



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

## DEPARTMENT OF NATURAL RESOURCES

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MAR 30 2015

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

Dear Mr. Hague:

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:

### Cross-State Air Pollution Rule (CSAPR) NO<sub>x</sub> Annual Trading Program

In accordance with 40 CFR 52.38(a)(3), the Air Program submitted a list electronically via email to the U.S. Environmental Protection Agency (EPA) Headquarters on March 27, 2015 (the March 27<sup>th</sup> submission). The list included the Transport Rule (TR) NO<sub>x</sub> Annual Trading Program allowances for existing units to be used for the 2016 Control Period under CSAPR. A copy of the email text from the March 27<sup>th</sup> submission is also attached to this letter.

Through this SIP submittal, the Air Program is requesting that EPA approve the list submitted via the March 27<sup>th</sup> submission, and allow the allocations included on the list to replace the TR NO<sub>x</sub> Annual allowance allocation provisions in 40 CFR 97.411(a) for the 2016 control period under CSAPR.

Accompanying this letter is a supplemental document which outlines the background, purpose, and authority for the SIP revision that we are submitting for approval. The Air Program is not requesting SIP approval of the supplemental document, but it is being provided with this letter to help facilitate approval of the list submitted via the March 27<sup>th</sup> submission.

Please consider the following statements regarding this SIP submission:

1. In accordance with 40 CFR 52.38(a)(3)(v)(A), Missouri notified the Administrator of its intent to submit a complete SIP revision for 2016 existing unit allocations by October 17, 2011.
2. In accordance with 40 CFR 52.38(a)(3)(i), the list submitted via the March 27<sup>th</sup> submission included all TR NO<sub>x</sub> Annual units in the state that commenced commercial operation before January 1, 2010.
3. In accordance with 40 CFR 52.38(a)(3)(ii), the sum of allocations included on the list submitted on March 27<sup>th</sup> is less than the total state budget for 2016 minus the sum of the new unit set-aside.
4. In accordance with 40 CFR 52.38(a)(3)(iii), the list submitted on March 27<sup>th</sup> was submitted

electronically in the format specified by the Administrator.

5. In accordance with 40 CFR 52.38(a)(3)(iv), the list submitted on March 27<sup>th</sup> is a permanent allocation for the units on the list for 2016 and the SIP revision does not provide for any changes to the listed units or allocations after approval by the Administrator under subpart AAAAA of 40 CFR Part 97.

The Missouri Air Conservation Commission adopted the SIP revision submitted on March 27<sup>th</sup> at the March 26, 2015 commission meeting. A public hearing for the proposed plan was held on January 29, 2015. A 30-day public comment period opened by December 29, 2015 and closed on February 5, 2015. During the public comment period for the proposed SIP revision, the Air Program did not receive any comments. A summary explaining that no comments were received is attached.

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 the complete submittal package will be emailed to the EPA Regional Office. Within three business days, this complete package will be posted on our website at <http://dnr.mo.gov/env/apcp/stateplans.htm>.

Thank you for your attention to this matter. If you have any questions regarding the March 27<sup>th</sup> submission, please contact Ms. Wendy Vit 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

Original signed by Kyra L. Moore

Kyra L. Moore  
Director

KLM:mlc

Enclosures:

Copy of the email text for the March 27<sup>th</sup> submission  
Copy of supplemental document and appendix to the SIP revision  
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  
Copy of the summary of comments and responses  
CD with electronic copy of the entire submittal package

c: Missouri Air Conservation Commission  
File# 2014-Transport Rule-NO<sub>x</sub> Annual

## Bechtel, Cheri

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**From:** Leath, Mark  
**Sent:** Friday, March 27, 2015 8:36 AM  
**To:** 'transport-rule@epa.gov'  
**Cc:** 'branch.paula@epa.gov'; 'bhesania.amy@epa.gov'; 'jay.michael@epa.gov'; 'kemp.lachala@epa.gov'; Moore, Kyra; Vit, Wendy; Wilbur, Emily; Graf, Wayne; Basham, Aaron; Leath, Mark; Bechtel, Cheri  
**Subject:** Missouri TR NO<sub>x</sub> Annual Allocations for Existing Units for Vintage Year 2016  
**Attachments:** Submittal Missouri 2016 TR NO<sub>x</sub> Annual Allocations.xls

Clean Air Market Division,

The attached Microsoft Excel document contains Missouri's Transport Rule (TR) NO<sub>x</sub> Annual Allocations for Existing Units for Vintage Year 2016. The Missouri Department of Natural Resources' Air Pollution Control Program is submitting this list to reallocate allowances to existing units under the federal Cross-State Air Pollution Rule's (CSAPR) TR NO<sub>x</sub> Annual Trading Program for the 2016 control period in accordance with 40 CFR 52.38(a)(3).

The Missouri Department of Natural Resources' Air Pollution Control Program is also submitting a letter to EPA Region VII to request approval of the complete SIP revision to allow for the reallocation of allowances for the 2016 control period. If EPA approves the SIP revision, the attached list of unit level TR NO<sub>x</sub> Annual allocations will replace the provisions of 40 CFR 97.411(a) for the 2016 control period under the CSAPR.

If you have any questions regarding the submission of the attached list of Missouri's unit level TR NO<sub>x</sub> Annual Allocations for existing units for vintage year 2016, please contact me via phone or email.

Thank you,

Mark Leath, P.E.  
Environmental Engineer  
Air Pollution Control Program  
Department of Natural Resources  
Phone: (573) 526-5503  
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**Supplemental Document for  
Missouri State Implementation Plan Revision**

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**Cross-State Air Pollution Rule (CSAPR)  
NO<sub>x</sub> Annual Trading Program**

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**Prepared for the  
Missouri Air Conservation Commission**



**Adoption  
March 26<sup>th</sup>, 2015**

**Missouri Department of Natural Resources  
Division of Environmental Quality  
Air Pollution Control Program  
Jefferson City, Missouri**



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# Purpose

The purpose of the State Implementation Plan (SIP) revision described in this document is for the Missouri Department of Natural Resources' Air Pollution Control Program (Air Program) to assume allocation authority for the Missouri existing unit budget in the Transport Rule (TR) NO<sub>x</sub> Annual Trading Program for the 2016 control period under the U.S. Environmental Protection Agency's (EPA) Cross-State Air Pollution Rule (CSAPR). The Air Program is submitting a SIP revision with adjusted individual unit level allocations that will replace the allocations from the existing unit budget established by the CSAPR Federal Implementation Plan (FIP) for the 2016 control period.

