



Jeremiah W. (Jay) Nixon, Governor • Harry D. Bozoian, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

December 8, 2016

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

Dear Mr. Hague:

The Missouri Department of Natural Resources' Air Pollution Control Program (air program) hereby submits the following:

Area Boundary Recommendations for the 2010 1-hour Sulfur Dioxide Standard: December 2017 Designations

Through this submittal, the air program is requesting that EPA take these enhanced recommendations into consideration during the designation process to be completed by December 31, 2017.

The state is revising its recommendation for area designations (e.g. attainment, nonattainment, unclassifiable) for the 2010 1-hour SO₂ standard. The revised recommendations are based on technical evaluations using air quality modeling to address seven parts of the State of Missouri: the areas surrounding the Ameren Meramec Energy Center, Empire District - Asbury plant, Montrose Generating Station, Sibley Generating Station, Sikeston Power Station, City Utilities of Springfield - John Twitty Energy Center, and the Thomas Hill Energy Center Power Division. The air program is enhancing the recommendations for these seven areas based on modeling analyses for these areas that demonstrates attainment with the standard. The air program is revising only the recommendation for these seven areas. For reference, the areas addressed in this revised recommendation are summarized in Table 1.

As a reminder, the air program submitted area recommendations for the 2010 1-hour SO₂ standard addressing the entire state for EPA's consideration in April 2013. These recommendations went through the state's public process and were adopted by the Missouri Air Conservation Commission on April 25, 2013. The entire table of county specific recommendations is included for reference in Table 2. For ease of reference, revisions to the April 2013 recommendation as listed in Table 1 are bolded in Table 2. The recommendation submitted in April 2013 is still relevant for all other areas not addressed in this revised recommendation.



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The Missouri Air Conservation Commission adopted the revised recommendations at the December 1, 2016, commission meeting. The commission has full legal authority to develop area boundary recommendations pursuant to Section 643.050 of the Missouri Air Conservation Law. A public hearing for the proposed recommendations was held on October 27, 2016. A 30-day public comment period opened by September 26, 2016, and closed on November 3, 2016. During the public comment period, the air program received both oral and written comments from Ameren Missouri. A summary of the comments received and our responses is attached.

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/naaqsboundarydesignations.htm>.

Also, due to their size, paper copies of the appendices to the recommendation are not included in this package. The disk(s) included with this package contains an electronic copy of the recommendation and appendices.

Thank you for your attention to this matter. If you have any questions regarding this submittal, please contact Ms. Darcy Bybee 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



Kyra L. Moore
Director

KLM:akc

Enclosures:

Area Boundary Recommendation (paper copies of the appendices are not included)
Summary of comments and responses
CD with electronic copy of the recommendation and appendices

c: Missouri Air Conservation Commission
File# 2010-SO2-5-DRR Modeling

Table 1. Missouri's Revised Boundary Recommendations for the 2010 1-hour SO₂ Standard: December 2017 Designations

Affected Source	Recommended Boundary	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

**Table 2. Missouri's Area Designation Recommendation for the 2010 1-hour SO₂ Standard
(As submitted in April 2013 with revisions as listed in Table 1 in bold)**

County	Recommended Classification
ADAIR	Unclassifiable
ANDREW	Unclassifiable
ATCHISON	Unclassifiable
AUDRAIN	Unclassifiable
BARRY	Unclassifiable
BATES	Unclassifiable
BARTON	Attainment
BENTON	Unclassifiable
BOLLINGER	Unclassifiable
BOONE	Unclassifiable
BUCHANAN	Unclassifiable
BUTLER	Unclassifiable
CALDWELL	Unclassifiable
CALLAWAY	Unclassifiable
CAMDEN	Unclassifiable
CAPE GIRARDEAU	Unclassifiable
CARROLL	Unclassifiable
CARTER	Unclassifiable
CASS	Unclassifiable
CEDAR	Unclassifiable
CHARITON	Unclassifiable
CHRISTIAN	Unclassifiable
CLARK	Unclassifiable
CLAY	Unclassifiable
CLINTON	Unclassifiable
COLE	Unclassifiable
COOPER	Unclassifiable
CRAWFORD	Unclassifiable
DADE	Unclassifiable
DALLAS	Unclassifiable
DAVIESS	Unclassifiable
DeKALB	Unclassifiable
DENT	Unclassifiable
DOUGLAS	Unclassifiable
DUNKLIN	Unclassifiable
FRANKLIN	Unclassifiable
GASCONADE	Unclassifiable
GENTRY	Unclassifiable
GREENE	Attainment
GRUNDY	Unclassifiable
HARRISON	Unclassifiable
HENRY	Attainment
HICKORY	Unclassifiable
HOLT	Unclassifiable
HOWARD	Unclassifiable
HOWELL	Unclassifiable

