

Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

FEB 16 2018

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

Dear Mr. Gulliford:

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:

Technical Correction to the Redesignation Request and Maintenance Plan for the St. Louis (Missouri) 2008 Ozone Standard Nonattainment Area

This SIP technical correction supplements the original Redesignation Request and Maintenance Plan for the St. Louis (Missouri) 2008 Ozone Standard Nonattainment Area, submitted to EPA and dated September 12, 2016. The air program asks EPA to consider the updated technical emission inventory data as part of the redesignation request and maintenance plan, and take the following actions:

1. Redesignate the St. Louis (Missouri) 2008 ozone nonattainment area to attainment pursuant to the provisions of the Clean Air Act, section 107;
2. Approve the associated maintenance plan, dated September 12, 2016 and this technical correction, as a revision to the State Implementation Plan (SIP) meeting the requirements of the Clean Air Act, section 175A; and
3. Approve the Motor Vehicle Emissions Budgets (MVEBs) for the year 2030 pursuant to Clean Air Act Section 176(c).

The Missouri Air Conservation Commission adopted this plan at the February 1, 2018 commission meeting. The commission has full legal authority to develop state implementation plans pursuant to Section 643.050 of the Missouri Air Conservation Law. A public hearing for the proposed plan was held on December 7, 2017. A 30-day public comment period opened on November 6, 2017 and closed on December 14, 2017. During the public comment period, the air program received two comments from two commenters. A summary of the comments received and our responses are attached.



Recycled paper

Mr. Jim Gulliford
Page Two

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 this document will be emailed to the EPA Regional Office. Within three business days, this complete submittal 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 this submittal, please contact Ms. Emily Wilbur 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 Darcy A. Bybee

Darcy A. Bybee
Director

DAB: sac

Enclosures:

Copy of plan

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

c: Missouri Air Conservation Commission
File# 2008-O3-9 Technical Correction

**Technical Correction to the
Redesignation Request and Maintenance Plan for the
St. Louis (Missouri) 2008 Ozone Standard
Nonattainment Area**

**Prepared for the
Missouri Air Conservation Commission**



**Adoption
February 1, 2018**

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

Project Number: 2008-O3-9-Technical Correction

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Executive Summary

Missouri is submitting a technical correction to the Redesignation Request and Maintenance Plan for the 2008 ozone National Ambient Air Quality Standard (NAAQS) for the Missouri portion of the St. Louis [St. Louis (MO)] ozone nonattainment area. The Redesignation Request and Maintenance Plan was submitted to the EPA on September 12, 2016. The technical corrections include a revision of the mobile emissions inventory for the 2014 emissions inventory year and a revision of the Motor Vehicle Emissions Budgets (MVEBs) for the St. Louis area. These corrections are necessary due to an error in the calculation of 2014 mobile emission estimates.

The correction to 2014 mobile emissions affects both the redesignation demonstration period (2011- 2014) and maintenance plan period (2014 – 2030) analyses of the ozone precursors - Nitrogen Oxides, Volatile Organic Compounds and Carbon Monoxide. With the corrections, these analyses show that emissions levels in the St. Louis nonattainment area will continue to decrease from attainment year 2014 levels, thereby maintaining the 2008 ozone NAAQS in future years. The technical correction does not alter the demonstration of maintenance of the 2008 8-hour ozone NAAQS in the St. Louis (MO) nonattainment area. Therefore, no revision to the maintenance demonstration was necessary.

In addition, a part of the inventory was set aside in the Redesignation Request and Maintenance Plan to create MVEBs pursuant to Clean Air Act Section 176(c) for the St. Louis (MO) nonattainment area. The technical correction recalculates MVEBs with the updated emission inventory values. Once approved by the EPA, these new budgets will replace previously approved MVEBs.

