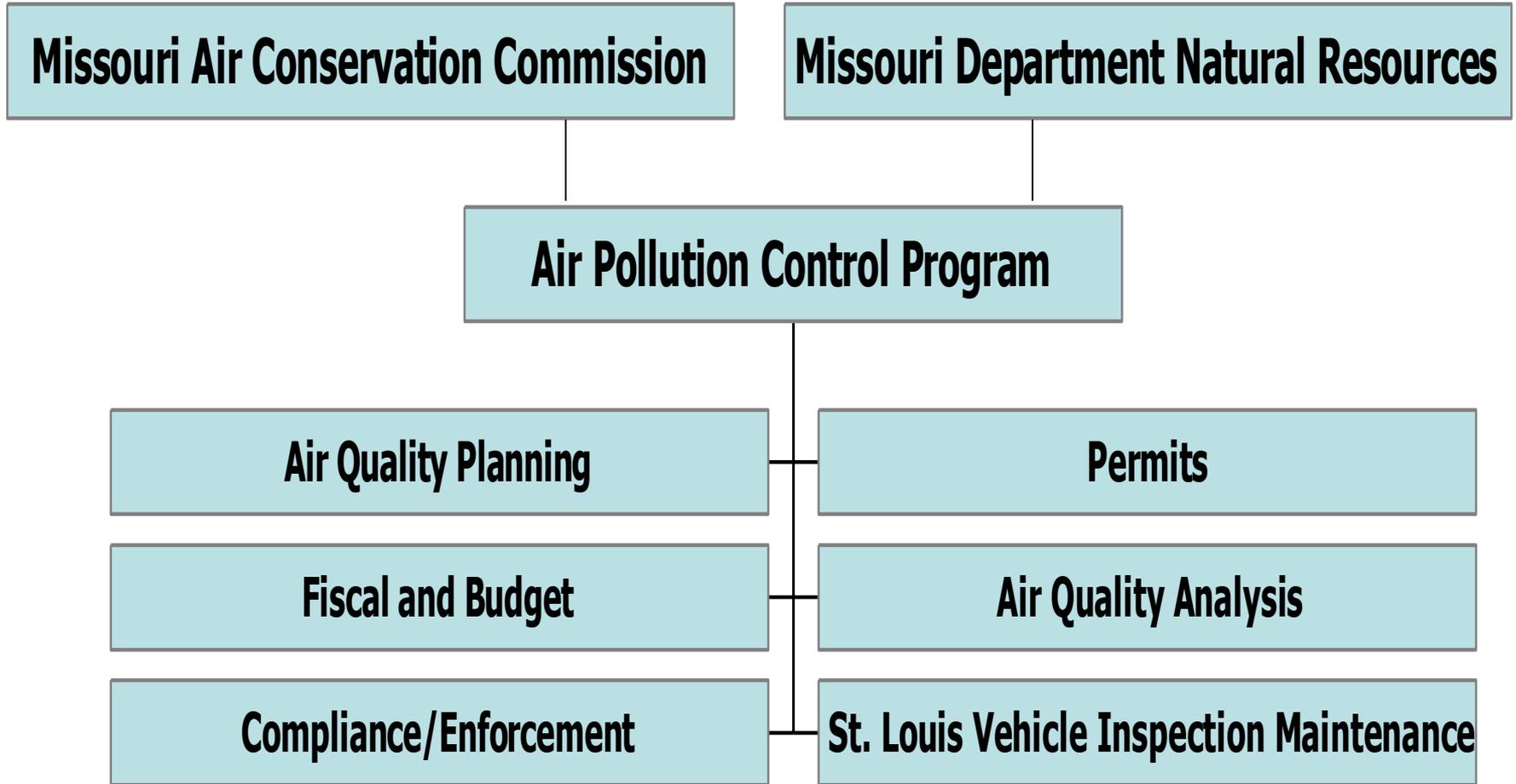


REGFORM Air Seminar

Air Pollution Control Program

March 2015



Missouri Air Conservation Commission

- David Zimmermann, Chair
- Gary Pendergrass, Vice Chair
- Mark Garnett
- Jack Baker
- Three vacant positions
- Quorum = 4

