



# Air Pollution Control Program Updates

## Part 2

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REGFORM

Missouri Air Compliance Seminar

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# Overview

- Climate Pollution Reduction Grant (CPRG) Update
- Ozone NAAQS Review vs. Reconsideration
- Ozone Good Neighbor Update
- St. Louis Ozone Nonattainment Area Update

# Climate Pollution Reduction Grant Update

# Climate Pollution Reduction Grant Update

## Overview

- The Climate Pollution Reduction Grant (CPRG) is part of the Inflation Reduction Act (IRA), signed into law in August of 2022
- CPRG is an EPA program that provides grants to states, local governments, tribes, and territories to create plans to reduce greenhouse gas emissions
- CPRG funding breakdown:
  - \$250 Million for planning grants
  - \$4.6 **B**illion for implementation of plans
- Project eligibility for implementation is based on inclusion in a climate action plan

# Climate Pollution Reduction Grant Update

## CPRG Planning Phase

- The Department of Natural Resources is the lead agency for CPRG planning in Missouri.
  - Non-competitive - \$3 million
  - Submitted a grant workplan to EPA in April, which was approved in August
  - Working to develop the plans and gather input on measures to include
- Missouri's main planning goals:
  - Ensure all Missouri communities are eligible for funding in the implementation phase
  - Set up communities to apply for funding for greenhouse gas reduction projects during the implementation phase

# Climate Pollution Reduction Grant Update

## CPRG Planning Phase, continued...

- The Department opened subgrant application period that closed on October 20<sup>th</sup> for municipalities to hold outreach meetings to inform communities about the CPRG and solicit project ideas.
- CPRG Planning Grants have three required deliverables
  - Priority Climate Action Plan (PCAP) - due March 1, 2024
  - Comprehensive Climate Action Plan (CCAP) - due March 1, 2025
  - Status Report – due Spring 2027

# Climate Pollution Reduction Grant Update

## Missouri CPRG Planning Phase – Useful Links

- Missouri CPRG webpage:

<https://dnr.mo.gov/air/what-were-doing/climate-pollution-reduction-grants-cprg-program>

- Sign up for email alerts on our webpage:



- Missouri CPRG Community Engagement Survey:

<https://www.surveymonkey.com/r/CPRG-Community-Engagement-Survey>

- Missouri CPRG Project Idea Submission Form (Submit by Nov. 30<sup>th</sup>):

<https://dnr.mo.gov/document-search/missouri-climate-pollution-reduction-grant-project-idea-submission-mo-780-3038>

# Climate Pollution Reduction Grant Update

## CPRG Implementation Phase

- EPA released a Notice of Funding Opportunity on September 20<sup>th</sup>, 2023.
- Eligibility:
  - Applicant organization must be “covered by” a CPRG Climate Action Plan
  - Project must be included in a CPRG Climate Action Plan
- Grant Applications are **due April 1<sup>st</sup>, 2024** for State and Municipal organizations
  - Grants scored on factors including short-term greenhouse gas reduction and cost effectiveness



# Climate Pollution Reduction Grant Update

## CPRG Implementation Phase, continued...

- The Department is actively soliciting project ideas for potential inclusion in a grant application under the CPRG Implementation
- The Department is collaborating with other state agencies to gather project ideas, and the municipalities receiving subgrants will also solicit project ideas for potential inclusion in an application
- The Department has a project idea submission form. Submit project ideas by November 30<sup>th</sup>, to ensure we “cover them” in our PCAP so they are eligible to apply for an implementation grant

<https://dnr.mo.gov/document-search/missouri-climate-pollution-reduction-grant-project-idea-submission-mo-780-3038>

# Ozone NAAQS Review vs. Reconsideration

# Ozone NAAQS Review vs. Reconsideration

Dates	Milestones
December 31, 2020	Final Rule - retain 2015 ozone standard without revision
October 29, 2021	EPA announces intention to reconsider the 2020 decision to retain the 2015 ozone standard
April 4, 2022	EPA releases draft policy assessment for CASAC review (EPA recommends retaining the 2015 ozone standard)
Summer 2022	CASAC holds hearings to discuss the scientific evidence from the 2020 NAAQS review
March 1, 2023	EPA releases 2 <sup>nd</sup> draft policy assessment for CASAC review (EPA recommends retaining the 2015 ozone standard)
June 9, 2023	CASAC releases its review of 2 <sup>nd</sup> draft policy assessment (all but one member recommend lowering primary standard and setting a new secondary standard using W126 index)
August 21, 2023	EPA announces that in lieu of a reconsideration, it will conduct full new review of the ozone standard