1. Inventory Correction

1.1 Redesignation Request and Maintenance Plan

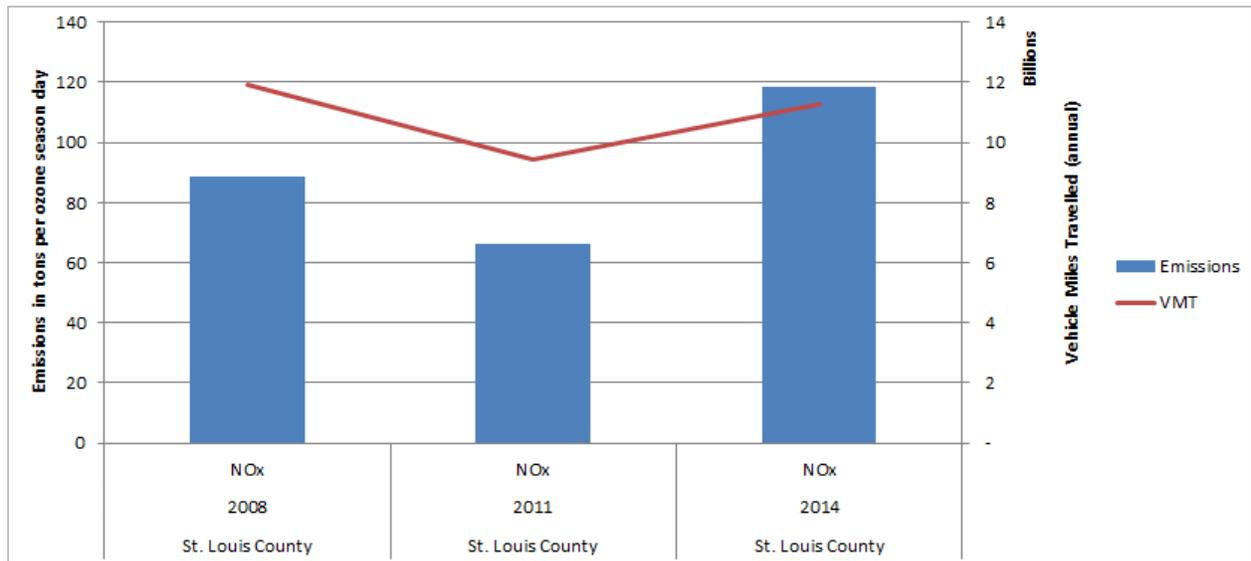
Missouri submitted a redesignation request and maintenance plan for the 2008 ozone standard to the EPA in September of 2016. Within that request is a redesignation emissions inventory that compares the 2011 base year and the 2014 attainment year. The redesignation request inventory demonstrates how the area attained the standard via ozone precursor emissions NO_x and VOC. On June 28, 2017, the EPA requested clarification regarding the change in NO_x and VOC emissions from 2011 to 2014, especially regarding the estimated increase in mobile source emissions.

1.2 Identification of Inventory Error

Mobile source emissions cover both the onroad and nonroad emission sectors. Nonroad emissions decrease from 2011 to 2014. Onroad emissions increase for both NO_x and VOC from 2011 to 2014 in the redesignation request. This single sector causes the total emission estimate of the 5-county St. Louis area to increase. A single county in the onroad sector, St. Louis County, is responsible for the majority of the increase, accounting for over 52 tons of NO_x and 53 tons of VOC increase per day. The remaining four counties show under 10 tons change in either pollutant. The redesignation request discusses that this increase is a result of the use of a new estimation method from the Missouri Department of Transportation (MoDOT) for vehicle miles travelled (VMT). VMT is a key input to the onroad vehicle emissions model.

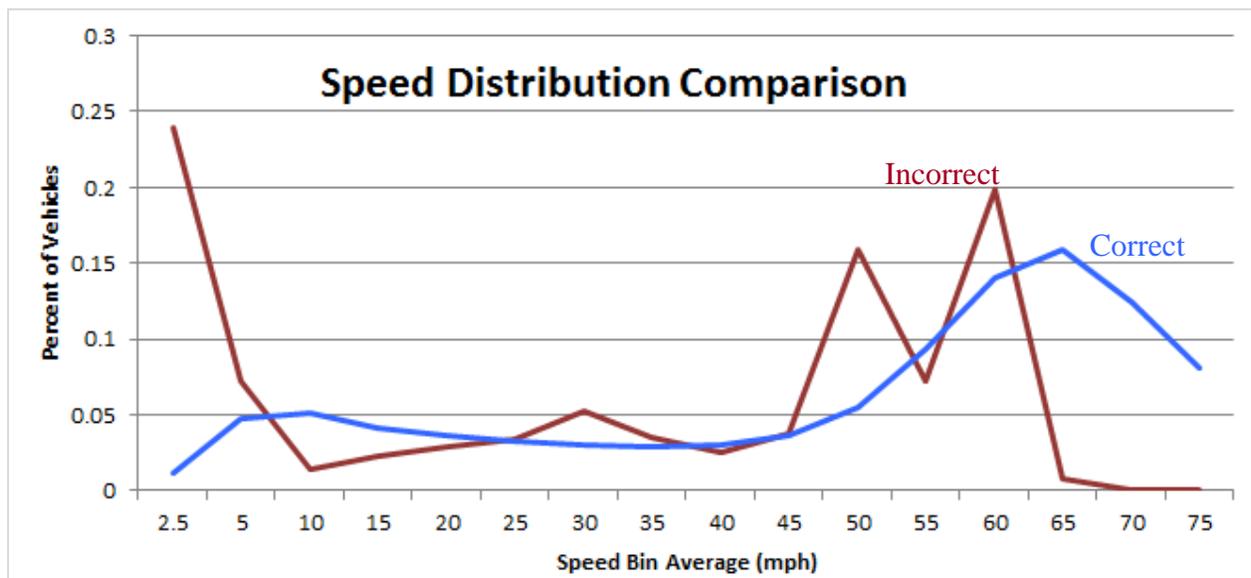
In response to the EPA's question, the air program further examined the increase of emissions in St. Louis County, and compared the emissions and VMT. Emissions in 2014 are considerably higher than would be predicted when looking at 2008 and 2011 VMT and emissions as in Figure 1-1. This review of VMT demonstrates that not all of the emissions increase is attributable to VMT alone.

