MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

2015 Ozone Standard St. Louis Marginal Nonattainment Area Plan

December 3, 2019
Air Pollution Control Program
Air Quality Planning Section
State Implementation Plan Unit

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Overview

- Missouri's Statutory Requirements
  - Stakeholder Meeting
- Background – 2015 Ozone Standard
- Federal Requirements for Nonattainment Areas
- Missouri's Statutory Requirements
  - Implementation Impact Report
- Marginal Nonattainment Area SIP – Tentative Schedule

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Missouri's Statutory Requirements

- RSMo 640.090 (effective October 2015) applies to nonattainment area plans and plans relating to carbon emissions for existing sources performance standards

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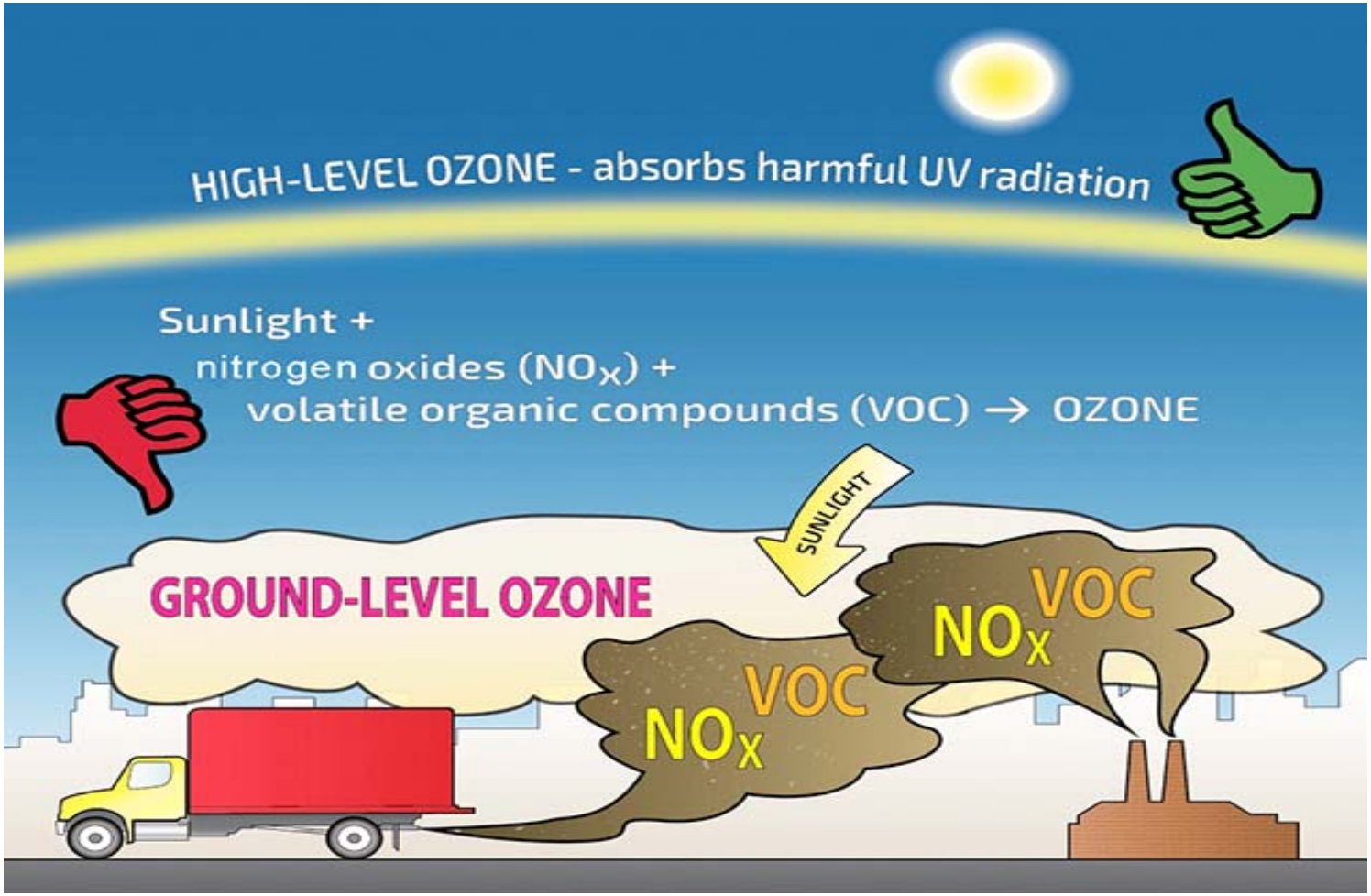
Missouri's Statutory Requirements - Stakeholder Meeting