This supplemental document outlines the purpose, background, and authority to submit as a SIP revision the unit level allowance allocations for existing TR NO<sub>x</sub> Annual units in Missouri for the 2016 control period. This supplemental document will be submitted to EPA, but the Air Program is only requesting SIP approval of the allowance allocations being submitted.

When the federal allowance allocation method is applied to Missouri's existing unit budget for the TR NO<sub>x</sub> Annual Trading Program for the 2016 control period, there are nine (9) excess allowances in the existing unit budget due to rounding. The SIP revision described in this document will reallocate four (4) of these nine (9) excess allowances as follows: two (2) allowances to the facility owned by the City of Chillicothe and two (2) allowances to the facility owned by the City of Higginsville. These two facilities were not allocated any allowances under the federal allocation method. All other existing unit budget allowances will be distributed identically to the federal allocation method.

The SIP revision described in this document redistributes emission allowances for the 2016 control period only. The Air Program is pursuing a separate rulemaking and SIP revision to reallocate allowances for the control periods in 2017 and beyond.

## 1. Background

In 2005, the EPA finalized a federal emission trading program for the eastern half of the country. This trading program was known as the Clean Air Interstate Rule (CAIR). CAIR established three different federal emission trading programs that were designed to limit interstate transport of emissions that significantly contribute to nonattainment or interfere with maintenance in downwind states. States are required to address these emissions in accordance with Clean Air Act (CAA) Section 110(a)(2)(D)(i)(I). CAIR addressed these requirements for states that were included in the rule for two different NAAQS, the 1997 8-hour ozone NAAQS, and the 1997 fine particulate matter (PM<sub>2.5</sub>) NAAQS. However, in 2008, the District of Columbia Circuit Court of Appeals (D.C. Circuit Court) remanded CAIR to EPA due to deficiencies found in the rule. EPA was directed by the courts to write a rule to replace CAIR and address these deficiencies. The EPA finalized the CSAPR on August 8, 2011 (76 FR 48208) in response to this court decision and was intended to replace CAIR beginning January 1, 2012.

However, in December 2011, prior to the implementation of CSAPR, the D.C. Circuit Court stayed the implementation of CSAPR pending the outcome of litigation that had been filed against the CSAPR. Then in August 2012, the D.C. Circuit Court issued a decision vacating CSAPR and directed EPA to continue to implement CAIR until they could implement a new replacement rule that addresses the Court's concerns. However, EPA appealed the D.C. Circuit Court's decision to the U.S. Supreme Court and in April 2014, the U.S. Supreme Court reversed the D.C. Circuit Court's decision that vacated the CSAPR. Then in June 2014, EPA filed a motion to the D.C. Circuit Court to lift the stay of the CSAPR and delay all compliance dates in the rule by three (3) years, which would require that phase I of CSAPR would begin in January 2015. In October 2014, the D.C. Circuit court granted EPA's motion to lift the stay of the CSAPR, and on December 3, 2014 the EPA promulgated an interim final rule (79 FR 71663) that extends the compliance dates of the CSAPR by three (3) years and clarifies that the rule will go into effect in 2015.

The CSAPR establishes four (4) separate federal emission trading programs for states located in the eastern half of the country. These four trading programs include the TR SO<sub>2</sub> Group 1 Trading Program, the TR SO<sub>2</sub> Group 2 Trading Program, the TR NO<sub>x</sub> Annual Trading Program, and TR NO<sub>x</sub> Ozone Season Trading Program. States that were found to be significantly contributing to a 1997 and/or 2006 PM<sub>2.5</sub> NAAQS nonattainment area or interfere with maintenance of these PM<sub>2.5</sub> NAAQS in a downwind state are included in one of the TR SO<sub>2</sub> Trading Programs, along with the TR Annual NO<sub>x</sub> Trading Program. States that were found to be significantly contributing to 1997 Ozone NAAQS nonattainment areas or interfere with maintenance of this ozone NAAQS in a downwind state are included in the TR NO<sub>x</sub> Ozone Season Trading Program.

The final CSAPR, which was published in the federal register on August 8, 2011, includes Missouri in the TR SO<sub>2</sub> Group 1 Trading Program and the TR NO<sub>x</sub> Annual Trading Program. Missouri was not included in the TR NO<sub>x</sub> Ozone Season trading program under the final rule. However, on December 27, 2011, EPA finalized a supplement to the final CSAPR (76 FR 80760), which added Missouri and five (5) other states to the TR NO<sub>x</sub> Ozone Season Trading Program. Therefore, Missouri is included in the TR NO<sub>x</sub> Ozone Season Trading Program beginning in 2015.

EPA is implementing CSAPR through a FIP beginning January 1, 2015 (79 FR 71663). Through the CSAPR, every state included in the rule has a statewide emission budget for each trading program in which it is included. These statewide budgets consist of a certain amount of allowances that are distributed to the CSAPR-affected units in that state. Applicability under the TR NO<sub>x</sub> Ozone Season Trading Program is defined in 40 CFR 97.504. Each allowance permits a unit to emit one ton of the respective air pollutant for which the allowance is granted. Allowances may be used to cover emissions from a particular unit, they may be banked to be used in a future year, or they can be traded or sold to other affected units included in the respective trading program. There are several different compliance options for units subject to CSAPR. Some examples of compliance options include, but are not limited to, the installation of controls to lower emissions, purchasing allowances from units with excess allowances due to over-controlling emissions, transfer allowances from one unit to another, fuel-switching, improved unit operating procedures, unit efficiency improvements, and modifications to unit dispatch order.

