



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

www.dnr.mo.gov

APR - 3 2014

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

Dear Mr. Brooks:

The Missouri Department of Natural Resources' Air Pollution Control Program (Air Program) hereby submits the following Missouri State Implementation Plan (SIP) revision for your approval:

Proposed Revision to the Limited Maintenance Plan for the St. Louis Nonclassifiable Maintenance Area for the 8-Hour Carbon Monoxide National Ambient Air Quality Standard

Through this SIP submittal, the Air Program is requesting that EPA approve the maintenance plan as meeting the requirements of the Clean Air Act, section 175A.

The Missouri Air Conservation Commission adopted this plan at the March 27, 2014 commission meeting. A public hearing for the proposed plan was held on January 30, 2014 and comments were accepted from December 30, 2013 through February 6, 2014. During the public comment period for the proposed plan, no comments were received.

In order to comply with Attachment A of the "Regional Consistency for the Administrative Requirements of State Implementation Plan Submittals and the Use of 'Letter Notices'" memo dated April 6, 2011, a searchable pdf version of this document will be emailed to the EPA Regional Office and will be posted on our website at <http://dnr.mo.gov/env/apcp/stateplans.htm>.

Also, due to their size, paper copies of the appendices to the plan are not included in this package. The disk(s) included with this package include an electronic copy of the plan and appendices.

Thank you for your attention to this matter. If you have any questions regarding this submittal, please contact Ms. Wendy Vit with the Missouri Department of Natural

Mr. Karl Brooks
Page Two

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

Original signed by Kyra L. Moore

Kyra L. Moore
Director

KLM:ewc

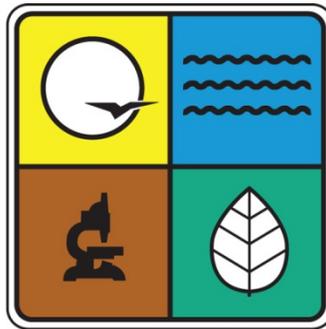
Enclosures:

Copy of plan (paper copies of the appendices are not included)
Copy of commission signature page certifying Missouri Air Conservation Commission adoption
Copy of public hearing notices
Copy of public hearing transcript introductory statement
Copy of recommendation for adoption
CD with electronic copy of the plan with appendices

c: Missouri Air Conservation Commission
File# 1971-CO-5 STL 2nd Maintenance

Proposed Revision to the Limited Maintenance Plan for the St. Louis Nonclassifiable Maintenance Area for the 8-Hour Carbon Monoxide National Ambient Air Quality Standard

Prepared for the
Missouri Air Conservation Commission



MISSOURI DEPARTMENT OF NATURAL RESOURCES

Adoption
March 27, 2014

**Division of Environmental Quality
Air Pollution Control Program
P.O. Box 176
1659 East Elm Street
Jefferson City, Missouri 65102-0176
Telephone (573) 751-4817**

Project Number: 1971-CO-5

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EXECUTIVE SUMMARY

This document outlines the Missouri Department of Natural Resources' Air Pollution Control Program's (hereafter referred to as the 'Air Program') Limited Maintenance Plan (hereafter referred to as the 'plan') for the St. Louis nonclassifiable Carbon Monoxide (CO) maintenance area (hereafter referred to as the 'St. Louis area'). This is the second of two required ten-year maintenance plans developed for the St. Louis area.

The St. Louis area includes the City of St. Louis and the portion of St. Louis County encompassed by Interstate 270 and the Mississippi River. The area was originally designated nonattainment for the 8-hour CO National Ambient Air Quality Standard (NAAQS) in 1978, with a design value of 14.0 ppm at the Shreve and Interstate 70 site in St. Louis City. Following the Clean Air Act (CAA) Amendments of 1990, the St. Louis area was not classified and prior designation was retained by operation of law in 1991 but without a measured violation based on 1988-89 or 1999-2000 data. The area is referenced as a nonclassifiable CO nonattainment area. Carbon monoxide air quality dramatically improved in the St. Louis region as a result of the implementation of state and federal control measures since the designation of the St. Louis area as nonattainment in 1978. The last exceedance occurred in 1994, and previous to that, the last exceedance occurred in 1987. Subsequently, in 1997, the Air Program submitted a request to redesignate the area to attainment and prepared a plan to maintain the standard through 2008. The plan was approved by the U.S. Environmental Protection Agency (EPA) on January 26, 1999. (See 64 FR 3855).

On October 6, 1995, Joseph W. Paisie sent EPA Regional Air Branch Chiefs a memorandum detailing a Limited Maintenance Plan Option for nonclassifiable CO areas. This memorandum describes a set of minimal maintenance plan requirements for CO nonattainment areas whose design values are less than or equal to 85 percent of the exceedance level of the CO NAAQS, or 7.65 parts per million (ppm). The EPA does not believe that the full maintenance plan requirements need be applied to these areas because they have achieved air quality levels well below the standard without the application of control measures required by the CAA Amendments of 1990 for classified CO nonattainment areas. Also, these areas do not have either a recent history of monitored violations of the CO NAAQS or a long prior history of monitored CO air quality problems. The St. Louis area met the requirement for the Limited Maintenance Plan option in the original redesignation and maintenance plan approved in 1999. The design value at that time (1994-95) was 5.7 ppm. The St. Louis area continues to qualify for the Limited Maintenance Plan option because its most recent design value (2011-2012) is 1.8 ppm.

This second maintenance plan provides for continued attainment of the 8-hour CO NAAQS for the St. Louis area through 2018. The plan also provides assurances that, in the event of a subsequent violation of the CO NAAQS, additional control options, called contingency measures, can quickly be implemented to prevent any future violations. In addition, this plan includes CO ambient air quality monitoring data from the last seven years and an updated emission inventory for average winter day CO emissions in the St. Louis area.

1. INTRODUCTION

1.1 NATIONAL AMBIENT AIR QUALITY STANDARD FOR CO

The CAA requires that the EPA carry out a periodic review of NAAQS for pollutants considered harmful to public health and the environment. These pollutants are carbon monoxide, lead, total suspended particles, sulfur dioxide, nitrogen oxide, and ozone. These pollutants are referred to as “criteria” pollutants. There are two categories of NAAQS set by the EPA: primary and secondary. The primary standards are health-based and are designed to establish limits to protect public health. The secondary standards are commonly referred to as “welfare-based” and are established to protect public welfare and are intended to protect against decreased visibility, and damage to crops, animals, and buildings.

The EPA establishes a standard for each criteria pollutant. If an area is found to exceed this value, it is classified as a nonattainment area for that specific pollutant. The States and/or tribes responsible for the affected area must then develop and carry out strategies and measures to attain the NAAQS. The goal is for any areas designated as “nonattainment” to be reclassified by the EPA to attainment for the pollutant. When that goal is achieved, the reclassified area enters the first of two ten-year maintenance periods. The St. Louis area is in the second maintenance period.

The CO NAAQS was initially set in April 1971 and has been reviewed three times: 1985, 1994, and 2011. In the 1985 review, the secondary CO NAAQS was revoked due to a lack of evidence of adverse effects on public welfare at or near ambient concentrations and has not been restored since. The EPA reviewed the CO NAAQS in 2011 (76 FR 50294) and determined that the current primary standard for CO was adequate to protect public health and the environment. In each review, the primary standards were retained without revision. However, the 2011 review included new provisions for States to develop near roadway monitoring networks (see section 1.4).