Figure 1-1 - NO_x Emission and VMT Trend for St. Louis County



Review of the onroad modeling input files for the MOVES model showed that the speed distribution table was incorrect for the 2014 St. Louis County model run. The air program determined this by plotting the speed distributions used in the redesignation request modeling against the EPA’s default speed distribution charts (figures 9-1 and 9-2) in the MOVES Technical Report Population and Activity of On-road Vehicles in MOVES2014. Figure 1-2 plots the redesignation request speed distribution in red, and the EPA default speed distribution in blue for passenger cars on urban highways at 5pm on weekdays.

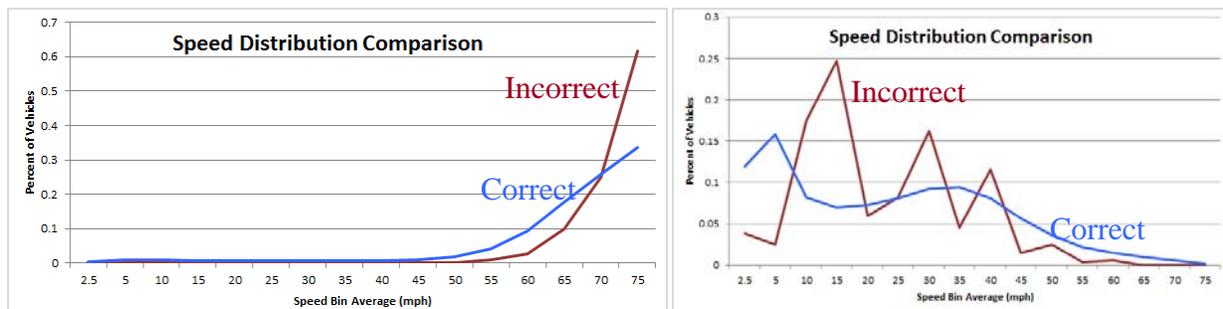
Figure 1-2 - Urban Restricted Roads (aka Highways), Passenger Car hour 17 (5pm) Weekday Speed Distribution



The incorrect speed distribution increases emissions primarily through incorrect urban highway speeds. The incorrect speed distribution overestimates the number of vehicles travelling between 2.5 and 10 mph. At very slow highway speeds, vehicles produce higher emissions and the incorrect speed distribution creates a large numbers of vehicles at these lower speeds. The correct speed distribution shows the average speed is near more emissions-efficient speed of 50-70 mph. The incorrect speed distribution skews emissions higher for urban highway travel, which is a significant portion of St. Louis county travel.

Similarly, figure 1-3 plots the redesignation request speed distribution in red, and the EPA default speed distribution in blue for rural highways and urban non-highways for passenger cars traveling on weekdays at 5pm. In both cases, the incorrect distribution causes emissions to increase by incorrectly identifying vehicles as traveling too fast or too slow. The air program believes this is the basis of the larger than expected emissions increase.

Figure 1-3 - Rural Highway (left) and Urban non-highway (right), Passenger Car hour 17 (5pm) Weekday Speed Distribution



The air program also investigated the speed distribution tables used in other counties in the St. Louis nonattainment area, and for the 2020 and 2030 years in the maintenance plan. The speed distribution tables used for all other counties and years coincide with the correct EPA default speed distribution. Therefore, no correction is needed for other county or year emission estimates.

1.3 Corrected Redesignation and Maintenance Inventories

The air program conducted an onroad model run including the correct speed distribution for St. Louis County. Based upon this revised model result, the 2014 St. Louis County onroad emission estimate appears in table 1-1. The corrected 2014 St. Louis County onroad emission estimate revises the inventory and demonstrates an emissions decrease for ozone precursor emissions NO_x and VOC from the base year of 2011 to the attainment year of 2014. All other emission sectors, including point, nonpoint, and nonroad emissions are unchanged from the redesignation request inventory.

