Kansas City and St. Louis areas should be smaller than the MSA. Since this differs from the presumption of the MSA and since the Agency is looking for national consistency, Missouri must present a clear demonstration as to why this recommendation is reasonable. In addition, because Missouri has not recommended inclusion of areas outside the MSA, its analysis should also be clear as to why it is reasonable to exclude nearby counties. This would be especially helpful to us.

We have reviewed Missouri's evaluation, discussed it with MDNR, and made suggestions as to how to strengthen the document. Examples of the suggestions we have made include such things as:

- Consider including a discussion about the degree of existing emissions controls consistent with criterion number ten in our guidance.
- Identify those factors that influenced the designation decision and state why a particular decision was reached for a county.

Lastly, EPA, Region 7 wants to recognize and compliment the MDNR staff for the time and effort they spent working with community leaders and other stakeholders in both Kansas

City and St. Louis throughout this designation effort. We hope this communication and interaction continues as we work together toward attaining the 8-hour ozone standard.

This concludes my testimony. I will be happy to answer any questions the Commission may have.

ADDRESS #
HOURS
9 AM - 12:00 NOON
MON, WEDNESDAY & THURSDAYS
PHONE #
(314) 867-1207 • 1-800-894-7315
FAX 314-867-3312

County Commission
OF
STE. GENEVIEVE COUNTY
Ste. Genevieve, Missouri 63670



LINDA L. HERMANN
District #1 Commissioner

ALBERT J. FULTS
Presiding Commissioner

RAY H. GETTINGER
District #2 Commissioner

June 19, 2003

Missouri Air Quality Commission
Department of Natural Resources
Jefferson City MO 65102

Dear Sir or Madam:

As representatives of the Ste. Genevieve County community, we appreciate the opportunity to present to the MACC these comments for your consideration on the proposed recommendation on the eight-hour zone non-attainment designations. We also appreciated the Department's efforts in bringing together the interested parties in the work group sessions to help us learn about the issues and understand what it means for us and to allow us to share our views.

As part of the work group process, we were invited to make comments on the draft "Work Group Summary On A Proposed Recommendation for the Eight-Hour Ozone Non-Attainment Area Designations" that is the topic of this public hearing. We responded by letter dated May 22, 2003, a copy of which is attached, that requested some change in the document that incorporated a clarification of what constitutes a monitor "violation". We also requested removal of language that seems to single out Ste. Genevieve County for special consideration of re-evaluation for inclusion based on future growth potential. This should not be specific to Ste. Genevieve County.

However, we note that changes we requested in the document (as detailed in the May 22, 2003 letter) were not incorporated in the document that you have under consideration today. Therefore, we request that you consider and adopt those changes as detailed in the attached edited version of the "Work Group Summary."

We would like to reiterate that we support the department's conclusion that Ste. Genevieve County should not be included in the eight-hour ozone non-attainment area. We understand the importance of this issue, not only for us but for the entire region, and will continue to participate in this very important process.

Thank you for your consideration.

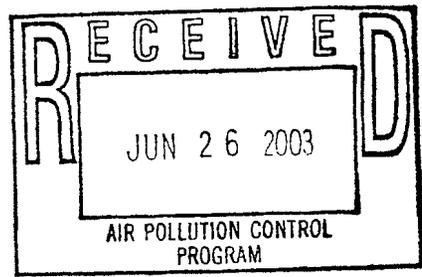
Sincerely,

Albert J. Fults, Presiding Commissioner

Linda L. Hermann, District #1 Commissioner

Ray H. Gettinger, District #2 Commissioner

SGCC/ck



**Comments By Presiding Commissioner of Ste. Genevieve County,
Albert Fults
Regarding the 8 – Hour Ozone Non Attainment Boundary
Recommendation for the St. Louis Area
Before the Missouri Air Conservation Commission
June 26, 2003**

Madam Chair, Members of the Commission, good morning. My name is Albert Fults and I am the Presiding Commissioner of Ste. Genevieve County. I reside at 5684 Dry Fork Rd, Festus, MO, in the north end of Ste. Genevieve County.

On behalf of all the citizens of Ste. Genevieve County I would like to thank you for this opportunity to express our thoughts on this critically important matter that is before you today.

Just a few short months ago we had very little idea of the process that led to the determination of how a boundary line was set for nonattainment areas. We are thankful and commend the Department for opening the process that led to the proposal before you today. The process was long and often confusing but we learned a lot and I believe you ended up with a better result because of it.

I only have a few brief comments, but before I begin I wanted to reiterate how important this matter is to all of Ste, Genevieve County. Unlike larger, more populous counties, our economy is small and fragile and cannot absorb large economic impacts such as those that could be imposed if we were part of a nonattainment area. As we initially learned of this proposal there was great concern that was expressed by all segments of our community. We only have 11 gas stations in the entire county, but I heard from each of them. Members of our city governments ... all three of them, spoke with me. Our business community as a whole and many individual citizens were worried. Even our School Board representatives were involved.

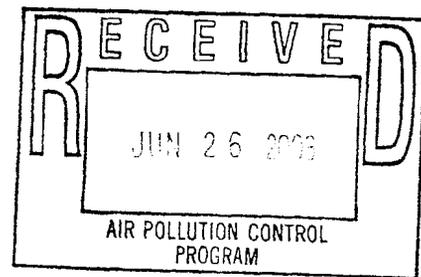
Although we don't plan to take up your valuable time this morning with each person testifying regarding this proposal, it is important that you recognize that a number of these people are in the audience this morning as a representative cross section of our County. Each one of them has taken their time - time they don't really have to spare - to come here this morning because they wanted you to know how personally concerned they are about this process. I assure you that we all share the same sentiments regarding this proposal. I also can tell you that many more would have come, but out of respect for the Commission and the process we attempted keep the numbers manageable.

