



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

JUN 11 2018

Mr. Jim Gulliford
Regional Administrator
U.S. EPA, Region VII
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Gulliford:

The Missouri Department of Natural Resources' Air Pollution Control Program (air program) hereby withdraws both the request for EPA consideration and the associated request for EPA approval of the following Missouri State Implementation Plan (SIP) submittal:

Nonattainment Area Plan for the 2010 1-Hour Sulfur Dioxide National Ambient Air Quality Standard – Jackson County Sulfur Dioxide Nonattainment Area, with the exception of the associated baseline emissions inventory

The air program submitted this SIP action to EPA on October 9, 2015. EPA deemed the action complete by operation of law on or about April 9, 2016.

On May 4, 2018, the air program submitted to EPA a Clean Data Determination (CDD) request confirming the Jackson County SO₂ Nonattainment Area has attained the standard. The May 4 submittal is based on the most recent three years (2015–2017) of complete and quality assured ambient air monitoring data. The data represents a three year design value less than the 2010 1-hour SO₂ standard of 75 parts per billion. The CDD, and associated ambient air monitoring data, demonstrates the control strategy for the area has indeed improved ambient air quality and reduced SO₂ concentrations to a level in compliance with the 2010 1-hour SO₂ standard.

In the memorandum of April 23, 2014, from Steve Page, Director, EPA Office of Air Quality Planning and Standards to the EPA Air Division Directors "Guidance for 1-hr SO₂ Nonattainment Area SIP Submissions," the EPA explained its intention to extend the Clean Data Policy to 1-hour SO₂ nonattainment areas that attained the standard. Under the Clean Data policy, the EPA interprets the requirements of the CAA that are specifically designed to help an area achieve attainment, such as attainment demonstrations and implementation of reasonably available control measures (including reasonably available control technology), reasonable further progress (RFP) demonstrations, and contingency measures, to be suspended as long as air quality continues to meet the standard. Furthermore, the requirements are completely eliminated after the area is redesignated to attainment.

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Therefore, the air program is withdrawing the October 9, 2015 SIP submittal, for which requirements to submit are to be suspended through the CDD. By withdrawing the 2015 SIP submittal, with the exception of the baseline emissions inventory, EPA is no longer obligated to act on this plan which perhaps will streamline approval of subsequent SIP actions.

In addition to this request for withdrawal, the air program is preparing a pending EPA submittal for the *Redesignation Request and Maintenance Plan for the 2010 Sulfur Dioxide Standard Jackson County Nonattainment Area*. This maintenance plan will ensure continued compliance with the 2010 SO₂ standard.

Thank you for the opportunity to revisit this SIP action request and associated SIP submittal. If you have any questions regarding this SIP withdrawal, please contact Ms. Emily Wilbur with the Missouri Department of Natural Resources' Air Pollution Control Program at P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Darcy A. Bybee
Director

DAB:brc