

# **Air Pollution Control Program Air Quality Planning Update**

**REGFORM**

**Air Compliance Seminar**

**November 5, 2025**

**Mark Leath, Air Quality Planning Section Chief**

# Overview

- Exceptional Event Demonstration for St. Louis
- St. Louis Ozone Nonattainment Area – Path Forward
- 2024 PM<sub>2.5</sub> National Ambient Air Quality Standard
- Regional Haze Next Steps
- Ozone Good Neighbor Update
- EPA Deregulatory Agenda

# Exceptional Event Demonstration for St. Louis

# Exceptional Event Demonstration for St. Louis

On November 3, 2025, the air program submitted a final exceptional event demonstration to EPA for ozone and PM<sub>2.5</sub> monitoring data influenced by the 2023 Canadian Wildfires.

Ozone Monitors in the St. Louis Area	Exceptional Events Days
Blair Street	<ul style="list-style-type: none"><li>43 days in 2023 (May, June, July, August, and September)</li></ul>
Arnold West	
Maryland Heights	
West Alton	
Foley West	
Orchard Farm	
Pacific	

PM <sub>2.5</sub> Monitors in the St. Louis Area	Exceptional Event Days
Blair Street	<ul style="list-style-type: none"><li>43 days in 2023 (May, June, July, August, and September)</li></ul>
South Broadway	
Forest Park	
Ladue	
Arnold West	

# Exceptional Event Demonstration for St. Louis

## Ozone and PM<sub>2.5</sub> Design Values

Ozone Monitors in the St. Louis Area	2022-2024 Design Value	2022-2024 Design Values (With EPA Concurrence)
Blair Street	70	65
Arnold West	68	64
Maryland Heights	71	65
West Alton	73	67
Orchard Farm	69	65
Pacific	67	62
Foley West	70	66

PM <sub>2.5</sub> Monitors in the St. Louis Area	2022-2024 Design Value	2022-2024 Design Values (With EPA Concurrence)
Blair Street	9.1	8.7
South Broadway	6.9	6.6
Forest Park	8.3	8.0
Ladue	6.9	6.7
Arnold West	7.7	7.4

# Exceptional Event Demonstration for St. Louis

## Missouri's Proposed - Exceptional Event Demonstration

- On September 16, 2025, the air program posted the proposed exceptional event demonstration for public notice and comment
  - 43 days in 2023 (ozone and PM<sub>2.5</sub>) (no days in 2022)
  - All MO monitors in the St. Louis Core-Based Statistical Area
  - Comment period closed October 17, 2025
- Requests expedited review and concurrence on minimum number of days needed to bring all MO monitors into compliance with ozone standard based on 2023-2025 design values
  - Based on preliminary monitoring data through the end of the 2025 ozone season, there are six days needed at the West Alton monitor and one day needed at the Maryland Heights monitor
  - All other MO monitors have preliminary design values in compliance with the standard without exceptional events
  - Illinois needs one day at two of its monitors located in the nonattainment area to have preliminary 2023-2025 design values in compliance

# Exceptional Event Demonstration for St. Louis

## 2023 - 2025 Ozone Design Values - St. Louis (MO)

### Nonattainment Area

Ozone Monitors in the St. Louis Area	2023-2025 Preliminary Design Value	2023-2025 Design Values With EPA Concurrence 6 days at West Alton and 1 day at Maryland Heights
Blair Street	70	70
Arnold West	70	70
Maryland Heights	71	70
West Alton	72	70
Orchard Farm	70	70
Pacific	70	70

# Exceptional Event Demonstration for St. Louis

## Missouri's Proposed - Exceptional Event Demonstration

- 2023 Canadian wildfires burned over 42 million acres from March through December.
  - Over twice the previous annual record
  - Over six times the 10-year annual average
- Monitors across the upper Midwest all showed abnormally high number of exceedances
- Due to distance of the fires and transport/dispersion - where clear causal evidence is shown for any monitors in St. Louis (for ozone or PM<sub>2.5</sub>) it is presumed to also provide clear and causal evidence that all monitors in St. Louis were impacted for both ozone and PM<sub>2.5</sub>



# Exceptional Event Demonstration for St. Louis

## Missouri's Proposed - Exceptional Event Demonstration

### Canadian National Wildfire Preparedness Levels

2023

January

1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

February

			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28				

March

			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

April

						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

May

	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

June

					1	2	3
4	5	6	7	8	9	10	
11	12	13	14	15	16	17	
18	19	20	21	22	23	24	
25	26	27	28	29	30		

July

							1
2	3	4	5	6	7	8	
9	10	11	12	13	14	15	
16	17	18	19	20	21	22	
23	24	25	26	27	28	29	
30	31						