The following two paragraphs are intended to summarize the method used by EPA in setting statewide and unit level allowance budgets under the CSAPR. Complete details regarding these methods can be found in the preamble to the CSAPR (76 FR 48208 – 48352).

EPA's method of setting statewide emission budgets through the CSAPR included the use of the future year modeling. EPA took into account all known or planned controls that would be operational on all affected units included in the CSAPR by January 1, 2012. EPA also took into account all cost effective controls that could be installed to control emissions at CSAPR-affected units. The modeling was performed using these inputs, and the emissions computed by the model at each unit were summed for each state included in the rule to develop the statewide emission budget. These statewide budgets cannot be increased by states through a SIP.

After calculating the statewide budgets, EPA allocated the allowances to individual units in each state. Under the FIP, the statewide budgets for each trading program are divided into two different budget pools, the existing unit budget and the new unit set-aside (NUSA). Existing units are defined as those in operation on or before January 1, 2010. The NUSA was established as a percent of the statewide budget, to cover emissions from units that commenced commercial operation after January 1, 2010. The allowances that remain in the statewide budget after the NUSA is subtracted make up the existing unit budget. Once these two budget pools were established, EPA allocated allowances to individual existing CSAPR-affected units (units that commenced operation prior to January 1, 2010) using a method that took into account both historical heat input and historical emissions at each unit.

These individual existing unit level allocations established through the FIP cannot be changed by states through a SIP for the 2015 control periods. However, for the 2016 control period, states can submit SIPs to alter the individual unit level allocations under the FIP from the existing unit budget. The unit level allocations in the NUSA cannot be changed by states through a SIP for the 2016 control periods. For the 2017 and beyond control periods, states can submit SIPs to alter the individual unit level allocations under the FIP from both the existing unit budget and the NUSA.

## **2. Missouri TR NO<sub>x</sub> Annual Trading Program SIP Revision for 2016**

### ***2.1 Summary of Federal Allocation Method to Existing Units Under CSAPR***

The following two paragraphs are intended to summarize the method used by EPA to set unit level allowance budgets for existing units under the CSAPR. Complete details regarding the federal allocation method can be found in the preamble to the CSAPR (76 FR 48208 – 48352).

Under the federal allocation method of the CSAPR, existing units are distributed allowances from the statewide existing unit budget based on their historical heat input and capped at their historical maximum emissions. Specifically, the highest (nonzero) three years of each unit's heat input from the control periods in 2006 – 2010 are averaged together. This value is then summed with every other unit in the state in order to determine a percentage of historical statewide heat input for each unit. This percentage is then multiplied by the statewide existing unit budget to calculate the initial allocation for each unit. This value is compared to historical high emissions value at that unit from the control periods in 2003 – 2010. If the initial allocation for the unit is lower than the historical high emissions value, the unit receives the initial allocation amount. If the initial allocation for the unit is higher than the historical high emissions value, the unit receives their historical high emissions value as their allocation and the remaining allowances are rolled back to the statewide existing unit budget. This process is repeated until the number of allowances allocated to existing units equals the amount of allowances in the statewide existing unit budget.

Once the number of allowances allocated to existing units equals the amount of allowances in the statewide existing unit budget, all allowances that have been allocated to existing units are rounded to the nearest whole number using conventional rounding. If more allowances are rounded down than rounded up, there will be excess allowances in the existing unit budget. If more allowances are rounded up than rounded down, there will not be enough allowances in the existing unit budget to cover the allowances that were allocated. In both cases, under the FIP, the difference would be made with the NUSA. In other words, under the FIP, any extra allowances in the existing unit budget due to rounding would be transferred to the NUSA, and allowances would be taken from the NUSA if needed to cover the existing unit budget as a result of rounding.

### ***2.2 Missouri TR NO<sub>x</sub> Annual Trading Program Allocation Method for 2016 Under the SIP***

When the federal allocation method is applied to Missouri's existing unit budget for the TR NO<sub>x</sub> Annual Trading Program for the 2016 control period, there are nine (9) excess allowances due to rounding. The SIP revision described in this document will reallocate four (4) of these nine (9) excess allowances as follows: two (2) allowances to the facility owned by the City of Chillicothe and two (2) allowances to the facility owned by the City of Higginsville. No other changes to the existing unit allowance allocations are being made.

Missouri's codified TR NO<sub>x</sub> Annual Trading Program NUSA for the 2016 control period is six percent (6%) of the statewide budget, or 3,144 allowances. Missouri's SIP, as outlined in this document, is reallocating four (4) of the nine (9) excess TR NO<sub>x</sub> Annual allowances to existing

units. Therefore, if Missouri's 2016 TR NO<sub>x</sub> Annual SIP is approved by EPA, five (5) excess allowances from the existing unit budget will be placed in the NUSA for the 2016 control period, in which case Missouri's NUSA for the TR NO<sub>x</sub> Annual Trading Program will contain 3,149 allowances for the 2016 control period.

### ***2.3 Authority to Implement this SIP***

Section 110(a)(2)(D)(i)(I) of the CAA requires States to develop SIPs to address their significant impact on downwind states' nonattainment and maintenance areas. If a state fails to address their significant impact on downwind states, then EPA can implement a FIP. States have the authority to revise their SIP in order to replace all or portions of a FIP if the requirements of the CAA are met.

Due to the timing of the requirements under the CSAPR FIP and the corresponding federal trading programs established under CSAPR, the EPA has issued regulations defining the states' authority to revise their SIP to replace the individual allocation method portions of the CSAPR FIP. 40 CFR 52.38 (a)(3) grants states the right to adopt and submit a SIP revision that would replace the TR NO<sub>x</sub> Annual allowance allocation provisions in 40 CFR 97.411(a) for the 2016 control period provided that certain requirements are met. These requirements include that the State must provide a list of TR NO<sub>x</sub> Annual Units and the allowances allocated to each of these units. All of the units on the list must be located in the state and must have commenced commercial operation before January 1, 2010. The total number of allowances must not exceed the total statewide budget listed in 40 CFR 97.410(a) for the 2016 control period minus the NUSA. The list must be submitted electronically in a format prescribed by EPA, and the SIP revisions must not provide for any change in the allocations on the list after approval of the SIP by EPA. The State must also have notified EPA of its intent to assume allocation authority for 2016 electronically in a format prescribed by EPA and the SIP revision must be submitted by April 1, 2015 (76 FR 48354).