A couple other individuals will speak this morning on behalf of Ste. Genevieve County and will offer some technical and business perspectives on the recommendation. I

support those comments as well, as they provide the foundation for what I have expressed here. In addition, we have submitted many comments and substantial factual information during this long process and we request that those submittals also be made a part of the record. In particular we have previously made specific recommendations regarding the wording of the recommendation. I have provided you another copy of that requested change as an attachment to my comments. We respectfully request that these wording changes be adopted.

In the end, it is our collective opinion that the decision not to include Ste. Genevieve County is the correct one. Although we have some minor concerns with the details, we all wholeheartedly support the final conclusion and urge the commission to adopt the basic recommendation with these minor changes.

Thank you. This concludes my comments and I would be happy to answer any questions you may have.



June 23, 2003

Missouri Air Conservation Commission
C/O Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

RE: Proposed Eight-Hour Ozone Boundary Recommendation for the St. Louis Nonattainment Area

Dear Commissioners:

On behalf of the Ste. Genevieve County Commissioners, I am submitting the enclosed report titled Evaluation of Ste. Genevieve County as a Potential Part of the St. Louis Proposed Eight-Hour Ozone Nonattainment Area. This letter summarizes the information in that report.

The Missouri Department of Natural Resources (DNR) has prepared a proposed recommendation regarding the establishment of the proposed boundary of the St. Louis eight-hour nonattainment area. That proposal will be the subject of a public hearing on June 26, 2003. Following this hearing, DNR staff will revise the document and submit it to you for adoption at the July 24, 2003 Commission hearing.

The proposed recommendation discusses the possible addition of new counties to the ozone nonattainment area including consideration of the addition of Ste. Genevieve County. The addition of Ste. Genevieve County to the nonattainment area is not warranted by the data and analysis in the technical support document. Based on the analysis contained in the attached report and on behalf of Ste. Genevieve County representatives, I wish to record my support for not including Ste. Genevieve County within the geographical boundaries of the St. Louis eight-hour ozone nonattainment area. This is consistent with the proposal of DNR staff.

The Commission should support the staff recommendation to exclude Ste. Genevieve County from the nonattainment area for the following reasons.

The Environmental Protection Agency, in a March 28, 2000 guidance document outlines eleven factors that should be considered when establishing the boundaries of the eight-hour ozone nonattainment area. These eleven factors can be boiled down to a single question that can be asked of any area that is



under consideration to be included in the area, "Are there substantial emissions in the area that should or could be further controlled to reduce elevated ozone levels in the nonattainment area?" With regard to Ste. Genevieve County, the answer to this question is an unequivocal "No".

With regard to the eleven factors that EPA suggests be considered:

Factor	Ste. Genevieve County Present Conditions
1. Emissions and air quality in adjacent areas	Represents only 1.7% of the proposed Nonattainment Area (NA) VOC emissions and 3.4% of the NA NO _x emissions
2. Population and degree of urbanization	Contains only 0.9% of the population of the proposed NA.
3. Monitoring data	The most recent data show that the one ozone monitoring site in the county shows attainment of the eight-hour ozone standard. Also, the monitoring site does not represent the impact of sources in Ste. Genevieve County on days when ozone tends to be elevated.
4. Location of emission sources	The emissions sources in Ste. Genevieve County are relatively distant from the NA.
5. Traffic and commuting patterns	Only 0.17% of the commuting trips to the proposed NA originate in Ste. Genevieve County.
6. Expected growth	In comparison to the proposed NA, Ste. Genevieve County population growth is very small. 1990 to 2000 county population growth was 2000 people (0.9% of the NA population).
7. Meteorology	Elevated ozone concentrations in the St. Louis area are not highly correlated with transport of ozone precursors from the county.
8. Geography / topography	There are no unique geographical or topographical features that would lend support to inclusion of Ste. Genevieve County.
9. Jurisdictional boundaries	The presumptive norm for the NA boundary is the C/MSA. Ste. Genevieve County is not within the St. Louis C/MSA.
10. Level of control	Major emission sources that have been constructed or undergone major modification since 1975 have Best Available Control Technology as a requirement for operation.

Factor	Ste. Genevieve County Present Conditions
11. Regional emission reductions	There are regional emission reductions on Electric Generating Units (EGUs) in eastern Missouri that have not yet been fully implemented. The impact of these reductions should be evaluated prior to expanding the nonattainment area boundaries.

Consideration of these factors confirms the DNR staff proposed recommendation that Ste. Genevieve County not be included in the eight-hour ozone NA.

The DNR staff recommendation and technical support document contain references to new sources proposed for Ste. Genevieve County that are presently in the DNR permitting process. Consideration of potential major new sources is inappropriate and these references should be removed from the final recommendation of DNR.

Major new sources or major modifications to existing sources are required to employ Best Available Control Technology (BACT). This emission limitation is more stringent than what is required of existing sources in a NA. (The level of emission control in a NA is Reasonably Available Control Technology [RACT].) Assuming the new sources referred to by DNR staff are built, they will be better controlled than what would be expected under the presumptive requirement of RACT. Further, while the sources that the DNR staff refers to are in the permitting system, a major new source could be proposed tomorrow for another county outside the proposed NA. The Prevention of Significant Deterioration (PSD) rules ensure that any major new source outside the NA will be well controlled and will not cause or contribute to a violation of an ambient standard within the nearby NA. For this reason, the discussion of proposed major sources in Ste. Genevieve County should be removed entirely from the final recommendation to the EPA.

