



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

## DEPARTMENT OF NATURAL RESOURCES

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AUG 4 2016

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

Dear Mr. Hague:

On February 2, 2016, the Missouri Department of Natural Resources' Air Pollution Control Program (air program) requested a determination that the Jefferson County 2010 1-hour Sulfur Dioxide (SO<sub>2</sub>) nonattainment area has attained the 2010 1-hour SO<sub>2</sub> National Ambient Air Quality Standard (NAAQS). Our request included the most recent three years of complete, quality-assured ambient air monitoring data showing that the area has attained the NAAQS during the 2013-2015 monitoring period. In a response letter, dated March 4, 2016, EPA stated that our SO<sub>2</sub> attainment determination request did not contain the necessary supporting modeling and technical analysis.

Subsequently, the air program is submitting a modeling demonstration that addresses the clean data policy requirements for SO<sub>2</sub> as established in EPA's April 23, 2014 memorandum titled, "Guidance for 1-Hour SO<sub>2</sub> Nonattainment Area SIP Submittals." Specifically, we are providing modeling of the most recent 3 years of actual emissions (2013-2015) for the Jefferson County SO<sub>2</sub> nonattainment area, which demonstrates compliance with the standard. This modeling demonstration is consistent with the EPA's December 2013 "*SO<sub>2</sub> NAAQS Designations Modeling Technical Assistance Document*."

The air program asserts that this, in combination with the previously submitted certified monitoring data collected at the Mott Street monitor, sufficiently supports a clean data determination for the Jefferson County SO<sub>2</sub> nonattainment area. The modeling files along with model documentation are included in attachment 1. The attachment is only being submitted electronically due to its size.

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

Mr. Mark Hague  
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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:akc

Enclosures:

Electronic copy of letter and attachment

c: Mr. Steven Brown, USEPA Region VII  
Project file #2010-SO2-6B Jefferson