

**MINUTES**  
**MISSOURI AIR CONSERVATION COMMISSION**  
**Elm Street Conference Center**  
**1730 East Elm Street**  
**Lower Level**  
**Bennett Springs Conference Room**  
**Jefferson City, MO 65101**  
**August 29, 2019**  
**9:00 a.m.**

**Commissioners Present**

Ron Boyer, Member  
Mark Fohey, Member  
Gary Pendergrass, Chairman  
Richard Rocha, Member  
Kevin Rosenbohm, Vice Chairman

**Staff Members Present**

Aaron Basham, Air Quality Planning Section, Air Pollution Control Program (APCP)  
Van Beydler, Public Information Coordinator, Department of Natural Resources  
Lindsay Boyd, Compliance/Enforcement Section, APCP  
Darcy Bybee, Director, APCP  
Kevin Carpenter, Compliance/Enforcement Section, APCP  
Stephanie Durbin, Compliance/Enforcement Section, APCP  
David Gilmore, Director's Office, APCP  
Sara Green, Director's Office, APCP  
Chris Heimsoth, ESP  
Kendall Hale, Permits Section Chief, APCP  
Mark Leath, Air Quality Planning Section, APCP  
Stephen Hall, Air Quality Analysis Section Chief, APCP  
Wayne Graf, Air Quality Planning Section, APCP  
Patricia Maliro, Air Quality Analysis Section, APCP  
Kyra Moore, Deputy Director, Division of Environmental Quality  
Paul Myers, Air Quality Planning Section, APCP  
Richard Swartz, Compliance/Enforcement Section Chief, APCP  
Angela Wagner, Permits Section, APCP  
Richard Waters, Assistant General Counsel, Department of Natural Resources  
Will Wetherell, ESP  
Emily Wilbur, Air Quality Planning Section Chief, APCP

**Others Present by Attendance Record**

Robert Brundage, Newman, Comley, and Ruth P.C.  
Dave Fraley, Diamond Sky Ventures  
Leslie Holloway, Missouri Farm Bureau  
Jay Hoskins, Metropolitan Sewer District

David Little, City Utilities of Springfield  
Jeremy Rogus, St. Louis County, Department of Health  
Roger Walker, Regulatory Environmental Group for Missouri (REGFORM)

**A. Call to Order**

Chairman Gary Pendergrass called the August 29, 2019, meeting of the Missouri Air Conservation Commission to order. The following commissioners were present: Gary Pendergrass, Ron Boyer, Mark Fohey, Kevin Rosenbohm, and Richard Rocha.

**B. Minutes from July 25, 2019**

Commissioner Boyer moved to approve the July 25, 2019, minutes as written. Vice Chairman Rosenbohm seconded the motion. All commissioners voted to approve the July 25, 2019, minutes as written.

**C. Welcome and Introductions**

Ms. Darcy Bybee said it is a full agenda with several reports and several public hearing items. She also mentioned the commission would tour the Environmental Services Program in the afternoon.

Ms. Bybee also announce the Division of Energy has moved to the Department of Natural Resources, effective yesterday. She also announced Mr. Chuck Adamson is the department's new General Counsel.

**D. Reports – The following referenced reports are in the August 29, 2019, Missouri Air Conservation Commission Briefing Document and available online at [dnr.mo.gov/env/apcp/macc.htm](http://dnr.mo.gov/env/apcp/macc.htm).**

**1) COMPLIANCE/ENFORCEMENT REPORT**

The video for this meeting and these reports can be viewed at <https://dnr.mo.gov/videos/archive-meetings.htm>. Please note that the video will be removed 90 days after the date of the commission meeting.

**a) Concern Report**

Mr. Richard Swartz said the Compliance/Enforcement Report begins on page 43 with the Concern Report. A total of 74 concerns were received between June 16, 2019, through July 15, 2019. During this time 54 investigations were completed by regional office staff. In addition, one Letter of Warning was issued.

**b) Ongoing Negotiations Report**

The Ongoing Negotiations Report can be found on page 83. There are eight enforcement actions in the negotiation process at this time, which is unchanged from the last commission meeting.

