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STATE OF ILLINOIS
Pollution Control Board

PC #7

Attn: John Terriault,
Asst. Clerk of the Board
Illinois Pollution Control Board
100 W. Randolph St., Suite 11-500
Chicago, Illinois 60601

The purpose of this letter is to provide comments on the Illinois Environmental Protection Agency's (IEPA's) proposed rulemaking involving case number R2008-019, Nitrogen Oxides Emissions From Various Source Categories, Amendments to 35 Ill. Adm. Code Parts 211 and 217, pertaining to Reasonably Available Control Technology (RACT) scheduled for public hearing February 3, 2009. The Missouri Department of Natural Resources' Air Program has completed a similar RACT development process for the control of Nitrogen Oxide (NO_x) emissions which contribute to ozone and particulate matter 2.5 micrometers in diameter (PM_{2.5}) formation in the St. Louis nonattainment area. The department's comments are intended to provide support for IEPA's proposed rulemaking for Nitrogen Oxides Emissions From Various Source Categories.

The St. Louis nonattainment area for ozone and PM_{2.5} includes counties in both Missouri and Illinois. A primary goal of the St. Louis ozone and PM_{2.5} modeling studies is to develop photochemical modeling databases and allied analysis tools necessary to reliably simulate the processes responsible for ozone and PM_{2.5} exceedances in the region. This is done to assist in the development of realistic emissions reduction strategies. The St. Louis modeling study includes episodic emissions, meteorological, ozone and PM_{2.5} simulations covering the central U.S. and centered on St. Louis.

NO_x RACT is a required element of the ozone and PM_{2.5} SIP planning process, and must be completed for the St. Louis nonattainment area before the U.S. Environmental Protection Agency (EPA) can take action on these plans for Missouri and Illinois. Missouri appreciates IEPA action to finalize this rule, as it will allow the EPA to approve Missouri's ozone plan submittal. In addition, the proposed rulemaking will help lower ozone and PM_{2.5} levels in the St. Louis nonattainment area. The emission reductions expected from this proposed rulemaking will assist in bringing the St. Louis nonattainment area into attainment for both the ozone and PM_{2.5} standards. As a result Missouri applauds IEPA's efforts and are in support of the proposed rulemaking.

Mr. John Terriault
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The department's Air Pollution Control Program appreciates the opportunity to comment on this proposed rulemaking. If you have any questions, please contact David Lamb with the department's Air Pollution Control Program, at P.O. Box 176, Jefferson City, MO 65102 or by phone at (573) 751-4817.

Sincerely,

James L. Kavanaugh
Director
Air Pollution Control Program
Missouri Department of Natural Resources

cc: Timothy J. Fox, Hearing Officer