County	Recommended Classification
IRON	Unclassifiable
JACKSON	Nonattainment (portion of Jackson County bounded by county line on north, Kansas state border on west, Interstate-435 on the east, and the following southern boundary line that part of Jackson County north of Interstate-670 and Interstate-70 from the Kansas border to the intersection with Interstate-435)
JACKSON	Attainment (The portion of Jackson County bounded by county lines to the North and East, Interstate 70 and 470 to the South, and Missouri Highway 291 to the West.)
JACKSON	Unclassifiable (remaining portion of county)
JASPER	Attainment
JEFFERSON	Nonattainment (Herculaneum and Festus townships and the Missouri portions of Valmeyer and Selma townships west of Illinois state border)
JEFFERSON	Unclassifiable (remaining portion of county)
JOHNSON	Unclassifiable
KNOX	Unclassifiable
LACLEDE	Unclassifiable
LAFAYETTE	Unclassifiable
LAWRENCE	Unclassifiable
LEWIS	Unclassifiable
LINCOLN	Unclassifiable
LINN	Unclassifiable
LIVINGSTON	Unclassifiable
McDONALD	Unclassifiable
MACON	Unclassifiable
MADISON	Unclassifiable
MARIES	Unclassifiable
MARION	Unclassifiable
MERCER	Unclassifiable
MILLER	Unclassifiable
MISSISSIPPI	Unclassifiable
MONITEAU	Unclassifiable
MONROE	Unclassifiable
MONTGOMERY	Unclassifiable
MORGAN	Unclassifiable
NEW MADRID	Unclassifiable
NEWTON	Unclassifiable
NODAWAY	Unclassifiable
OREGON	Unclassifiable
OSAGE	Unclassifiable
OZARK	Unclassifiable
PEMISCOT	Unclassifiable
PERRY	Unclassifiable
PETTIS	Unclassifiable
PHELPS	Unclassifiable
PIKE	Unclassifiable
PLATTE	Unclassifiable
POLK	Unclassifiable

County	Recommended Classification
PULASKI	Unclassifiable
PUTNAM	Unclassifiable
RALLS	Unclassifiable
RANDOLPH	Attainment
RAY	Unclassifiable
REYNOLDS	Unclassifiable
RIPLEY	Unclassifiable
ST. CHARLES	Unclassifiable
ST. CLAIR	Unclassifiable
ST. FRANCOIS	Unclassifiable
STE. GENEVIEVE	Unclassifiable
ST. LOUIS	Attainment (The portion of St. Louis County bounded by county and state lines to the South, West and East, and Interstate 255 and 50 to the North and East.)
ST. LOUIS	Unclassifiable
ST. LOUIS CITY	Unclassifiable
SALINE	Unclassifiable
SCHUYLER	Unclassifiable
SCOTLAND	Unclassifiable
SCOTT	Attainment
SHANNON	Unclassifiable
SHELBY	Unclassifiable
STODDARD	Unclassifiable
STONE	Unclassifiable
SULLIVAN	Unclassifiable
TANEY	Unclassifiable
TEXAS	Unclassifiable
VERNON	Unclassifiable
WARREN	Unclassifiable
WASHINGTON	Unclassifiable
WAYNE	Unclassifiable
WEBSTER	Unclassifiable
WORTH	Unclassifiable
WRIGHT	Unclassifiable