

MINUTES
MISSOURI AIR CONSERVATION COMMISSION
Elm Street Conference Center
1730 East Elm Street
Bennett Springs Conference Room
Jefferson City, MO 65101
September 29, 2016
9:00 a.m.

Commissioners Present

Mark Garnett, Member
Jack Jones, Member
Gary Pendergrass, Chairman
David Zimmermann, Vice Chairman

Commissioners Absent

Jack Baker, Member

Staff Members Present

Stacy Allen, Air Quality Planning Section, Air Pollution Control Program (APCP)
Adel Alsharafi, Air Quality Planning Section, APCP
Darcy Bybee, Air Quality Planning Section Chief, APCP
Logan Cole, Water Protection Program
Deanna Distler, Director's Office, APCP
David Gilmore, Director's Office, APCP
Kendall Hale, Permits Section Chief, APCP
Steve Hall, Air Quality Analysis Section Chief, APCP
Patricia Maliro, Air Quality Analysis Section, APCP
Kyra Moore, Director, APCP
Julia Katich Mudd, Assistant General Counsel, Department of Natural Resources
Lisa Nahach, Public Information Specialist, APCP
Richard Swartz, Compliance/Enforcement Section Chief, APCP
Emily Wilbur, Air Quality Planning Section, APCP

Others Present by Attendance Record

Mike Alesandrini, AECOM
Ken Anderson, Ameren
Sandra Cupp, Civil and Environmental Consultants, Inc.
John Dempsey, Ameren
Kathrina Donegan, St. Louis County, Air Pollution Control Program
Dave Fraley, Diamond Sky Ventures
Jennifer Hernandez, Attorney General's Office
Chris Schreiber, Schreiber Engineering, LLC
Steve Rudloff, Missouri Limestone Producers Association
David Shanks, Boeing

Joe Stolle, GeoEngineers, Inc.
Wendy Vit, GeoEngineers, Inc.
Roger Walker, Regulatory Environmental Group for Missouri

A. Call to Order

Chairman Gary Pendergrass called the September 29, 2016, meeting of the Missouri Air Conservation Commission to order. The following commissioners were present: Gary Pendergrass, Jack Jones, David Zimmermann and Mark Garnett.

B. Minutes from August 25, 2016, Meeting

Vice Chairman David Zimmermann moved to approve the August 25, 2016, minutes as written. Commissioner Mark Garnett seconded the motion, and all commissioners voted to approve the August 25, 2016, minutes as written.

C. Public Hearing

None.

D. Reports - The following referenced reports are in the September 29, 2016, Missouri Air Conservation Commission Briefing Document and available online at dnr.mo.gov/env/apcp/macc.htm.

1) COMPLIANCE/ENFORCEMENT

Mr. Richard Swartz said the Compliance/Enforcement Report begins on page 15 with the Concern Report. There were a total of 46 concerns received from July 16, 2016, through August 15, 2016. During this time period 44 investigations were completed and one Notice of Violation was issued. The number of NOV's is expected to decrease due to the new Procedure for Assistance Compliance and Enforcement manual. More Letters of Warning will be issued in an attempt to get responsible parties to achieve compliance. If the responsible party does not return to compliance then the LOW will be elevated to an NOV. The PACE manual will be posted on the web soon.

The Ongoing Negotiations Report can be found on pages 29 and 30. There are 31 enforcement actions in the negotiation process at this time. Some of these cases have been closed with No Further Action letters over the past month.

The Finalized Agreement Report is on page 31. For the time period of July 16, 2016 through August 15, 2016, the department finalized one agreement with a total penalty of \$2,000. The entire amount was suspended. There are some Agreements On Consent that are in the legal review process and those will be reported on at the next meeting.

The Pending Referrals Report can be found on page 33. At this time, there are 15 Active Referrals. The Attorney General's Office resolved the Didion and Sons case.

Commissioner Jack Jones inquired about the suspension of penalty in the open burning case of James Smith.

Mr. Swartz replied that most open burning cases involve individuals that may not understand there are environmental rules against open burning. The department tries to educate these individuals and works with them to sign an Administrative Order of Consent. This consent agreement stipulates that if they do not break the law by open burning for two years then they don't have to pay the suspended monetary penalty. This agreement motivates them to stay within the law.

2) **PERMITS REPORT**

Mr. Hale stated the Permits Report begins on page 35 of the briefing document with the Permit Applications Received Report. A total of 336 construction and 164 operating permit projects have been received in 2016.

The Permit Applications Completed report begins on page 41 of the briefing document. A total of 372 construction and 162 operating permit projects have been completed in 2016. The total number projects completed exceeded the total number projects received last month.

The Open Permits Report is on page 51 of the briefing document. This report details the types of projects currently open in the Permit Section.

A total of five Intermediate permit projects are on public notice. No requests were received to hold a public hearing for the Prevention of Significant Deterioration permit for Continental Cement so it was canceled. Public comments regarding the PSD permit for Continental Cement will be taken through September 29, 2016. Buzzi Unicem also has a PSD permit on public notice for their cement plant in Festus. A tentative public hearing has been scheduled for October 27, 2016, and comments will be taken through November 1, 2016. If no requests to hold a public hearing are received by October 24, 2016, then the public hearing will be canceled.

A nonattainment review has been scheduled for the Metal Containers Corporation in Arnold. A tentative public hearing has been scheduled for October 27, 2016. If no requests to hold a public hearing are received by October 24, 2016, then the public hearing will be canceled. Public comments will be taken through November 24, 2016.