As required by CSAPR, on October 17<sup>th</sup>, 2011, the Air Program notified EPA of its intent to assume the allocation authority for 2013 for the TR NO<sub>x</sub> Annual Trading Program. As clarified in EPA's CSAPR Interim Final rule that was promulgated on December 3, 2014 (79 FR 71663), because implementation of the CSAPR was delayed through litigation for three (3) years, the letter of intent submitted back in 2011, still satisfies the requirement to submit such a letter in order for the state to assume allocation authority for existing units for the 2016 control period.

The Missouri Air Conservation Commission has the legal authority to develop, implement, and enforce regulations regarding air pollution, including the requirements of the SIP submittal described in this document, under section 643.050 of the Revised Statutes of Missouri, also known as the Missouri Air Conservation Law.

### ***2.4 Public Participation and Outreach***

In accordance with Section 110(a)(2) of the CAA, Missouri is required to hold a public hearing prior to adoption of a SIP revision and the subsequent submittal to the EPA. The Department notified the public and other interested parties of the public hearing and comment period thirty (30) days prior to holding such hearing for the SIP revision described in this document as follows:

- Notice of availability of the SIP revision described in this document was posted on the Department of Natural Resources' Air Pollution Control Program website by December 29, 2014: <http://www.dnr.mo.gov/env/apcp/stateplanrevisions.htm>
- The public hearing on the SIP revision described in this document was held on January 29, 2015, at 9:00 a.m. CST at the Bennett Springs Conference Room, 1730 E. Elm Street, Jefferson City, MO 65101.
- The comment period for the SIP revision described in this document opened on December 29, 2014 and closed on February 5, 2015, at 5:00 p.m. CST, which was seven (7) days after the public hearing.

The Air Program also held several stakeholder meetings and conference calls with CSAPR-affected facilities since the final CSAPR was promulgated on August 8, 2011. The goal of these meetings was to discuss the SIP revisions to assume allowance allocation authority under the CSAPR.

### ***2.5 Missouri TR NO<sub>x</sub> Annual Trading Program Allocations for 2016***

Table 1, below, summarizes Missouri's TR NO<sub>x</sub> Annual Trading Program Allocations for the 2016 control period. Appendix A includes the same allocations as Table 1, but is presented in EPA's prescribed format for submitting state allocations under the CSAPR.

For clarity, the following list notes the differences between Table 1 and Appendix A:

- Table 1 includes the facility plant names and ORIS codes for each facility; Appendix A includes the facility compliance account numbers that correspond to each plant as opposed to their names and
- Table 1 includes the state name in each row; Appendix A includes the state's primary reserve account number from which the allocations will be transferred to each facility.
- Table 1 does not have a specific column to indicate the vintage year of the allocations. Appendix A has a column to specify that the vintage year of the all the allocations is 2016.
- When Appendix A is submitted to EPA, it will be submitted electronically as a Microsoft Excel document and will be titled *Missouri 2016 Existing Unit Allocations – TR NO<sub>x</sub> Annual Trading Program*.

By April 1, 2015, the Air Program will submit a SIP revision to EPA with Missouri's TR NO<sub>x</sub> Annual Trading Program Allocations for the 2016 control period. The SIP revision will contain the table in Appendix A, and will be submitted electronically in the format prescribed by EPA.

**Table 1. Missouri TR NO<sub>x</sub> Annual Allocations for the 2016 Control Period**

Plant Name	State	ORIS ID	Boiler ID	2016 TR NO <sub>x</sub> Annual Allocation
Asbury	Missouri	2076	1	989
Audrain Power Plant	Missouri	55234	CT1	2
Audrain Power Plant	Missouri	55234	CT2	2
Audrain Power Plant	Missouri	55234	CT3	2
Audrain Power Plant	Missouri	55234	CT4	2
Audrain Power Plant	Missouri	55234	CT5	1
Audrain Power Plant	Missouri	55234	CT6	1
Audrain Power Plant	Missouri	55234	CT7	1
Audrain Power Plant	Missouri	55234	CT8	1
Blue Valley	Missouri	2132	3	141
Chamois Power Plant	Missouri	2169	2	278
Chillicothe	Missouri	2122	GT1A	2
Chillicothe	Missouri	2122	GT1B	0
Chillicothe	Missouri	2122	GT2A	0
Chillicothe	Missouri	2122	GT2B	0
Columbia	Missouri	2123	6	24
Columbia	Missouri	2123	7	67
Columbia	Missouri	2123	8	0
Columbia Energy Center (MO)	Missouri	55447	CT01	1
Columbia Energy Center (MO)	Missouri	55447	CT02	2
Columbia Energy Center (MO)	Missouri	55447	CT03	1
Columbia Energy Center (MO)	Missouri	55447	CT04	1
Dogwood Energy Facility	Missouri	55178	CT-1	33
Dogwood Energy Facility	Missouri	55178	CT-2	30
Empire District Elec Co Energy Ctr	Missouri	6223	1	1
Empire District Elec Co Energy Ctr	Missouri	6223	2	2
Empire District Elec Co Energy Ctr	Missouri	6223	3A	11
Empire District Elec Co Energy Ctr	Missouri	6223	3B	11
Empire District Elec Co Energy Ctr	Missouri	6223	4A	12
Empire District Elec Co Energy Ctr	Missouri	6223	4B	12
Essex Power Plant	Missouri	7749	1	9
Fairgrounds	Missouri	2082	CT01	0
Greenwood Energy Center	Missouri	6074	1	6
Greenwood Energy Center	Missouri	6074	2	5
Greenwood Energy Center	Missouri	6074	3	7
Greenwood Energy Center	Missouri	6074	4	8
Hawthorn	Missouri	2079	5A	2,445
Hawthorn	Missouri	2079	6	1
Hawthorn	Missouri	2079	7	7
Hawthorn	Missouri	2079	8	8
Hawthorn	Missouri	2079	9	21
Higginsville Municipal Power Plant	Missouri	2131	4A	2
Higginsville Municipal Power Plant	Missouri	2131	4B	0
Holden Power Plant	Missouri	7848	1	5
Holden Power Plant	Missouri	7848	2	6