Table 1-1 Revised Emission Inventory Comparison, 2011-2014 NO_x and VOC (tons per ozone season day)

2011			2014		Difference	
Point	NO _x	VOC	NO _x	VOC	NO _x	VOC
Franklin County	27.75	2.52	21.13	2.08	-6.62	-0.44
Jefferson County	16.66	1.63	17.96	1.91	1.30	0.28
St. Charles County	25.04	3.34	21.05	4.12	-3.99	0.78
St. Louis County	16.74	3.5	16.79	2.87	0.05	-0.63
St. Louis City	4.49	3.59	4.78	2.88	0.29	-0.71
Total	90.68	14.58	81.7	13.86	-8.98	-0.72

Area/Nonpoint	NO _x	VOC	NO _x	VOC	NO _x	VOC
Franklin County	0.49	3.36	0.46	5.80	-0.03	2.44
Jefferson County	0.62	7.48	0.42	5.44	-0.20	-2.04
St. Charles County	0.68	11.21	0.89	11.50	0.21	0.29
St. Louis County	2.65	38.68	3.77	35.88	1.12	-2.80
St. Louis City	1.16	12.04	0.93	11.19	-0.23	-0.85
Total	5.60	72.77	6.47	69.81	0.87	-2.96

Onroad	NO _x	VOC	NO _x	VOC	NO _x	VOC
Franklin	7.83	2.4	8	2.57	0.17	0.17
Jefferson	12.45	4.24	12.87	4.65	0.42	0.41
St. Charles	21.04	6.73	19.68	7.75	-1.36	1.02
St. Louis County	66.34	20.17	60.29	19.01	-6.05	-1.16
St. Louis City	16.55	4.46	10.92	4.23	-5.63	-0.23
Total	124.21	38	111.76	38.21	-12.45	0.21

Nonroad	NO _x	VOC	NO _x	VOC	NO _x	VOC
Franklin	5.72	3.31	5.24	2.91	-0.48	-0.40
Jefferson	3.33	3.12	3.04	2.72	-0.29	-0.40
St. Charles	8.34	6.23	7.40	5.25	-0.94	-0.98
St. Louis County	23.85	22.99	17.53	19.61	-6.32	-3.38
St. Louis City	6.31	3.38	5.23	2.92	-1.08	-0.46
Total	47.55	39.03	38.44	33.42	-9.11	-5.61

Total	268.04	164.38	238.37	155.30	-29.67	-9.08
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In addition, this revision in emissions inventory for 2014 affects the calculation of the maintenance period emissions change. The maintenance demonstration compares the emission levels in 2014 and the projection of emissions in the future year of 2030. The aggregate emissions of NO_x and VOC in 2030 continue to show a decrease from 2014 emission levels, though the decrease in emissions is smaller than in the previous maintenance plan with incorrect 2014 emissions. For reference, Table 1-2 displays the revised maintenance demonstration emissions inventory.

Table 1-2 2014 to 2030 Emissions Difference (tons per ozone season day)

State	Source Category	2014		2030		Difference	
		VOC	NO _x	VOC	NO _x	VOC	NO _x
Missouri	Point Sources	13.86	81.7	14.31	93.08	0.45	11.38
	Area Sources	69.81	6.47	68.80	13.03	-1.01	6.56
	Onroad Mobile Sources	38.21	111.76	18.42	25.57	-19.79	-86.19
	Nonroad Sources	33.42	38.44	30.01	29.90	-3.41	-8.54
	Total	155.30	238.37	131.54	161.58	-23.76	-76.79

2. Transportation Conformity

Transportation conformity ensures that federal transportation projects in nonattainment and maintenance areas do not hinder the area from attaining and maintaining the 2008 8-hour ozone NAAQS. This means that the level of emissions estimated by MoDOT or the metropolitan planning organizations must not exceed the MVEBs as defined in the maintenance plan. The program coordinated with the East-West Gateway Council of Governments (EWGW), the metropolitan planning organization for the St. Louis area, to develop the revised MVEBs for the maintenance period. The change in emissions inventory from Section 1 requires the program revise MVEBs from the original maintenance following the interagency consultation process outlined in 10 CSR 10-5.480.

2.1 Safety Margin

Safety margin is defined in 40 CFR 93.101 as the difference in emissions from all sources between the projected future year, 2030 in this case, and attainment year, 2014 in this case. The safety margin, or a percentage of the safety margin, can be allocated to the transportation sector. Table 2-1 lists the safety margin for each pollutant, using the corrected 2014 emissions inventory, and banked emission reduction. The banked emission amount is unchanged from the original maintenance plan.

Table 2-1 Safety Margin (tons per ozone season day)

County	2014 VOC	2014 NO _x	2030 VOC	2030 NO _x	VOC Safety Margin	NO _x Safety Margin
St. Louis Area Total	155.30	238.37	131.55	161.58	23.76	76.79
Area Total 2030 Banked Emissions					2.85	0.01
Reduced Safety Margin					20.91	76.78

* Note: Figures may not total exactly due to rounding.

The safety margin for the area is reduced by the amount of banked emissions that are possible in 2030. This reduction will ensure that future year mobile budgets will be set at a level that maintains total emissions below the level of the attainment year 2014, including possible banked emissions.

2.2 Revised Motor Vehicle Emissions Budgets

40 CFR Part 93 requires emission budgets be allocated for the on-road mobile sources in the St. Louis ozone nonattainment area. Transportation authorities must follow these budgets to assure that transportation plans, programs, and projects are consistent with, and conform to, the maintenance of acceptable air quality in the nonattainment area throughout the term of the maintenance plan. The technical correction to the inventory values requires revision of the mobile budgets, and the revision of the budgets followed the interagency consultation process.