The MDNR has adopted rules that will result in further emission reductions affecting the proposed NA. These rules have not yet been implemented. Before expanding the boundaries of the NA, DNR should evaluate the effectiveness of these rules in reducing ambient ozone concentrations at nonattainment monitors.

In summary, the information and analyses in the enclosed report support:

- ?? An eight-hour NA area definition that does not include Ste. Genevieve County consistent with the DNR staff recommendation, and
- ?? Removal of the discussion of potential new sources in Ste. Genevieve County.



Missouri Air Conservation Commission

June 25, 2003

Page 4

Thank you for this opportunity to comment on this important step in the process of implementing the eight-hour ozone standard in the St. Louis area.

Sincerely,

URS CORPORATION

A handwritten signature in black ink that reads "Ken Hagg".

Ken Hagg
Vice-President

Enclosure

EVALUATION OF STE. GENEVIEVE
COUNTY AS A POTENTIAL PART OF
THE ST. LOUIS PROPOSED EIGHT-
HOUR OZONE NONATTAINMENT
AREA

Prepared for
Ste. Genevieve County
Missouri

June, 2003

URS

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1001 Highlands Plaza Drive West
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Project 21561297

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1 Introduction

The Environmental Protection Agency (EPA) established a new eight-hour National Ambient Air Quality Standard (NAAQS) for ozone on July 17, 1997. There was litigation concerning that standard that delayed EPA's process to implement the new ozone NAAQS. That litigation has been decided and now EPA is moving forward with the implementation process.

The first step in the implementation process is to determine those areas that do not meet the new standard. EPA's analysis of monitored ozone data in the St. Louis Region shows that there are monitors in the region that do not meet this new NAAQS. Thus further action is required.

The next step is the setting of the geographical boundaries that define the extent of the area not attaining the new NAAQS (called the nonattainment area or NA). EPA is at this point in the implementation process.

The State of Missouri, through its Governor, has the responsibility to recommend to EPA the boundaries of the Missouri portion of the St. Louis eight-hour ozone NA. The EPA must notify any state of changes that EPA intends to make to the state recommended boundaries at least 120 days prior to April 15, 2004 and then must publish the final NA boundaries by April 15, 2004.

This document examines issues related to the establishment of the NA boundary for the St. Louis eight-hour NA and in particular, information related to the potential for inclusion of Ste. Genevieve County as part of the NA area.

1.1 Statutory Background

The federal Clean Air Act (CAA) contains the requirements governing the establishment of boundaries of NAs. Section 107(d) of the CAA states:

“(d) Designations.

(1) (A) Submission by Governors of Initial Designations Following Promulgation of New or Revised Standards. — By such date as the Administrator may reasonably require, but not later than 1 year after promulgation of a new or revised national ambient air quality standard for any pollutant under section 109, the Governor of each State shall (and at any other time the Governor of a State deems appropriate the Governor may) submit to the Administrator a list of all areas (or portions thereof) in the State, designating as—

(i) nonattainment, any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for the pollutant,

(ii) attainment, any area (other than an area identified in clause (i)) that meets the national primary or secondary ambient air quality standard for the pollutant, or

(iii) unclassifiable, any area that cannot be classified on the basis of available information as meeting or not meeting the national primary or secondary ambient air quality standard for the pollutant.

The Administrator may not require the Governor to submit the required list sooner than 120 days after promulgating a new or revised national ambient air quality standard.

(B) Promulgation by EPA of Designations. —

(i) Upon promulgation or revision of a national ambient air quality standard, the Administrator shall promulgate the designations of all areas (or portions thereof) submitted under subparagraph (A) as expeditiously as practicable, but in no case later than 2 years from the date of promulgation of the new or revised national ambient air quality standard. Such period may be extended for up to one year in the event the Administrator has insufficient information to promulgate the designations.

(ii) In making the promulgations required under clause (i), the Administrator may make such modifications as the Administrator deems necessary to the designations of the areas (or portions thereof) submitted under subparagraph (A) (including to the boundaries of such areas or portions thereof). Whenever the Administrator intends to make a modification, the Administrator shall notify the State and provide such State with an opportunity to demonstrate why any proposed modification is inappropriate. The Administrator shall give such notification no later than 120 days before the date the Administrator promulgates the designation, including any modification thereto. If the Governor fails to submit the list in whole or in part, as required under subparagraph (A), the Administrator shall promulgate the designation that the Administrator deems appropriate for any area (or portion thereof) not designated by the State.

(iii) If the Governor of any State, on the Governor's own motion, under subparagraph (A), submits a list of areas (or portions thereof) in the State designated as nonattainment, attainment, or unclassifiable, the Administrator shall act on such designations in accordance with the procedures under paragraph (3) (relating to redesignation).

(iv) A designation for an area (or portion thereof) made pursuant to this subsection shall remain in effect until the area (or portion thereof) is redesignated pursuant to paragraph (3) or (4)."

The recommendation of the State of Missouri called for in section 107(d)(1)(A) is presently the subject of consideration by the Missouri Air Conservation Commission (MACC).

1.2 Policy Background

The EPA issued a guidance document¹ to suggest to states the factors that should be considered in making NA recommendations. That guidance was first issued in March of 2000. At that time the litigation surrounding the new ozone standard was not fully decided. The EPA then reissued the guidance in November of 2002.

This guidance contains the documentation that EPA requests from states to support their recommendations on the boundaries of eight-hour ozone NA areas.