Chairman Pendergrass said he noticed a decrease in the backlog of permits.

Mr. Hale responded that four new permit engineers started approximately three months ago. They have helped to complete some of the smaller projects which helps to free up time for other staff to complete more complex projects.

3) **AIR QUALITY PLANNING REPORT**

The slides from Ms. Bybee’s presentation can be seen in Attachment A of these minutes or on the commission’s website at <http://dnr.mo.gov/env/apcp/macc.htm>.

a) **Rules and State Implementation Plan (SIP) Agenda**

The Rule and SIP Agenda is found on pages 53 – 54. Ms. Stacy Allen will be presenting the Proposed Area Boundary Recommendation for the 2015 Ozone Standard. The public hearing for this adoption item was held at the commission meeting last month, and the comments and responses to this item are printed in the briefing document.

The Proposed Area Boundary Recommendations for the 2010 Sulfur Dioxide Standard: December 2017 Designations will be presented to the commission at the October 27, 2016, public hearing in Springfield and then for adoption at the December 1, 2016, meeting.

b) **Rules In Progress Schedule**

The Rules In Progress Schedule is found on pages 55 – 56 of the briefing document. Both rules, 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* (first row on page 55) and 10 CSR 10-6.210, *Confidential Information* (second row from the bottom, page 55) are on track to be effective at the end of 2016. Information on a proposed rescission was sent to the commission for 10 CSR 10-6.100, *Alternate Emission Limits*. This information regarding the proposed rescission is also available on the department’s Regulatory Action Tracking System website at <https://dnr.mo.gov/proposed-rules> (see the Rules in Development section).

c) **State Air Quality Plans Status Report**

The State Air Quality Plans Status Report can be found on pages 57 – 62 of the briefing document. The shaded portions are the pieces that have been updated since the last meeting.

Ozone

The Redesignation Request and Maintenance Plan for the 2008 Ozone Standard was adopted by the commission last month and was submitted to EPA on September 12, 2016. Ms. Allen will present the Boundary Recommendations for the 2015 Ozone Standard to the commission for adoption. As of this week, there have been 40 exceedances of the 2008/2015 standards or just the 2015 standard. Ms. Bybee briefly reviewed the 2015 ozone standard designation timeline. For up to date preliminary ozone monitoring data, please see: <http://dnr.mo.gov/env/apcp/docs/ozonemonitordata.pdf>.

Sulfur Dioxide

Ms. Bybee briefly reviewed all four rounds of the 2010 Sulfur Dioxide National Ambient Air Quality Standard or NAAQS implementation, where they are located in the briefing document, and the websites where they can be found.

Two areas of the state have been designated as nonattainment for the first round, the existing monitor round: a portion of Jackson and Jefferson counties. These two areas were shown on a map. Monitoring results in both areas are showing that they are coming into attainment.

Round two is also known as the Consent Decree round. EPA evaluated and officially designated three areas in Missouri on June 30, 2016. Ms. Bybee briefly described these areas, EPA's designation, and showed where they are located on a map. The slides from Ms. Bybee's presentation can be seen in Attachment A of these minutes or on the commission's website at <http://dnr.mo.gov/env/apcp/macc.htm>.

The third and fourth rounds are also known as the Data Requirements Rule or DRR. Sixteen sources are being evaluated under the DRR. Ms. Bybee mentioned the three compliance methods available and how each source plans to demonstrate compliance with the DRR. By December 2017, EPA will designate the areas surrounding the seven DRR sources that are pursuing a compliance demonstration by air quality modeling. The models use recent actual emissions to approximate actual conditions to demonstrate compliance with the NAAQS. All seven areas are proposed as attainment and documentation supporting the recommendations was posted for public notice on September 26, 2016, at <http://dnr.mo.gov/env/apcp/stateplanrevisions.htm>. Ms. Bybee showed slides listing the affected sources, the proposed area designation recommendations, where they are located in Missouri and the third round recommendation timeline. These slides are located in Attachment A of these minutes or on the commission's website at <http://dnr.mo.gov/env/apcp/macc.htm>.

Round four will be the final round of designations for the 2010 SO₂ NAAQS. By December 2020, EPA will designate the areas surrounding the four monitoring sources along with all of the remaining undesignated areas of the state. Ms. Bybee showed a map of all the round four monitoring sources in Missouri and the fourth round timeline. Again, these slides are located in Attachment A of these minutes or on the commission's website at <http://dnr.mo.gov/env/apcp/macc.htm>.

Cross State Air Pollution Rule

The Cross State Air Pollution Rule or CSAPR addresses transport of pollution across state lines. EPA proposed an amendment to this rule last year and finalized it on September 7, 2016. This rule will take effect with

the 2017 ozone season. The final rule keeps the cap and trade program, like the original rule. Missouri has been found to contribute to downwind air pollution so it was necessary to continue to include Missouri in the rule. EPA has included approximately a 25 percent reduction for Missouri for ozone season Nitrogen Oxide (NOx) from the previous CSAPR Rule. More information may be found at: <https://www.epa.gov/airmarkets/final-cross-state-air-pollution-rule-update>.

d) National Ambient Air Quality Standards

Lead

The last lead NAAQS was set in 2008 at 0.15 micrograms per cubic meter with a three-month rolling average. On September 16, 2016, EPA announced their decision to retain, without revision, the 2008 lead NAAQS. There are currently two nonattainment areas in Missouri for that standard. The retention of the 2008 lead standard means Missouri is under no additional obligation, other than its current obligation, to bring those two areas into attainment. More information can be found at <https://www.epa.gov/lead-air-pollution/national-ambient-air-quality-standards-naaqs-lead-pb>.