# Ozone NAAQS Review vs. Reconsideration

Timeframe	Milestones
August 25, 2023	EPA publishes call for information on studies to be included in an updated ozone integrated science assessment (ISA)
Spring 2024	EPA to conduct science policy workshop
Fall 2024	EPA to release drafts of integrated review plan (IRP)
Early 2025 *	EPA to release drafts of ISA
Spring 2025 *	EPA to release drafts of risk and exposure analysis (REA), and policy analysis (PA)
Late 2025 *	Proposed rule on ozone NAAQS review
Summer 2026 *	Final rule on ozone NAAQS review

\* Timeframes are speculative, not based on EPA announcements

# Ozone Good Neighbor Update

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Dates	Milestones
October 26, 2015	EPA promulgates 2015 ozone standard (70 ppb)
March – October 2018	EPA releases three guidance documents to states for developing good neighbor plans for 2015 ozone standard
June 10, 2019	Missouri submits good neighbor plan for 2015 ozone standard to EPA (Missouri’s 2019 good neighbor plan)
January 12, 2022	EPA finalizes Consent Decree with deadlines for acting on good neighbor plans in many states where it failed to act
February 2, 2022	EPA proposes to disapprove Missouri’s 2019 Good Neighbor Plan
April 6, 2022	EPA proposes federal Good Neighbor Plan for Missouri and 25 other states
November 1, 2022	Missouri submits supplement to Missouri’s 2019 Good Neighbor Plan

# Ozone Good Neighbor Update

Dates	Milestones
February 13, 2023	EPA promulgates final disapproval of Missouri's 2019 Good Neighbor Plan, but does not act on the Nov. 2022 Supplement
April 13, 2023	Missouri Attorney General files with 8 <sup>th</sup> Circuit - petition for judicial review and motion for stay of the EPA disapproval of Missouri's plan
May 26, 2023	The 8 <sup>th</sup> Circuit enters an order denying EPA's motion to transfer the case to the D.C. Circuit and grant's Missouri's request to stay EPA's disapproval of Missouri's plan until litigation is resolved
June 5, 2023	EPA publishes final federal good neighbor plan for 23 states, including Missouri
July 31, 2023	EPA publishes final interim rule staying the federal good neighbor plan for Missouri and five other states, where courts had granted stays of the disapprovals (Missouri remains in CSAPR NO <sub>x</sub> Ozone Season Group 2 Program)