The CO NAAQS includes a 1-hour standard and an 8- hour standard; this plan addresses the 8-hour standard. The 8-hour standard is computed by first finding the maximum and second maximum (non-overlapping) eight-hour average values at each monitoring site each year for two years and using the higher second maximum value from the two years as the design value for that monitoring site. For a metropolitan area, such as St. Louis, that has more than one monitoring site, the design value for each site is determined and the highest of these values serves as the design value for the entire area. The St. Louis area’s design value for the most recent two years of data (2011 – 2012) is 1.8 ppm.

If the design value exceeds the level of the standard, 9 ppm for CO, that area is in violation of the NAAQS. An exceedance of the standard is different than a violation. An exceedance occurs when any 8-hour average reading exceeds the standard. A second exceedance in one year results in a violation.

1.2 DESCRIPTION OF THE ST. LOUIS NONCLASSIFIABLE CO NONATTAINMENT AREA

The St. Louis area includes the City of St. Louis and the portion of St. Louis County encompassed by Interstate 270 and the Mississippi River as shown in Figure 1 below.

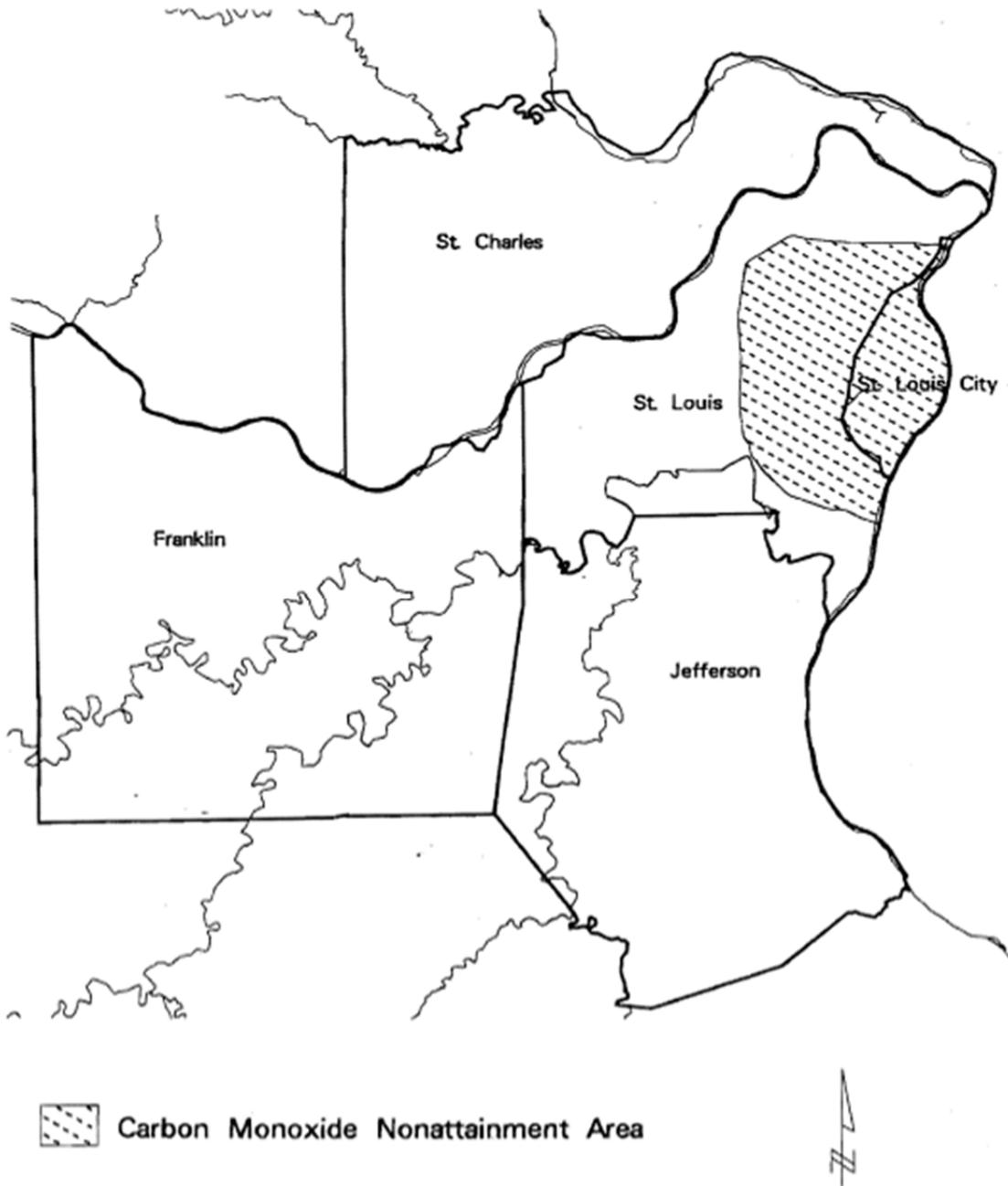


Figure 1 St. Louis Nonclassifiable CO Maintenance Area

1.3 LIMITED CO MAINTENANCE PLAN OPTION

The Air Program is using the Limited Maintenance Plan option in preparing this second ten-year revision to the SIP. The option is explained in EPA guidance of October 6, 1995, from Joseph

W. Paisie, Group Leader, Integrated Policy and Strategies Group, EPA. The guidance allows for a less rigorous approach than was previously required in developing attainment/maintenance plans for CO nonattainment areas that have design values at or below 7.65 ppm (85% of the CO NAAQS). The EPA believes the continued applicability of prevention of significant deterioration (PSD) requirements, any control measures already in the State Implementation Plan (SIP), and federal measures (such as the federal motor vehicle control program) should provide adequate assurance of maintenance for these areas.

The limited maintenance plan approach has five required elements: a description of and commitment to a sustained monitoring network, a maintenance demonstration, an attainment emission inventory, a contingency plan in case of a violation, and a conformity determination. Monitoring Network and Continued Attainment of the CO NAAQS.

This section presents monitoring information that demonstrates St. Louis has continued to maintain the 8-hour CO standard of 9 ppm, and that the design value in the area is lower than the 7.65 ppm design value required for limited maintenance plans. The department maintains an EPA-approved network of ambient air quality monitors to verify attainment status of the St. Louis area. This demonstration is based on the past six years of quality assured air monitoring data monitored through the St. Louis CO monitoring network as specified in 40 CFR 58. The data was collected and quality assured in accordance with 40 CFR 58 and recorded in EPA's Air Quality System (AQS) database.