Not all enforcement actions the program is pursuing are showing up on this report due to the timing of actions and the underlying queries. Moving forward, Mr. Swartz will be reviewing the data matrix that is used to generate the report so it more accurately reflects what the Compliance/Enforcement Section is working on.

**c) Finalized Agreement Report**

No finalized agreements were reported.

**d) Pending Referrals Report**

The Pending Referrals Report can be found on page 85. There are four active referrals at this time, which is also unchanged from last month.

**e) Administrative Penalty Order**

A unilateral APO was issued to Hilltop Tree Services in Clinton County on July 31, 2019. Mr. Swartz gave further detail regarding the APO.

**2) PERMIT REPORT**

Mr. Kendall Hale said the Permit Report begins on page 87 of the briefing document with the Permit Applications Received Report. For the months of January through July, the Permit Section received 303 Construction and 82 Operating Permit projects. The Permit Section has received a total of 385 permit projects, so far, for 2019. This is 33 more construction projects than last year at this same time.

The Permit Applications Completed Report begins on page 93 of the briefing document. For the months of January through July the Permit Section completed 261 Construction and 97 Operating Permit projects. The Permit Section has completed a total of 358 permit projects, so far, for 2019. This information is searchable on the Air Pollution Control Program's website and is updated weekly.

The Open Permits Report is on page 99 of the briefing document. This report details the types of projects currently open in the Permit Section. There are currently 164 Construction and 131 Operating permit projects open in the Permit Section. There are still two Basic Renewal projects. The Permit Section is reviewing those projects to ensure they can be terminated or if they need to be reclassified as Intermediate or Part 70.

There is one significant modification to a Part 70 operating permit that is on public notice for Southeast Missouri State. And there is one Intermediate permit project on public notice for Enersys in Warrensburg. Draft permits are located on the program's website. Comments can be submitted electronically and in writing. For details on how to submit comments visit the Air Pollution Control Program's website at <https://dnr.mo.gov/env/apcp/permit-public-notice.htm>

The Permit Section was down to three vacancies. The new Senior Office Support Assistant has been on board for approximately one month and is helping to keep the Permit Section organized. The Permit Section lost one engineer and anticipates losing one more. By the next commission meeting the Permit Section will be back up to five vacancies. Seven out of 19 permit writers in the Permit Section currently have less than a year's worth of experience.

The Permit Section is reviewing the way it is organized and the way it processes permit applications to improve efficiency.

### **3) AIR QUALITY PLANNING REPORT**

#### **a) Rule and State Implementation Plan Agenda**

Ms. Emily Wilbur said the Rule and SIP Agenda begins on page 101 and continues through page 104 of the briefing document. Although there are no items that will be presented to the commission for adoption there are six public hearing items: three rules and three SIP revisions. The rulemakings are 10 CSR 10-5.570, *Control of Sulfur Emissions From Stationary Boilers*, 10 CSR 10-6.161 *Commercial and Industrial Solid Waste Incinerators*, and 10 CSR 10-6.200, *Hospital, Medical, Infectious Waste Incinerators*. The three SIP revisions that will be presented are the revision to the ozone maintenance plan for St. Louis and the revision to the PM<sub>2.5</sub> maintenance plan for St. Louis, and a revision to the inspection and maintenance plan in the St. Louis area.

The September 26, 2019, commission meeting will be held in Springfield at the Southwest Regional Office. No public hearing items are scheduled for that meeting. However, four rulemakings are scheduled to be presented for proposed adoption and they are as follows: 10 CSR 10-5.442, *Control of Emissions From Lithographic and Letterpress Printing Operations*; 10 CSR 10-5.550, *Control of Volatile Organic Compound Emissions From Reactor Processes and Distillation Operations Processes in the Synthetic Organic Chemical Manufacturing Industry*; 10 CSR 10-6.050, *Start-Up, Shutdown, and Malfunction Conditions*; and 10 CSR 10-6.140, *Restriction of Emissions Credit for Reduced Pollutant Concentrations From the Use of Dispersion Techniques*. The comment period for those four rules ended at the beginning of August. The status for those four rules, and all of the rules, can be found in the Rules in Progress Schedule.

