



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

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OCT 28 2014

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

Dear Mr. Brooks:

This is in response to your August 19, 2014 letter regarding designations for the 2012 annual fine particulate matter (PM<sub>2.5</sub>) National Ambient Air Quality Standard (NAAQS) of 12 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ). The letter states the U.S. Environmental Protection Agency (EPA) intends to designate the City of St. Louis and St. Louis, St. Charles, Franklin, and Jefferson Counties as “unclassifiable” and the rest of the state “attainment/unclassifiable.” We are concerned that an “unclassifiable” status may leave the St. Louis area open to a future nonattainment area designation when the issues with Illinois’ PM<sub>2.5</sub> monitoring data are resolved.

In our December 10, 2013 submission, we recommended the entire State of Missouri be designated “attainment/unclassifiable” for the 2012 annual PM<sub>2.5</sub> NAAQS. Our recommendation considered that all Missouri monitors were in compliance with this standard based on 2010-2012 ambient monitoring data. It also relied on our technical evaluation of monitoring, emissions, and meteorological data demonstrating that Illinois sources, not Missouri sources, were the primary contributors to violating monitors located on the Illinois side of the St. Louis area.

We stand by our recommendation that the entire State of Missouri be designated “attainment/unclassifiable” for the 2012 annual PM<sub>2.5</sub> NAAQS. All Missouri monitors continue to be in compliance of this standard based on 2011-2013 data and annual PM<sub>2.5</sub> design values are trending downward. Though quality-assurance issues preclude the use of Illinois PM<sub>2.5</sub> monitoring data to determine a violation of the NAAQS, the general conclusions from our analysis still stand. Our evaluation of meteorological patterns and general trends data on high and low PM<sub>2.5</sub> days support the conclusion that localized sources in Illinois are the primary contributors to the monitors of concern on the Illinois side of the St. Louis area.

We also have comments on a statement in EPA’s Illinois Technical Support Document (TSD) indicating that if the Illinois portion of the St. Louis area is determined to be violating the 2012 PM<sub>2.5</sub> NAAQS, EPA would likely find the contributing area to be the same as the area contributing to violations of the previous 1997 PM<sub>2.5</sub> NAAQS of  $15 \mu\text{g}/\text{m}^3$ . The 1997 PM<sub>2.5</sub> standard boundary designation process is not comparable to the current process because one of Missouri’s monitors in the St. Louis urban core was in violation of that standard at the time.

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Consequently, our designation effort for the 1997 standard focused on evaluating Missouri sources' contribution to the violating Missouri monitor and recommending an appropriate nonattainment area boundary. The Air Program cautions against applying conclusions from the previous PM<sub>2.5</sub> designation effort to the current process because Missouri does not have any monitors violating the 2012 PM<sub>2.5</sub> NAAQS.

We appreciate the valuable assistance EPA Region 7 staff has provided thus far and look forward to continuing to work with you and your staff throughout the rest of the process. If you have any questions regarding this letter, please contact Ms. Wendy Vit, Air Quality Planning Section Chief, Air Pollution Control Program at P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817. Thank you for your consideration.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

A handwritten signature in black ink that reads "Kyra L Moore". The signature is written in a cursive style with a large, stylized "K" and "M".

Kyra Moore  
Director

KM:mlc

cc: Missouri Air Conservation Commission  
File# 2012-PM-1 Annual Designation Recommendation