1.4 ST. LOUIS CO MONITORING NETWORK

There is currently one site, Blair Street, that monitors CO in the St. Louis area. The Blair St. site is Missouri's National Core (NCore) multipollutant monitoring site. Carbon monoxide monitoring is required at NCore sites. Prior to September of 2010, there were three sites that monitored ambient CO concentrations in the St. Louis area: Blair St., Sunset Hills and Margaretta. Due to reductions in measured CO concentrations and funding restrictions, the CO monitors at the Sunset Hills and Margaretta sites were discontinued. The justification for the permanent discontinuation of the Sunset Hills and Margaretta CO Monitors was addressed in the 2011 Monitoring Network plan <http://dnr.mo.gov/env/apcp/docs/2011monitoringnetwork.pdf> (see pages 26 through 28) which was subsequently approved by the EPA Region VII administrator on December 12, 2011. EPA's Monitoring Network Plan approval letter can be found at the Region VII air quality programs page: http://www.epa.gov/region07/air/quality/quality.htm#mo_air

In addition to the continued CO monitoring at the Blair Street Site, a near roadway CO monitoring site began operation at the Forest Park Site in the St. Louis on January 1, 2013. The CO monitoring network for the St. Louis area is presented below in Figure 2.

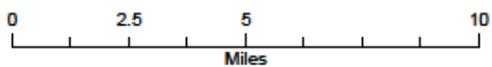
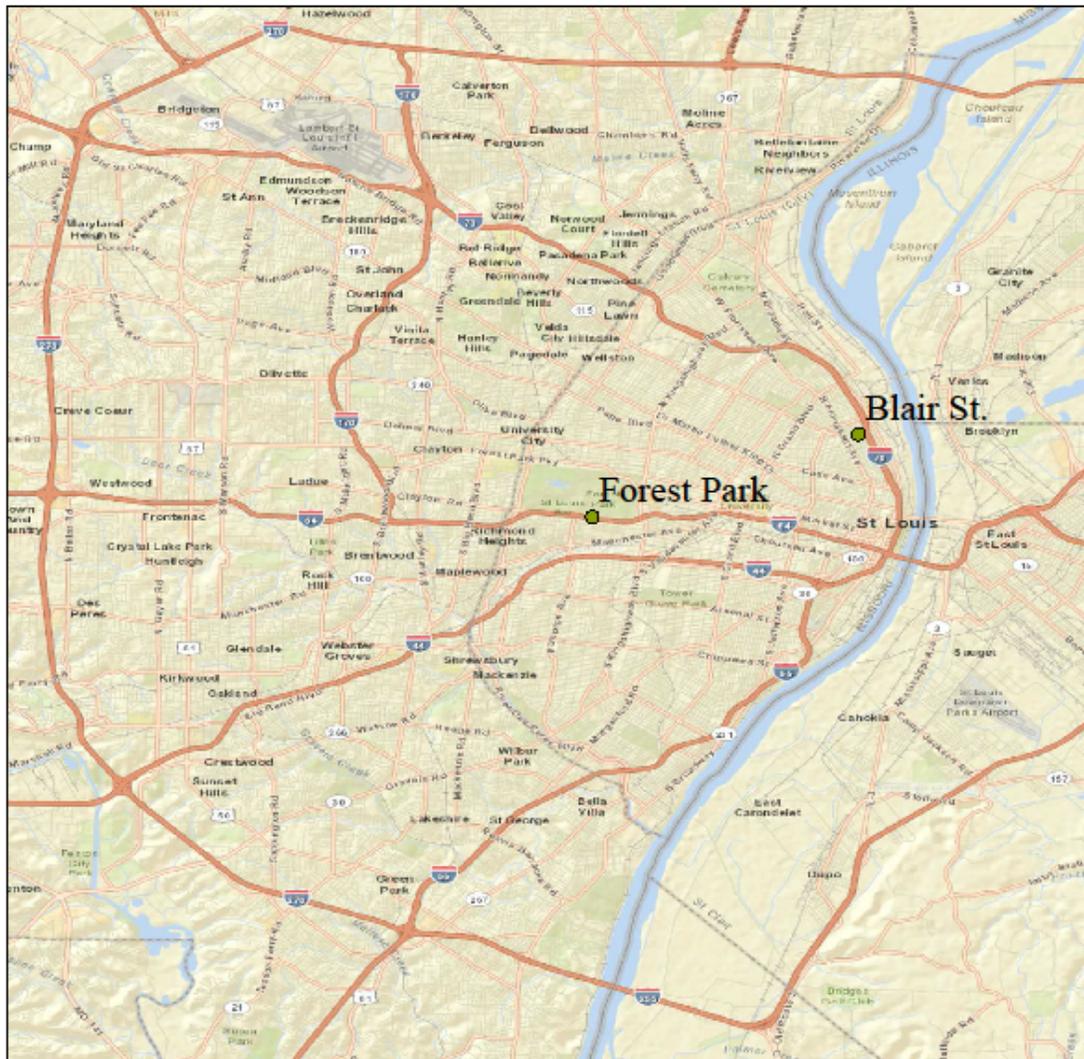
1.5 QUALITY ASSURANCE PROGRAM

Ambient air monitoring data for CO is collected, verified, and validated in accordance with 40 CFR 58 and a Quality Assurance Project Plan (QAPP). The QAPP outlines standard operating procedures for operating the network and validating the data. In addition, the network is reviewed annually through the Annual Monitoring Network Plan, which outlines the proposed changes to the network for implementation in the subsequent year. Review of the network takes

into consideration changes to the regulations, requested special projects, budget issues etc. A site can either be discontinued or relocated based on the annual review and with approval from the EPA. The network is further reviewed more comprehensively every five years through a Network Assessment, according to 40 CFR 58.10, for determining, at a minimum, if the network is meeting the monitoring objectives. The quality assured data collected at the site(s) is submitted to AQS and is available for public review as outlined in 40 CFR 58.

1.6 CONTINUED MONITORING COMMITMENT

The Department of Natural Resources, through the Air Program and the Environmental Services Program, is committed to continue operating an appropriate CO monitoring network in the St. Louis area in accordance with 40 CFR 58 and EPA-approved annual monitoring plans to verify the attainment status of the area. The department will continue to quality assure the ambient air monitoring data in accordance with 40 CFR 58 and submit the data to AQS in a timely fashion. The department is committed to continue working with the EPA to ensure that the CO monitoring network sufficiently meets the requirements of 40 CFR 58 and its monitoring objectives.



Missouri Department of Natural Resources
 Division of Environmental Quality
 Air Pollution Control Program
 Prepared by Bern Johnson 27 AUG 13

Figure 2 St. Louis CO Monitoring Network

2. MAINTENANCE DEMONSTRATION

The maintenance demonstration is considered to be satisfied if the monitoring data show that the area is meeting the air quality criteria for limited maintenance areas – a concentration less than or equal to 7.65 ppm.

Design values for CO are determined by using the second-highest non-overlapping 8-hour average value for each of two consecutive years. The higher of the 8-hour averages from the two years is the design value. Table 1 shows the second highest 8-hour average values at each CO monitoring site in the St. Louis area since 2006. As described in section 2.1, there were three CO monitoring sites in the St. Louis area until the Sunset Hills and Margareta CO monitors were discontinued in 2010.

The St. Louis area's design value for the first ten-year maintenance plan (1994 – 1995) was 5.7 ppm. The St. Louis area's 2008 – 2009 design value using 2008 as the emission inventory base year is 2.8 ppm (approximately 30% of the CO NAAQS). The design value for the St. Louis area's most recent 2-year period, 2011 – 2012, is 1.8 ppm (approximately 20% of the CO NAAQS).