#### **b) Rules in Progress Schedule**

The Rules in Progress Schedule begins on page 105 of the briefing document. Since the July commission meeting, three rulemakings were filed with the Secretary of State: 10 CSR 10-6.330, *Restriction of Emissions From Batch-Type Charcoal Kilns*; 10 CSR 10-6.390, *Control of NO<sub>x</sub> Emissions From Large Stationary Internal Combustion Engines*; and 10 CSR 10-6.060, *Construction Permits*. These three proposed rulemakings will be published in the *Missouri Register* and will appear in a future public hearing schedule in a future briefing document.

EPA finalized two rulemakings and they are now part of the SIP: 10 CSR 10-6.040, *Reference Methods* and 10 CSR 10-6.110, *Reporting Emission Data, Emission Fees, and Process Information*. Five additional rulemakings were proposed to be approved by EPA and three of them (page 106) are rescissions of the Clean Air Interstate Rule (CAIR): 10 CSR 10-6.362, 10 CSR 10-6.364 and 10 CSR 10-6.366. These three rules have been rescinded because they have been superseded by the Cross-State Air Pollution Rules (CSAPR). EPA is also proposing to approve two CSAPR rules (page 108): 10 CSR 10-6.372, *Annual NO<sub>x</sub> Trading Allowance Allocations* and 10 CSR 10-6.374, *Ozone Season NO<sub>x</sub> Trading Allowance Allocations*.

Ms. Wilbur said she will update the commission on those rules in the coming months.

**c) State Plans Report**

The State Plans Report begins on page 111 of the briefing document. Ms. Wilbur pointed to the three SIP revisions that will be presented at public hearing and focused on EPA action since the last commission meeting. EPA has redesignated the St. Louis area from “Unclassifiable” to “Unclassifiable Attainment” for the PM<sub>2.5</sub> 2012 Standard. Although the monitors in the area have been complying with the standard for several years, EPA is now finalizing this action and has redesignated this area to attainment. With this action the historic five county St. Louis nonattainment area will be in compliance of all of the PM standards and all of the historic ozone standards.

Back in November 2018 an action was submitted to EPA for their approval. As the commission may recall, the program had a SIP revision for the Lake Road facility in St. Joseph. The facility had switched from coal to natural gas and the program was updating the SIP to reflect those operational changes. EPA has finalized that action and it has been approved into the Missouri SIP.

**4) DIRECTOR’S REPORT**

**a) Staffing**

There are approximately 13 vacancies program-wide. The program hopes to fill several vacancies, especially in the Permits section, as quickly as possible. The program continues to review vacancies to determine which vacancies to fill immediately and which positions to hold, balancing expenditures with workload.

**b) 2020 Fee Stakeholder Process**

The entire program is trying to be more efficient and effective. As Mr. Hale mentioned, the Permit Section is reviewing ways to streamline and improve efficiency. The Asbestos Unit has also made great strides in efficiency, along with other areas of the program. Beyond vacancies and streamlining processes, the program is also taking a close look at training and equipment expenses. Training is needed and necessary and the program is trying do it in the most frugal manner.

With all of this in mind, the program is also reviewing its fees, including revenue and expenditures. The program last held a fee stakeholder process to review fees in 2014. Fees were raised at the beginning of 2016 and 2017 based upon and following the statutory process. Asbestos, permits, and emission fees were all items that were discussed with the public and the stakeholder process. The program is in the early stages of kicking off another stakeholder process early next year, possibly in the spring. Ms. Bybee said she wanted to inform the commission early and will present information on how the program uses its funds in the near future.

Commissioner Rocha said fees are a difficult topic. He applauded the effort on bringing up this topic early. It's important to create dialog and build as much consensus ahead of time as possible.

**c) Ozone**

The 2019 ozone monitoring season kicked off in March and will end at the end of October. Last month the program reported three days of preliminary exceedances of the 2015 ozone standard. This month there have been a total of six days, 11 different ozone monitors, have recorded a preliminary exceedance. At this point, the program does not have any regulatory obligations due to the six preliminary exceedances under the 2015 ozone standard. The West Alton air monitor, which is the design value for the St. Louis area, was out of commission for a while due to flooding. The program is evaluating what that data gap means with regard to the calculating the design value. The preliminary ozone monitoring data is posted on the web weekly and Mr. Steve Hall gives an annual update on emissions and monitoring in the spring.