- Statute Requires Department to:
  - Hold a stakeholder meeting to solicit stakeholder input from electric generators and loading serving entities, industrial energy consumers, citizen consumer groups, and renewable energy groups

Background - 2015 Ozone Standard

Ground-level Ozone Basics



https://ecology.wa.gov/Air-Climate/Air-quality/Air-quality-targets/Air-quality-standards/Ozone-pollution

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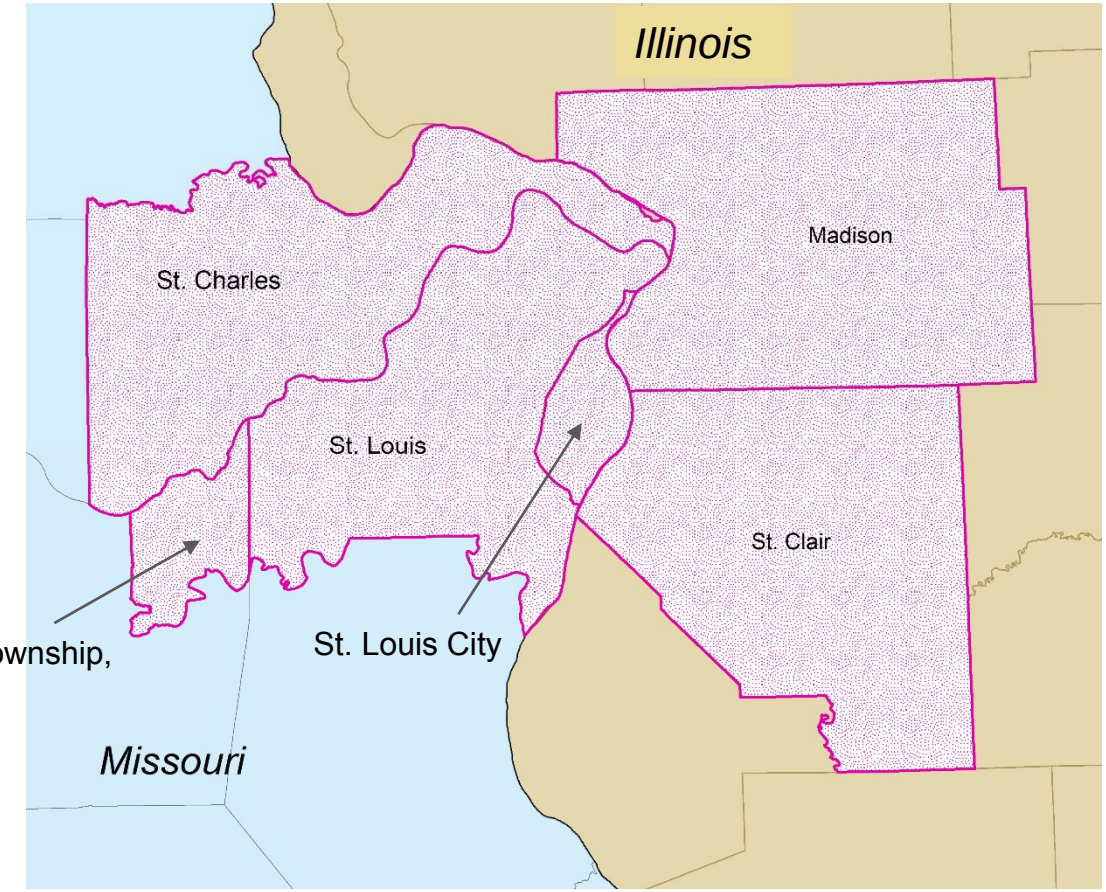
Background - 2015 Ozone Standard