The second highest 8-hour average values recorded in St. Louis since 2006 have not been more than 35 percent of the 8-hour CO NAAQS. This monitoring data qualifies the St. Louis area for the Limited Maintenance Plan option and provides assurance that the St. Louis area continues to maintain compliance with the CO NAAQS.

Table 1 2006-2012 2nd Highest 8-Hour Average CO Monitored Values (ppm)*

Monitoring Site Name	2006	2007	2008	2009	2010	2011	2012
Blair Street	1.9	1.4	2.6	1.3	1.7	1.4	1.8
Sunset Hills	1.2	1.0	0.8	0.7	** 0.6	-	-
Margareta	2.5	2.7	2.8	1.7	** 1.2	-	-

* Concentrations as reported by AQS AMP 450 Report as of 08/27/13

** Incomplete Data and Discontinued Monitor

2.1 CONTINUED ENFORCEABLE CONTROL MEASURES

The St. Louis area was designated as nonattainment of the 8-hour CO NAAQS in 1978. Since that time, the implementation of permanent and enforceable reductions of CO emissions has contributed to improvements in ambient CO concentrations and to the continued attainment of the 8-hour CO NAAQS. The primary control measures used to attain and maintain the 8-hour CO standard include:

- New Source Performance Standards (NSPS)
- PSD Permitting (10 CSR 10-6.060 Construction Permits Required)
- National Emissions Standards for Hazardous Air Pollutants (NESHAPS)/Maximum Achievable Control Technology (MACT) Standards
- Federal gasoline detergent additive rule
- Heavy-Duty Diesel Engine Standards
- Tier 2 Rule-Vehicle Standards

- Tier 4 Rule-Off Road Mobile Engine Standards
- Reformulated Gasoline (RFG)
- Gateway Vehicle Inspection Program
- Open Burning Restrictions

During the first 10 year maintenance period, federal control measures such as the Federal Motor Vehicle Emission Control Program and emission standards for non-road engines were noted as projected improvements to ambient air quality. The mobile source control measures have resulted in significant reductions in CO emissions. Federal regulations for the control of mobile sources are expected to continue to be tightened in the future. The tightening of federal motor vehicle standards and the phase out of older higher polluting vehicles will continue to contribute to the maintenance of the 8-hour CO NAAQS.

2.1.1 Permanent and Enforceable Controls

The Air Program provides assurance that all of the control measures adopted by state rules and listed in this document that have been used to attain and maintain the 8-hour CO standard are permanent and enforceable. Any revisions to the control measures included in this document will be submitted as a SIP revision to EPA for approval.

2.1.2 Provisions for Permitting New or Modified Emissions Sources

In accordance with the CAA, Missouri has a long-standing and fully implemented New Source Review (NSR) permitting program for new major sources and significant modifications of existing sources. This NSR program in any attainment area is referred to as a PSD permitting program. Missouri has adopted the PSD Program under State rule *10 CSR 10-6.060, Construction Permits Required*. One of the major components of the PSD program is the implementation of Best Available Control Technology (BACT) on new major sources or significant modification of existing major sources. Missouri has been delegated full authority to implement the PSD program by the EPA.

3. 2008 BASE YEAR EMISSION INVENTORY

In accordance with the Limited Maintenance Plan guidance, the Air Program must provide an emissions inventory that *“should represent emissions during the time period associated with the monitoring data showing attainment. The inventory should be based on actual “typical winter day” emissions of CO.”*

In 1997, the Air Program submitted a request to redesignate the area to attainment and prepared a plan to maintain the standard through 2008. This plan establishes 2008 as the base year of the second ten-year maintenance period. A base year of 2008 is representative of the time period associated with the monitoring data summarized in Table 1 of the previous section. The 2008 base year inventory includes a comprehensive average winter day CO emissions inventory for the City of St. Louis and St. Louis County from point, area, on-road mobile, and off-road mobile emissions (Table 2). Biogenic emissions are not included in these summaries. The 2008 base year inventory is based on actual activity levels in 2008 and includes all emissions in St. Louis

City and St. Louis County, even though the maintenance area only includes the City of St. Louis and the portion of St. Louis County encompassed by the I-270 loop.

Annual point source emissions for CO were compiled from Missouri’s Air Emissions Database. Annual emissions inventories for point, area, on road mobile and off road mobile source categories are described in detail in Appendix A. The unit of measurement for this inventory is tons CO per average winter day. In order to calculate the emissions in tons CO per average winter day for St. Louis City and St. Louis County, the Air Program followed the methods listed in Appendix B of this document. For point sources, annual emissions were divided by 366 (2008 was a leap year) to get average winter day emissions.

Similarly, for area sources other than residential fuel combustion, annual emissions were divided by 366 to get average winter day emissions. Annual area source emissions were calculated using the most recently available methodologies and emissions factors from U.S. EPA along with activity data (typically population, employment, fuel use, etc.) specific to 2008. For residential fuel combustion source categories, temporal allocation methods were used to adjust the annual emissions to an average day in January. The two area source values were then summed to obtain a total area source tons CO/average winter day value.

On-road mobile source emissions were calculated using EPA’s Motor Vehicle Emissions Simulator (MOVES) version 2010a for 2008 for the months of January, February, March, and December and then divided by 122, the number of days in those months, to get the average winter day emissions. For off-road mobile sources, emissions were developed using EPA’s NONROAD 2008a emissions model to calculate average winter day CO emissions.

Table 2 2008 CO Emissions for St. Louis County and City (tons/average winter day)

County	Source Category	CO Emissions (tons/average winter day)
St. Louis County	Point Sources	13.65
St. Louis County	Area Sources	52.33
St. Louis County	On Road Mobile Sources	425.49
St. Louis County	Off Road Mobile Sources	211.50
St. Louis County	sub-total	702.97
St. Louis City	Point Sources	3.61
St. Louis City	Area Sources	17.93
St. Louis City	On Road Mobile Sources	106.93
St. Louis City	Off Road Mobile Sources	38.97
St. Louis City	sub-total	167.44
Total (St. Louis City and County)	Point Sources	17.26
Total (St. Louis City and County)	Area Sources	70.26
Total (St. Louis City and County)	On Road Mobile Sources	532.42
Total (St. Louis City and County)	Off Road Mobile Sources	250.48
Total (St. Louis City and County)	Total	870.42

4. CONTINGENCY MEASURES

Section 175(A) of the CAA specifies the requirements for maintenance plans. In addition to providing a plan for the maintenance of the NAAQS for an additional ten (10) years after expiration of the first maintenance period, this plan also includes a list of contingency measures to correct any violation of the 8-hour CO NAAQS that might occur in the future.

Contingency measures are to be used to further reduce emissions in the event that future violations of the 8-hour CO NAAQS occur. While these measures do not need to be fully adopted by the Missouri Air Conservation Commission prior to the occurrence of a NAAQS violation, the contingency measures are expected to be implemented as expeditiously as possible once a triggering event occurs. The maintenance plan must identify the triggers that determine when contingency measures will be adopted, and the measures that the Air Program will consider.