The ozone forecast for Kansas City today is green, which is good. Today's ozone forecast for St. Louis is yellow, which is moderate. Orange is the level when the program starts to send out Tweets and GovDelivery e-mails. As always, the program will be paying close attention to the air quality throughout the ozone season.

**c) Volkswagen**

Last month Ms. Wilbur gave a presentation on the culmination of all the work the Volkswagen team was able to accomplish this year, along with stakeholders, citizens, and entities that applied for funding. Tomorrow, August 30, 2019, will close the round of application periods for government trucks and transit/shuttle buses. The application period for several other categories will open over the next several weeks. It is not too late to participate in the process and it is not too late to apply for funding.

Commissioner Rocha suggested someone review the possibility of installing a couple of EV charging stations in a couple of locations. He said it would benefit citizens, visitors, and department employees.

Ms. Bybee responded that the program a little earlier in the process for the EV infrastructure funding piece than in some of the other categories. She said that visitors, citizens, and department employees would certainly benefit, and that she would pass on his message.

Commissioner Boyer inquired if the department's new legal counsel, Mr. Chuck Adamson, is in addition to Mr. Richard Waters or in lieu of him.

Ms. Bybee replied that Mr. Adamson is the general counsel for the department. In addition, Ms. Shawna Bligh has joined the department as well. Mr. Richard Waters is still the attorney assigned to most matters for the air program.

#### **d) Future Meeting Dates**

Ms. Bybee said she appreciated the commission setting their 2020 meeting dates at the July meeting. She noted, however, there is a conference in April 2020 that would overlap with the commission meeting that is scheduled to take place on Thursday, August 30, 2020. She asked if the commission would consider moving their meeting to Wednesday, August 29, 2020.

The commission approved moving the April 30, 2020, meeting date to April 29, 2020.

Ms. Bybee added that the Ozark Clean Air Alliance is scheduled to give a presentation at the September 26, 2019, meeting in Springfield.

### **E. Public Hearing**

The video for this meeting and these reports can be viewed at <https://dnr.mo.gov/videos/archive-meetings.htm>. Please note that the video will be removed 90 days after the date of the commission meeting.

Chairman Pendergrass called the public hearing to order.

Mr. Aaron Basham presented 10 CSR 10-5.570, *Control of Sulfur Emissions From Stationary Boilers*. More information on the proposed amendment can be found on page 117 of the briefing document.

Mr. Paul Myers presented 10 CSR 10-6.161, *Commercial and Industrial Solid Waste Incinerators*. More information on the proposed amendment can be found on page 127 of the briefing document.

Mr. Myers presented 10 CSR 10-6.200, *Hospital, Medical, Infectious Waste Incinerators*. More information on the proposed amendment can be found on page 133 of the briefing document.

Mr. Mark Leath presented the Maintenance Plan Revision for the St. Louis (Missouri) Maintenance Area Under the 1979, 1997, and 2008 Ozone Standards. More information on the proposed revision can be found on page 137 of the briefing document.

Commissioner Rocha submitted a question and Mr. Leath replied. To view the question and response the video may be viewed at <https://dnr.mo.gov/videos/archive-meetings.htm>. Please note that the video will be removed 90 days after the date of the commission meeting.

Mr. Leath presented the Maintenance Plan Revision for the St. Louis (Missouri) Maintenance Area Under the 1997 Annual Fine Particulate Matter (PM<sub>2.5</sub>) Standard. More information on the proposed revision can be found on page 139 of the briefing document.

Mr. Leath presented the Inspection and Maintenance Program for the St. Louis Area – 2019 Revision. More information on the proposed revision can be found on page 141 of the briefing document. To view the slides to his presentation, please see Attachment A at the end of these minutes.

Chairman Pendergrass closed the public hearing.

To obtain a copy of the public hearing transcript, please contact Kathy Porter by writing to Alaris Litigation Services, 711 North 11th Street, St. Louis, MO 63101, or by phone at 1-800-280-3376.