The presumptive mobile budget for the area begins with the onroad 2030 mobile emission total. The program then considers if some amount of the safety margin should be applied toward the 2030 mobile emission estimate. Through the consultation process in September and October 2017, the partner agencies on transportation and air quality issues agreed that a sensitivity analysis on 2030 emissions was in order to see what level of emissions might be possible given an aggressive transportation growth scenario. The “FHWA Forecasts of Vehicle Miles Traveled

(VMT): Spring 2017” expects national compound annual growth of 1.07% from 2015 to 2025, with a high economic growth rate of 1.19% for the same period. Since this national growth rate smooths out potential localized higher growth rates, the consultation partners chose a rate of 5% annual compound growth to represent an aggressive VMT growth rate for St. Louis. This rate is comparable to single year growth rates in the fastest growing cities of the country like Austin, TX and Atlanta, GA. Applying this rate for all years from 2014 to 2030 captures the increased emissions that could happen given increasing congestion and lower speeds with more vehicle trips on an unexpanded road network, though congestion and speed are not directly changed in the future year model scenarios.

In the 5% per year VMT growth scenario, VOC emissions could grow to 23 tons per ozone season day in 2030, and NO_x could grow to 44 tons per ozone season day in 2030. While this growth rate is highly unlikely, it speaks to the need to apply a portion of the safety margin toward the MVEB to avoid coming near the budget limit in future years. The budget values of 22.00 tons for VOC and 40 tons for NO_x were arrived at by consulting with EWGW staff. Consulting partner agencies discussed the previous decision to assign 80% of the safety margin toward the mobile budget, but ultimately did not choose that percentage. Instead, the consultation process choose the budget values based on the sensitivity analysis, in this case choosing a final budget number near the aggressive growth rate emission total. 40 CFR Part 93 does not specify the method for choosing the final budget, allowing the consultation process to set the budgets as they see fit, as long as future emissions maintain air quality goals. The revised budgets represent allocating approximately 20% of the safety margin to the mobile sector in 2030 for comparison to the previous budget setting process.

The calculations of safety margin, applied safety margin, and remaining safety margin for each pollutant appear in Tables 2-2 and 2-3. The motor vehicle budget for the Missouri portion of the nonattainment area is summarized in Table 2-4.

Table 2-2 Onroad Motor Vehicle VOC Emission Budgets (tons per ozone season day)

	2014 Onroad VOC	2030 Onroad VOC	Safety Margin VOC	Applied Safety Margin VOC	Remaining Safety Margin VOC	MVEB VOC
St. Louis Area Total	38.21	18.42	23.76	-	-	-
Reduced Safety Margin Budget Calculation			20.91	3.58	17.33	22.00

Table 2-3 Onroad Motor Vehicle NO_x Emissions Budgets (tons per ozone season day)

	2014 Onroad NO _x	2030 Onroad NO _x	Safety Margin NO _x	Applied Safety Margin NO _x	Remaining Safety Margin NO _x	MVEB NO _x
St. Louis Area Total	111.76	25.57	76.79	-	-	-
Reduced Safety Margin Budget Calculation			76.78	14.43	62.35	40.00

Table 2-4 Onroad Motor Vehicle 2030 Revised Emission Budgets (tons per ozone season day)

2030 St. Louis Area Revised Budget	VOC	NO _x
	22.00	40.00

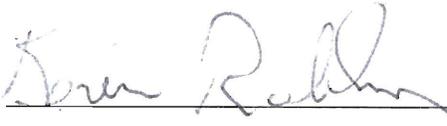
The Missouri Air Conservation Commission **ADOPTS** the following action on this 1st day of February, 2018:

Missouri State Implementation Plan Revision: Technical Correction to the Redesignation Request and Maintenance Plan for the St. Louis (Missouri) 2008 Ozone Standard Nonattainment Area

 _____, Chairman

 _____, Vice Chairman

 _____, Member

 _____, Member

_____, Member

_____, Member

_____, Member

Morgan, Cheri

From: Missouri DNR <MODNR@public.govdelivery.com>
Sent: Monday, November 06, 2017 11:35 AM
To: Alexander, Jennifer; Payne, Stan; wendy.vit@dnr.mo.gov; Beydler, Van; Patterson, Connie; Morgan, Cheri; Nahach, Lisa; Moore, Kyra; Bybee, Darcy; Schmidt, Connie; Bungart, Renee
Subject: Courtesy Copy: Missouri Air Conservation Commission - December 7, 2017 Public Hearing

This is a courtesy copy of an email bulletin sent by Cheri Morgan.