Plant Name	State	ORIS ID	Boiler ID	2016 TR NO <sub>x</sub> Annual Allocation
Holden Power Plant	Missouri	7848	3	5
Howard Bend	Missouri	2102	CT1A	0
Howard Bend	Missouri	2102	CT1B	0
Iatan	Missouri	6065	1	3,464
James River	Missouri	2161	**GT1	7
James River	Missouri	2161	**GT2	15
James River	Missouri	2161	3	232
James River	Missouri	2161	4	264
James River	Missouri	2161	5	487
John Twitty Energy Center	Missouri	6195	1	897
John Twitty Energy Center	Missouri	6195	CT1A	1
John Twitty Energy Center	Missouri	6195	CT1B	1
John Twitty Energy Center	Missouri	6195	CT2A	1
John Twitty Energy Center	Missouri	6195	CT2B	1
Labadie	Missouri	2103	1	2,321
Labadie	Missouri	2103	2	2,495
Labadie	Missouri	2103	3	2,695
Labadie	Missouri	2103	4	2,613
Lake Road	Missouri	2098	6	463
Lake Road	Missouri	2098	GT5	2
McCartney Generating Station	Missouri	7903	MGS1A	11
McCartney Generating Station	Missouri	7903	MGS1B	11
McCartney Generating Station	Missouri	7903	MGS2A	11
McCartney Generating Station	Missouri	7903	MGS2B	11
Meramec	Missouri	2104	1	724
Meramec	Missouri	2104	2	682
Meramec	Missouri	2104	3	1,204
Meramec	Missouri	2104	4	1,678
Meramec	Missouri	2104	CT01	0
Meramec	Missouri	2104	CT2A	0
Meramec	Missouri	2104	CT2B	0
Mexico	Missouri	6650	CT01	0
Moberly	Missouri	6651	CT01	0
Montrose	Missouri	2080	1	811
Montrose	Missouri	2080	2	795
Montrose	Missouri	2080	3	835
Moreau	Missouri	6652	CT01	0
New Madrid Power Plant	Missouri	2167	1	2,548
New Madrid Power Plant	Missouri	2167	2	2,432
Nodaway Power Plant	Missouri	7754	1	5
Nodaway Power Plant	Missouri	7754	2	5
Northeast Generating Station	Missouri	2081	11	0
Northeast Generating Station	Missouri	2081	12	0
Northeast Generating Station	Missouri	2081	13	0
Northeast Generating Station	Missouri	2081	14	0
Northeast Generating Station	Missouri	2081	15	0

Plant Name	State	ORIS ID	Boiler ID	2016 TR NO <sub>x</sub> Annual Allocation
Northeast Generating Station	Missouri	2081	16	0
Northeast Generating Station	Missouri	2081	17	1
Northeast Generating Station	Missouri	2081	18	1
Peno Creek Energy Center	Missouri	7964	CT1A	11
Peno Creek Energy Center	Missouri	7964	CT1B	10
Peno Creek Energy Center	Missouri	7964	CT2A	10
Peno Creek Energy Center	Missouri	7964	CT2B	10
Peno Creek Energy Center	Missouri	7964	CT3A	11
Peno Creek Energy Center	Missouri	7964	CT3B	11
Peno Creek Energy Center	Missouri	7964	CT4A	10
Peno Creek Energy Center	Missouri	7964	CT4B	10
Ralph Green Station	Missouri	2092	3	1
Rush Island	Missouri	6155	1	2,086
Rush Island	Missouri	6155	2	2,106
Sibley	Missouri	2094	1	249
Sibley	Missouri	2094	2	245
Sibley	Missouri	2094	3	1,567
Sikeston	Missouri	6768	1	1,420
Sioux	Missouri	2107	1	2,098
Sioux	Missouri	2107	2	1,893
South Harper Peaking Facility	Missouri	56151	1	15
South Harper Peaking Facility	Missouri	56151	2	19
South Harper Peaking Facility	Missouri	56151	3	23
St. Francis Power Plant	Missouri	7604	1	31
St. Francis Power Plant	Missouri	7604	2	29
State Line (MO)	Missouri	7296	1	9
State Line (MO)	Missouri	7296	2-1	57
State Line (MO)	Missouri	7296	2-2	59
Thomas Hill Energy Center	Missouri	2168	MB1	928
Thomas Hill Energy Center	Missouri	2168	MB2	1,451
Thomas Hill Energy Center	Missouri	2168	MB3	2,993
Viaduct	Missouri	2096	CT01	0



## **Appendix A**

### **Missouri 2016 NO<sub>x</sub> Annual Allocations**

The table on the following pages includes the 2016 NO<sub>x</sub> Annual Allocations under the Cross-State Air Pollution Rule that the Missouri Department of Natural Resources' Air Pollution Control Program intends to submit to EPA by April 1<sup>st</sup>, 2015. The table is in the format prescribed by EPA; however, when the table is submitted to EPA, it will be submitted electronically as a Microsoft Excel Document and this cover page will not be included.