#### **F. New Business**

Commissioner Boyer presented a proposed resolution to the commission. He requested this resolution be included on the September 26, 2019, meeting agenda and printed in the next briefing document. See Attachment B at the end of these minutes for a copy of the proposed resolution.

Ms. Bybee said the proposed resolution will be included in the next briefing document and posted online under the August 29, 2019, meeting heading and also under the September 26, 2019 meeting heading. It will also be added to the agenda for the September 26, 2019, meeting.

Chairman Pendergrass said that in years past retiring commissioners were have been presented with a plaque recognizing their service on the commission. He requested staff prepare plaques for Commissioners Mark Garnett, Jack Baker, and Jack Jones.

Ms. Bybee said the program will prepare the plaques.

#### **G. Open Comment Session**

No one addressed the commission.



## **H. Future Meeting Dates**

### **September 26, 2019 – Thursday**

Southwest Regional Office  
2040 West Woodland  
East and West Conference Rooms  
Springfield, MO 65807

### **October 31, 2019 – Thursday**

Elm Street Conference Center  
1730 East Elm Street  
Lower Level  
Bennett Springs Conference Room  
Jefferson City, MO 65101

### **December 3, 2019 – Tuesday**

Elm Street Conference Center  
1730 East Elm Street  
Lower Level  
Bennett Springs Conference Room  
Jefferson City, MO 65101

### **January 30, 2020 – Thursday**

Location to be Determined

### **March 26, 2020 – Thursday**

Location to be Determined

### **April 29, 2020 – Wednesday**

Location to be Determined

### **May 28, 2020 – Thursday**

Location to be Determined

### **July 30, 2020 – Thursday**

Location to be Determined

### **August 27, 2020 – Thursday**

Location to be Determined

### **September 24, 2020 – Thursday**

Location to be Determined

### **October 29, 2020 – Thursday**

Location to be Determined

### **December 3, 2020 – Tuesday**

Location to be Determined

**I. Discussion of Pending Litigation and Legal Matters**

Chairman Pendergrass announced the commission will go into Closed Session and then after the Closed Session the commission will adjourn the meeting.

**J. Meeting Adjournment**

Vice Chairman Rosenbohm moved to go into Closed Session pursuant to Section 610.021(1) RSMo and for adjournment of the August 29, 2019, meeting upon conclusion of the Closed Session. Commissioner Fohey seconded the motion.

All commissioners voted to go into Closed Session pursuant to Section 610.021(1) RSMo and for adjournment of the August 29, 2019, meeting upon conclusion of the Closed Session.

Respectfully submitted,

*Signature on File*

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Darcy A. Bybee, Director  
Air Pollution Control Program

Approved:

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Gary Pendergrass, Chairman  
Missouri Air Conservation Commission



**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES

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# Inspection and Maintenance Program for the St. Louis Area – 2019 Revision

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Mark Leath  
Missouri Department of Natural Resources'  
Air Pollution Control Program

Prepared for: Missouri Air Conservation Commission  
August 29, 2019

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**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES

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# Overview

- History of the I/M program in St. Louis
- Ozone Standard Boundary Designations (Historical and Current)
- Requirements to remove I/M programs
- Maintenance plan revisions
- Technical analysis

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## History of the I/M Program

- Original St. Louis I/M Program began in 1984
  - Franklin, Jefferson, St. Charles, and St. Louis counties and the City of St. Louis
- Four major revisions: 1990, 1995, 1999, and 2007 - Gateway Vehicle Inspection Program (GVIP)
- GVIP – Decentralized on-board diagnostics test required every two years for 1996 and newer (gas) and 1997 and newer (diesel) vehicles with gross vehicle weight rating 8,500 pounds or less

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## Ozone Standard Boundary Designations (Historical and Current)

### St. Louis (MO) Ozone Nonattainment Areas

1979, 1997, and 2008  
ozone standards

- Franklin, Jefferson, St. Charles, and St. Louis counties and City of St. Louis
- The full area has been redesignated to attainment for all three historical ozone standards

2015 ozone standard

- St. Charles and St. Louis counties, City of St. Louis and Boles Township in Franklin County
- Does not include Jefferson County or any area in Franklin County except for Boles Township