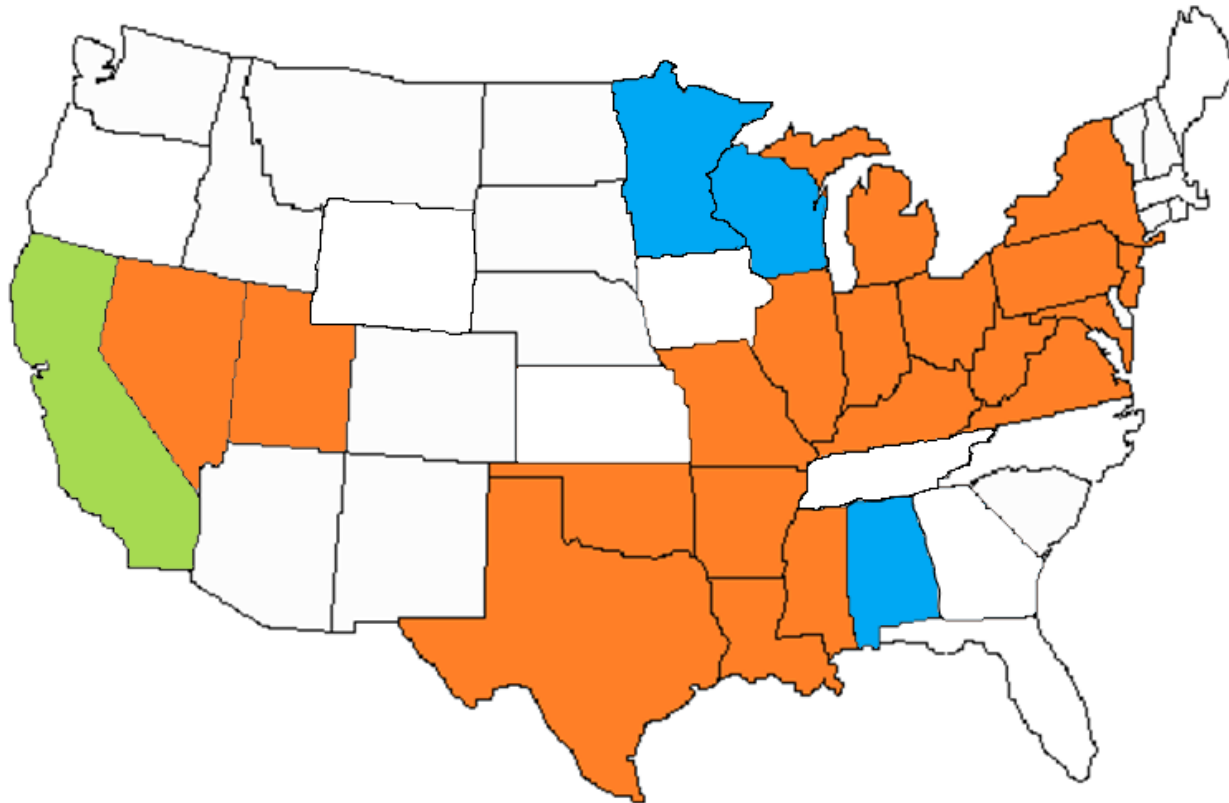
# Ozone Good Neighbor Update




Dates	Milestones
August 9, 2023	Missouri Attorney General files Opening Brief in the challenge to EPA's disapproval of the Missouri Good Neighbor Plan
September 26, 2023	D.C. Circuit denies motion to stay the federal good neighbor plan, so it remains in effect in all states where courts have not granted stays of the state plan disapprovals
October 16, 2023	Ohio, Indiana, and West Virginia filed a petition with the Supreme Court to request an emergency stay of the federal good neighbor plan
November 9, 2023	EPA deadline to file Response Brief for all states/groups challenging the good neighbor SIP disapprovals in the 8 <sup>th</sup> Circuit
TBD	Missouri to file Reply Brief with the 8 <sup>th</sup> Circuit
TBD	Oral arguments, and decision from 8 <sup>th</sup> Circuit



# Ozone Good Neighbor Update

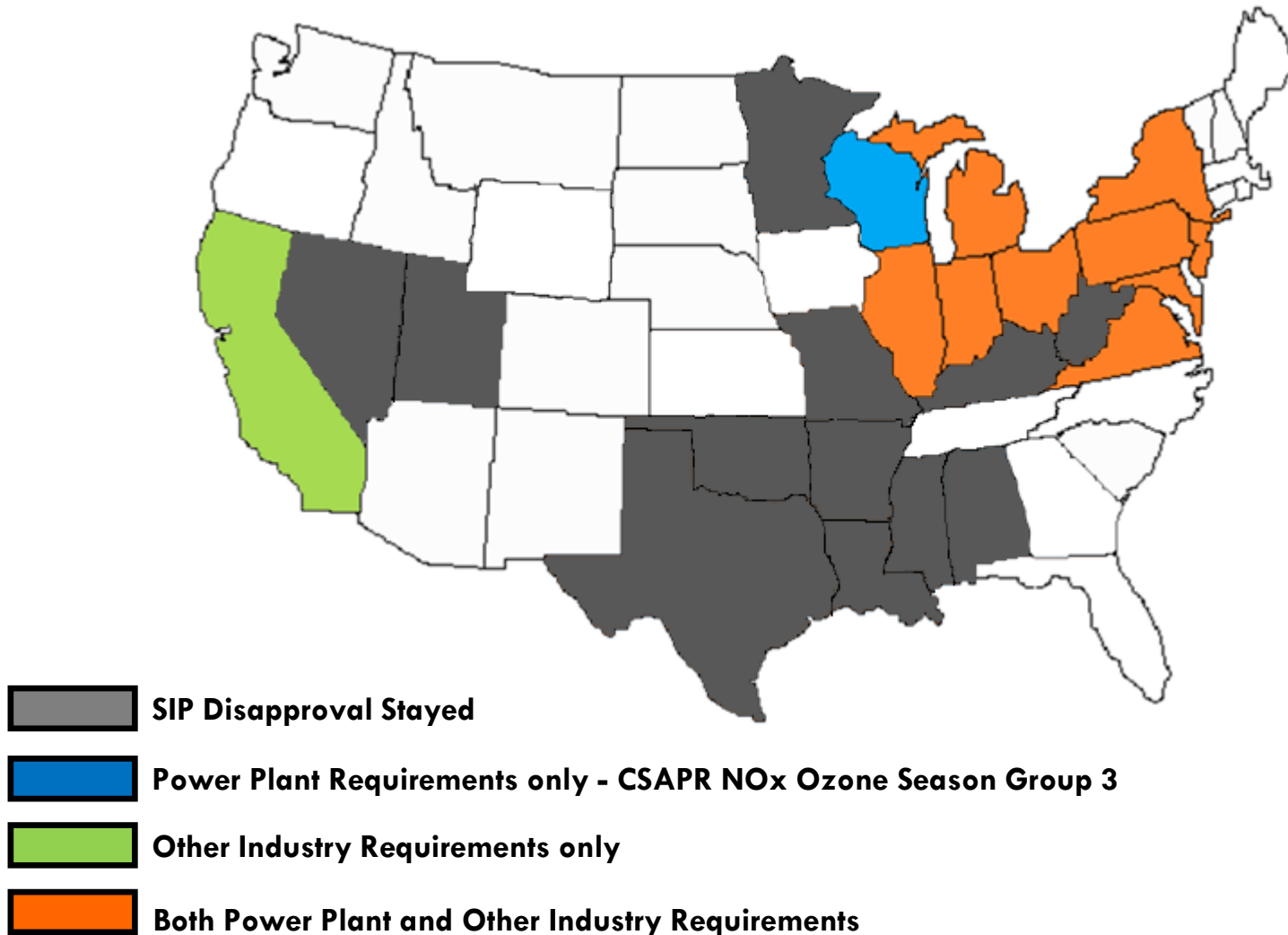
## Final Ozone Good Neighbor Plan - Affected States