STReserveAcct	ReceiveAcct	UnitId	VintageYear	Amount
MO0000000100	002076FACLT	1	2016	989
MO0000000100	055234FACLT	CT1	2016	2
MO0000000100	055234FACLT	CT2	2016	2
MO0000000100	055234FACLT	CT3	2016	2
MO0000000100	055234FACLT	CT4	2016	2
MO0000000100	055234FACLT	CT5	2016	1
MO0000000100	055234FACLT	CT6	2016	1
MO0000000100	055234FACLT	CT7	2016	1
MO0000000100	055234FACLT	CT8	2016	1
MO0000000100	002132FACLT	3	2016	141
MO0000000100	002169FACLT	2	2016	278
MO0000000100	002122FACLT	GT1A	2016	2
MO0000000100	002122FACLT	GT1B	2016	0
MO0000000100	002122FACLT	GT2A	2016	0
MO0000000100	002122FACLT	GT2B	2016	0
MO0000000100	002123FACLT	6	2016	24
MO0000000100	002123FACLT	7	2016	67
MO0000000100	002123FACLT	8	2016	0
MO0000000100	055447FACLT	CT01	2016	1
MO0000000100	055447FACLT	CT02	2016	2
MO0000000100	055447FACLT	CT03	2016	1
MO0000000100	055447FACLT	CT04	2016	1
MO0000000100	055178FACLT	CT-1	2016	33
MO0000000100	055178FACLT	CT-2	2016	30
MO0000000100	006223FACLT	1	2016	1
MO0000000100	006223FACLT	2	2016	2
MO0000000100	006223FACLT	3A	2016	11
MO0000000100	006223FACLT	3B	2016	11
MO0000000100	006223FACLT	4A	2016	12
MO0000000100	006223FACLT	4B	2016	12
MO0000000100	007749FACLT	1	2016	9
MO0000000100	002082FACLT	CT01	2016	0
MO0000000100	006074FACLT	1	2016	6
MO0000000100	006074FACLT	2	2016	5
MO0000000100	006074FACLT	3	2016	7
MO0000000100	006074FACLT	4	2016	8
MO0000000100	002079FACLT	5A	2016	2,445
MO0000000100	002079FACLT	6	2016	1
MO0000000100	002079FACLT	7	2016	7
MO0000000100	002079FACLT	8	2016	8
MO0000000100	002079FACLT	9	2016	21
MO0000000100	002131FACLT	4A	2016	2

MO0000000100	002131FACLT	4B	2016	0
MO0000000100	007848FACLT	1	2016	5
MO0000000100	007848FACLT	2	2016	6
MO0000000100	007848FACLT	3	2016	5
MO0000000100	002102FACLT	CT1A	2016	0
MO0000000100	002102FACLT	CT1B	2016	0
MO0000000100	006065FACLT	1	2016	3,464
MO0000000100	002161FACLT	**GT1	2016	7
MO0000000100	002161FACLT	**GT2	2016	15
MO0000000100	002161FACLT	3	2016	232
MO0000000100	002161FACLT	4	2016	264
MO0000000100	002161FACLT	5	2016	487
MO0000000100	006195FACLT	1	2016	897
MO0000000100	006195FACLT	CT1A	2016	1
MO0000000100	006195FACLT	CT1B	2016	1
MO0000000100	006195FACLT	CT2A	2016	1
MO0000000100	006195FACLT	CT2B	2016	1
MO0000000100	002103FACLT	1	2016	2,321
MO0000000100	002103FACLT	2	2016	2,495
MO0000000100	002103FACLT	3	2016	2,695
MO0000000100	002103FACLT	4	2016	2,613
MO0000000100	002098FACLT	6	2016	463
MO0000000100	002098FACLT	GT5	2016	2
MO0000000100	007903FACLT	MGS1A	2016	11
MO0000000100	007903FACLT	MGS1B	2016	11
MO0000000100	007903FACLT	MGS2A	2016	11
MO0000000100	007903FACLT	MGS2B	2016	11
MO0000000100	002104FACLT	1	2016	724
MO0000000100	002104FACLT	2	2016	682
MO0000000100	002104FACLT	3	2016	1,204
MO0000000100	002104FACLT	4	2016	1,678
MO0000000100	002104FACLT	CT01	2016	0
MO0000000100	002104FACLT	CT2A	2016	0
MO0000000100	002104FACLT	CT2B	2016	0
MO0000000100	006650FACLT	CT01	2016	0
MO0000000100	006651FACLT	CT01	2016	0
MO0000000100	002080FACLT	1	2016	811
MO0000000100	002080FACLT	2	2016	795
MO0000000100	002080FACLT	3	2016	835
MO0000000100	006652FACLT	CT01	2016	0
MO0000000100	002167FACLT	1	2016	2,548
MO0000000100	002167FACLT	2	2016	2,432
MO0000000100	007754FACLT	1	2016	5

MO0000000100	007754FACLT	2	2016	5
MO0000000100	002081FACLT	11	2016	0
MO0000000100	002081FACLT	12	2016	0
MO0000000100	002081FACLT	13	2016	0
MO0000000100	002081FACLT	14	2016	0
MO0000000100	002081FACLT	15	2016	0
MO0000000100	002081FACLT	16	2016	0
MO0000000100	002081FACLT	17	2016	1
MO0000000100	002081FACLT	18	2016	1
MO0000000100	007964FACLT	CT1A	2016	11
MO0000000100	007964FACLT	CT1B	2016	10
MO0000000100	007964FACLT	CT2A	2016	10
MO0000000100	007964FACLT	CT2B	2016	10
MO0000000100	007964FACLT	CT3A	2016	11
MO0000000100	007964FACLT	CT3B	2016	11
MO0000000100	007964FACLT	CT4A	2016	10
MO0000000100	007964FACLT	CT4B	2016	10
MO0000000100	002092FACLT	3	2016	1
MO0000000100	006155FACLT	1	2016	2,086
MO0000000100	006155FACLT	2	2016	2,106
MO0000000100	002094FACLT	1	2016	249
MO0000000100	002094FACLT	2	2016	245
MO0000000100	002094FACLT	3	2016	1,567
MO0000000100	006768FACLT	1	2016	1,420
MO0000000100	002107FACLT	1	2016	2,098
MO0000000100	002107FACLT	2	2016	1,893
MO0000000100	056151FACLT	1	2016	15
MO0000000100	056151FACLT	2	2016	19
MO0000000100	056151FACLT	3	2016	23
MO0000000100	007604FACLT	1	2016	31
MO0000000100	007604FACLT	2	2016	29
MO0000000100	007296FACLT	1	2016	9
MO0000000100	007296FACLT	2-1	2016	57
MO0000000100	007296FACLT	2-2	2016	59
MO0000000100	002168FACLT	MB1	2016	928
MO0000000100	002168FACLT	MB2	2016	1,451
MO0000000100	002168FACLT	MB3	2016	2,993
MO0000000100	002096FACLT	CT01	2016	0