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## Requirements to Remove I/M Programs

### 40 CFR 51 Subpart S – Inspection and Maintenance Program Requirements

- Removal after attainment - requires EPA approval of a demonstration that emissions related to the removal of I/M would not negatively impact future maintenance of the ozone standard

### Clean Air Act Section 110(I)

- EPA cannot approve any plan revision that would interfere with attainment or reasonable further progress of any national ambient air quality standard

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## Maintenance Plan Revisions

- Missouri has four EPA-approved maintenance plans for the five-county St. Louis (MO) area:
  - 1997 annual fine particulate matter (PM<sub>2.5</sub>) standard
  - 1979, 1997, and 2008 ozone standards
- All these approved plans relied on an I/M program
  - The department is proposing to revise our PM<sub>2.5</sub> and ozone maintenance plans concurrently with this I/M SIP revision
  - The revisions do not address the 2015 ozone standard

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## Technical Analysis

- Appendix 3 of proposed SIP revision includes the Clean Air Act Section 110(l) demonstration for removal of I/M in Franklin and Jefferson counties
- Evaluates the impact of removal on current national ambient air quality standards

## Technical Analysis - Continued

- The department modeled numerous scenarios with the latest version of EPA's mobile source emissions model (MOVES 2014b).
- For the 2015 ozone standard, the scenarios included –
  - 2017 Baseline Scenario
  - 2020 and 2030 Scenarios with I/M
  - 2020 and 2030 Scenario without I/M
- Ozone scenarios evaluated July weekday ozone precursor emissions (NO<sub>x</sub> and VOC) for all on-road mobile sources.

## Technical Analysis - Continued

Monitoring Site	County	2015-17 Ozone Design Value (ppb)	2016-18 Ozone Design Value (ppb)
Arnold West	Jefferson	68	69
Pacific	St. Louis	64	66

- With the exception of Boles Township, Jefferson and Franklin County were designated attainment under the 2015 ozone standard
  - Attainment: Areas that meet the standard and are not contributing to nearby areas that do not meet the standard
- Both 2015-2017 and 2016-2018 design values in Jefferson County comply with the standard
- 2017 emission levels are adequate to remain in compliance with the standard

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## Technical Analysis - Continued

Franklin and Jefferson County Modeled Onroad Mobile Source Emissions (Tons/O<sub>3</sub> Season day)

Area	2017 Baseline	
	NO <sub>x</sub>	VOC
Franklin	4.52	1.64
Jefferson	6.86	2.94
Combined	11.38	4.58

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## Technical Analysis - Continued

Franklin and Jefferson County Modeled Onroad Mobile Source Emissions (Tons/O<sub>3</sub> Season day)

Area	2020				2030			
	Scenario 1 - with I/M		Scenario 2 - without I/M		Scenario 1 - with I/M		Scenario 2 - without I/M	
	NO <sub>x</sub>	VOC	NO <sub>x</sub>	VOC	NO <sub>x</sub>	VOC	NO <sub>x</sub>	VOC
Franklin	3.24	1.33	3.40	1.48	1.80	0.95	1.89	1.06
Jefferson	4.93	2.41	5.20	2.69	2.74	1.72	2.87	1.91
Combined	8.17	3.74	8.60	4.17	4.54	2.67	4.76	2.97
Difference from Scenario 1			<b>0.43</b>	<b>0.43</b>			<b>0.24</b>	<b>0.37</b>

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## Technical Analysis - Continued

Comparing On-road Emissions  
2017 (Actual) vs. 2020 and 2030 (Without I/M)\*

Area	2020		2030	
	NO <sub>x</sub>	VOC	NO <sub>x</sub>	VOC
Franklin	-1.11	-0.16	-2.63	-0.59
Jefferson	-1.66	-0.25	-3.99	-1.03
Combined	-2.78	-0.41	-6.62	-1.62