The Air Program has developed a contingency plan for the St. Louis nonclassifiable CO maintenance area. The contingency plan, which details the Level I and Level II triggers and corresponding actions to be taken, is summarized in Table 3. The potential contingency measures, to be evaluated after a triggering event, are listed in Table 4. Consistent with this contingency plan, the Air Program agrees to adopt and implement the necessary corrective actions in the event that violations of the 8-hour CO NAAQS occur anywhere within the St. Louis nonclassifiable maintenance area during the maintenance period covered by this plan. The implementation of contingency measures will take place as expeditiously as practicable, but in no event later than twenty-four (24) months after the Air Program makes a determination that a violation of the appropriate trigger has occurred, based on quality-assured ambient air quality data that has been uploaded into EPA's Air Quality System (AQS).

The contingency plan provides for different levels of corrective responses should the ambient 8-hour CO levels exceed the NAAQS in any year. A Level I response would occur in the event that an 8-hour CO concentration at any monitoring site in the St. Louis nonclassifiable maintenance area exceeds 9 ppm at any point. The Air Program will evaluate the air quality and determine if adverse emission trends are likely to continue. If so, the Air Program will determine what and where controls may be required, as well as the level of emissions reductions needed to avoid a violation of the NAAQS. If controls are required, the potential contingency measures listed in Table 4 will be evaluated in addition to other measures that may be identified through the evaluation or that become available through future advances in control technology and methods. It is noted that the EPA does not require a state to implement contingency measures when occasional exceedances are recorded. The Air Program's voluntary commitment to initiate a Level I response is intended to prevent future violations of the NAAQS from ever occurring.

A Level II trigger occurs when a violation of the 8-hour CO NAAQS at any monitoring station in the St. Louis nonclassifiable CO maintenance area is recorded during the maintenance period after this plan has been adopted by EPA. The Air Program will conduct a thorough analysis to determine appropriate measures to address the cause of the violation. Contingency measures will be selected from those listed in Table 4 or from any other measured identified and deemed appropriate and effective at the time the selection is made. Level II triggers are more serious

than Level I triggers and cost effectiveness thresholds could be increased when determinations for additional controls are made.

The contingency measures listed in Table 4 are expected to be evaluated in the event of a Level I or Level II trigger; however, federal actions that require control measures may also be taken into account when the analysis to determine the cause of a future violation takes place. These additional federal actions, while not actual contingency measures, may be evaluated in the event of a trigger to determine their effect on the levels of expected emissions from sources in the area in order to determine whether or not additional local control measures are necessary. The future federal measures that may be evaluated in the event of a future trigger include future federal on-road vehicle standards, future federal nonroad engine standards, future federal MACT requirements, and future federal NSPS and NESHAP requirements. Furthermore, the Air Program remains committed to addressing future CO NAAQS revisions through state implementation plans. These plans could include other control techniques not included in Table 4. These and any other newly identified potential control measures may also be considered in the analysis following a future Level I or II triggering event.

The Air Program commits to compiling annual CO emissions inventories for the St. Louis nonclassifiable CO maintenance area every three years for the duration of this limited maintenance plan to facilitate the emissions trends analysis included in the contingency plan under Levels I and II.

Adoption of additional control measures is subject to necessary administrative and legal processes. The Air Program will solicit input from all interested and affected persons in the area prior to selecting appropriate control measures. No contingency measures will be implemented without providing the opportunity for full public participation. This process will include publication of notices, an opportunity for public hearing, and other measures required by Missouri law.

Table 3 Contingency Plan for the St. Louis Nonclassifiable CO Maintenance Area

Contingency Measure Trigger	Action to be Taken
<p><u>Level I Trigger</u></p> <p>A single exceedance of the 8-hour CO NAAQS at any monitor located in the St. Louis nonclassifiable CO Maintenance Area.</p>	<p>The Air program will evaluate the air quality and determine if adverse emission trends are likely to continue. If so, the Air Program will determine what and where controls may be required, as well as the level of emissions reductions needed to avoid a violation of the NAAQS. The evaluation shall be completed as expeditiously as possible and, if necessary, control measures shall be adopted and implemented as expeditiously as practicable, taking into consideration the ease of implementation and the technical and economic feasibility of the selected measures. This action will be taken no later than 24 months after the Air Program has determined that a Level I trigger has occurred through quality assured monitoring data that has been uploaded into EPA’s Air Quality System (AQS).</p>

<p><u>Level II Trigger</u></p> <p>A monitored violation of the NAAQS at any CO monitoring station in the St. Louis nonclassifiable CO maintenance area.</p>	<p>The Air Program will conduct a thorough analysis to determine appropriate measures to address the cause of the violation. Analysis shall be completed within 6 months of a Level II trigger as identified through quality assured monitoring data that has been uploaded into EPA’s Air Quality System (AQS). Once the analysis is complete, the selected measures shall be implemented as expeditiously as practicable, taking into consideration the ease of implementation and the technical and economic feasibility of the selected measures. The completion of the analysis and the implementation of the selected measures will occur no later than 24 months after the date of the Level II trigger.</p>
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Table 4 Potential Contingency Measures for the St. Louis Nonclassifiable CO Maintenance Area

Contingency Measure Method	List of Potential Contingency Measures to be Considered
Implement controls for local individual sources with significant effects on the monitored violation	<ul style="list-style-type: none"> • Identify local sources with significant CO emissions and develop controls through consent agreements or rules
Revise rules that control CO emissions	<ul style="list-style-type: none"> • Lower the applicability thresholds in existing rules that control CO emissions • Lower the CO limits in existing rules • Broaden the geographical area of existing rules that limit CO emissions • Include new source categories under the applicability of existing rules that limit CO emissions • Implement New Source Review Permitting Conditions for new and modified major sources of CO
New rules that control CO emissions	<ul style="list-style-type: none"> • Enhanced Heavy-Duty Diesel Anti-Idling Program (i.e. mandated rest periods and locomotives) • Implement mandatory wood-burning restrictions

5. TRANSPORTATION AND GENERAL CONFORMITY

As required by Section 176 of the CAA, the Air Program has developed transportation/air quality conformity procedures (10 CSR 10-5.480) and general conformity procedures (10 CSR 10-6.300) that are consistent with federal conformity regulations. Under these rules, one means of demonstrating conformity of federal actions is to indicate that expected emissions from planned actions are consistent with the emissions budget for the area.

Under the Limited Maintenance Plan approach, emissions budgets may be treated as essentially not constraining for the length of the maintenance period because it is “unreasonable to expect that such an area will experience so much growth in that period that a violation of the CO NAAQS would result” (see Limited Maintenance Plan guidance section 3.e). In other words, EPA would be concluding that emissions need not be capped for the maintenance period. Therefore, in areas with approved limited maintenance plans, federal actions requiring conformity determinations under both the transportation conformity rule and the general conformity rule are considered to satisfy the "budget test".

According to the EPA's Limited Maintenance Plan guidance, and SIP and conformity requirements, a regional emissions analysis will not need to be performed for conformity determinations for the respective long range transportation plan or transportation improvement program. While the St. Louis area is not subject to the budget test, the area remains subject to other transportation and general conformity requirements.