The Missouri Air Conservation Commission **ADOPTS** the following action on this 26th day of March, 2015:

Missouri State Implementation Plan Revision – Cross-State Air Pollution Rule NO<sub>x</sub> Annual Trading Program

Original signed by Commissioners:  
**David C. Zimmermann**  
**Gary J Pendergrass**  
**Jack C Baker**

Chairman

Vice Chairman

Member

\_\_\_\_\_, Member

\_\_\_\_\_, Member

\_\_\_\_\_, Member

\_\_\_\_\_, Member

The Missouri Air Conservation Commission **ADOPTS** the following action on this 26th day of March, 2015:

Missouri State Implementation Plan Revision – Cross-State Air Pollution Rule NO<sub>x</sub> Annual Trading Program

\_\_\_\_\_, Chairman

\_\_\_\_\_, Vice Chairman

\_\_\_\_\_, Member

*1*  
Original signed by Mark Garnett

Member

\_\_\_\_\_, Member

\_\_\_\_\_, Member

\_\_\_\_\_, Member

## Vit, Wendy

---

**From:** Missouri DNR <MODNR@public.govdelivery.com>  
**Sent:** Monday, December 29, 2014 8:57 AM  
**To:** Bungart, Renee; Archer, Larry; Lovejoy, Victoria; Moore, Kyra; Vit, Wendy; Bechtel, Cheri; Terlizzi, Gena; Alexander, Jennifer  
**Subject:** Courtesy Copy: Missouri Air Conservation Commission - January 29, 2015 Public Hearing

**This is a courtesy copy of an email bulletin sent by Wendy Vit.**

**This bulletin was sent to the following groups of people:**

Subscribers of Air Public Notices (691 recipients)



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### MISSOURI AIR CONSERVATION COMMISSION WILL HOLD PUBLIC HEARING

JEFFERSON CITY, MO -- The Missouri Air Conservation Commission will hold a public hearing on Thursday, January 29, 2015 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):

- \* Missouri State Implementation Plan Revision – Cross-State Air Pollution Rule (CSAPR) NO<sub>x</sub> Annual Trading Program

This proposed State Implementation Plan (SIP) revision will reallocate four oxides of nitrogen (NO<sub>x</sub>) annual allowances under the U.S. Environmental Protection Agency's Cross-State Air Pollution Rule. Two NO<sub>x</sub> annual allowances each will be distributed to the City of Chillicothe and the City of Higginsville. These two municipalities would have received zero allowances under the federal allocation method. All other existing unit budget allowances will be distributed following the federal allocation method. This SIP revision redistributes emission allowances for the 2016 control period only. The Missouri Department of Natural Resources' Air Pollution Control Program is pursuing a separate rulemaking and SIP revision to reallocate allowances for the control period 2017 and beyond.

- \* Missouri State Implementation Plan Revision – Cross-State Air Pollution Rule (CSAPR) NO<sub>x</sub> Ozone Season Trading Program

This proposed State Implementation Plan (SIP) revision will reallocate two oxides of nitrogen (NO<sub>x</sub>) ozone season allowances under the U.S. Environmental Protection Agency's Cross-State Air Pollution Rule. One NO<sub>x</sub> ozone season allowance each will be distributed to the City of Chillicothe and the City of Higginsville. These two municipalities would have received zero allowances under the federal allocation

method. All other existing unit budget allowances will be distributed following the federal allocation method. This SIP revision redistributes emission allowances for the 2016 control period only. The Missouri Department of Natural Resources' Air Pollution Control Program is pursuing a separate rulemaking and SIP revision to reallocate allowances for the control period 2017 and beyond.

If the Commission adopts these actions, it will be the Department's intention to submit them to the U.S. Environmental Protection Agency to be included in Missouri's State Implementation Plan.

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 5, 2015. 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.



**Missouri Department of Natural Resources**

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## Air Pollution Control Program

### State Plan Action

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



### On Public Notice

#### Missouri State Implementation Plan Revision – Cross-State Air Pollution Rule (CSAPR) NOx Annual Trading Program

The Missouri Department of Natural Resources' Air Pollution Control Program is proposing a State Implementation Plan (SIP) revision to reallocate four NOx annual allowances under the U.S. Environmental Protection Agency's Cross-State Air Pollution Rule. Two NOx annual allowances each would be distributed to the City of Chillicothe and the City of Higginsville. These two municipalities would have received zero allowances under the federal allocation method. All other existing unit budget allowances will be distributed following the federal allocation method.

This SIP revision redistributes emission allowances for the 2016 control period only. The Air Program is pursuing a separate rulemaking and SIP revision to reallocate allowances for the control period 2017 and beyond.

[CSAPR SIP-NOx Annual Appendix A](#)

[Submit Comments Now](#)

A public hearing is scheduled for this plan action on January 29, 2015. Comments about this plan action will be accepted through the close of business on February 5, 2015.

#### Missouri State Implementation Plan Revision – Cross-State Air Pollution Rule (CSAPR) NOx Ozone Season Trading Program

The Missouri Department of Natural Resources' Air Pollution Control Program is proposing a State Implementation Plan (SIP) revision to reallocate two NOx Ozone Season allowances under the U.S. Environmental Protection Agency's Cross-State Air Pollution Rule. One NOx ozone season allowance each will be distributed to the City of Chillicothe and the City of Higginsville. These two municipalities would have received zero allowances under the federal allocation method. All other existing unit budget allowances will be distributed following the federal allocation method.

This SIP revision redistributes emission allowances for the 2016 control period only. The Air Program is pursuing a separate rulemaking and SIP revision to reallocate allowances for the control period 2017 and beyond.

[CSAPR SIP-NOx Ozone Season Appendix A](#)

[Submit Comments Now](#)

A public hearing is scheduled for this plan action on January 29, 2015. Comments about this plan action will be accepted through the close of business on February 5, 2015.

### Proposed for Adoption

None at this time.