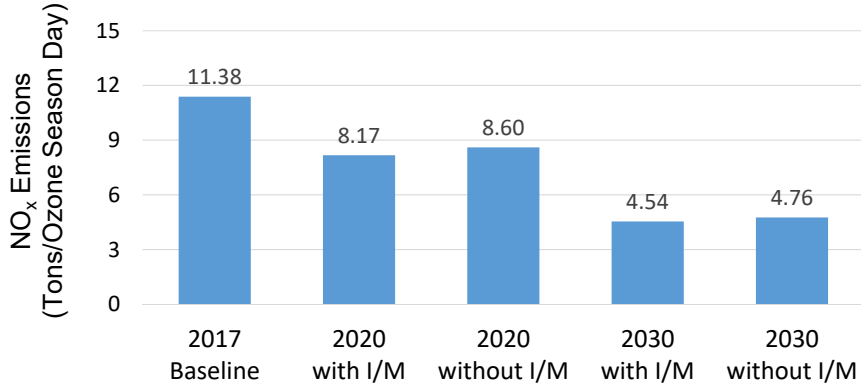
\* A negative value indicates a decline in emissions between 2017 and the year listed

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## Technical Analysis - Continued

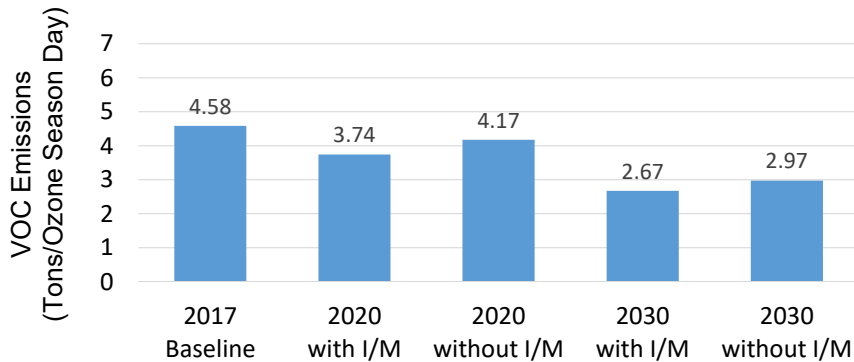
Modeled Onroad NO<sub>x</sub> Emissions -  
Franklin and Jefferson Counties



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## Technical Analysis - Continued

Modeled Onroad VOC Emissions -  
Franklin and Jefferson Counties



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## Technical Analysis - Continued

### Boles Township (Franklin County)

- Boles Township is part of the St. Louis marginal nonattainment area under the 2015 ozone standard
- According to the 2010 Census, Boles Township represented approximately 18 percent of Franklin County's total population
- Analysis assumes 20 percent of onroad emissions from Franklin County are attributed to Boles Township

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## Technical Analysis - Continued

### St. Louis (MO) Nonattainment Area Modeled Onroad Mobile Source Emissions (Tons/O<sub>3</sub> Season Day)

Area	2017 Baseline	
	NO <sub>x</sub>	VOC
Boles Township (Franklin – Partial)	0.90	0.33
St. Charles	10.96	4.75
St. Louis County	32.69	12.96
St. Louis City	5.43	2.43
<b>Total</b>	<b>49.98</b>	<b>20.47</b>

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## Technical Analysis - Continued

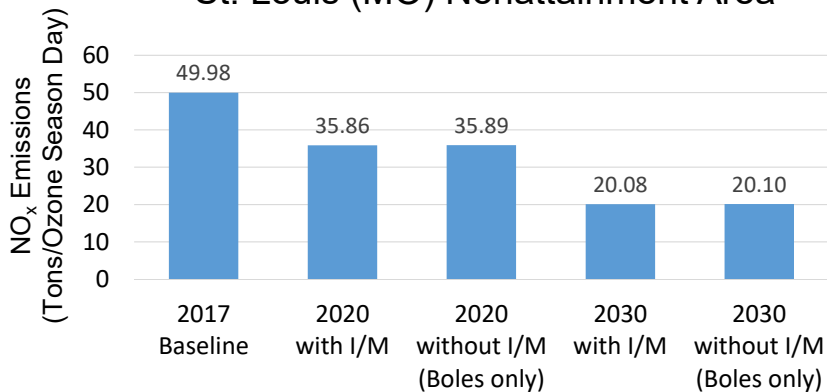
St. Louis (MO) Nonattainment Area Modeled Onroad  
Mobile Source Emissions (Tons/O<sub>3</sub> Season Day)