On September 26, 2016, EPA also announced their intention to approve the State Implementation Plan for the Exide Technologies-Canon Hollow facility in Holt County, Missouri. More information regarding EPA's approval can be found at <https://www.gpo.gov/fdsys/pkg/FR-2016-09-26/pdf/2016-22981.pdf>.

Nitrogen Dioxide

EPA announced on September 22, 2016, that they are opening a comment period on the 2010 Nitrogen Dioxide (NO₂) NAAQS. EPA must receive any public comments by December 8, 2016. There are no nonattainment areas in Missouri based on the 2010 standard. Based upon air quality monitoring data (some of which is preliminary and not yet quality assured), the highest monitored level in Missouri is approximately half of the 2010 standard. More information regarding EPA's announcement can be found at <https://www.gpo.gov/fdsys/pkg/FR-2016-09-22/pdf/2016-22681.pdf>

e) Periodic Rule Review

This is the process where all of the Department of Natural Resources rules, and other specific state departments, are undergoing a full review. The public comment portion of the review started on July 1, 2016, and officially closed on August 31, 2016. Two comments were received: one for the Kansas City Surface Coating Rule (10 CSR 10-2.230) and one for the Construction Permits By Rule (10 CSR 10-6.062). The program sincerely appreciates the comments and is working on the path forward to

address them. The program is also continuing work to complete other responsibilities under the review and will have an update for the commission in the near future.

4) DIRECTOR'S REPORT

a) Sulfur Dioxide

Ms. Moore provided the commission an update on sulfur dioxide (SO₂) monitoring at the Ameren Labadie site. Last month the Sierra Club appeared before the commission and submitted letters to the commission with concerns. In addition, other interest at the local level on this topic:

- St. Charles County and the City of Pacific passed resolutions regarding this issue, asking EPA to ensure monitoring around Labadie is sufficient.
- Washington University Environmental Law Clinic, on behalf of Sierra Club, submitted a petition for reconsideration of the SO₂ designation (Unclassifiable) regarding Ameren Labadie.

As background: Ameren Labadie installed two SO₂ monitors and started collecting data in April 2015. These monitors were sited utilizing information and data available at that time and following federal regulations. The two locations with data collected since April 2015: Valley and Northwest. In addition to air quality data, the Valley site also collects meteorological data.

EPA designated the area around Ameren Labadie as Unclassifiable June 30, 2016, as part of Round 2 of SO₂ designations. The unclassifiable designation places Ameren Labadie in Round 3 and 4, or the Data Requirements Rule round. As part of the designation, EPA acknowledged the two monitors, Valley and Northwest, were sited correctly at the time. However, based on the more recent on-site meteorological data collected at the Valley site, EPA requested at least one additional monitor in an area representative of maximum concentrations, considering terrain and the recent available meteorological data. Note: due to flooding at the Valley site we do not have one full year of on-site meteorological data.

Over the last three months program staff has worked with Ameren and EPA to enhance the monitoring network around Labadie. The status of monitoring around Ameren Labadie, as of September 29, 2016:

- Additional monitor Southwest of plant – operational January 1, 2017
- Other monitoring enhancements still pending
- Re-public notice Monitoring Network plan with changes, anticipate public notice start early November 2016

Ms. Moore presented a map of the Ameren Labadie area to the commission. The map may be viewed in Attachement C to these minutes

or on the commission's website at <http://dnr.mo.gov/env/apcp/macc.htm>. Ms. Moore said she would provide an update to the commission at their next meeting.

Commissioner Jack Jones asked if slides or images of the proposed monitoring sites could be provided to the commission.

Ms. Moore replied yes, the program has several pictures.

b) Clean Power Plan

The U.S. District Court of Appeals held a hearing on Tuesday, September 27, 2016. A final decision is not expected until next year. Ms. Moore said she would provide an update to the commission once more is known.

c) Air Program Advisory Forum

Ms. Moore reminded the commission that the Air Program Advisory Forum is scheduled to meet after the September 29, 2016, commission meeting at 1:00 p.m. in the Bennett Springs Conference Room.

d) Diesel Emission Reduction Act

The Diesel Emission Reduction Act provides funds for projects that reduce diesel emissions. This year the project was school buses. In June, after reviewing applications from the school districts that applied for grant dollars, the program awarded funds to six school districts to help replace 10 old buses with newer, cleaner burning school buses. The grant dollars provides for 25 percent of the cost of the bus or at least \$16,000. Twenty-two school districts applied for funds.

e) Director

The current Director of the Missouri Department of Natural Resources, Ms. Sara Parker Pauley, will become the director of the Missouri Department Conservation Commission as of November 1, 2016.

E. Recommended for Adoption and Actions to be Voted on

Ms. Stacy Allen presented the Area Boundary Recommendation for the 2015 Ozone Standard for adoption. More information on the proposed standard can be found on page 63 of the briefing document. The slides from Ms. Allen's presentation can be seen in Attachment B of these minutes or on the commission's website at <http://dnr.mo.gov/env/apcp/macc.htm>.

Commissioner Jack Jones said he appreciated the detailed histograms in Ms. Allen's presentation.

Commissioner Mark Garnett moved to adopt the Area Boundary Recommendation for the 2015 Ozone Standard. Vice Chairman Zimmermann seconded the motion. All of the commissioners voted to adopt the Area Boundary Recommendation for the 2015 Ozone Standard as revised.