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## Contact

### Air Pollution Control Program

P.O. Box 176

Jefferson City, MO 65102

800-361-4827

573-751-4817

Email: [cleanair@dnr.mo.gov](mailto:cleanair@dnr.mo.gov)

Asbestos Notifications Email:

[AsbestosNotifications@dnr.mo.gov](mailto:AsbestosNotifications@dnr.mo.gov)

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1 BEFORE THE MISSOURI AIR CONSERVATION COMMISSION MEETING

2

3

4

5

PUBLIC HEARING

Missouri State Implementation Plan Revision - Cross-State Air

6 Pollution Rule NOx Annual Trading Program; Missouri State

Implementation Plan Revision - Cross-State Air Pollution

7

Rule NOx Ozone Season Trading Program

8

9

January 29, 2015

Elm Street Conference Center

10

1730 East Elm Street

Lower Level

11

Jefferson City, MO 65101

12

13 Before:

14 Gary Pendergrass - Chair

Jack Baker - Member

15 Mark Garnett - Member

David Zimmermann - Member

16

17

18 THE COURT REPORTER:

19 Jenna Petree

MIDWEST LITIGATION SERVICES

20 401 Locust Street

Columbia, MO 65201

21 573-449-0561

22

23

24

25

1 Proceedings

2 MR. BAKER: The hearing will come to order.

3 Let the record show the following Commissioners are  
4 present: Jack Baker, David Zimmermann, Mark Garnett, and  
5 Gary Pendergrass by phone. Air Commission -- the Air  
6 Conservation Commission of the State of Missouri has called  
7 this public hearing pursuant to Section 643.070 Revised  
8 Statutes of Missouri; EPA promulgated rule 40 CFR 51.102,  
9 for the purpose of hearing testimony relating to: Missouri  
10 State Implementation Plan Revision - Cross-State Air  
11 Pollution Rule NOx Annual Trading Program; Missouri State  
12 Implementation Plan Revision - Cross-State Air Pollution  
13 Rule NOx Ozone Season Trading Program.

14 The hearing will close at 5:00 p.m. on  
15 February 5, 2015.

16 Anyone how has not been scheduled to appear,  
17 but who wishes to be heard, should indicate that you wish  
18 to speak on the sign-in sheet available at the door.

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

23 When you testify, please state your name,  
24 business address, and your occupation or affiliation.

25 If you have a prepared statement, it will be

1 MR. BAKER: Okay. We are ready the sensitive  
2 findings. I'm on the wrong page. I got ahead of my  
3 myself.

4 MARK LEATH, having been first duly sworn, testifies as  
5 follows:

6 MR. LEATH: Mr. Chairman, members of the  
7 Commission. My name is Mark Leath. I am employed as an  
8 environmental engineer with the Missouri Department of  
9 Natural Resources' Air Pollution Control Program. I work  
10 at 1659 East Elm Street, Jefferson City, Missouri.

11 I am here today to present testimony on two  
12 proposed Missouri State Implementation Plan or the SIP  
13 revisions entitled, "Cross-State Air Pollution Rule, or  
14 CSAPR, NOx Annual Trading Program, and Cross-State Air  
15 Pollution Rule NOx Ozone Season Trading Program." The  
16 executive summaries for these two plans start in the  
17 briefing document on pages 99 and 105, respectively.

18 If it pleases the Commission, I would like to  
19 present both plans together.

20 The CSAPR is a federal rule designed to reduce  
21 the interstate transport of power plant emissions through  
22 an EPA-administered emission cap-and-trade program. CSAPR  
23 is being implemented as a Federal Implementation Plan, or  
24 FIP, effective without action by starting in 2015, but  
25 states have the option to reallocate emission allowances



**RECOMMENDATION FOR ADOPTION**

**PROPOSED REVISION TO**

**MISSOURI STATE IMPLEMENTATION PLAN –  
CROSS-STATE AIR POLLUTION RULE (CSAPR)  
NO<sub>x</sub> ANNUAL TRADING PROGRAM**

On January 29, 2014, the Missouri Air Conservation Commission held a public hearing for a revision to the Missouri State Implementation Plan (SIP) entitled – *Cross-State Air Pollution Rule (CSAPR) NO<sub>x</sub> Annual Trading Program*. A summary of comments received and the Air Program’s corresponding responses is included on the following page. No revisions were made to the proposed plan as a result of comments received.

The plan has not been reprinted in the briefing document due to its volume. The entire 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 it 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 –**  
**CROSS-STATE AIR POLLUTION RULE (CSAPR)**  
**NO<sub>x</sub> ANNUAL TRADING PROGRAM**

The public comment period for the proposed revision to the Missouri State Implementation Plan (SIP) for the *Cross-State Air Pollution Rule (CSAPR) NO<sub>x</sub> Annual Trading Program* opened on December 29, 2014 and closed on February 5, 2015. No revisions to the proposed plan were made as a result of comments. However, minor clarifications and revisions were made to the supplemental document that will accompany the plan as a result of internal review.

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 did not receive any comments.

**SUMMARY OF MINOR CHANGES:** The SIP revision being proposed for adoption only consists of the list of existing CSAPR units and their corresponding NO<sub>x</sub> Annual Allocations for the 2016 control period under CSAPR. The supplemental document that will accompany the SIP revision describes the background, purpose, and authority to submit this list as a SIP revision to the U.S. Environmental Protection Agency (EPA). Accordingly, the document describing the SIP revision has been renamed for clarity to show that it is a supplemental document that will accompany the SIP revision. The Air Program is only requesting SIP approval of the list that will be submitted and not the document itself. In addition to the title change of the supplemental document, other minor changes and clarifications were made to the supplemental document as follows:

- Throughout the document, minor narrative changes were made to provide clarity that only the list of allocations will be submitted as a SIP revision and that the document only explains the background, purpose, and authority to do so.
- A list was added to subsection 2.5 of the document to clearly explain the differences between the information displayed in Table 1 of the document and the information displayed in Appendix A, which will be submitted to EPA as the SIP revision.
- References to EPA's CSAPR Interim Final Rule, which was promulgated in December 2014, were added to section 1 and subsection 2.3 of the document.