- October 26, 2015 - EPA finalized the 2015 ozone standard, decreasing it from 75 ppb to 70 ppb (80 FR 65292)
  - Standard is based on the 3-year average of the 4th highest daily maximum 8-hour average concentrations
- June 4, 2018 - EPA finalizes nonattainment designation for the St. Louis area (83 FR 25776)
  - St. Louis and St. Charles counties, the City of St. Louis, and Boles Township in Franklin County were designated as part of the bi-state St. Louis nonattainment area (marginal classification)

Background - 2015 Ozone Standard

2015 Ozone St. Louis Bi-State Marginal Nonattainment Area

Designation effective
August 3, 2018
(83 FR 25776)



Boles Township,
Franklin

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Federal Requirements for Nonattainment Areas

- December 6, 2018 – EPA finalizes the nonattainment area SIP requirements rule for the 2015 ozone standard
- Marginal Nonattainment Area Requirements –
  - Emissions inventory: § 51.1315
  - Emissions statement rule: § 51.1315
  - Nonattainment new source review (Permitting): § 51.1314
- St. Louis Marginal Nonattainment Area Attainment Deadline: August 3, 2021

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Federal Requirements - Emission Inventory

- 2017 Emissions Inventory (Ozone Season Day) –
  - 2017 Point Source Emissions;
  - 2017 Area Source Emissions;
  - 2017 Onroad Mobile Source Emissions;
  - 2017 Nonroad Mobile Source Emissions;
  - 2017 Event (Wildfire) and Biogenic Source Emissions;
- Emission inventory submittal deadline: August 3, 2020

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Federal Requirements - Emission Statement

- The state must provide a commitment to update the emissions inventory for the area no less frequently than every three years
- Missouri's SIP already includes necessary reporting elements for permitted emission sources
  - *10 CSR 10-6.110 Reporting Emission Data, Emission Fees, and Process Information*
- Emission statement submittal deadline: August 3, 2020

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Federal Requirements – Nonattainment New Source Review

Missouri's SIP already contains the necessary permitting provisions –

- *10 CSR 10-6.060 Construction Permits Required*
- Nonattainment new source review submittal deadline: August 3, 2021

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Missouri's Statutory Requirements – Implementation Impact Report

- Statute Requires Department to:
  - develop an implementation impact report in collaboration with the public service commission and the departments of health and senior services, revenue, conservation, and economic development
  - submit the plan and report to the Governor, joint committee on government accountability, president pro tempore of the senate, and speaker of the house
  - post the plan and report on website 45 days before submittal to EPA and must remain on website for 1 year

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Missouri Statutory Requirements – Contents of Implementation Impact Report

- Economic impact of plan
- Existence and cost efficiency of technology needed
- Whether plan goals are achieved at sustainable cost
- Remaining useful life of affected sources (if provided)
- Depreciation schedules for early retirement sources
- Policy options – less stringent standards or longer compliance schedules
- Impact on taxes and general revenue

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Missouri Statutory Requirements – Contents of Implementation Impact Report

- Impact on citizen health - scientific peer reviewed studies
- Options for flexibility in achieving reduction goals
- Cost benefit analysis – public and private
- Impact on electric generation, supply, distribution, and reliability
- All elements of regulatory impact report (RSMo 640.015)
- Information about how other states are formulating their plans

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Marginal Nonattainment Area SIP - Tentative Schedule

- Plan and Implementation Impact Report Development – Fall/Winter 2019
- Public Comments – Winter/Spring 2020
- Public Hearing –Spring 2020
- Adoption – Spring/Summer 2020
- Submittal – Summer 2020

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Questions?

Air Pollution Control Program

Air Quality Planning Section

Email: apcpsip@dnr.mo.gov

Phone: 573-751-4817