1.2.1 Information to Support State Recommendations

The EPA outlines eleven types of information that should be considered and included with a state's recommended NA boundaries:

1. Emissions and air quality in adjacent areas (including adjacent C/MSAs)
2. Population density and degree of urbanization including commercial development (significant difference from surrounding areas)
3. Monitoring data representing ozone concentrations in local areas and larger areas (urban or regional scale)
4. Location of emission sources (emission sources and nearby receptors should generally be included in the same nonattainment area)
5. Traffic and commuting patterns
6. Expected growth (including extent, pattern and rate of growth)
7. Meteorology (weather/transport patterns)
8. Geography/topography (mountain ranges or other air basin boundaries)
9. Jurisdictional boundaries (e.g., counties, air districts, existing one-hour nonattainment areas, Reservations, etc.)
10. Level of control of emission sources
11. Regional emission reductions (e.g., NO_x SIP call or other enforceable regional strategies)

The Missouri Department of Natural Resources (DNR) provides information on these factors in its proposed recommendation on the NA boundaries² and a supporting technical document³

¹ Boundary Guidance on Air Quality Designations for the 8-Hour Ozone National Ambient Air Quality Standards (NAAQS or Standard), John Seitz, Director OAQPS, March 28, 2000.

² Workgroup Summary on A Proposed Recommendation for the 8-Hour Ozone Nonattainment Area Designations. (The recommendations are for the St. Louis NA and the Kansas City NA.)

³ Technical Support Document for Determination of Nonattainment Boundaries in Missouri for the 8-hour Ozone National Ambient Air Quality Standard.

1.3 DNR Process to Develop Recommendation

The DNR convened a workgroup made up of parties with an interest in the state's recommendation regarding the NA boundary. The workgroup included representatives of local governments (including representatives of Ste. Genevieve County) as well as representatives of commercial and industrial interests and environmental groups.

Though the DNR provided the various interests with an opportunity to discuss issues related to the establishment of the NA boundary, the DNR states in its document that: "... this document does not reflect a consensus of the stakeholders that participated in the workgroup discussions."

1.4 DNR Recommendation

The DNR recommends that the Missouri portion of the St. Louis eight-hour ozone NA include the following political subdivisions:

- St. Louis City,
- St. Louis County,
- St. Charles County,
- Franklin County, and
- Jefferson County

This recommendation sets the proposed NA boundary exactly as it was of the previous one-hour ozone NAAQS.

1.5 Ste. Genevieve Role and Interest

The DNR proposed recommendation considered the possible expansion of the NA to potentially include:

- Pike County
- St. Francois County
- Lincoln County
- Warren County
- Crawford County
- Washington County
- Montgomery County
- Gasconade County, and
- Ste. Genevieve County,

As a county that was part of DNR's evaluation process, Ste. Genevieve County has a keen interest in DNR's proposed recommendation and the ultimate outcome of this process.

2 Application of EPA Regulations and Policy

EPA policy specifies the process that should be followed in order to develop boundaries for eight-hour ozone nonattainment areas. The policy says:

"... In reducing ozone concentrations above the NAAQS, EPA believes it is best to consider controls on sources over a larger area due to the pervasive nature of ground level ozone and transport of ozone and its precursors. Thus, EPA recommends that the Metropolitan Statistical Area or the Consolidated Metropolitan Statistical Area (C/MSA) serve as the presumptive boundary for 8-hour NAAQS nonattainment areas.⁴ We believe this approach will best ensure public health protection from the adverse effects of ozone pollution caused by population density, traffic and commuting patterns, commercial development, and area growth. In the past, areas within C/MSAs have generally experienced higher levels of ozone concentrations and ozone precursor emissions than areas not in C/MSAs. In addition, the 1990 Amendments to the CAA established the C/MSA as the presumptive boundary for ozone nonattainment areas classified as serious, severe and extreme."

2.1 Areas Which Must Be Considered

The EPA guidance on setting NA boundaries suggests that the boundaries of the Consolidated Metropolitan Statistical Area (CMSA) serve as the presumptive NA boundaries. In the case on the St. Louis NA, those counties include:

- Franklin County,
- Jefferson County,
- Lincoln County,
- St. Charles County,
- St. Louis County,
- Warren County, and
- St. Louis City.

⁴ C/MSAs are identified by the U.S. Bureau of the Census and can be found at:
<http://www.census.gov/population/www/estimates/aboutmetro.html>.

Each of these political subdivisions was considered by the DNR as part of the formulation of their proposed recommendation.

2.2 Areas Which May Be Considered

The EPA guidance on NA boundaries states:

“In some cases, the most appropriate nonattainment area boundary may be larger than the C/MSA. For example, if sources located in a county or on Indian lands outside the C/MSA contribute to violations within the C/MSA, States or Tribes should consider whether it would be appropriate to expand the nonattainment area to include the area in which those sources are located.”

The DNR considered the following additional counties:

- Pike County,
- St. Francois County,
- Ste. Genevieve County,
- Crawford County,
- Washington County,
- Montgomery County, and
- Gasconade County.

2.3 Consideration of Ste. Genevieve County

The sections below consider the possible addition of Ste. Genevieve County to the proposed NA definition relative to the eleven evaluation factors suggested in the EPA guidance. For those evaluation factors where appropriate, this analysis uses the one-hour ozone NA (also DNR's proposed recommendation) as the baseline for the evaluation of Ste. Genevieve's potential addition to the NA.