Air Program Statistics - 2014

Staff positions performing Air Work

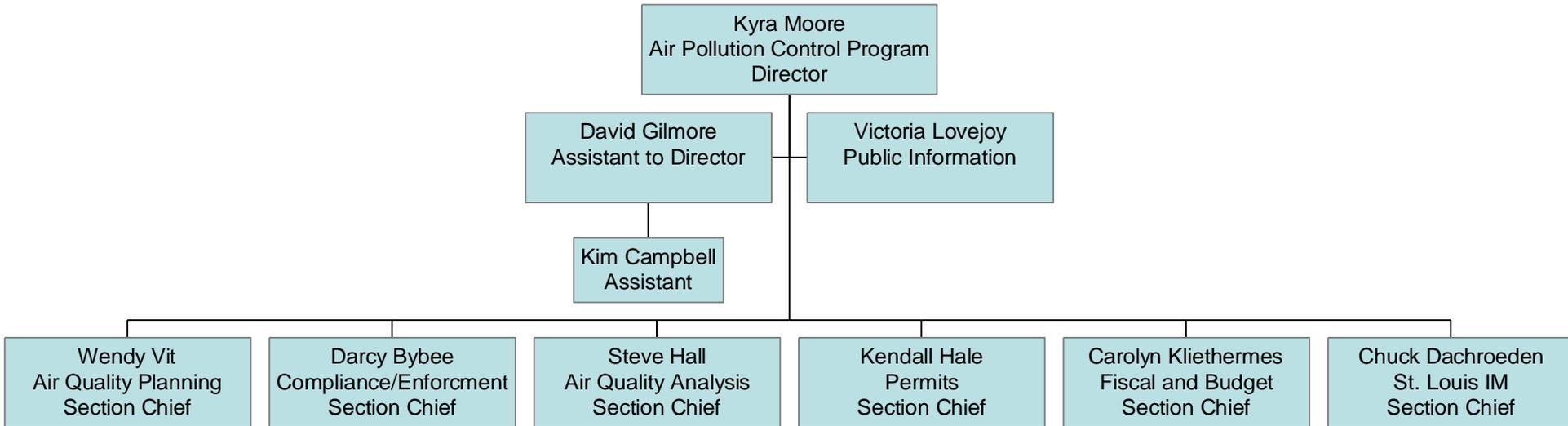
- Air Pollution Control Program – 108 (some part-time)
- Environmental Services Program ~20
- Regional Offices ~29
- Local Agencies ~9 (no funding from state)

Total ~ 154 (does not include locals)

Air Work

- **5 DNR Regional Offices**
 - St. Louis, Kansas City, Northeast (Macon), Southeast (Poplar Bluff), Southwest (Springfield)
 - Air Work includes inspections, complaint investigations, open burning permits
- **Environmental Services Program**
 - Air Monitoring
- **Local Air Agencies**
 - St. Louis County, St. Louis City, Kansas City, Springfield
 - Work dependent on agency

Air Pollution Control Program



March 2015

Air Quality Planning Section

- Rulemakings
- State Implementation Plan (SIP) development
- Computer modeling to support SIPs
- National Ambient Air Quality Standard (NAAQS) boundary recommendations

Air Quality Planning Section

Wendy Vit, Section Chief

Cheri Bechtel

Rules Unit

Wayne Graf

Aaron Basham

Paul Myers

Stan Payne

Shelly Reimer

Seanmichael Stanley

SIP Unit

Emily Wilbur

Assem Abdul

Stacy Allen

Adel Alsharafi

Ashley Keas

Mark Leath

Cliff Li

Bob Randolph

Joe Winkelmann

March 2015

Permit Section

- Issues permits for all applicable sources of air pollution
 - Construction and Operating Permits
- Processes permit applicability requests
- Performs air quality analysis for proposed sources
- Oversees permitting for local air agencies

Permits Section

Kendall Hale, Section Chief

Operating Permits

Michael Stansfield

David Buttig

Tandi Edelman

Jason Dickneite

Bern Johnson

Don Murphy

Jacob Robinett

Jill Wade

Nicole Weidenbenner

Berhanu Getahun –
StL

Construction Permits

Susan Heckenkamp

Alana Hess

Jordan Hindman

Kathy Kolb

David Little

J Luebbert

Ryan Schott

Chad Stephenson

Daronn Williams

Chia-Wei Young

Permit Modeling

Dawn Froning

Kelly Robson

John Bullard

Linda McDonald

March 2015

Air Quality Analysis Section

- Obtains, tracks and analyzes air emission inventory questionnaire (EIQ) data
- Coordinates statewide air monitoring network
- Develop Maximum Achievable Control Technology (MACT) databases
- Compliance Assistance

Air Quality Analysis Section

Steve Hall, Section Chief

Data Management Unit

Nathan O'Neil

Jeanette Barnett

Kent Branson

Jeanne Brown

Josh Martin

Clayton Ridenour

Jeffrey Stevens

Terry Stock

Brenda Wansing

Monitoring Unit

Patricia Maliro

Jerry Downs

Eric Giroir

Michael Maddux

Frank Shovlin

Carlton Flowers

Compliance/Enforcement Section

- Resolves enforcement actions from Regional Offices/Local Agencies; Refers cases to Attorney General, if necessary
- Conducts oversight of Vapor Recovery/IM
- Issues Asbestos Certifications, Contractor Registrations and Training Provider Accreditations
- Provides General Compliance Assistance
- Works with Regional Offices/Local Agencies to investigate citizen concerns and conduct routine inspections
 - asbestos, vapor recovery, open burning, dust, odors and general compliance

Compliance/Enforcement Section

Darcy Bybee, Section Chief

Asbestos Unit

Richard Hall

Stephanie Durbin

Cari Gerlt

Laura Guinn

Compliance Unit

Corinne Rosania

Amanda Horstmann

Cliff Johnson

Heather Lucas

Jaime Rizo

Ernest Wilson

Testing &

Emissions Unit

Richard Swartz

Jennifer Kissel

Steve Sidebottom

Patrick Vavra

Josh Vander Veen

Vicky Son

Cassandra Allee

March 2015

Fiscal and Budget Section

- Prepares budget, manages cash flow and time accounting, accounts payable & receivables
- Administers federal grant projects
- Coordinates state and federal workplans and local memorandum of agreements
- Maintains record retention and responds to Sunshine Requests
- Reviews legislation and fiscal note requests