6. PUBLIC PARTICIPATION

In accordance with Section 110(a)(2) of the CAA, the Air program is required to hold a public hearing prior to adoption of this maintenance plan and the subsequent submittal to the EPA. The Air Program will notify the public and other interested parties of an upcoming public hearing and comment period 30 days prior to holding such hearing for this plan as follows:

- Notice of availability of the plan was posted on the Department of Natural Resources' Air Pollution Control Program website on December 30, 2013:
<http://www.dnr.mo.gov/env/apcp/stateplanrevisions.htm>
- A public comment period opened when the plan was posted on Department of Natural Resources' Air Pollution Control Program's website on December 30, 2013, and closed on February 6, 2014, seven days after the public hearing.
- The public hearing date on this plan is to be held on January 30, 2014, beginning at 9:00 a.m. at the Bennett Springs Conference Room, 1730 E. Elm St., Jefferson City, MO 65101.

7. CONCLUSION

The Missouri Department of Natural Resources' Air Pollution Control Program has prepared this plan to meet the requirements of Section 175A of the CAA. This plan provides for the continued attainment of the 8-hour CO NAAQS for a period of ten years after expiration of the previous ten-year period. All controls in this plan will remain in place after the end of this second ten-year period. Any further changes will be addressed through the requirements of Section 110(l) of the CAA.

This plan contains all the required elements for the Limited Maintenance Plan option for CO: a description of and commitment to a sustained monitoring network, a maintenance demonstration, an attainment emission inventory, a contingency plan in case of a violation, and a conformity determination.

The department is committed to operating a network of air quality monitors sufficient to verify that the CO NAAQS will be maintained throughout the second ten-year maintenance period, in accordance with all EPA monitoring requirements. This plan includes a demonstration that the St. Louis area is currently maintaining the CO NAAQS. The design value for the most recent two-year period, 2011-2012, is 1.8 ppm. The Air Program has prepared a comprehensive CO emissions inventory, in tons CO per average winter day, for the emission base year 2008. This plan includes contingency measures in the event a future violation occurs. In accordance with the Limited Maintenance Plan guidance, this plan considers federal actions are not constraining and satisfy both the transportation and general conformity budget tests.

This limited maintenance plan has been prepared in accordance with the requirements of the CAA and in conjunction with the guidance provided by EPA documents and staff.

The Missouri Air Conservation Commission **ADOPTS** the following action on this 27th day of March, 2014:

Missouri State Implementation Plan Revision – Limited Maintenance Plan for the St. Louis Nonclassifiable Maintenance Area for the 8-hour Carbon Monoxide National Ambient Air Quality Standard

Original signed by Commissioners:	
Gary J Pendergrass	Chairman
Mark Garnett	Vice Chairman
David C. Zimmermann	Member
Jack C Baker	Member
_____	Member

Bechtel, Cheri

From: Missouri DNR <MODNR@public.govdelivery.com>
Sent: Tuesday, December 24, 2013 8:33 AM
To: Bungart, Renee; Archer, Larry; Beydler, Van; Lovejoy, Victoria; Moore, Kyra; Vit, Wendy; Bechtel, Cheri; Crawford, Betsy
Subject: Courtesy Copy: Missouri DNR Air Public Notices Update - Missouri Air Conservation Commission Public Hearing, Jan. 30, 2014

This is a courtesy copy of an email bulletin sent by Cheri Bechtel.

This bulletin was sent to the following groups of people:

Subscribers of Air Public Notices (535 recipients)



Having trouble viewing this email? [View it as a Web page.](#)



MISSOURI AIR CONSERVATION COMMISSION WILL HOLD PUBLIC HEARING

JEFFERSON CITY, MO -- The Missouri Air Conservation Commission will hold a public hearing on Thursday, January 30, 2014 beginning at 9 a.m. at the Elm Street Conference Center, 1730 East Elm Street, Lower Level, Bennett Springs Conference Room, Jefferson City, Missouri. The commission will hear testimony related to the following proposed action(s):

- * 10 CSR 10-6.200 (amendment) Hospital, Medical, Infectious Waste Incinerators

This proposed amendment will remove language from the compliance and performance testing provisions that provide an exemption to the emission limits for hospital, medical, and infectious waste incinerators (HMIWI) during start-up, shutdown, or malfunction conditions. In addition, the hierarchy of definitions will clearly state that the applicable definitions in the Code of Federal Regulations take precedence over those in 10 CSR 10-6.020 Definitions and Common Reference Tables. At the same time, EPA test method references in the state rule will be revised to match how these methods are referred to in the federal HMIWI regulations.

The above rule action will not be submitted for inclusion in the Missouri State Implementation Plan but will be submitted for inclusion in the plan established under Clean Air Act Section 111(d) covering existing sources of noncriteria pollutants.

- * 10 CSR 10-5.240 (rescission) Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area

This proposed rescission will remove an outdated rule originally written in 1967, prior to the federal Clean Air Act. This rule was intended to provide the Missouri Air Conservation Commission authority to regulate particulate matter and sulfur dioxide emissions from concentrated sources in the St. Louis area. Given that section 643.050, RSMo provides the commission authority to promulgate regulations necessary to enforce the provisions of the Clean Air Act, this rule is no longer necessary.

The above rule action will be submitted to the U.S. Environmental Protection Agency for removal from the Missouri State Implementation Plan.

* 10 CSR 10-6.010 (amendment) Ambient Air Quality Standards

This proposed amendment will update the standards for ambient air quality throughout Missouri in order to reflect recent changes in the National Ambient Air Quality Standards (NAAQS) for fine particulate matter (PM_{2.5}), nitrogen dioxide (NO₂), and sulfur dioxide (SO₂); reorganize the standards table for clarity; and update the rule purpose statement to more accurately reflect the rule. The Clean Air Act requires periodic reviews of the air quality criteria, the science upon which the standards are based, and the NAAQS themselves. As a result of federal review, the U.S. Environmental Protection Agency has recently updated the PM_{2.5}, NO₂, and SO₂ NAAQS, and this rulemaking would revise these values in the state rule for consistency.

* Missouri State Implementation Plan Revision – Supplement/Revision to the Redesignation Demonstration and Maintenance Plan for the Missouri Portion of the St. Louis Nonattainment Area for the 1997 Annual Fine Particulate Matter National Ambient Air Quality Standard

In August 2011, the Missouri Air Conservation Commission adopted the Redesignation Demonstration and Maintenance Plan for the Missouri Portion of the St. Louis Nonattainment Area for the 1997 Annual Fine Particulate Matter National Ambient Air Quality Standard. This plan was then submitted to the U.S. Environmental Protection Agency on August 26, 2011 for inclusion in the Missouri State Implementation Plan. The Missouri Department of Natural Resources Air Pollution Control Program has developed a technical supplement/revision to this plan. The technical supplement/revision to this plan makes corrections to the emissions inventories included in the plan, includes emissions inventories and a discussion on controls for the Illinois portion of the nonattainment area, and changes the future year of the plan from 2022 to 2025. This technical supplement also establishes motor vehicle emissions budgets to be used in regional transportation conformity determinations for the base year (2008) and the future year (2025) of the plan.