2.3.1 Emissions and Air Quality

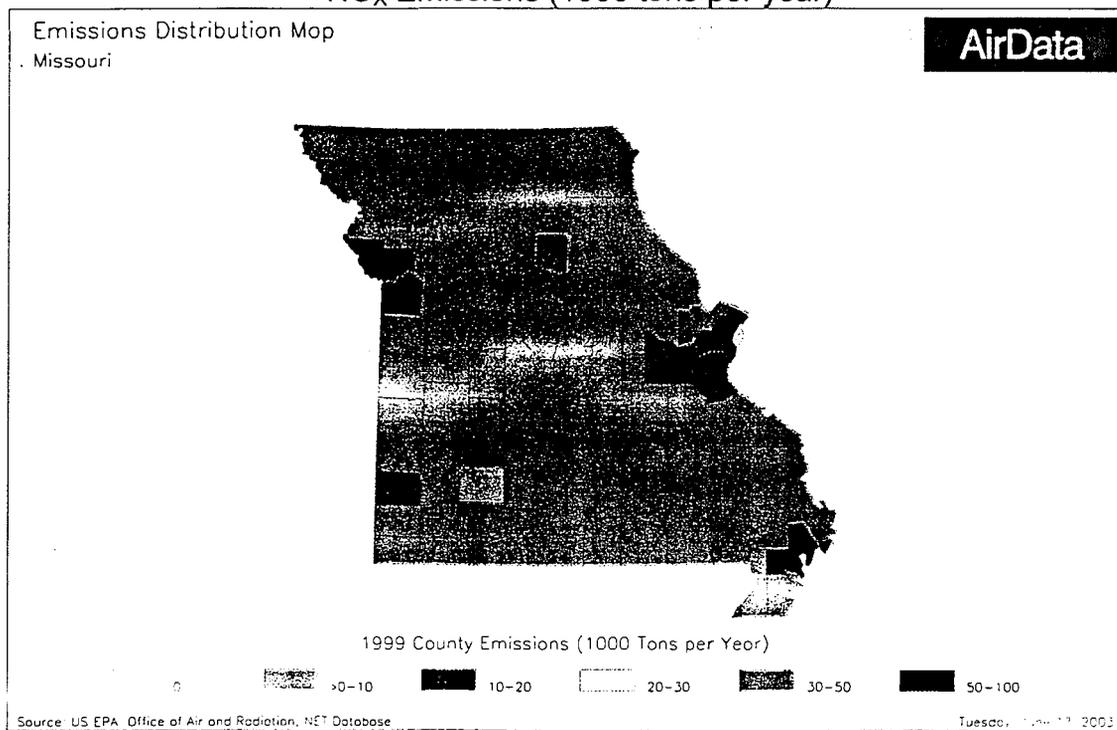
Emissions of ozone precursors (Nitrogen Oxides [NO_x] and Volatile Organic Compounds [VOC]) are low in Ste. Genevieve County when compared to the emissions for the entire recommended Nonattainment Area.

The table below shows VOC and NO_x emissions for the recommended nonattainment area and the percent of the emissions that would be added if the nonattainment area were to include Ste. Genevieve County. Ste. Genevieve County VOC and NO_x emissions are about one quarter of the emissions located in Franklin County, the county with the least emissions of the counties in the recommended nonattainment area.

County	Total VOC (TPD)	Percent of NA Area	Total NO _x (TPD)	Percent of NA Area
St. Louis	138.9	54.0%	184.5	40.0%
St. Charles	34.3	13.3%	103.7	22.5%
Jefferson	21.1	8.2%	59.5	12.9%
St. Louis City	45.7	17.8%	57.9	12.6%
Franklin	17.3	6.7%	55.4	12.0%
NA Area (Missouri Portion)	257.3	100.0%	461	100.0%
Ste. Genevieve	4.5	1.7%	15.7	3.4%

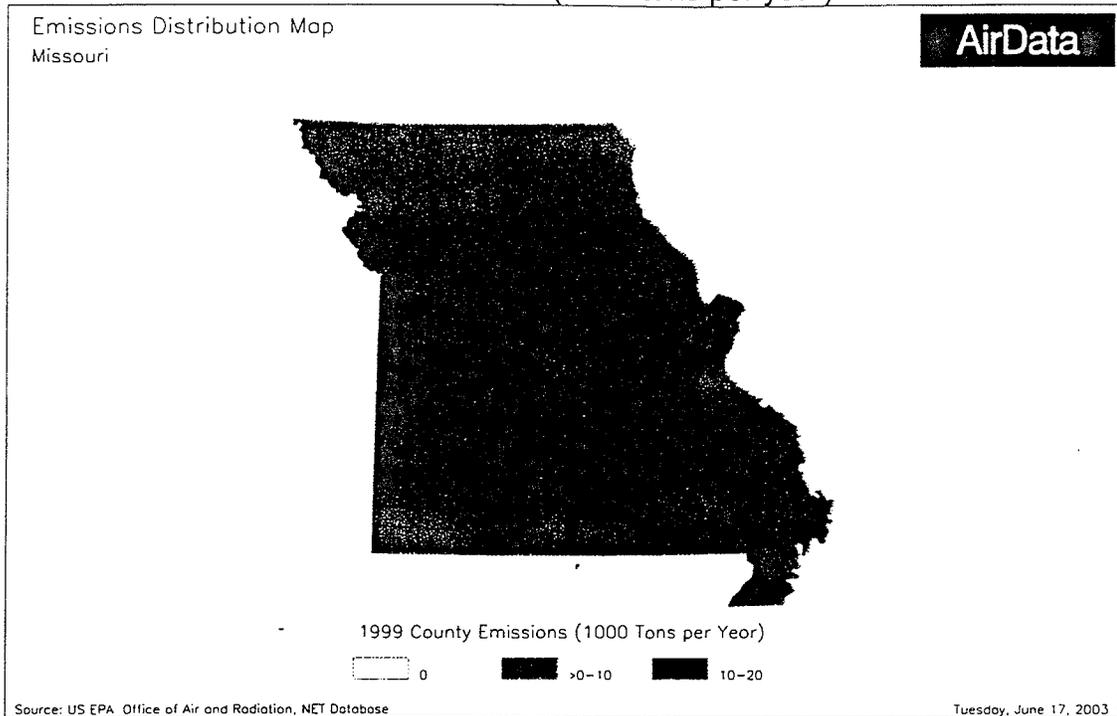
EPA has mapped 1999 emissions on their website⁵. The maps below show that emissions from Ste. Genevieve County are in the lowest emissions interval mapped for the State of Missouri.