F. Appeals and Variance Requests

None.

G. New Business

None.

H. Unfinished Business

None.

I. Open Session

None.

J. Future Meeting Dates

October 27, 2016 – Thursday

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

December 1, 2016 – Thursday

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

January 31, 2017 – Tuesday

Location to be Determined

March 30, 2017 – Thursday

Location to be Determined

April 27, 2017 – Thursday

Location to be Determined

May 25, 2017 – Thursday

Location to be Determined

July 27, 2017 – Thursday
Location to be Determined

August 31, 2017 – Thursday
Location to be Determined

September 28, 2017 – Thursday
Location to be Determined

October 26, 2017 – Thursday
Location to be Determined

December 7, 2017 – Thursday
Location to be Determined

K. Discussion of Pending Litigation and Legal Matters

None.

L. Missouri Air Conservation Commission

Vice Chairman Zimmermann moved to adjourn the September 29, 2016, Missouri Air Conservation Commission meeting. Commissioner Mark Garnett seconded the motion, and all commissioners voted to adjourn the meeting.

Chairman Pendergrass adjourned the September 29, 2016, Missouri Air Conservation Commission meeting.

Respectfully submitted,

Signature on File

Kyra L. Moore, Director
Air Pollution Control Program

Approved:

Gary Pendergrass, Chairman
Missouri Air Conservation Commission



Air Quality Planning

Darcy Bybee

Air Quality Planning Section Chief
Air Pollution Control Program

Missouri Air Conservation Commission Meeting
Jefferson City, MO
September 29, 2016

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Air Quality Planning Updates

- Rule and State Implementation Plan (SIP) agenda
- Rules in Progress Schedule
- State Air Quality Plans Status Report
 - Ozone, Sulfur Dioxide, Cross State Air Pollution Rule, Lead, Nitrogen Dioxide
- Periodic Rule Review

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Rule and SIP Agenda

Pages 53-54

3

Rule and SIP Agenda

Briefing Document, page 53

September 29, 2016, Public Hearing:

None

Actions to be voted on:

Proposed Area Boundary Recommendation for the 2015
Ozone Standard

4



Rule and SIP Agenda

Briefing Document, pages 53-54

October 27, 2016, Public Hearing:

Proposed Area Boundary Recommendations for the
2010 Sulfur Dioxide Standard: December 2017
Designations

Actions to be voted on:

None

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Rule and SIP Agenda

Briefing Document, page 54

December 1, 2016, Public Hearing:

None

Actions to be voted on:

Proposed Area Boundary Recommendations for the
2010 Sulfur Dioxide Standard: December 2017
Designations

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Rules in Progress Schedule

Pages 55-56

7

Rules in Progress Schedule

Briefing Document, pages 55-56

- Page 55, 1st row:
 - 10 CSR 10-6.220, Opacity Rule
- Page 55, 2nd row from the bottom:
 - 10 CSR 10-6.210, Confidential Information Rule
- Update to Briefing Document Report:
 - 10 CSR 10-6.100, Alternate Emission Limits (proposed rescission)

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10 CSR 10-6.100, *Alternate Emission Limits*

See the department's *Regulatory Action Tracking System* webpage (*Rules in Development* Section) for additional information:

<https://dnr.mo.gov/proposed-rules>

State Air Quality Plans Status Report

Pages 57-62

Ozone

State Air Quality Plans Status Report

Briefing Document, pages 57-62

- Ozone
 - Redesignation Request and Maintenance Plan for 2008 Ozone Standard, Page 58, Row 2
 - Boundary Recommendations for 2015 Ozone Standard, Page 57, Row 6
 - <http://dnr.mo.gov/env/apcp/docs/ozonemonitordata.pdf>

2015 Ozone Standard Designation Timeline

August 25, 2016

- Public Hearing at Missouri Air Conservation Commission meeting

Today

- Proposing for adoption by MACC

October 2016

- Submit recommendation to EPA

June 2017

- EPA sends “120-day” letters to states
- Opportunity for feedback

October 1, 2017

- EPA finalizes designations

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Sulfur Dioxide

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State Air Quality Plans Status

Briefing Document, pages 57-62

- Sulfur Dioxide
 - Round 1, Pages 59 Row 2 & Page 60, Row 4
 - <http://dnr.mo.gov/env/apcp/sips.htm#Sulfurdioxide>
 - Round 2, Page 59, Row 3
 - <http://dnr.mo.gov/env/apcp/naaqsboundarydesignations.htm#SO2>
 - Rounds 3 & 4, Page 60, Row 1
 - <http://dnr.mo.gov/env/apcp/so2.htm>