Fiscal and Budget

Carolyn Kliethermes, Section Chief

Grant Management

Deedra Beye

Fileroom Management

Derek Apel

Financial Operations Unit

Sara Pringer

Tim Largent

Tara Overbey

Receptionist

Debbie Heinrich

March 2015

Fiscal and Budget - Contacts

- Construction Permit Invoices & Asbestos Inspection Fee Invoices & EIQ Payment
 - Tim Largent (573) 526-3420
- Credit Card Processing
 - Tara Overbey (573) 526-0537

St. Louis Inspection and Maintenance

- Oversees vehicle inspection and maintenance program
- Performs covert and overt audits of emissions testing facilities
- Provides technical assistance and customer education

St. Louis Inspection and Maintenance

Chuck Dachroeden, Section Chief

Technical Services Unit

Vacant

Angelo Vitullo

Jackie Heisler

Inspection Services Unit

Vacant

Shawna Fuhrman

Travis Glueck

Allen Logan

David Offu

Antwane President

March 2015

Updates and Overview

- Compliance Enforcement Initiative
- Ozone Standard
- Sulfur Dioxide Standard
- Cross State Air Pollution Rule
- Clean Power Plan
- Opacity Rule
- Fees and more.....

Compliance Assistance Visits

Darcy Bybee

Air Pollution Control Program

Compliance Assistance Visits (CAVs)

The Missouri Department of Natural Resources wants to help businesses, communities and industrial facilities to better understand the requirements of environmental regulations and avoid compliance issues. One way to do this is using CAVs.

As of July 1, 2014, each program in the department's Division of Environmental Quality began formally offering CAVs to those entities regulated by the department.

What are CAVs?

An on-site assistance visit that is intended to be beneficial to a facility that:

- is faced with a change in permit or regulatory requirements.
- is undergoing a change in operational status.
- is undergoing a change in management.
- just would like some assistance in ensuring their compliance.

What happens during a CAV?

- A department representative will come to your facility to meet with you (and any other individuals that you invite).
- During the visit the representative will assist you with understanding regulatory requirements, help you with achieving and maintaining compliance, and be available as a continuing resource for technical assistance.
- A CAV is not intended to serve as a comprehensive inspection of the facility and will not result in a determination of compliance or noncompliance.

Ozone

Sulfur Dioxide (SO₂)