NO_x Emissions (1000 tons per year)



⁵ <http://www.epa.gov/air/data/emisdist.html>

VOC Emissions (1000 tons per year)



The emissions data for Ste. Genevieve County clearly support the DNR recommendation that Ste. Genevieve County not be in the proposed NA.

2.3.2 Population Density

Ste. Genevieve County is a rural area with a very small population (0.9% of the base case) and a low population density. The table below shows population and population density statistics.

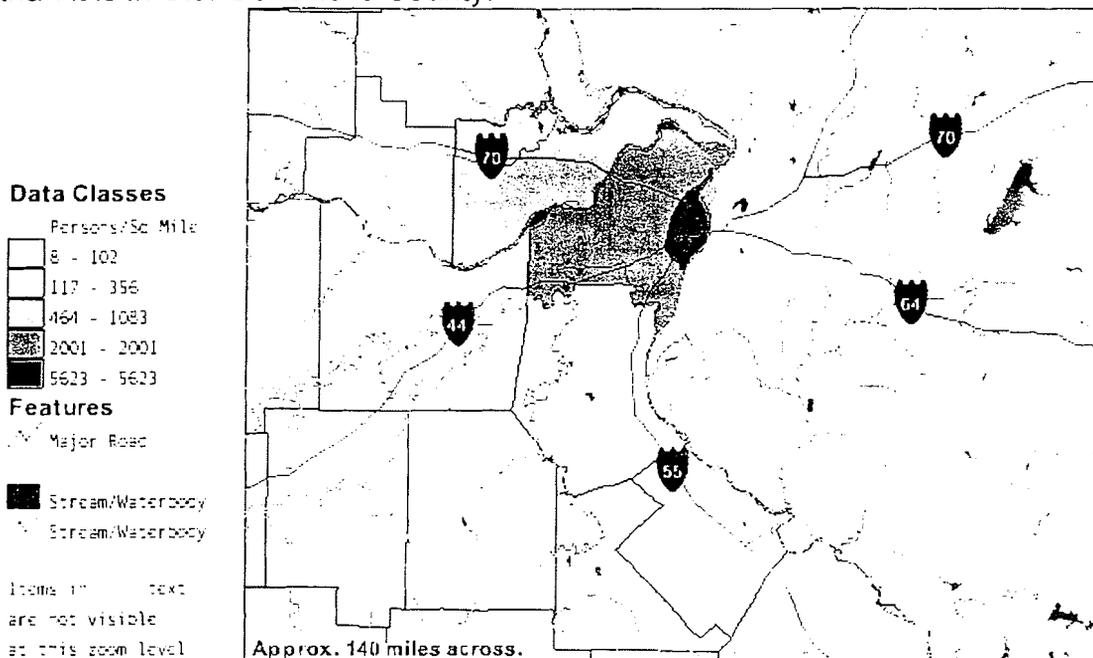
<i>County</i>	<i>2000 Census Population Density (1000 persons / sq. mi.)⁶</i>	<i>2000 Census Population⁷ (1000)</i>	<i>Population - Percent of NA Area</i>
St. Louis	2,001.4	1016	52.4%
St. Charles	506.6	284	14.6%
Jefferson	301.6	198	10.2%
St. Louis City	5,622.9	348	17.9%
Franklin	101.7	94	4.8%
NA Area (Missouri Portion)		1940	100.0%

⁶ Data from US Census Bureau <http://factfinder.census.gov/servlet/GCTTable>

⁷ Data from DNR Technical Support Document

County	2000 Census Population Density (1000 persons / sq. mi.) ⁶	2000 Census Population ⁷ (1000)	Population - Percent of NA Area
Ste. Genevieve	35.5	18	0.9%

The figure on the following page⁸ shows the population density for the counties that comprise the recommended NA and surrounding counties. This figure shows that the population density in counties within the proposed NA is greater than it is in Ste. Genevieve County.



These data support DNR's recommendation to not include Ste. Genevieve County in the NA.