This bulletin was sent to the following groups of people:

Subscribers of Air Public Notices (1152 recipients)



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Missouri Air Conservation Commission Will Hold Public Hearing

The Missouri Air Conservation Commission will hold a public hearing at 9 a.m., Thursday, Dec. 7, 2017 in the Bennett Spring Conference Room of the Elm Street Conference Center, 1730 East Elm St., Jefferson City, Mo. Visitors may access the conference center via the lower level of the building.

The commission will hear testimony related to the following two proposals:

1. Revised recommendation for area boundaries related to the 2015 ozone standard.

More information is available at dnr.mo.gov/env/apcp/stateplanrevisions.htm.

2. Correction to redesignation request and maintenance plan for the 2008 ozone standard.

The correction would fix an error in estimated mobile emissions in the emissions inventory and motor vehicle budgets. The commission already approved the redesignation request and maintenance plan for the 2008 standard. The public hearing will focus only on the correction. More information is available at dnr.mo.gov/env/apcp/stateplanrevisions.htm.

The public may review relevant documents at the Missouri Department of Natural Resources, Air Pollution Control Program, 1659 Elm St., Jefferson City, (573) 751-4817, and in the public notices section of the program's website: dnr.mo.gov/env/apcp/public-notices.htm. This information is available at least 30 days prior to the public hearing date.

The department will accept comments until 5 p.m. on Dec. 14, 2017. Please send written comments to Darcy Bybee, Chief of the Air Quality Planning Section, MoDNR, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176. You may email comments to the Air Quality Planning Section's State Implementation Plan email group at apcpsip@dnr.mo.gov or via the program's website noted above. The department gives equal consideration to written comments and testimony delivered during public hearings.

People with disabilities requiring special services or accommodations to attend the meeting can make arrangements by calling the program directly at (573) 751-4817 or the Division of Environmental Quality's toll-free number at (800) 361-4827. If they prefer, they may write 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 people may contact the program through Relay Missouri, (800) 735-2966.\TTY.

Visit our webpage dedicated to the Missouri Air Conservation Commission's meetings:
dnr.mo.gov/env/apcp/macc.htm



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State Plan Actions

On Public Notice | Proposed for Adoption



On Public Notice

Technical Correction to the Redesignation Request and Maintenance Plan for the St. Louis (Missouri) 2008 Ozone Standard Nonattainment Area

This technical correction addresses the St. Louis nonattainment area Redesignation Request and Maintenance Plan under the 2008 ozone standard. The plan was submitted to the U. S. Environmental Protection Agency on September 12, 2016, including a maintenance plan to demonstrate the area will continue to meet the standard in future years as outlined in emission inventory projections, contingency measures, and motor vehicle budgets. Technical corrections to the emissions inventory and motor vehicle budgets fix an error in the mobile emission estimates. The correction does not affect the maintenance of air quality in the five-county St. Louis region in the future year. Redesignation to attainment will occur when the U. S. Environmental Protection Agency gives final approval to the plan, including the technical correction.

Technical Correction to the Redesignation Request and Maintenance Plan for the 2008 Ozone Standard Nonattainment Area

Submit Comments Now

A public hearing is scheduled for this correction on December 7, 2017. Comments about this correction will be accepted through close of business on December 14, 2017.

Revision to Area Boundary Designation Recommendation for the 2015 Ozone Standard

Missouri is proposing to submit to the U.S. Environmental Protection Agency a revised boundary designation recommendation for the 2015 ozone standard. This revised recommendation replaces the recommendation submitted to the EPA on September 30, 2016. Nonattainment recommendations are for areas with monitored violations based on 2015-2017 preliminary monitoring data and areas contributing to the violation. All other areas of the state are recommended for an unclassifiable/attainment designation. The air program intends to submit this revised recommendation to EPA to consider prior to finalizing the designations for the 2015 ozone standard. This action will not be submitted for inclusion in the Missouri State Implementation Plan.

Revision to Area Boundary Designation Recommendation for the 2015 Ozone Standard

- [Appendix A](#)

Submit Comments Now

A public hearing is scheduled for plan action on December 7, 2017. Comments about this plan action will be accepted through close of business on December 14, 2017.

Proposed for Adoption

Missouri State Implementation Plan Revision – Redesignation Request & Maintenance Plan for the 2010 Sulfur Dioxide Standard

This SIP revision addresses redesignation requirements for the Jefferson County nonattainment area under the 2010 1-hour sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS), per the Clean Air Act. A portion of Jefferson County was designated nonattainment in August 2013. However, monitoring data for 2013-2015 show the area has attained the standard of 75 parts per billion. The SIP revision includes a maintenance plan to demonstrate Jefferson County will continue to meet the standard in future years through permanent and enforceable emissions

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Contact Information

Air Pollution Control Program

P.O. Box 176

Jefferson City, MO 65102

800-361-4827

573-751-4817

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[Meet the Air Pollution Control Program Director](#)

reductions. Redesignation to attainment will occur when U. S. Environmental Protection Agency gives final approval of this plan.

