

Springfield Sulfur Dioxide and
Ozone Reconsideration Status Meeting
Wednesday, November 17, 2010

11 a.m. – 1 p.m.

Midtown Carnegie Branch Library Community Room
397 East Central Street
Springfield, MO

The following summarizes the comments and responses discussed during the meeting proceedings. Attached separately are the presentation materials from the southwest Missouri/Springfield area outreach meeting to discuss the final Sulfur Dioxide, or SO₂, standard and the pending final Ozone standard. Thirty-four attendees participated in the outreach meeting.

Sulfur Dioxide Questions

Q: Does the Air Program expect to recommend nonattainment areas based on county boundaries?

Response: Each of the three areas with monitored violations (based on 2007-2010 data) of the new SO₂ standard have monitors located within 2-3 miles of county and/or state boundaries. The final SO₂ rule states the presumptive boundary for designating areas is the county boundary, unless additional area specific information demonstrates otherwise. We are considering single-county nonattainment areas as a starting point, consistent with EPA guidance. When our analysis is complete, we will determine whether the technical evidence (e.g., emissions, meteorology and population) suggests nonattainment areas that are larger or smaller than single counties. The county boundary approach to designating areas is subject to change based on pending EPA guidance.

Q: What is the SO₂ source designated by the large star on slide 8 near the Jasper County line?

Response: The Empire District Electric Company - Asbury Power Plant.

Q: Will the Air Program provide information to affected areas/counties (including specific SO₂ sources) to allow for adequate lead time to prepare for infrastructure plan requirements, respond to information collection activities, etc. by the June 2013 deadline for these plans? Counties and SO₂ sources would like to know what will be required in advance and in general, would like to receive updates regarding the latest plans and other developments.

Response: The Air Program is responsible for developing the infrastructure plans with input from affected sources and other stakeholders as needed. The Air Program intends to provide information to affected areas on a timely basis and expects there will be specific controls and additional requirements primarily for larger SO₂ sources rather than regional SO₂ controls. Furthermore, the Air Program expects to work directly with affected larger SO₂ sources to allow for adequate preparation prior to implementing controls and requirements.

Q: Is there anything metropolitan planning organizations, or MPOs, need to provide the Air Program and/or any formal commitments regarding the SO₂ standard?

Response: Compared to ozone and its precursors, SO₂ emissions are linked more closely to local stationary sources and are not impacted significantly by the transportation sector

(particularly after federal low sulfur gasoline and diesel requirements have been implemented). At this time, the Air Program does not anticipate significant commitment from MPOs related to the SO₂ standard and the focus will be to work directly with large SO₂ sources.

Q: Does the Air Program anticipate Greene County will be designated as a SO₂ nonattainment area?

Response: Yes, based on monitored violations of the new SO₂ standard, the Air Program expects the Springfield/Greene County area will likely be designated as a SO₂ nonattainment area (along with the Jackson County area and the Jefferson County area). EPA guidance is expected to provide additional considerations; however, due to the established June 2011 deadline for initial boundary designation recommendations, the Air Program expects the remainder of the state will likely be designated as unclassifiable.

Q: In practical terms, what will be the impact on individual companies wanting to locate in SO₂ unclassifiable areas versus SO₂ nonattainment areas?

Response: Companies seeking to expand or locate in such areas would only be impacted by the SO₂ plans if they generate SO₂ emissions. SO₂ sources in both unclassifiable and nonattainment areas will both be subject to applicable permitting requirements as well as applicable federal and state air pollution control rules. We also anticipate that pending/proposed federal rules (Transport Rule, boiler and utility MACTs) will contribute significant SO₂ emission reductions that could result in minimal need for additional local controls in areas such as Springfield with design values relatively close to the standard. Until we have the implementation guidance from EPA outlining the requirements in nonattainment and unclassifiable areas, we will not know exactly what the differences are between these types of areas. EPA plans to issue draft guidance in early 2011 and finalize the guidance in the summer of 2011.

Our intended approach is to address areas with projected violations based on modeling via the infrastructure plan requirements for unclassifiable areas rather than to formally redesignate additional areas as SO₂ nonattainment in the next few years. We understand SO₂ infrastructure plans will include control requirements, attainment demonstrations and contingency measures – similar to traditional plans for other air quality standards. This intended approach should work better with the SO₂ implementation timeline already established to ensure all areas are in compliance with SO₂ standards by the August 2017 deadline. This approach will depend largely on flexibility included in EPA guidance.

Q: Please describe your modeling process – is it computer generated? If so, where does the Air Program obtain the input data? How confident are you with the data quality?

Response: The model used for evaluating SO₂ emission sources is computer-based. Modeling inputs are quality assured and are obtained primarily from permit conditions, emission limits, maximum hourly design rates, and Emissions Inventory Questionnaires. The Air Program continues to scrutinize SO₂ emissions inventory information for medium and large SO₂ sources (and as resources allow for small and area SO₂ sources) and will narrow this focus based on EPA guidance. The Air Program plans to work with affected SO₂ sources to ensure that all inputs used in the refined modeling analysis are accurate and representative of the sources' operations.

One final point regarding the SO₂ discussion – many of the terms used for both ozone and SO₂ have quite different implications in each arena. For example, unclassifiable ozone areas typically do not have to implement controls while unclassifiable SO₂ areas will be further assessed/detailed via refined dispersion modeling and will consequently be subject to controls or compliance requirements. For ozone, similar compliance requirements are typically applicable in nonattainment areas only, rather than also in unclassifiable areas. Furthermore, infrastructure plans/requirements are expected to be quite different for SO₂ compared to historical applications for ozone areas.

Ozone Questions

Q: If the monitor in El Dorado Springs were to be designated nonattainment, would the Air Program engage other areas/states in regards to transport of pollution to the monitor?

Response: This monitor was historically established as a “background monitor” to assess ozone levels entering the state via transport. As in the previous designation recommendation, the Air Program expects to recommend Cedar County as a “rural transport” monitor based on monitored levels at El Dorado Springs. “Rural transport” means there are no major anthropogenic sources in the county that are directly contributing to the monitored ozone levels. Rather, the monitor’s ozone values are being impacted by sources outside the immediate area of the monitor. This classification is different than just being designated as a normal nonattainment area as it recognizes that there is little if anything the county can do to reduce the monitor’s ozone values.

Q: What does the Air Program intend to do about the high values being recorded for the first two years at the monitor in Alba (Jasper County)? Will the Air Program submit a recommendation for this monitor?

Response: At this point, the monitor will only have two years of data by the time the EPA’s court ordered deadline to release their final ozone values occurs in late August 2011. If this date is pushed back, it is possible that the monitor will have three years of data that have not been quality assured by the deadline. EPA does have the ability to postpone classifications for one year for an area. They did this nationwide with the designation submitted under the 2008 ozone standard, and also did it for specifically for Kansas City under the 1997 ozone standard in the early 2000s. The Air Program expects to review high ozone values recorded at this monitor and identify areas impacting these ozone levels. As this is another urban area on the boarder with other states (much like Kansas City and St. Louis), this work will require the Air Program to contact and work with Oklahoma, possibly Arkansas and EPA’s Region 5 to identify sources impacting the monitor.