Emily Wilbur

State Implementation Plan Unit Chief

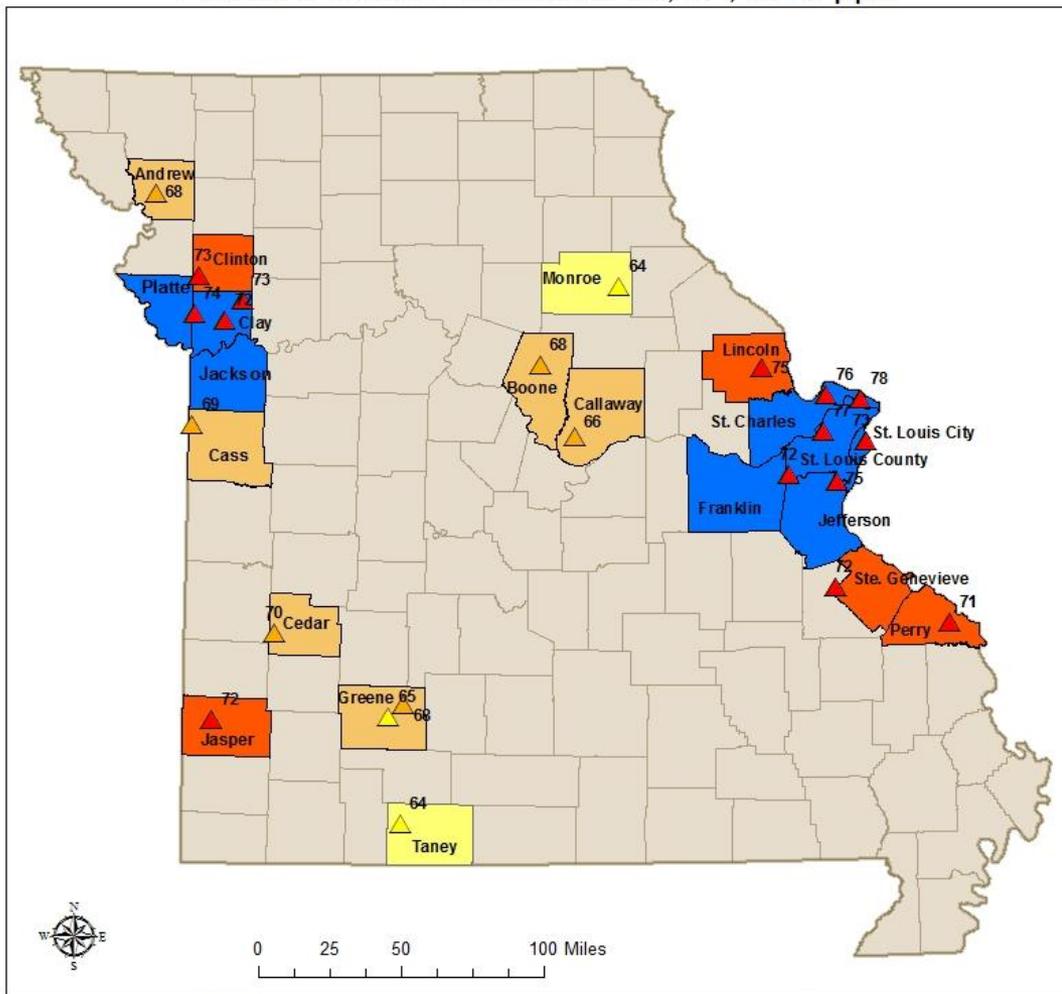
Air Pollution Control Program

National Ambient Air Quality Standard (NAAQS) for Ozone

- 2008 standard of 75 ppb
 - St. Louis area – marginal nonattainment
 - Marginal area attainment determinations and 1-year attainment date extensions based on 2012-2014 air quality data
- New Standard - EPA proposed
 - October 1, 2015 – EPA final
 - Court order deadline
 - 65 to 70 ppb

Potential Impact of 2015 Ozone NAAQS on Missouri Counties

Possible Levels Evaluated: 60, 65, & 70 ppb



Based on 2012-2014 Monitored Designated Values (not yet quality assured data)

Legend

- ▲ Monitors with 12-14 DV > 70 ppb
- ▲ Monitors with 12-14 DV > 65 ppb
- ▲ Monitors with 12-14 DV > 60 ppb
- Kansas City Ozone Maintenance Area
- St. Louis Ozone Nonattainment Area
- County with Monitored 12-14 DV > 70 ppb
- County with Monitored 12-14 DV > 65 ppb
- County with Monitored 12-14 DV > 60 ppb

This map is for reference only - Recommendations and designations based on 2014 – 2016 data: Unknown impact

23 Ozone Monitors
 All greater than 60 ppb
 20 greater than 65 ppb
 14 greater than 70 ppb

Based on 2012-2014 preliminary data



Ozone Tentative Schedule

- October 2016 – States’ boundary recommendations
- October 2017 – EPA final designations
- October 2020 to 2021 – State plans due for nonattainment areas
- 2020 to 2023 – Attainment dates

SO₂ NAAQS

- Current (2010)
 - Primary standard revised to 75 ppb (1-hour)
 - Annual and 24-hour standards were revoked
- Two initial nonattainment areas designated
- Portions of:
 - Jackson County (Troost Avenue monitor)
 - Jefferson County (Mott St. Monitor)

Nonattainment State Implementation Plan Timeline

- Nonattainment designations were effective Oct. 4, 2013
- State Plans due to EPA April 2015
- Control strategies must be implemented by Jan. 1, 2017
- Attainment date is Oct. 4, 2018

Nonattainment Area Plan & Rule Tentative Timeline

- **Dec. 2014** – 60-day comment period for 10 CSR 10-6.261 *Control of Sulfur Dioxide Emissions*
 - Comment period closed February 11, 2015
- **March - June 2015** – Proposed rule/ plan(s) on Public Notice (30+ day comment period)
- **April/July 2015** – Public Hearing for rule/plan(s)
- **No later than Dec. 2015** – Submit rule/plan(s) to EPA