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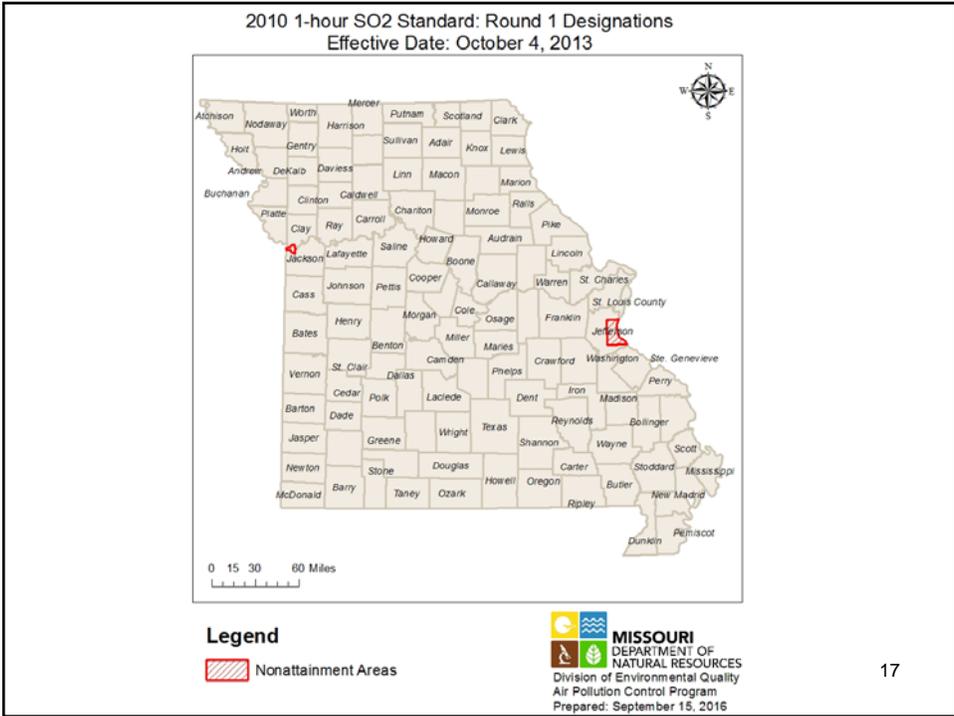
2010 Sulfur Dioxide Standard (75 ppb)

Round 1: nonattainment areas based on existing monitoring network data

- Two areas in Missouri designated as nonattainment, (effective October 2013).
 - Portion of Jackson County (Kansas City area)
 - Portion of Jefferson County*

* *We anticipate submitting a redesignation request for the Round 1: Jefferson County area in the near future.*

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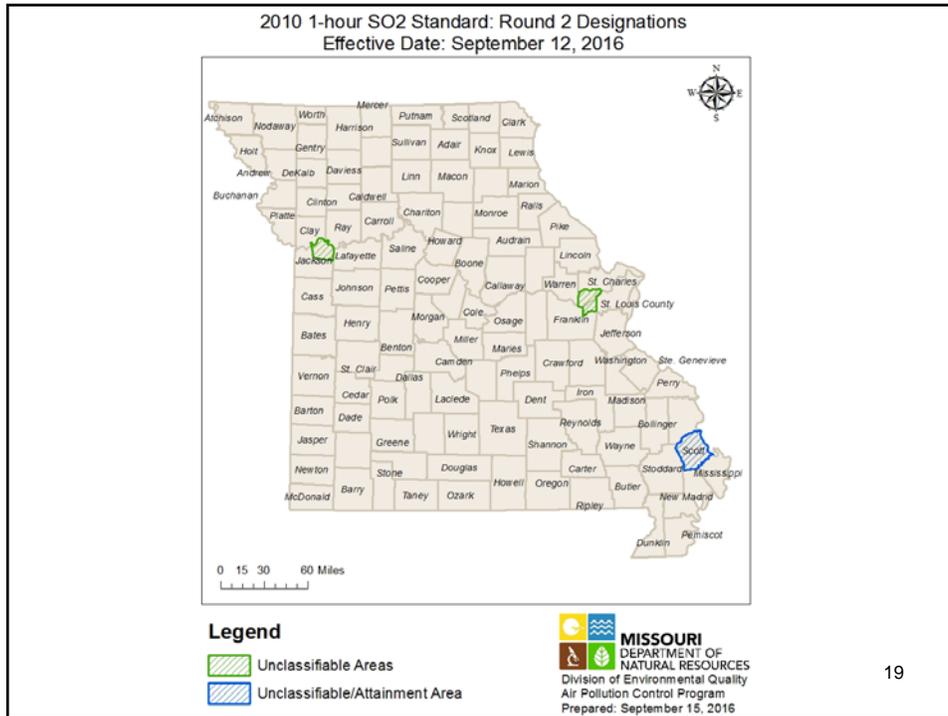
2010 Sulfur Dioxide Standard

2nd Round: Federal Consent Decree Round

- Three areas in Missouri evaluated
- EPA finalized designations in July 2016:

Location	EPA's Final Designation
Sikeston Power Station	<i>Unclassifiable/Attainment</i>
Kansas City Power & Light - Sibley Generating Station	<i>Unclassifiable</i>
Ameren Missouri - Labadie Energy Center	<i>Unclassifiable</i>

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2010 Sulfur Dioxide Standard

3rd & 4th Rounds: SO₂ Data Requirements Rule

- 16 sources being evaluated under the DRR
 - Affects sources that emitted >2,000 tons of SO₂ in 2014 (latest emission year)
- Three compliance options available:
 1. Limit emissions to less than 2,000 tons/year (5)
 2. Model compliance using actual emissions (7)
 3. Install air monitors (4)

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2010 Sulfur Dioxide Standard

3rd Round (Dec. 2017 Designations)

- Seven DRR sources chose to demonstrate compliance with air quality modeling
- Model using recent *actual emissions* to approximate *actual conditions*
- All seven areas proposed as attainment
- Posted for public notice on Sept. 26:
<http://dnr.mo.gov/env/apcp/stateplanrevisions.htm>

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3rd Round Proposed Recommendation