A public hearing was held for this plan action on August 31, 2017. Comments about this plan action were accepted through close of business on September 7, 2017.

Comments Received:

- **Ameren Missouri** 
 - **Attachment 1** 
 - **Attachment 2** 
 - **Attachment 3** 
- **Environmental Protection Agency Region VII** 
- **Holcim – Sainte Genevieve Plant** 
- **Regulatory Environmental Group for Missouri (REGFORM)** 
- **Interdisciplinary Environmental Clinic, Washington University School of Law** 
 - **August 31, 2017 public hearing presentation** 

The plan was reviewed and revised in response to comments. The revised plan and response to comments are posted below. Consideration for adoption is currently scheduled for the December 7, 2017, Missouri Air Conservation Commission meeting.

**Redesignation Request & Maintenance Plan for the 2010 Sulfur Dioxide Standard
Jefferson County Nonattainment Area** 

Summary of Comments and Responses 

By Division

About Us
Division of Administrative Support-Jobs
Division of Environmental Quality
EIERA
Missouri Geological Survey
Missouri State Parks

Explore by Topic

Asbestos Information
Drinking Water
Ecycle
Education and Interpretation
Online Searchable Databases
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Wastewater

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Governor
Eric R. Greitens

Director
Carol S. Comer

DEPARTMENT OF NATURAL RESOURCES
STATE OF MISSOURI

MISSOURI AIR CONSERVATION COMMISSION

IN RE:

REVISION TO AREA BOUNDARY DESIGNATION RECOMMENDATION
FOR THE 2015 OZONE STANDARD

MISSOURI STATE IMPLEMENTATION PLAN REVISION - TECHNICAL
CORRECTION TO THE REDESIGNATION REQUEST AND MAINTENANCE
PLAN FOR THE ST. LOUIS (MISSOURI) 2008 OZONE STANDARD
NONATTAINMENT AREA

Public Hearing
1730 East Elm Street
Lower Level
Bennett Spring Conference Room
Jefferson City, Missouri 65101
December 7, 2017

BEFORE:

David Zimmermann, Chair, Missouri Air Conservation
Commission
Gary Pendergrass, Missouri Air Conservation Commission
Jack Jones, Missouri Air Conservation Commission
Mark S. Garnett, Missouri Air Conservation Commission
Kevin Rosenbohm, Missouri Air Conservation Commission
Kyra Moore, Director of Staff, Missouri Air Conservation
Commission

Reported by:
Julie K. Kearns, CCR 993
Alaris
3432 West Truman Boulevard, Suite 207
Jefferson City, Missouri 65109
(573) 636-7551

1 P R O C E E D I N G S

2 (Hearing started at 9:48 A.M.)

3 CHAIRMAN ZIMMERMANN: The hearing will come to
4 order. Let the record show the following Commissioners
5 are present: Mark Garnett, Gary Pendergrass, Dave
6 Zimmermann, Jack Jones and Kevin Rosenbohm.

7 The Air Conservation Commission of the State of
8 Missouri has called this public hearing pursuant to
9 Section 643.050(2) in accordance with Section 643.070,
10 Revised Statutes of Missouri, and the EPA promulgated Rule
11 40 CFR 51.102 for the purpose of hearing testimony
12 relating to: Revisions to the Area Boundary Designation
13 Recommendation for the 2015 Ozone Standard, Missouri State
14 Implementation Plan Revision - Technical Correction to the
15 Redesignation Request and Maintenance Plan for the St.
16 Louis, Missouri 2008 Ozone Standard Nonattainment Area.

17 The hearing record will close at 5 P.M. on
18 December 14, 2017. Anyone who has not been scheduled to
19 appear, but who wishes to be heard should indicate that
20 you wish to speak on the sign-in sheets available at the
21 door. Section 643.100 of the Missouri statutes provides
22 that all oral testimony be given under oath and recorded.
23 Accordingly, when you are called to testify, please
24 present yourself to the court reporter first to be sworn
25 in.

1 are the recommended nonattainment areas and the rest of
2 the counties are recommended unclassifiable/attainment
3 areas. Based on the preliminary 2015-2017 monitoring data
4 and the five-factor analysis, the air program is
5 recommending the City of St. Louis and the counties of St.
6 Louis and St. Charles as nonattainment areas. All other
7 counties are recommended unclassifiable/attainment
8 designation.

9 If the Commission adopts this recommendation,
10 the Department intends to submit it to EPA for
11 consideration prior to the final designations. Chairman,
12 Commissioners, that concludes my testimony. If there are
13 any questions, I will be happy to answer them at this
14 time.

15 CHAIRMAN ZIMMERMANN: Any questions for Adel? I
16 see none. Thank you.

17 COMMISSIONER PENDERGRASS: Nice presentation.

18 MR. ALSHARAFI: Thank you.

19 CHAIRMAN ZIMMERMANN: Next, Missouri State
20 Implementation Plan Revision - Technical Correction to the
21 Redesignation Request and Maintenance Plan for the St.
22 Louis, Missouri 2008 Ozone Standard Nonattainment Area.
23 Stacy.