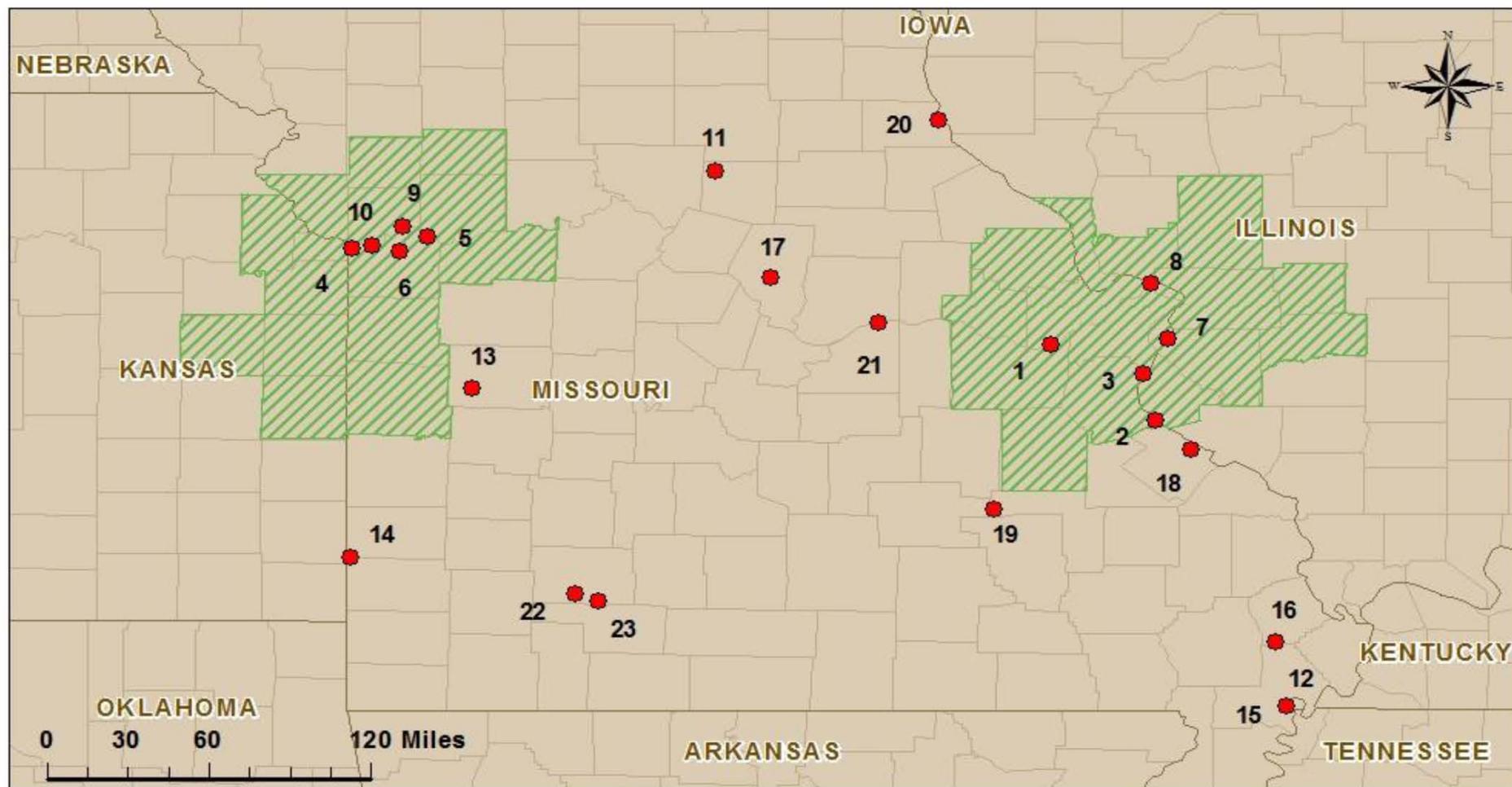
Future Phases

- EPA's Proposed Data Requirements Rule
 - evaluation criteria for next rounds of designations
 - air quality characterized by monitoring or modeling
- Final rule expected mid-2015

Tentative Timeline for SO₂

- Based on proposed Data Requirements Rule
 - All dates subject to change per final rule
- Jan 2016 – MDNR to submit list of sources to EPA model/monitor
- Jan 2017 – monitors operational
- Dec 2017 – designations -> Modeling
- Dec 2020 – designations -> Monitoring

Application of EPA's Options from the SO₂ Data Requirements Rule



Air Pollution Control Program
Prepared: April 28, 2014

Legend

- Option 1 - Sources Affected using 2011 Actual Emissions
- ▨ USA Core Based Statistical Areas (CBSA) with Pop. > 1million



Legend of Sources affected by Option 1 of EPA's Proposed SO₂ Data Requirements Rule

Number on Map	Plant Name	Number on Map	Plant Name
1	AMEREN MISSOURI-LABADIE PLANT	13	KANSAS CITY POWER AND LIGHT CO-MONTROSE GENERATING STATION
2	AMEREN MISSOURI-RUSH ISLAND PLANT	14	EMPIRE DISTRICT ELECTRIC CO-ASBURY PLANT
3	AMEREN MISSOURI-MERAMEC PLANT	15	NORANDA ALUMINUM INC-NEW MADRID
4	VEOLIA ENERGY KANSAS CITY INC-GRAND AVENUE STATION	16	SIKESTON POWER STATION-SIKESTON POWER STATION
5	KCP AND L - GREATER MO OPERATIONS-SIBLEY GENERATING STATION	17	UNIVERSITY OF MISSOURI (MU)-POWER PLANT
6	INDEPENDENCE POWER AND LIGHT-BLUE VALLEY STATION	18	MISSISSIPPI LIME COMPANY-STE. GENEVIEVE
7	ANHEUSER-BUSCH INC-ST. LOUIS	19	DOE RUN COMPANY-BUICK SMELTER
8	AMEREN MISSOURI-SIOUX PLANT	20	BASF CORPORATION-HANNIBAL PLANT
9	INDEPENDENCE POWER AND LIGHT-MISSOURI CITY STATION	21	CENTRAL ELECTRIC POWER COOPERATIVE-CHAMOIS PLANT
10	KANSAS CITY POWER AND LIGHT CO-HAWTHORN STATION	22	CITY UTILITIES OF SPRINGFIELD MISSOURI-JOHN TWITTY ENERGY
11	THOMAS HILL ENERGY CENTER POWER DIVISION-THOMAS HILL	23	CITY UTILITIES OF SPRINGFIELD MISSOURI-JAMES RIVER POWER PLANT
12	NEW MADRID POWER PLANT-MARSTON	* Based on 2011 Actual Emissions Data	

Note: Applicability may change based on the final rule or recent actual emissions data.

EPA's Cross State Air Pollution Rule (CSAPR)

Proposed Clean Power Plan

Mark Leath, P.E.