Area	2020				2030			
	Scenario 1 – with I/M		Scenario 2 - without I/M (Boles only)		Scenario 1 – with I/M		Scenario 2 - without I/M (Boles only)	
	NO <sub>x</sub>	VOC	NO <sub>x</sub>	VOC	NO <sub>x</sub>	VOC	NO <sub>x</sub>	VOC
Boles Township	0.65	0.27	0.68	0.30	0.36	0.19	0.38	0.21
St. Charles	7.88	3.89	NA	NA	4.38	2.75	NA	NA
St. Louis	23.43	10.52	NA	NA	13.16	7.33	NA	NA
St. Louis City	3.90	1.98	NA	NA	2.18	1.36	NA	NA
Combined	35.86	16.66	35.89	16.69	20.08	11.63	20.10	11.65
Difference from Scenario 1			<b>0.03</b>	<b>0.03</b>			<b>0.02</b>	<b>0.02</b>

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## Technical Analysis - Continued

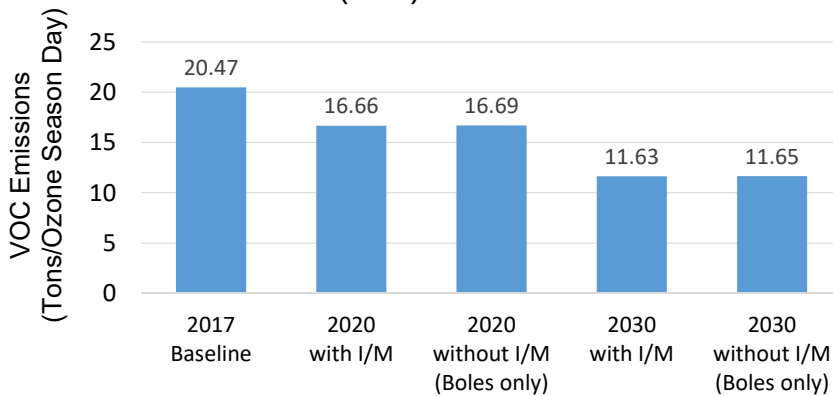
Modeled Onroad NO<sub>x</sub> Emissions -  
St. Louis (MO) Nonattainment Area



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## Technical Analysis - Continued

### Modeled Onroad VOC Emissions - St. Louis (MO) Nonattainment Area



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## Technical Analysis - Conclusion

- Area designated attainment using 2017 air quality data (except Boles Township)
- Projected 2020 and 2030 onroad emissions expected to decrease from 2017 actual emissions without I/M
- The emission benefit of I/M in Boles Township represents less than 0.2 percent of the total onroad emissions in the Missouri portion of the nonattainment area
- Removal of I/M in Franklin and Jefferson counties will not interfere with attainment or reasonable further progress for the 2015 ozone standard

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**MISSOURI AIR CONSERVATION COMMISSION**

**RESOLUTION CONCERNING REPEAL OF SECTION 393.135 OF THE  
MISSOURI REVISED STATUTES TO ALLOW COST RECOVERY DURING  
CONSTRUCTION OF NUCLEAR POWER PLANTS**

**WHEREAS**, our nation’s rapidly growing energy demand will require a balanced portfolio of energy sources that includes nuclear power plants;

**WHEREAS**, nuclear power plants promote clean air by providing continuous power with no greenhouse gas or traditional air pollutant emissions; and

**WHEREAS**, section 393.135 has proven to be an intractable roadblock for financing and construction of new nuclear power plants in Missouri;

**THEREFORE, BE IT RESOLVED** that pursuant to section 643.050.3 (Powers and Duties of the Commission) the Commission, for the advancement of clean air and a secure energy future for Missouri, respectfully calls on the Missouri Legislature to repeal or replace section 393.135 in order to allow cost recovery during the construction of nuclear power plants.

PASSED AND APPROVED on this \_\_\_\_\_ day of \_\_\_\_\_, 2019

By: \_\_\_\_\_ By: \_\_\_\_\_

By: \_\_\_\_\_ By: \_\_\_\_\_

By: \_\_\_\_\_