24 (Witness sworn.)

25 MS. ALLEN: Mr. Chairman, members of the

1 Commission, my name is Stacy Allen. I am employed as an
2 Environmental Scientist with the Missouri Department of
3 Natural Resources' Air Pollution Control Program. I work
4 at 1659 East Elm Street in Jefferson City, Missouri.

5 I'm here today to present testimony on the
6 proposed Missouri State Implementation Plan Revision
7 titled - Technical Correction to the Redesignation Request
8 and Maintenance Plan for the St. Louis, Missouri 2008
9 Ozone Standard Nonattainment Area. The executive summary
10 for this plan starts on page 116 of the briefing document.

11 The air program is proposing a technical
12 correction to the Redesignation Request and Maintenance
13 Plan originally submitted to the EPA on September 12 of
14 2016. The technical correction includes revisions to the
15 emissions inventory and the motor vehicle emissions
16 budgets. These corrections are necessary due to an error
17 in the calculation of 2014 mobile emission estimates.

18 The correction to 2014 emissions affects both
19 the redesignation period, 2011 to 2014, and maintenance
20 plan period, 2014 to 2030. The correction continues to
21 show that the area will meet the 2008 ozone standard
22 future years and no revision to the maintenance
23 demonstration is needed.

24 In addition, a part of the inventory was set
25 aside to create motor vehicle emissions budgets according

RECOMMENDATION FOR ADOPTION

MISSOURI STATE IMPLEMENTATION PLAN REVISION –

TECHNICAL CORRECTION TO THE REDESIGNATION REQUEST AND MAINTENANCE PLAN FOR THE ST. LOUIS (MISSOURI) 2008 OZONE STANDARD NONATTAINMENT AREA

On December 7, 2017, the Missouri Air Conservation Commission held a public hearing for the Missouri State Implementation Plan (SIP) revision entitled – Technical Correction to the Redesignation Request and Maintenance Plan for the St. Louis (Missouri) 2008 Ozone Standard Nonattainment Area. A summary of comments received and the air program’s corresponding responses is included on the following page(s). Revisions were made to the proposed plan as a result of comments received.

The revised plan has not been reprinted in the briefing document due to its volume. However, the Executive Summary is included for reference. The entire revised 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 revised. If the commission adopts this plan, the department intends to submit it to the U.S. Environmental Protection Agency for inclusion in the Missouri State Implementation Plan.

COMMENTS AND RESPONSES ON
MISSOURI STATE IMPLEMENTATION PLAN REVISION –
TECHNICAL CORRECTION TO THE REDESIGNATION REQUEST AND
MAINTENANCE PLAN FOR THE ST. LOUIS (MISSOURI) 2008 OZONE STANDARD
NONATTAINMENT AREA

The public comment period for the Technical Correction to the Redesignation Request and Maintenance Plan for the St. Louis (Missouri) 2008 Ozone Standard Nonattainment Area opened on November 6, 2017 and closed on December 14, 2017. Revisions to the proposed plan were made as a result of comments.

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. Any changes to the proposed plan are included in the response to comments.

SUMMARY OF COMMENTS: During the public comment period for the proposed plan, the air program received one comment from the U.S. Environmental Protection Agency (EPA) and one comment from Air Conservation Commissioner Jack Jones.

COMMENT #1: The EPA commented that the air program did not apply an exact percent of the safety margin toward the mobile emission budget as was done in the original Redesignation Request and Maintenance Plan submitted in September 2016.

RESPONSE AND EXPLANATION OF CHANGE: The purpose of the technical correction document is to correct an error in the emissions inventory for 2014. Consequently, the air program re-evaluated the mobile emissions budget based on the erroneous inventory and engaged with the Interagency Consultation Group to determine a final budget. During that process, the group decided on a fixed budget near the expected emissions in the aggressive growth scenario. The original Redesignation Request and Maintenance Plan differs from the technical correction, specifically the consultation choice to use a fixed budget versus a percentage when calculating the budget. Additional language added to the Technical Correction document explains that the consultation process resulted in a safety margin application different from the original Redesignation Request and Maintenance Plan, but the method is allowed within the requirements of 40 CFR Part 93. Changes were made to the document as a result of this comment, though the budget and safety margin values are unchanged.

COMMENT #2: Commissioner Jones asked if the mobile budgets are based on an arithmetic average from air monitors.

RESPONSE: The mobile budgets are based on a projection of future emissions in 2030, rather than on air monitoring data. The technical correction document describes the steps to calculate the budget from mobile onroad emission projection in 2030, including adding a portion of the safety margin to the budget in case emissions grow more than the projection. No changes were made to the document as a result of this comment.