Air Pollution Control Program

CSAPR Overview

- Federal program based on regional trading of emission allowances for Electric Generating Units (EGUs)
- Established 4 regional trading programs
 - Annual SO₂ Group 1 (Missouri)
 - Annual SO₂ Group 2
 - Annual NO_x (Missouri)
 - Ozone Season NO_x (Missouri)
- Implemented through Federal Implementation Plans – Began January 1, 2015

CSAPR SIP Options

- Budget total cannot change
- 2015 allowances: Cannot change
- 2016 allowances and beyond: Can be modified by states through a SIP revision
 - 2016 allowances: due **April 1st, 2015**
 - 2017 and 2018 allowances: due **December 1st, 2015**

CSAPR “Abbreviated” SIPs for 2016

- SIP revisions to reallocate allowances for two programs:
 - NO_x Annual and NO_x Ozone Season
 - Allocate allowances to two facilities that received zero allowances under the Federal Implementation Plan (Chillicothe and Higginsville)
- Public Hearing: January 29, 2015
- Scheduled Adoption: March 26, 2015
 - Submit to EPA by April 1, 2015

CSAPR Rulemakings for 2017 & Beyond

- State rulemakings for all three programs:
 - NO_x Annual & Ozone, and SO₂ Annual
- Purpose:
 - NO_x Annual & Ozone: Chillicothe & Higginsville
 - SO₂ Annual: Address assurance provision concerns for a unit with dual ownership
- Estimated rulemaking timeline:
 - 60-Day Comment Period: Currently open - closes April 10, 2015
 - Public Hearing: July 2015
 - Submittal Deadline: December 1st, 2015

CSAPR Litigation Update

- February 25, 2015 – D.C. Circuit Court heard oral arguments on remaining CSAPR issues
- Issues include among others
 - CSAPR budgets over control some states
 - EPA’s CSAPR modeling was arbitrary and capricious
 - EPA lacked authority to issue FIPs for several states
 - EPA wrongfully interpreted the “interfere with maintenance clause”
- Decisions expected later this year

EPA's Clean Power Plan

- June 2014 - EPA proposed a rule to require states to develop plans to control CO₂ emissions from existing power plants
- Proposed rule sets state goals expressed as rates of lbs CO₂/MW-hr
- Affects 21 sources in Missouri



EPA Identified Likely Affected Missouri Sources

Plant Name	Owner/Operator
Labadie Meramec Rush Island Sioux	Ameren (Union Electric Company)
New Madrid St Francis Energy Facility Thomas Hill	Associated Electric Cooperative, Inc.
Chamois	Central Electric Power Cooperative and Associated Electric Cooperative, Inc.
Sikeston Power Station	City of Carthage, Sikeston Bd. of Municipal Utilities, City of Fulton, and City of Columbia
Columbia	City of Columbia
James River Power Station John Twitty Energy Center	City of Springfield, MO
Dogwood Energy Facility	Dogwood Energy, LLC and North American Energy Services
Asbury State Line Combined Cycle	Empire District Electric Company
Iatan	Empire District Electric Company, KCP&L, KCP&L GMO, and Missouri Joint Municipal Electric Utility Commission
Blue Valley	Independence Power and Light
Hawthorn Montrose	KCP&L
Lake Road Sibley	KCP&L GMO

Clean Power Plan

EPA's Proposed Goals for Missouri (lbs CO₂/MW-h)	
2020 – 2029 Interim Goal	2030 and Beyond Final Goal
1,621	1,544

Missouri's 2012 Adjusted Average Statewide Rate: 1,963 lbs CO₂/MW-h

Clean Power Plan – Recent Actions

- In January, EPA set target date of summer 2015 for several actions:
 - Final rule to require state plans for existing power plants
 - Proposed rule for a federal plan to take effect if states fail to submit an approvable plan
 - Final rules for new and modified power plants
- In February, EPA announced it intends to host trainings for Clean Power Plan implementation

Clean Power Plan - MDNR's Estimated Schedule

Timeframe	Action
Now to Summer 2015	Attend trainings, communicate with stakeholders, track federal actions
Summer 2015	EPA promulgates final rule, and proposes default Federal Plan
Spring 2016	Public Hearing for initial State plan (30-day comment period)
Early Summer 2016	Adoption of initial plan
Summer 2016*	State submits initial plan to EPA
Summer 2017*	Submittal deadline for the full plan and rule if Missouri does not partner with another state
Summer 2018*	Submittal deadline for the full plan and rule if Missouri partners with another state(s)
January 2020	Interim compliance period begins (per proposed rule)
2030 and beyond	Compliance with final goal required (per proposed rule)

* Note: Proposed rule requires an initial plan to be submitted by June 2016, and allows for 1 or 2 year extensions for the full plan and rule submittal



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Opacity Rule Amendment (10 CSR 10-6.220)