-  Power Plant Requirements only - CSAPR NOx Ozone Season Group 3
-  Other Industry Requirements only
-  Both Power Plant and Other Industry Requirements

# Ozone Good Neighbor Update

## Final Ozone Good Neighbor Plan - Affected States



# St. Louis Ozone Nonattainment Area Update

# St. Louis Ozone Nonattainment Area Update



## Legend

 2015 St. Louis Ozone NAA

# St. Louis Ozone Nonattainment Area Update

Dates	Milestones
October 26, 2015	EPA promulgates 2015 ozone standard (70 ppb)
June 4, 2018	EPA designates St. Louis City and County, St. Charles County, and Boles Township in Franklin County as nonattainment (classified as Marginal) for 2015 ozone standard. Jefferson County was attainment
July 14, 2021	EPA revises designation for Jefferson County adding it to the St. Louis nonattainment area (Marginal)
September 8, 2021	Department submits Missouri's Marginal St. Louis nonattainment area plan for St. Louis to EPA
January 21, 2022	Department certifies 2021 ozone monitoring data. All monitors in nonattainment area (MO and IL) have 2019-2021 design values in compliance with the 2015 ozone standard

# St. Louis Ozone Nonattainment Area Update

Dates	Milestones
April 8, 2022	Department submits Missouri's maintenance plan and redesignation request for St. Louis nonattainment area to EPA
July 11, 2022	Alton, IL monitor measures preliminary violation of the 2015 ozone standard
October 7, 2022	EPA reclassifies St. Louis nonattainment area from Marginal to Moderate, sets moderate nonattainment SIP deadline as January 1, 2023
September 6, 2023	Department submits Missouri's Moderate St. Louis nonattainment area plan to EPA
September 13, 2023	EPA issues completeness determination for Missouri's Moderate St. Louis nonattainment area plan

# St. Louis Ozone Nonattainment Area Update

Dates	Milestones
October 18, 2023	EPA publishes findings of failure to submit Moderate ozone nonattainment area plans for 11 states (Missouri not included)
May 1, 2024	Deadline for states to certify 2023 ambient monitoring data
August 4, 2024	Attainment deadline for Moderate ozone nonattainment areas under the 2015 ozone standard
September 13, 2024	EPA deadline to act on (approve or disapprove) Missouri's Moderate ozone nonattainment SIP
February 4, 2025	Deadline for EPA to determine which Moderate nonattainment areas attained by the attainment deadline and which areas failed to attain by the deadline and will be reclassified from Moderate to Serious

# Questions

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