* Missouri State Implementation Plan Revision – Americold Logistics, LLC 24-Hour Particulate Matter (PM₁₀) National Ambient Air Quality Standard (NAAQS) Consent Judgment

As required by Section 110(a) of the Clean Air Act, Missouri's State Implementation Plan (SIP) must ensure attainment and maintenance of all National Ambient Air Quality Standards (NAAQS). The Missouri Department of Natural Resources' Air Pollution Control Program is proposing to amend and strengthen the Missouri SIP to address violations of the 24-hour coarse particulate matter (PM₁₀) NAAQS of 150 micrograms per cubic meter (µg/m³) near the Americold Logistics, LLC's Carthage Crushed Limestone (CCL) facility. The SIP revision consists of a consent judgment with CCL for measures intended to reduce PM₁₀ emissions at the facility, all of which are scheduled for installation and operation by March 31, 2014.

* Missouri State Implementation Plan Revision – Limited Maintenance Plan For The St. Louis Nonclassifiable Maintenance Area For The 8-Hour Carbon Monoxide National Ambient Air Quality Standard (NAAQS)

The initial maintenance plan for the St. Louis nonclassifiable Carbon Monoxide (CO) maintenance area ensured attainment of the CO NAAQS through 2008. Pursuant to Section 175A(b) of the Clean Air Act, the State must submit a subsequent plan revision for maintaining the standard for an additional 10 year period after the expiration of the first maintenance period. The Air Program has developed a second maintenance plan that provides for continued attainment of the 8-hour CO NAAQS for the St. Louis area from 2008 through 2018. The plan provides assurances that, in the event of a subsequent violation of the CO NAAQS, additional control options, called contingency measures, can quickly be implemented to prevent any future violations. In addition, this plan includes CO ambient air quality monitoring data from the last seven years and an updated emission inventory for average winter day CO emissions in the St. Louis area.

If the Commission adopts these action(s), it will be the Department's intention to submit the action(s) to the U.S. Environmental Protection Agency to be included in Missouri's State Implementation Plan unless otherwise noted above.

Documents for the above item(s) will be available for review at the Missouri Department of Natural Resources, Air Pollution Control Program, 1659 Elm Street, Jefferson City, (573) 751-4817 and in the Public Notices section of the program web site <http://dnr.mo.gov/env/apcp/public-notices.htm>. This information will be available at least 30 days prior to the public hearing date.

The Department will accept written or email comments for the record until 5 p.m. on February 6, 2014. Please send written comments to Chief, Air Quality Planning Section, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176. Email comments may be submitted via the program web site noted above. All written and email comments and public hearing testimony will be equally considered.

Citizens wishing to speak at the public hearing should notify the secretary to the Missouri Air Conservation Commission, Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102-0176, or telephone (573) 526-3420. The Department requests persons intending to give verbal presentations also provide a written copy of their testimony to the commission secretary at the time of the public hearing.

Persons with disabilities requiring special services or accommodations to attend the meeting can make arrangements by calling the Program directly at (573) 751-4817, the Division of Environmental Quality's toll free number at (800) 361-4827, or by writing two weeks in advance of the meeting to: Missouri Department of Natural Resources, Air Conservation Commission Secretary, P.O. Box 176, Jefferson City, MO 65102. Hearing impaired persons may contact the program through Relay Missouri, (800) 735-2966.

You are subscribed to the Air Public Notices topic for Missouri DNR. This information has recently been updated, and is now available at the link below. Thank you for your interest in the Air Public Notices.

<http://dnr.mo.gov/env/apcp/stateplanrevisions.htm>

Update your subscriptions, modify your password or email address, or stop subscriptions at any time on your [Subscriber Preferences Page](#). You will need to use your email address to log in. If you have questions or problems with the subscription service, please contact subscriberhelp.govdelivery.com.

This service is provided to you at no charge by [Missouri DNR](#).

Jay Nixon, Governor
Sara Parker Pauley, Director

Air Pollution Control Program



State Plan Actions

[On Public Notice](#) | [Proposed for Adoption](#)

On Public Notice

Supplement/Revision to the Redesignation Demonstration and Maintenance Plan for the Missouri Portion of the St. Louis Nonattainment Area for the 1997 Annual Fine Particulate Matter National Ambient Air Quality Standard

Based on monitoring data from 2007-2009, the St. Louis nonattainment area achieved attainment of the 1997 annual fine particulate matter (PM_{2.5}) national ambient air quality standard (NAAQS). In August 2011, the Missouri Air Conservation Commission adopted the Redesignation Demonstration and Maintenance Plan for the Missouri Portion of the St. Louis Nonattainment Area for the 1997 Annual PM_{2.5} NAAQS. This plan was then submitted to the U.S. Environmental Protection Agency for inclusion in the Missouri State Implementation Plan. The Missouri Department of Natural Resources Air Pollution Control Program has developed a technical supplement/revision to this plan. The technical supplement/revision to this plan makes corrections to the emissions inventories included in the plan, includes emissions inventories and a discussion on controls for the Illinois portion of the nonattainment area, and changes the future year of the plan from 2022 to 2025. This technical supplement also establishes motor vehicle emissions budgets to be used in regional transportation conformity determinations for the base year (2008) and the future year (2025) of the plan. Through this SIP submittal, the Missouri Department of Natural Resources Air Pollution Control Program is requesting that:

- EPA redesignate the Missouri Portion of the St. Louis 1997 PM_{2.5} nonattainment area to attainment pursuant to the provisions of the Clean Air Act, section 107;
- Concurrently, EPA approve the associated maintenance plan as a revision to the State Implementation Plan (SIP) meeting the requirements of the Clean Air Act, section 175A;
- That EPA approve the 2008 base year inventory as meeting the requirements under Clean Air Act section 172(c)(3); and
- Approve the Motor Vehicle Emissions Budgets (MVEBs) for the years 2008 and 2025 pursuant to Clean Air Act Section 176(c).

[Proposed Supplement/Revision to the Redesignation Demonstration and Maintenance Plan for the Missouri Portion of the St. Louis Nonattainment Area for the 1997 Annual Fine Particulate Matter National Ambient Air Quality Standard Appendices A through L](#)

[Submit Comments](#)

A public hearing is scheduled for this plan action on January 30, 2014. Comments about this plan action will be accepted through the close of business on February 6, 2014.

Missouri State Implementation Plan Revision - Limited Maintenance Plan for the St. Louis Nonclassifiable Maintenance Area for the 8-Hour Carbon Monoxide National Ambient Air Quality Standard

The initial maintenance plan for the St. Louis nonclassifiable Carbon Monoxide (CO) maintenance area ensured attainment of the CO NAAQS through 2008. Pursuant to Section 175A(b) of the Clean Air Act, the State must submit a subsequent plan revision for maintaining the standard for an additional 10 year period after the expiration of the first maintenance period. The Air Program has developed a second maintenance plan that provides for continued attainment of the 8-hour CO NAAQS for the St. Louis area from 2008 through 2018. The plan provides assurances that, in the event of a subsequent violation of the CO NAAQS, additional control options, called contingency measures, can quickly be implemented to prevent any future violations. In addition, this plan includes CO ambient air quality monitoring data from the last seven years and an updated emission inventory for average winter day CO emissions in the St. Louis area.