Seanmichael Stanley

Air Pollution Control Program

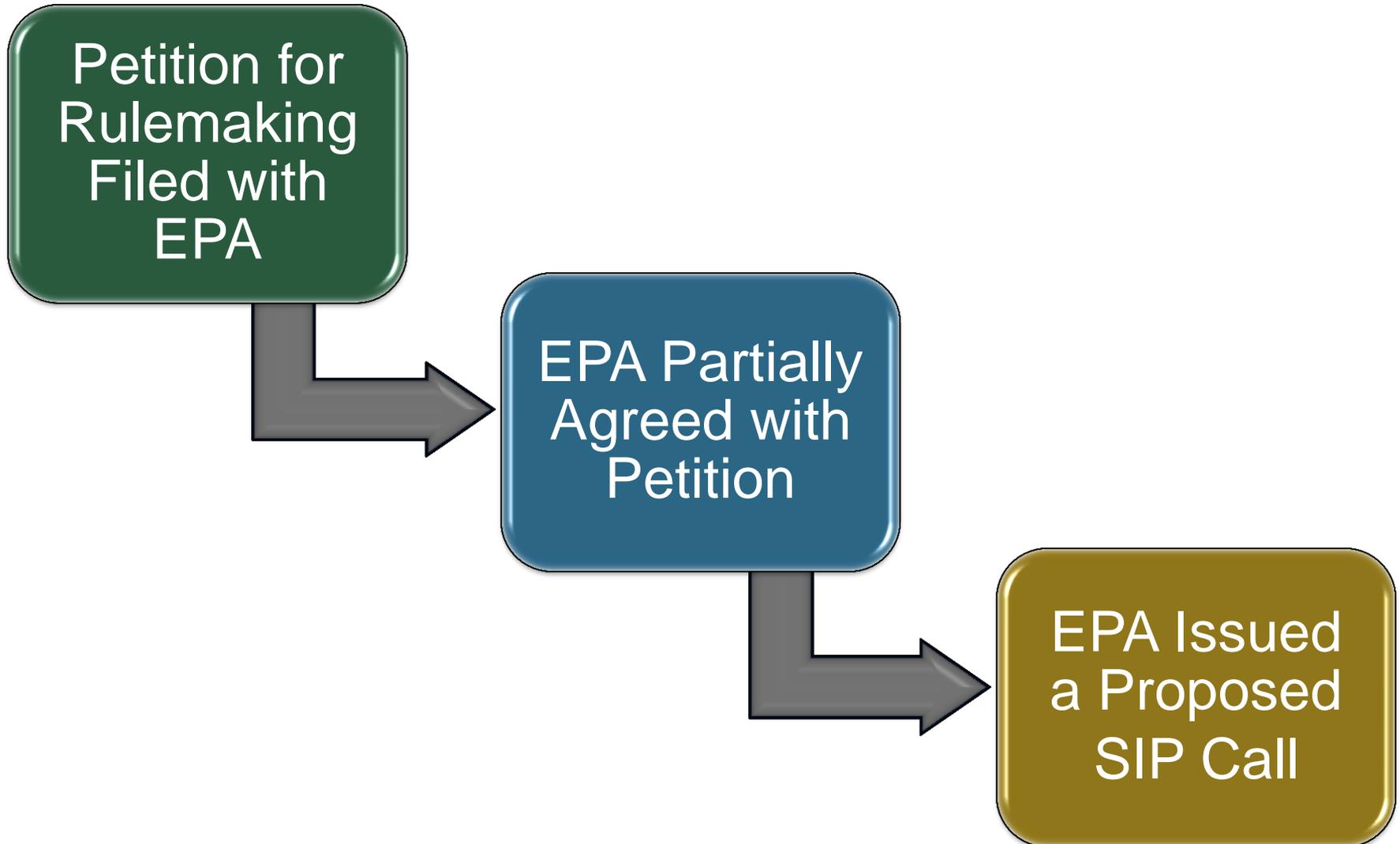
- EPA Proposed State Implementation Plan (SIP) Call
- Proposed Amendments
- Rulemaking Timeline



Key Points:

- Why it has been proposed
- How we are addressing it
- The implications

What Happened:



Subsection (3)(C) – Paraphrased:

If you exceed the emission limit, it is a violation, unless the director determines that enforcement action is not warranted.

Our fix is simple:

- Remove language from the rule

The implications:

- The provisions of the *Start-Up, Shutdown, and Malfunction Conditions* rule still apply
- Must be fixed within 18 mo. of final SIP Call, Expected May 2015

Key Points:

- Exemptions
- Clarified Compliance Requirements

Exemptions:

- Emission units subject to Mercury and Air Toxics Standards (MATS) or Boiler Maximum Available Control Technology (MACT) regulations
- Emission units burning gaseous fuels
- Fugitive Emissions
- Internal Combustion Engines
- Indoor emissions

