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MEMORANDUM

DATE: December 29, 2009

TO: Elizabeth Naess, Air Quality Management Plan (AQMP) Project

Coordinator

United States Environmental Protection Agency, Office of Air

Quality Planning and Standards

FROM: St. Louis AQMP Project Team

(Transmitted by the Missouri Department of Natural Resources,

Air Pollution Control Program)

SUBJECT: Transmittal of Final Draft AQMP for St. Louis, MO/IL

Attached you will find the final draft AQMP for St. Louis. This document is the result of significant efforts from many members of the St. Louis AQMP3 project team. Staff from the Missouri Department of Natural Resources, the Illinois Environmental Protection Agency, the City of St. Louis Air Pollution Control Division, the East-West Gateway Council of Governments, the United States Environmental Protection Agency (EPA) Regions V and VII along with the Office of Air Quality Planning and Standards (OAQPS) have contributed to the development of this document and the previously submitted documents related to the AQMP Pilot Project. This draft plan is the result of dozens of conference calls and several face-to-face meetings in St. Louis discussing the AQMP project presented by EPA-OAQPS at the September 2007 kickoff meeting.

As you know, this AQMP has been designed to provide a new mechanism to perform air quality management in the St. Louis area using a multi-pollutant approach. The plan contains specific information about the current air quality in St. Louis including current PM and ozone nonattainment status and certain air toxics of concern. The plan outlines the approach that will be utilized by both states to develop State Implementation Plans to meet current air quality standards. It also includes an adaptive management mechanism to allow the AQMP to change as air quality standards or goals in St. Louis change. In addition, the plan contains a new approach for communicating complex air quality data to the public. This new approach will rely on cumulative costs for exposure to air pollutants and metrics that are more easily understood (e.g. dollars and projected hospital admissions vs. parts per billion in a modeled grid cell).

The draft plan has been reviewed by members of the Air Quality Advisory Committee. This committee contains air quality stakeholders within the St. Louis area including state and local government representatives, the environmental community, and regulated entities. This final draft has been modified slightly due to comments received from this group, but is still undergoing review at this time. The final plan will be an evolving document that will be revised when circumstances change (e.g. different air quality goals) and to continually improve the process of air quality management in St. Louis.

The overall goals of the AQMP are as follows:

- (1) the completion of all required Clean Air Act submittals for compliance with the National Ambient Air Quality Standards (NAAQS) in St. Louis preferably using one air quality planning exercise for multiple pollutants under a combined State Implementation Plan (SIP);
- (2) the inclusion of air toxics exposure as an important metric for consideration of alternative control requirements for all NAAQS;
- (3) the incorporation of environmental justice and extensive community involvement in the decision-making process including the regulated and environmental communities; and
- (4) consideration of other ancillary air quality issues in the development of the SIP including smart growth/transportation, energy issues, and climate change.

It is the intention of Missouri and Illinois to work to achieve these goals and, in so doing, speed air quality improvement in St. Louis for all citizens. This submittal fulfills the December 2009 deadline for the St. Louis AQMP that was established early in the development process by EPA-OAQPS. If you have comments or questions about the draft plan, please contact the AQMP3 project team.