



COMMENTS AND RESPONSES ON

PROPOSED REVISION TO

MISSOURI STATE IMPLEMENTATION PLAN – 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

The public comment period for the proposed revision to the Missouri State Implementation Plan (SIP) entitled 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 (PM_{2.5}) National Ambient Air Quality Standard (NAAQS) opened on December 30, 2013 and closed on February 6, 2014. 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. Any changes to the proposed plan are included in the response to comments.

SUMMARY OF COMMENTS: During the public comment period for the proposed plan, the Air Program received three (3) written comments and one (1) oral comment from the U.S. Environmental Protection Agency (EPA).

COMMENT #1: EPA commented that the Air Program should provide a discussion regarding emission reduction credits held by sources in compliance with state rule *10 CSR 10-6.410 Emissions Banking and Trading*, and how it relates to compliance with the 1997 annual PM_{2.5} NAAQS.

RESPONSE AND EXPLANATION OF CHANGE: State rule *10 CSR 10-6.410 Emissions Banking and Trading*, allows the banking and trading of emission reduction credits to be used for permitting purposes only. Section 5.5 of the plan document was amended to explain how these credits are used for New Source Review (NSR) offset purposes in nonattainment areas and for Prevention of Significant Deterioration (PSD) increment purposes in areas designated attainment. These credits only apply to these specific aspects of obtaining a permit under Missouri's EPA-approved NSR permitting program, and cannot be used to alleviate any source from undergoing a NAAQS impact analysis in any area. Nor can these credits be used to alleviate any source from implementing Best Available Control Technology requirements for PSD permits in attainment areas or Lowest Achievable Emissions Rate and alternative site analysis requirements in nonattainment areas. Therefore, the emission reduction credits that have been banked by Missouri sources are not anticipated to have any impact on Missouri's demonstration that the St. Louis area will continue to maintain the 1997 annual PM_{2.5} NAAQS

through the future year in the plan.

COMMENT #2: EPA commented that the Air Program should revise the language used in section 4.2 of the plan document to more accurately portray the history of the Oxides of Nitrogen (NO_x) SIP Call and the federal NO_x Budget Trading Program.

RESPONSE AND EXPLANATION OF CHANGE: The Air Program coordinated with EPA regarding this comment. Narrative revisions were made to section 4.2 of the plan document to more accurately portray the history of the NO_x SIP Call and the NO_x Budget Trading Program as a result of this comment.

COMMENT #3: EPA commented that the Air Program should revise the language used in chapter 6 of the plan document to more clearly explain how the transportation conformity rule applies to the 1997 annual PM_{2.5} NAAQS in the St. Louis area.

RESPONSE AND EXPLANATION OF CHANGE: The Air Program coordinated with EPA regarding this comment and narrative revisions were made to chapter 6 of the plan document as a result of this comment. The revisions to the transportation conformity section of the document more clearly explain how the transportation conformity rule applies to the 1997 annual PM_{2.5} NAAQS in the St. Louis area; however, the transportation conformity budgets proposed in the plan at the public hearing held on January 30, 2014 have not changed since the proposal.

COMMENT #4: During the public hearing, EPA expressed support for the plan and their appreciation to the Air Program for coordinating early in the development of this plan document.

RESPONSE: The Air Program appreciates EPA's support of this plan and the assistance they provided during the development of the plan. No changes to the plan were made as a result of this comment.