



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

DEC 29 2016

OFFICE OF THE
REGIONAL ADMINISTRATOR

Ms. Kyra Moore, Director
Missouri Department of Natural Resources
Air Pollution Control Program
1659 East Elm Street
Jefferson City, Missouri 65101

Dear Ms. Moore:

With this letter, I am pleased to approve the Missouri Department of Natural Resources' Air Pollution Control Program's, 2016 Monitoring Network Plan (or the plan). The plan was submitted to U.S. Environmental Protection Agency for approval on December 20, 2016. The plan was reviewed and found to be in accordance with the provisions of Code of Federal Regulations, 40 CFR Part 58-*Ambient Air Surveillance*.

As indicated in the submittal letter and the cover to the plan's *Appendix 7-Comments and Responses of Proposed 2016 Monitoring Network Plan, Revision 1*, the plan was first posted for public comment, as required by 40 CFR Part 58, on the MDNR's website from May 27, 2016, through June 28, 2016. Due to substantive changes in the plan, the MDNR provided a public comment period from November 15, 2016, to December 15, 2016, for the *2016 Monitoring Network Plan Revision 1* (revised plan). During the May-June 2016 public comment period, the MDNR received comments from Ameren Missouri and the Washington University School of Law on behalf of the Sierra Club. During the November-December 2016 public comment period the MDNR received comments from two citizens; the Washington University School of Law on behalf of the Sierra Club; the Labadie Environmental Organization; Ameren Missouri; the City of Springfield Utilities and the St. Charles County Council. The MDNR responded to the public comments but did not make substantive changes to the *2016 Monitoring Network Plan Revision 1*.

As you are aware, on August 21, 2015, the EPA promulgated the Data Requirements Rule (the rule), codified at 40 CFR Part 51 Subpart BB, for the 2010 1-hour Sulfur Dioxide Primary National Ambient Air Quality Standard. The rule required air agencies to: submit a list of applicable sources (or source areas) by January 15, 2016; notify the EPA, by July 1, 2016, whether the air agency had chosen to characterize peak 1-hour SO₂ concentrations in the source areas through ambient air quality monitoring, air quality modeling techniques, or provide federally enforceable emission limitations (limiting emissions to less than 2,000 tons per year). If monitoring is selected for characterization, the air agency must include relevant information about the monitors, used to meet the requirements of the rule, in the air agency's annual monitoring network plan.

The MDNR identified 16 source areas subject to the rule in its January 2016 submission and notified the EPA that it was planning to utilize monitoring to characterize four of those source areas in its July 2016 submission: Ameren Missouri Labadie Energy Center (Labadie); Doe Run Buick Source Recycling (Buick); AECI New Madrid Power Plant – Marston (AECI); and Noranda Aluminum Incorporated - New Madrid (Noranda). The plan includes monitor specific information for the Labadie,



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Buick, and Noranda locations. Although, the plan does not specifically mention AECI as a DRR source characterized by monitoring, the plan does discuss AECI in its *Appendix 4-Review of Proposed SO₂ and Meteorological Monitoring Stations around the Noranda New Madrid Plant*. AECI and Noranda share a fence line and AECI was included in the dispersion modeling utilized to select the site for the Noranda/AECI monitor location. As such, the EPA finds that the plan includes monitoring information for each of the four DRR source areas the MDNR indicated it would characterize by collecting ambient air quality monitoring data in accordance with 40 CFR Part 58.

The plan is well organized and thorough. The EPA appreciates your commitment to protecting air quality for the citizens of Missouri and dedication to our shared mission. I look forward to continued work with you and your staff.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Hague", with a stylized flourish at the end.

Mark Hague