Affected Source	Proposed Boundary	Proposed Area Designation Recommendation
Ameren Missouri-Meramec Energy Center	Portion of St. Louis County	Attainment
Empire District Electric Co-Asbury Plant	Barton and Jasper Counties	Attainment
Kansas City Power And Light Co (KCP AND L)-Montrose Generating Station	Henry County	Attainment
KCP AND L - Greater Mo Operations-Sibley Generating Station	Portion of Jackson County	Attainment
Sikeston Power Station	Scott County	Attainment
City Utilities of Springfield - John Twitty Energy Center	Greene County	Attainment
Thomas Hill Energy Center Power Division-Thomas Hill	Randolph County	Attainment ²²

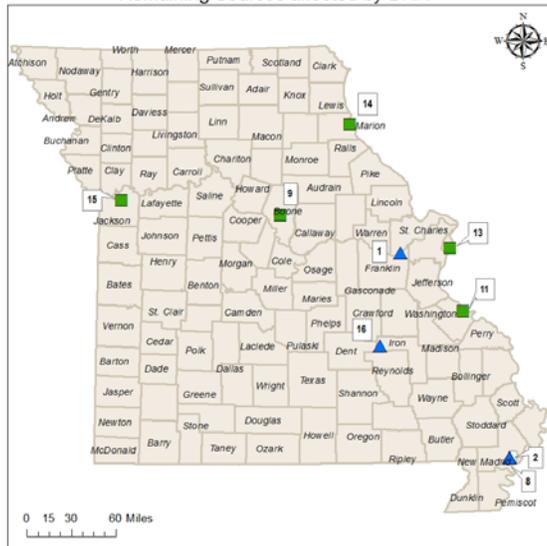
2010 Sulfur Dioxide Standard

4th Round (Dec. 2020 Designations)

- 4 monitoring sources + all remaining undesignated areas

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2010 1-hour SO₂ Standard: Round 4
Remaining Sources affected by DRR



Legend

- Limited Sources
- ▲ Monitoring Sources

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4th Round Timeline

January 1, 2017

- New monitors operational

2017-2019

- Collect monitoring data

Early 2020

- Public Notice for boundary recommendations

May 2020

- Submit boundary recommendations for Round 4

December 31,
2020

- EPA designates all remaining areas

February 2026

- Attainment date for any nonattainment areas

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Final Cross State Air Pollution Rule (CSAPR)

Page 62, row 1

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Cross State Air Pollution Rule (CSAPR)

- Addresses transport of pollution across state lines.
- EPA proposed an update in 2015, finalized September 7, 2016.
- Takes effect with the 2017 ozone season.

<https://www.epa.gov/airmarkets/final-cross-state-air-pollution-rule-update>

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Lead (Pb) and Nitrogen Dioxide (NO₂) NAAQS

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Lead NAAQS

- 2008 Lead NAAQS: 0.15 ug/m³, 3 month average
- September 16, 2016—EPA announced decision to retain, without revision, the 2008 Lead NAAQS
- 2 current nonattainment areas in Missouri
- More information: <https://www.epa.gov/lead-air-pollution/national-ambient-air-quality-standards-naaqs-lead-pb>
- Exide Consent Agreement proposed for approval: <https://www.gpo.gov/fdsys/pkg/FR-2016-09-26/pdf/2016-22981.pdf>
- Air Quality Plans Status Report: Page 57, rows 1-4

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NO₂ NAAQS

- 2010 NO₂ NAAQS:
 - 100 ppb, 3 year average
 - 53 ppb, Annual
- September 22, 2016—EPA announced opening comment period on NO₂ NAAQS
- Comments must be received by December 8, 2016
- No nonattainment areas in Missouri
- More information: <https://www.gpo.gov/fdsys/pkg/FR-2016-09-22/pdf/2016-22681.pdf>

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Periodic Rule Review

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Periodic Rule Review (536.175 RSMo)

- Comment period closed August 31, 2016
- Air program received two comments—thank you!
 - 10 CSR 10-2.230, Control of Emissions From Industrial Surface Coating Operations
 - 10 CSR 10-6.062, Construction Permits By Rule
- In the process of reviewing—stay tuned!

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Division of Environmental Quality Director: Leanne Tippett Mosby

Date: September 29, 2016

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.



2015 Ozone Standard Boundary Recommendation Response to Comments

Air Pollution Control Program

September 2016

1



Overview

- Support for Recommendation
- Design Value Methodology and Updates
- Monitoring Trends



2

Support for Recommendation

- Three letters of support for the recommendation 
 - Mississippi Lime Company
 - Southeast Missouri Regional Planning & Economic Development Commission's Environmental Quality Committee
 - St. Louis Regional Chamber's Energy and Environment Council Air Committee

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Design Value Methodology

- Ozone concentrations are measured continuously and report ozone concentrations for each hour of the day.
- With 214 days in the April to October ozone season, each monitor produces a **maximum** of 5,136 1-hour averages used to calculate the 8-hour averages.
- The 2017 ozone season will extend from March to October with a **maximum** of 5,880 1-hour averages

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Design Value Methodology

- The daily maximum design value at each location for each year are ranked and only the **fourth highest 8-hour average** is used for each of the three years to calculate the design value for a single monitor

Example:

Year	8-hour average ozone concentration (ppb)				Three-Year Design Value
	First High	Second High	Third High	Fourth High	
2013	82	80	75	69	65
2014	74	73	65	62	
2015	70	69	67	66	

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Design Value Updates

- Upon review, three design values required update to the certified 2013-2015 data
- St. Louis design values and boundary recommendation remain unchanged
- Branson, Hillcrest and Rocky Creek are updated on the following slide