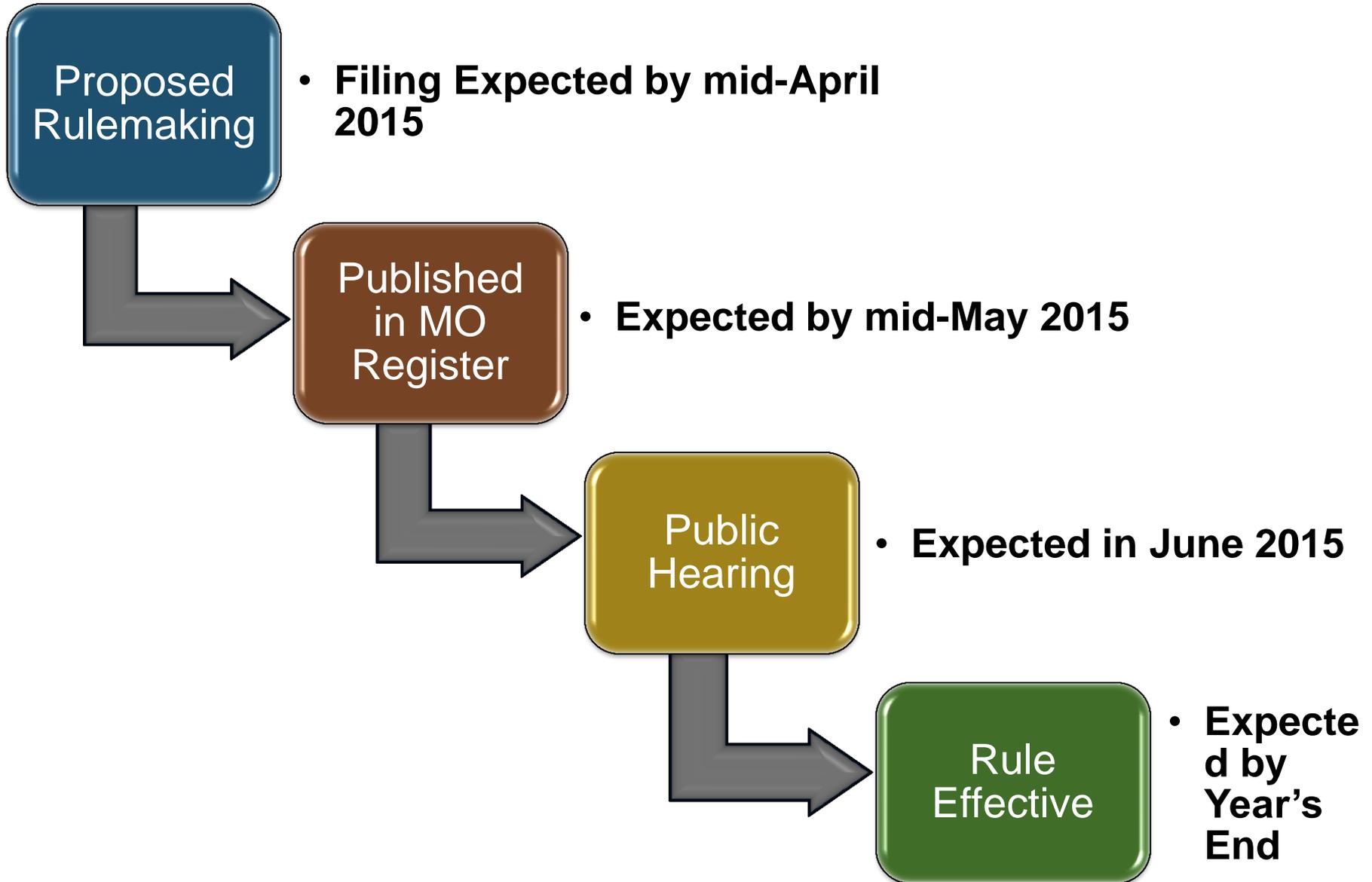
Clarified Compliance Requirements:

- Removing unnecessary test methods
- Adding EPA Method ALT-082
- Clarifying that alternative monitoring methods and modified test methods must be approved by the department and EPA prior to use

Monitoring Schedule:

- No longer being proposed in this amendment
- Monitoring schedules will continue to be specified in permits

Rulemaking Timeline



Ask now or ask later:

Seanmichael Stanley

Email: Seanmichael.Stanley@dnr.mo.gov

Phone: (573) 526-0538

Other Air Issues

Kyra Moore

Air Pollution Control Program

Communication Tools

- Federal Plain Language Guidelines

<http://www.plainlanguage.gov/index.cfm>

- Updating air rules, webpages, and other written communications using clear, plain language (where possible...)
- Slow process....but stay tuned!

Air Fees

- 2014 – Emission Fee Change
 - \$ per ton – proposed \$48.00
 - Effective January 1, 2016 (for calendar 2015 emissions)
- 2015 Fee Stakeholder Meetings – discussing permit and asbestos fees:

http://dnr.mo.gov/env/apcp/airadvisory/apcp_stakeholder.htm#feemtgs

2015 Fee Stakeholder Process

- Continue the discussion of fees that support the activities of the program:
 - Permit fees
 - Asbestos Fees
- Goal – submit revised fee structure to Missouri Air Conservation Commission mid-year

Timeline for Fee Rulemaking - tentative

- Early 2015 : Fee Stakeholder Discussions
- April - May 2015: Present proposed fee structure to Missouri Air Conservation Commission (MACC) and obtain MACC approval to begin rulemaking.
- Summer 2015: File proposed rulemaking

Timeline for Fee Rulemaking-continued

- Sept – Dec 2015:
 - Public hearing(s)
 - Rule adoption(s)
 - File order of rulemaking(s)
- January 2017
 - Rulemaking(s) effective.
 - Fee(s) take effect

How To Stay Informed

Public notices – rules, permits, state plans:

<http://dnr.mo.gov/env/apcp/public-notice.htm>

Air Program Advisory Forum :

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



Click to
receive
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this issue.

Air Program Contact Information

- firstname.lastname@dnr.mo.gov
- Front Desk (573) 751-4817

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Jefferson City, MO 65102
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Division of Environmental Quality Director: Leanne Tippett Mosby

Date: March 5, 2015

Nothing in this document may be used to implement any enforcement action or levy any penalty unless promulgated by rule under chapter 536 or authorized by statute.