2.3.3 Monitoring Data

The only ozone monitoring site in Ste. Genevieve County is located in Bonne Terre. The figure below⁹ shows the location of the site. DNR states that "...wind flows from the south are the most common for high 1-hour and 8-hour ozone episodes in St. Louis"¹⁰. The map shows that the Bonne Terre ozone monitor is not downwind of Ste. Genevieve County sources when there are wind flows from the south. Elevated ozone levels recorded at this monitor are not likely to be related to sources in Ste. Genevieve County. DNR, in its Technical Support Document, states: "Northerly winds will produce exceedences at the Arnold and/or BonneTerre monitoring locations, but are less frequent than the other

⁸ Figure taken from the US Census Bureau

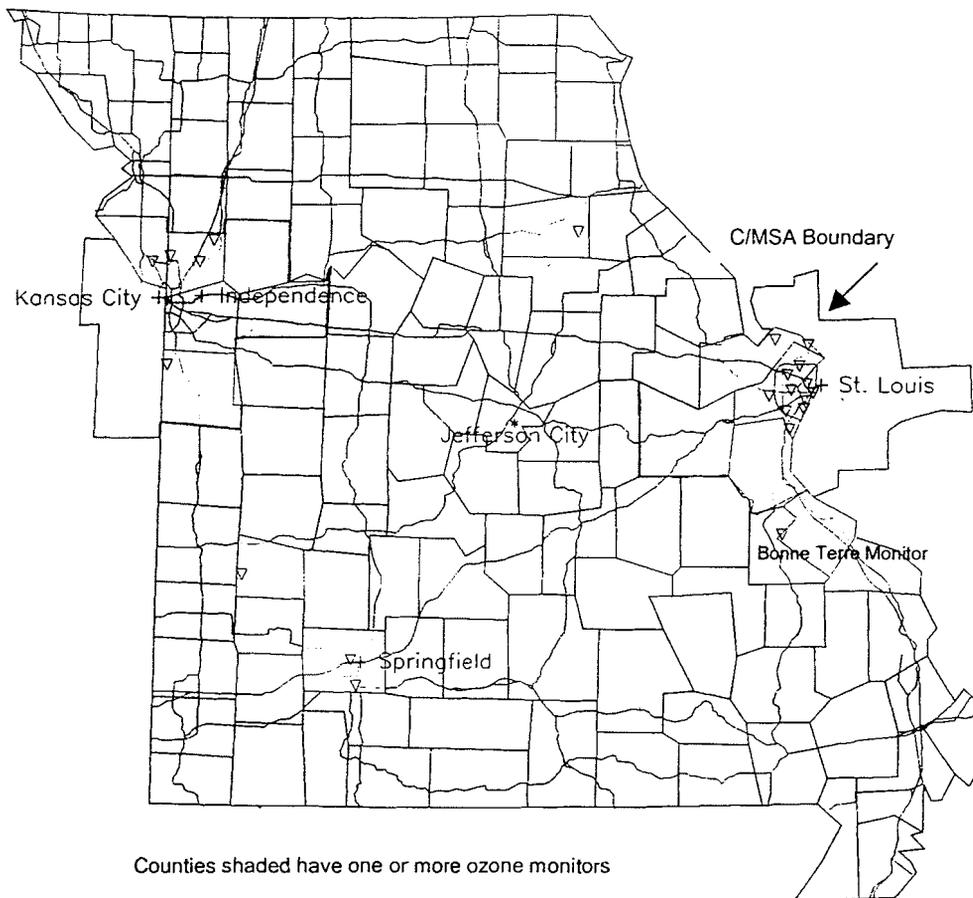
<http://factfinder.census.gov/servlet/ThematicMapFramesetServlet>

⁹ Figure taken from EPA website <http://www.epa.gov/air/data/monloc.html?st~MO~Missouri>.

¹⁰ DNR Technical Support Document

flows listed above.” Consistent with the DNR recommendation, including Ste. Genevieve County in the NA on the basis of data collected at this monitor is not technically justified.

Ozone Monitoring Sites in Missouri



Nonetheless, the data in the following table shows that the three-year average ozone level for the most recent period (2000 to 2002) is below the NAAQS for ozone.

Three-Year Average Ozone Levels in Eastern Missouri
(ppb)

Monitor	95-97	96-98	97-99	98-00	99-01	00-02
	Average	Average	Average	Average	Average	Average
West Alton	100	95	95	94	90	90
Orchard Farm	93	90	91	92	90	90

Monitor	95-97	96-98	97-99	98-00	99-01	00-02
S. Lindbergh	83	84	89	89	88	89
Queeny Park	81	82	85	90	88	88
Newstead	83	81	83	-	-	-
Margaretta						88
Arnold	90	87	92	91	89	86
Ferguson	88	87	89	88	85	86
St. Ann	85	84	87	87	-	-
Breckenridge						86*
Bonne Terre		88	88	90	85	84
Clayton – Hunter	83	81	82	83	81	84
S. Broadway	82	79	79	81	81	82
Clark & Tucker	72	75	78	74	73	73

* Breckenridge design value based on 2000-01 data
BOLD denotes monitors that exceed the 85 ppb cutoff

Monitoring data show that Ste. Genevieve County should not be in the NA since the ozone monitor in the county shows attainment.

2.3.4 Location of Emission Sources

The largest ozone precursor emission sources in Ste. Genevieve County are about 25 miles from the nearest monitor showing nonattainment of the eight-hour ozone NAAQS. (This is the Arnold monitor that shows ozone levels only slightly above [86 ppb compared to the cutoff of 85 ppb] the NAAQS.) These sources are not local to the St. Louis area ozone nonattainment monitors.

2.3.5 Traffic and Commuting Patterns

The 2000 census data contain information concerning commuting patterns between resident and workplace counties in Missouri¹¹. These data show that about 21% (1,723 trips) of the work-trips from Ste. Genevieve County were to the proposed NA. Conversely, about 0.17% of the work-trips into the proposed NA were from Ste. Genevieve County.

These data support the DNR recommendation to not include Ste. Genevieve County in the eight-hour ozone NA.

2.3.6 Expected Growth

As shown in the table below, population growth between the 1990 census and the 2000 census was 4.5% for the proposed NA. Population growth in Ste.

