MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

St. Louis Nonattainment Area Plan for the 2015 Ozone Standard

January 18, 2023
Air Pollution Control Program
Air Quality Planning Section
State Implementation Plan Unit

Overview

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

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Missouri's Statutory Requirements

- RSMo 640.090 (effective October 2015) applies when the department develops, amends, or revises nonattainment area plans and plans relating to carbon emissions for existing source performance standards under the Clean Air Act.

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Missouri's Statutory Requirements: Stakeholder Meeting

- Statute Requires the 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

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Background – Ozone

- Ozone occurs naturally in the upper atmosphere where it absorbs the sun's UV radiation, preventing it from reaching the surface
- Ground-level ozone can cause lung damage, damage plants, and contribute to smog
- Ground-level ozone forms when Nitrogen Oxides and Volatile Organic Compounds mix in the presence of sunlight
  - Common emission sources include vehicles, power plants, industries, burning, and biogenics
  - Summer heat increases ozone levels

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Background – 2015 Ozone Standard

- October 26, 2015 - EPA revised primary and secondary Ozone standards (80 FR 65291)
  - In 2020, the standard was reviewed again and not changed
- In 2018, areas around St. Louis designated as a nonattainment area
  - Area included City of St. Louis, St. Louis county, St. Charles county, and Boles Township in Franklin county.
  - In 2021, Jefferson county added to nonattainment area.
  - Area is considered a bi-state nonattainment area, and includes Madison, St. Clair, and Monroe counties in Illinois.

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Background – 2015 Ozone Standard

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Background – 2015 Ozone Standard

Oct. 26, 2015 – EPA promulgates the 2015 ozone standard at 70 ppb.

2015

June 4, 2018 – EPA designates St. Louis City and County, St. Charles County, and Boles Township in Franklin County as nonattainment for 2015 ozone standard. Jefferson County was attainment.

2018

2021

July 14, 2021 – EPA revises designation for Jefferson County adding it to the St. Louis nonattainment Area.

Sept. 8, 2021 – Department submits marginal area nonattainment plan for St. Louis to EPA.

Jan. 21, 2022 – Department certifies 2021 ozone monitoring data. All monitors have 2019-2021 design values in compliance with the 2015 ozone standard.

2022

April 8, 2022 – Department submits maintenance plan and redesignation request for St. Louis nonattainment area to EPA.

July 11, 2022 – Alton, IL monitor measures preliminary violation of the 2015 ozone standard.

Oct. 7, 2022 – EPA reclassifies St. Louis nonattainment area from marginal to moderate.

Jan. 1, 2023 – Deadline for moderate area nonattainment plan elements.

2023

Dec. 6, 2022 – EPA proposes to approve Missouri's marginal area nonattainment plan for St. Louis

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Federal Requirements for Ozone Nonattainment Areas

Additional Nonattainment Area SIP Requirements for Marginal and Moderate Ozone Areas – CAA 182

Marginal Areas	Moderate Areas
• Emission Inventory, Periodic Updates, Emission Statements • Nonattainment Area Permitting • Offset Requirement: 1.1 - 1 • Corrections to RACT and Vehicle Inspection and Maintenance (I/M) Programs	• All elements for marginal areas • NO_x RACT and VOC RACT • Attainment Demonstration • 15 Percent RFP Plan • Contingency Plan • Basic I/M Program • Offset Requirement: 1.15 - 1

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Missouri's Statutory Requirements: Implementation Impact Report

- Statute Requires the 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 the Division of Energy
  - 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 the Department's 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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Nonattainment Area SIP Tentative Schedule

- Plan and IIR Development – Fall 2022 to Spring 2023
- Public Comments – Spring/Summer 2023
- Public Hearing – Spring/Summer 2023
- Adoption/Submittal – Summer 2023

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Questions?

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