Unchanged

Monitor Name	2013-2015 Design Value (ppb)
Arnold West	70
Blair Street	65
Bonne Terre	65
Farrar	66
Foley	68
Maryland Heights	70
Orchard Farm	69
Pacific	65
West Alton	71

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Design Value Updates

Monitor Area	Monitor Name	2013-2015 DV
Joplin	Alba	65
Branson	Branson	60
Southwest MO	El Dorado Springs	63
Springfield	Fellows Lake	61
	Hillcrest High School	61

Monitor Area	Monitor Name	2013-2015 DV
Columbia	Finger Lakes	63
Jefferson City	New Bloomfield	63
St. Joseph	Savannah	64
Rural site	Mark Twain	59
Kansas City	Liberty	64
	Richards Gebaur	64
	Rocky Creek	68
	Trimble	67
	Watkins Mill	66

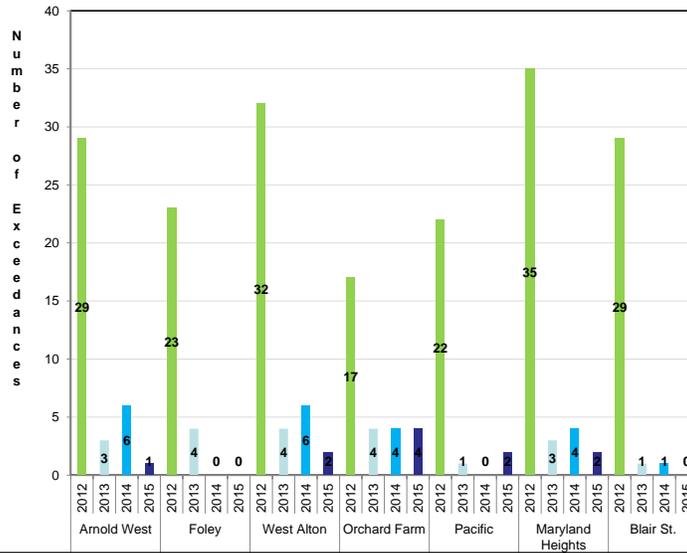
Monitoring Trends: Exceedance Histograms

- Number of days per year where the maximum 8-hour ozone concentration exceeds 70 ppb, the 2015 ozone standard
- Years 2012 through 2015 examined for all monitors, grouped by regions
- 2012 was a drought year with many exceedances
 - Recent years show less exceedances



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**St. Louis Area, MO 8-hour Average Ozone Daily
Maximum Exceeding 70 ppb from 2012-2015**

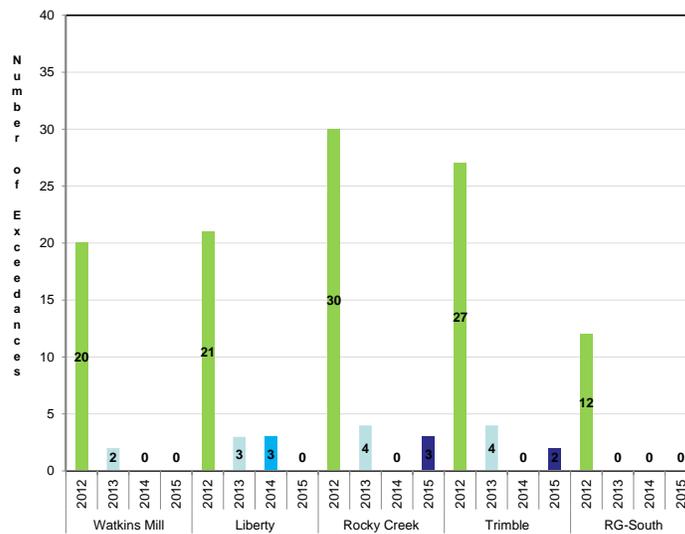


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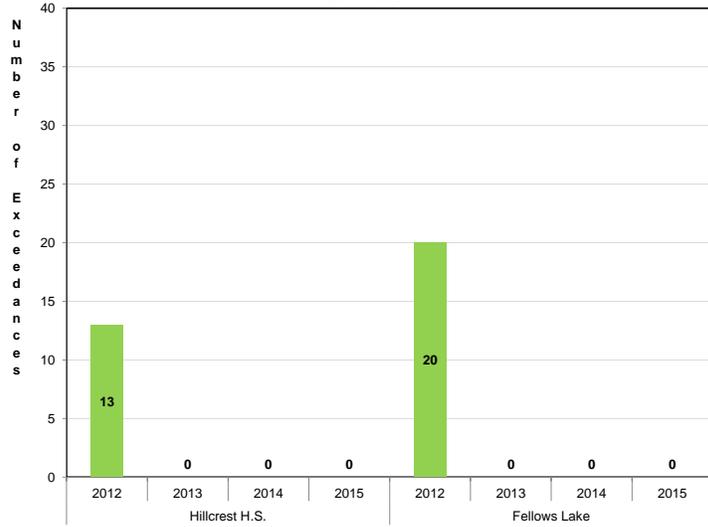
**Kansas City Area, MO 8-hour Average Ozone
Daily Maximum Exceeding 70 ppb from 2012-2015**