[Proposed Revision to Limited Maintenance Plan for the St. Louis Nonclassifiable Maintenance Area for the 8-Hour Carbon Monoxide National Ambient Air Quality Standard Appendices A and B](#)

[Submit Comments](#)

A public hearing for this plan action will be held on Jan. 30, 2014. Comments about this plan action will be accepted through the close of business on Feb. 6, 2014.

Missouri State Implementation Plan Revision - Americold Logistics, LLC 24-Hour Particulate Matter (PM10) National Ambient Air Quality Standard (NAAQS) Consent Judgment

As required by Section 110(a) of the Clean Air Act, Missouri's State Implementation Plan (SIP) must ensure attainment and maintenance of all National Ambient Air Quality Standards (NAAQS). The Missouri Department of Natural Resources' Air Pollution Control Program is proposing to amend and strengthen the Missouri SIP to address violations of the 24-hour coarse particulate matter (PM10) NAAQS of 150 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) near the Americold Logistics, LLC's Carthage Crushed Limestone (CCL) facility. The SIP revision consists of a consent judgment with CCL for measures intended to reduce PM10 emissions at the facility, all of which are scheduled for installation and operation by March 31, 2014.

[Proposed CCL PM10 SIP Revision](#)
[Attachment 2 - Proposed CCL Consent Judgment](#)
[Exempt Equipment List](#)

[Submit Comments](#)

A public hearing for this plan action will be held on Jan. 30, 2014. Comments about this plan action will be accepted through the close of business on Feb. 6, 2014.

Proposed for Adoption

None at this time.

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1 PROCEEDINGS

2 CHAIRMAN PENDERGRASS: The hearing will
3 come to order. Let the record show the
4 following Commissioners are present: Jack
5 Baker, Mark Garnett, Gary Pendergrass, and David
6 Zimmerman.

7 The Air Conservation Commission of the
8 State Of Missouri has called this public hearing
9 pursuant to Section 643.070, Revised Statutes of
10 Missouri; EPA promulgated rule 40 CFR 51.102,
11 for the purpose of hearing testimony related to:

12 Missouri State Implementation Plan
13 Revision - Supplement/Revision to the
14 Redesignation Demonstration and Maintenance Plan
15 for the Missouri Portion of the St. Louis
16 Nonattainment Area for the 1997 Annual Fine
17 Particulate Matter National Ambient Air Quality
18 Standard.

19 Missouri State Implementation Plan
20 Revision - Americold Logistics, LLC Particulate
21 Matter (PM10) Consent Judgment.

22 Missouri State Implementation Plan
23 Revision - Limited Maintenance Plan for the St.
24 Louis Nonclassifiable Maintenance Area for the
25 8-hour Carbon Monoxide National Ambient Air

1 **Quality Standard.**

2 10 CSR 10-6.200 (amendment) Hospital,
3 Medical, Infectious Waste Incinerators.

4 10 CSR 10-5.240 (rescission) Additional
5 Air Quality Control Measures May be Required
6 When Sources are Clustered in a Small Land Area.

7 10 CSR 10-6.010 (amendment) Ambient Air
8 Quality Standards.

9 The hearing record will close at 5:00
10 p.m. on February 6, 2014.

11 Anyone who has not been scheduled to
12 appear, but who wishes to be heard, should
13 indicate that you wish to speak on the sign-in
14 sheets available at the door or by letting the
15 commission know by telephone after the public
16 hearing has been presented.

17 Section 643.100 of the Missouri
18 Statutes provides that all oral testimony be
19 given under oath. Accordingly, when you are
20 called to testify, please present yourself to
21 the court reporter first to be sworn in.

22 When you testify, please state your
23 name, business address and your occupation or
24 affiliation. If you have a prepared statement,
25 it will be helpful if you would provide a copy

1 MS. WILBUR: Good morning, Chairman,
2 members of the Commission. My name is Emily
3 Wilbur. I am employed with the Air Pollution
4 Control Program as the State Implementation Plan
5 (SIP) Unit Chief. I work at 1659 East Elm
6 Street, Jefferson City, Missouri. I am here
7 today to present testimony on a Limited
8 Maintenance Plan for the St. Louis
9 Nonclassifiable Maintenance Area for the 8-Hour
10 Carbon Monoxide National Ambient Air Quality
11 Standard, or NAAQS. An executive summary of the
12 plan can be found on Page 117 of your briefing
13 document.

14 This plan is the second of two ten-year
15 maintenance plans required by the federal Clean
16 Air Act. This plan demonstrates that the St.
17 Louis area has continued to maintain compliance
18 with the 8-hour CO NAAQS of 9 parts per million,
19 which was initially set in April 1971.

20 The St. Louis area, which includes the
21 City of St. Louis and the portion of St. Louis
22 County encompassed by Interstate 270 and the
23 Mississippi River, was originally designated
24 nonattainment in 1978, with a design value of 14
25 parts per million. Since then, carbon monoxide

RECOMMENDATION FOR ADOPTION

PROPOSED REVISION TO

MISSOURI STATE IMPLEMENTATION PLAN – Proposed Revision to the Limited Maintenance Plan for the St. Louis Nonclassifiable Maintenance Area for the 8-Hour Carbon Monoxide National Ambient Air Quality Standard

On January 30, 2014, the Missouri Air Conservation Commission held a public hearing concerning a revision to the Missouri State Implementation Plan (SIP) for the Proposed Revision to the Limited Maintenance Plan for the St. Louis Nonclassifiable Maintenance Area for the 8-Hour Carbon Monoxide National Ambient Air Quality Standard (CO NAAQS). This second maintenance plan provides for continued attainment of the 8-hour CO NAAQS for the St. Louis area from 2008 through 2018, pursuant to Section 175A(b) of the federal Clean Air Act.

No comments were received during the public comment period.

The proposed plan has not been reprinted in the briefing document due to its volume. The entire proposed plan is available for review at the Missouri Department of Natural Resources' Air Pollution Control Program, 1659 East Elm Street, Jefferson City, Missouri, 65101, (573)751-4817. It is also available online at <http://dnr.mo.gov/env/apcp/stateplanrevisions.htm>.

The Air Program recommends the commission adopt the plan as proposed. If the commission adopts this plan, it will be the department's intention to submit this plan to the U.S. Environmental Protection Agency for inclusion in the Missouri State Implementation Plan.

**COMMENTS AND RESPONSES ON
PROPOSED REVISION TO**

**MISSOURI STATE IMPLEMENTATION PLAN –
Proposed Revision to the Limited Maintenance Plan for the St. Louis Nonclassifiable
Maintenance Area for the 8-Hour Carbon Monoxide National Ambient Air Quality
Standard**

The public comment period for the proposed revision to the Missouri State Implementation Plan (SIP) for the Limited Maintenance Plan for the St. Louis Nonclassifiable Maintenance Area for the 8-Hour Carbon Monoxide National Ambient Air Quality Standard opened on December 30, 2013 and closed on February 6, 2014. No revisions to the proposed plan were made as a result of comments.

The following is a summary of comments received and the Missouri Department of Natural Resources' Air Pollution Control Program's (Air Program's) corresponding responses.

SUMMARY OF COMMENTS: During the public comment period for the proposed plan, the Air Program received no comments.