¹¹ US Census Bureau Website
http://www.census.gov/population/cen2000/commuting/2KRESKO_MO.xls and
http://www.census.gov/population/cen2000/commuting/2KWRKCO_MO.xls

Genevieve County was 12.5%; however, because the 1990 population was small, this represented a growth of only 2,000 residents. In 1990, Ste. Genevieve County population was about 0.8% of the population of the proposed NA. In 2000, this percentage was about 0.9%.

<i>County</i>	<i>2000 Census (1,000)</i>	<i>1990 Census (1,000)</i>	<i>Population Growth (1,000)</i>	<i>Population Growth (%)</i>
St. Louis	1,016	994	22	2.2%
St. Charles	284	213	71	33.3%
Jefferson	198	171	27	15.8%
St. Louis City	348	397	-49	-12.3%
Franklin	94	81	13	16.0%
NA Area (Missouri Portion)	1,940	1,856	84	4.5%
Ste. Genevieve	18	16	2	12.5%

1990 to 2000 population growth in Ste. Genevieve County was less than that in each of the Missouri counties in the proposed NA except for St. Louis City, which lost population during that period. Population growth does not make Ste. Genevieve a candidate for inclusion in the St. Louis eight-hour ozone NA.

2.3.7 Meteorology

The DNR technical support document demonstrates that elevated ozone concentrations are associated with calm wind conditions, winds from the east, west, southeast, south and southwest. Furthermore, when elevated concentrations do coincide with southerly winds, many times ozone and ozone precursors are being transported into from Missouri from other states. The analysis of meteorological conditions does not provide strong support for inclusion of Ste. Genevieve County in the nonattainment area.

2.3.8 Geography

Geographical features, by themselves are not a major influence on ozone levels in the St. Louis region.

2.3.9 Jurisdictional Boundaries

Ste. Genevieve County is not in the St. Louis CMSA or the previous nonattainment area for the one-hour ozone NAAQS.

Jurisdictional boundaries do not support the inclusion of Ste. Genevieve County in the St. Louis eight-hour NA. Emissions of ozone precursors (Nitrogen Oxides [NO_x] and Volatile Organic Compounds [VOC]) are low in Ste. Genevieve County

when compared to the emissions for the entire recommended Nonattainment Area.

2.3.10 Level of Control

The counties in the proposed St. Louis eight-hour ozone NA are subject to the broad set of regulatory requirements that were put in place to achieve the one-hour ozone NAAQS. Within Ste. Genevieve County, major new sources or major modifications permitted since 1975 have been subject to Best Available Control Technology (BACT) emission limitations for ozone precursors. BACT represents the best or highest level of emission control (taking into account economic, environmental, and energy considerations), determined on a case-by-case basis, for each major new source or modification. BACT represents a more stringent level of control than Reasonably Available Control Technology (RACT) limits applied to existing sources in the existing nonattainment area. Future major new source construction and all modifications to existing sources in Ste. Genevieve County will be subject to the more restrictive BACT limits. Thus the existing and future levels of control for ozone precursors support the exclusion of Ste. Genevieve County from the St. Louis nonattainment area.

2.3.11 Regional Emission Reductions

The DNR has adopted NO_x emissions control requirements for Electric Generating Units (EGUs) located outside of the proposed eight-hour ozone NA. There are no EGUs affected by this requirement in Ste. Genevieve County; however, this regional requirement demonstrates how the DNR can put in place requirements on existing sources outside of the St. Louis ozone NA if it is shown that that is necessary to bring about attainment of the NAAQS.

The ability of the DNR to adopt regional emission reductions, if necessary, is consistent with not including Ste. Genevieve County in the St. Louis eight-hour ozone NA.

2.3.12 Summary of Evaluation Factors

Factor	Ste. Genevieve County
1. Emissions and air quality in adjacent areas	Does not support inclusion
2. Population and degree of urbanization	Does not support inclusion
3. Monitoring data	Does not support inclusion

Factor	Ste. Genevieve County
4. Location of emission sources	Does not support inclusion
5. Traffic and commuting patterns	Does not support inclusion
6. Expected growth	Does not support inclusion
7. Meteorology	Meteorology patterns are variable and do not fully support inclusion
8. Geography / topography	Does not support inclusion
9. Jurisdictional boundaries	Does not support inclusion
10. Level of control	Does not support inclusion
11. Regional emission reductions	Does not support inclusion

3 Conclusion

Evaluation of the eleven factors outlined in EPA's guidance concerning the definition of the eight-hour ozone NA leads to the recommendation proposed by the DNR.

The recommendation for the NA boundary as it relates to Ste. Genevieve County is clear and summarized in the following section.

3.1 Recommended Status of Ste. Genevieve County

Based on evaluation of the eleven criteria contained in EPA's guidance memorandum concerning boundaries for the eight-hour ozone NA, Ste. Genevieve County should not be a part of the NA.

Further, the potential for future growth due to major new sources or modifications should have no bearing on Missouri's recommendation to EPA regarding the NA boundary. Major new sources and modifications must be well controlled as a result of DNR's New Source Review Program in order to receive a permit - better controlled than existing sources. The language relating to new sources in the DNR proposed recommendation should be removed.

3.2 Basis for Recommendation

For DNR to recommend that Ste. Genevieve County be part of the eight-hour ozone NA, the collective evaluation of the eleven factors outlined in EPA's guidance memorandum should point to adding this county. As shown in the analysis above, this is not the case. In fact, one of the eleven evaluation criteria even partially supports the inclusion of Ste. Genevieve County in the NA.