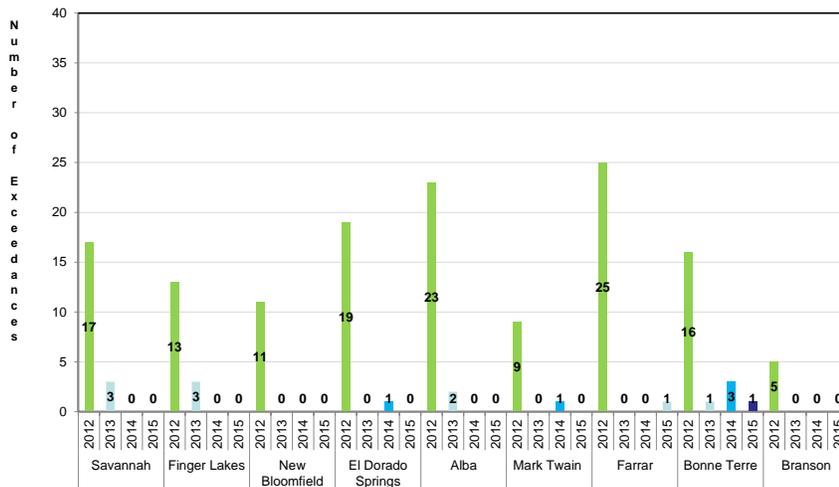
10



Springfield Area, MO 8-hour Average Ozone Daily Maximum Exceeding 70 ppb from 2012-2015



Outstate Area, MO 8-hour Average Ozone Daily Maximum Exceeding 70 ppb from 2012-2015



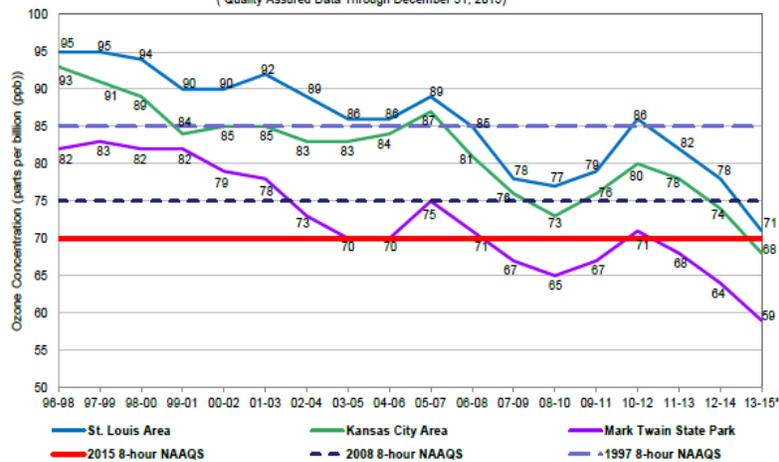
Monitoring Trends: Design Value

- Design values trends, along with current and previous ozone standards for reference
- The highest design value area-wide for St. Louis and Kansas City for years 1996 through 2015 show decreasing ozone concentrations

13

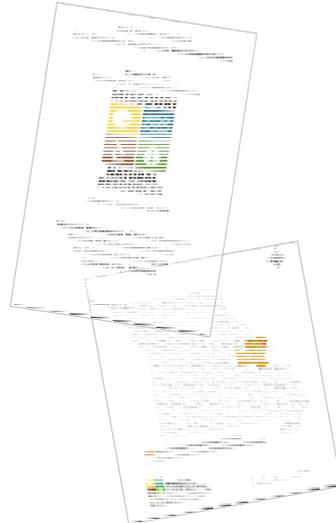
Ozone (O₃) Ambient Air Monitoring

1996-2015 8-hour Ozone Design Value Trends
 St. Louis & Kansas City Areas
 (*Quality Assured Data Through December 31, 2015)



Conclusion

- Request the commission to adopt the boundary recommendation
- EPA considers the recommendation when designating areas
- Not included in the SIP



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Division of Environmental Quality Director: Leanne Tippet Mosby

Date: September 29, 2016

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.

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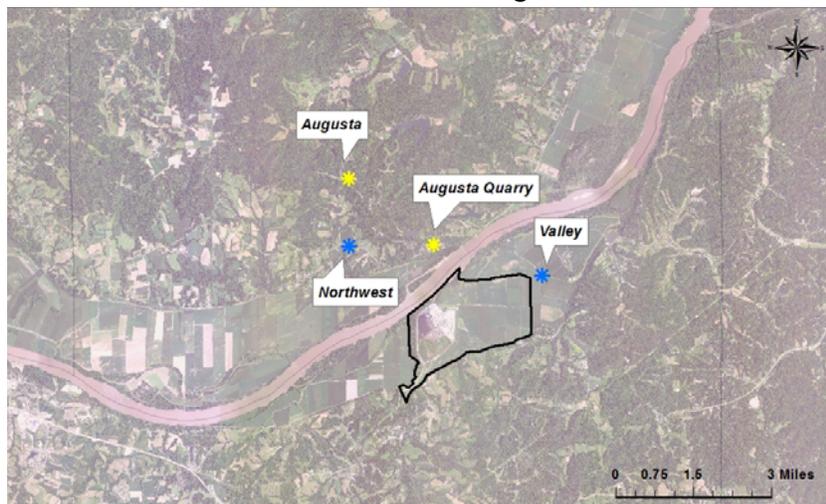


Director's Report

Kyra L. Moore, Director
Air Pollution Control Program

Missouri Air Conservation Commission Meeting
Jefferson City, MO
September 29, 2016

Current and Historical Air Monitoring Sites – Ameren Labadie



Status as of September 29, 2016:

- Additional monitor Southwest of plant – operational 1/1/17
- Other monitoring enhancements still pending
- Will re-public notice Monitoring Network plan when all monitoring enhancements final
- Anticipate public notice start no later than November 1, 2016

Division of Environmental Quality Director: Leanne Tippett Mosby

Date: September 29, 2016

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