August

		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

September

				1	2	
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

October

1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

	Level 1	Level 2	Level 3	Level 4	Level 5
Agency Fire Danger	Low	Moderate	High	Very High	Extreme
Current Fire Load	Low	Moderate	High	Very High	Extreme
Anticipated Fire Load (7 Days)	Low	Moderate	High	Very High	Extreme
Agency Resource Levels	Adequate	Adequate	Some Assistance	Assistance Required	Inadequate
Agency's Ability to Respond to CIFFC Resource Requests	Excellent	Good	Moderate	Poor	No Ability

# Exceptional Event Demonstration for St. Louis

## Missouri's Proposed - Exceptional Event Demonstration

St. Louis (MO) Ozone Monitors - Through End of 2025 Ozone Season

Site	County	Fourth Highest Eight-Hour Ozone Averages					Critical Values	Exceedances	Design Values		
		Parts per billion (ppb)						> 70 ppb (2015 Std)	Year-to-date		
		2021	2022	2023	2024	2025 <sup>cd</sup>	CV - 70	2025 <sup>c</sup>	21-23	22-24	23-25 <sup>c</sup>
St. Louis											
Arnold West	Jefferson	73	67	78	61	71	74	4	72	68	70
Blair Street*	St. Louis City	68	68	77	66	67	70	2	71	70	70
Foley West	Lincoln	60	68	76	66	67	71	3	68	70	69
Maryland Heights	St. Louis	65	67	81	66	66	66	2	71	71	71
Orchard Farm	St. Charles	65	67	73	67	70	73	3	68	69	70
Pacific	St. Louis	65	61	77	64	69	72	3	67	67	70
West Alton	St. Charles	67	71	80	68	69	65	2	72	73	72

<sup>cd</sup> The 2025 data is not yet quality assured or certified.

# Exceptional Event Demonstration for St. Louis

## Missouri's Proposed - Exceptional Event Demonstration

Upper Midwest (all regulatory ozone monitors) number of exceedances

State	2019	2020	2021	2022	2023	2024
Illinois	43	111	76	81	498	51
Wisconsin	17	83	62	62	333	66
Iowa	1	0	0	0	122	0
Kansas	1	3	7	12	46	9
Kentucky	7	9	12	16	87	28
Minnesota	3	2	5	0	98	1
Nebraska	0	0	7	1	50	9
Arkansas	2	3	7	12	15	9
Oklahoma	7	3	29	73	103	95
Tennessee	9	0	9	23	46	33

# Exceptional Event Demonstration for St. Louis

## Missouri's Proposed - Exceptional Event Demonstration

Blair Street - PM<sub>2.5</sub> Exceedances (> 9.0 µg/m<sup>3</sup>)

2019 to 2024 Annual and (May - September)

Monitor	2019 Exceedance	2020 Exceedance	2021 Exceedance	2022 Exceedance	2023 Exceedance	2024 Exceedance
Blair Street	150 (56)	122 (48)	153 (79)	130 (59)	226 (122)	115 (51)

# Exceptional Event Demonstration for St. Louis

Day-by-day Analysis

Ozone

												Clear, Causal Relationship
Historical Concentration	Photographic Evidence	Air Quality Index	Back Trajectory	HMS	99th Percentile $\geq$ 5 ppb	5 ppb > 99th Percentile	Q/D	GAM	Matching Day	EMBER	SONOMA Tech	

PM<sub>2.5</sub>

											Clear, Causal Relationship
Historical Concentration	Satellite Image	Air Quality Index	Back Trajectory + HMS	Photographic Evidence	National Weather Service Reports		GAM	Matching Day	SONOMA Tech		

# Exceptional Event Demonstration for St. Louis

## Regulatory Significance: 2021-2023 Ozone Design Values

- EPA's proposed reclassification rule for MO STL from moderate to serious ozone nonattainment reviewed 2021-2023 design values
- However, air program comments indicate EPA could reverse its determination without an exceptional event demonstration since the area attained prior to the deadline (2019-2021 design values)
- Also, for 2021-2023 design values to all comply, IL EPA would need to submit and receive concurrence for an exceptional event demonstration for numerous days for the monitors on the Illinois side of the nonattainment area

# Exceptional Event Demonstration for St. Louis

## Regulatory Significance: 2023-2025 Ozone Design Values

- Preliminary 2023-2025 design values at all monitors on the Missouri side of the STL Ozone nonattainment area comply with the 2015 ozone standard except the West Alton and Maryland Heights monitors
- Only one day needed for two monitors in Illinois to have all Illinois 2023-2025 design values in the nonattainment area in compliance
- Proposed demonstration requests expedited review and determination of concurrence for the minimum number of days to bring all STL (MO) monitors into compliance based on the 2023-2025 design values

# Exceptional Event Demonstration for St. Louis

## Regulatory Significance: 2023-2025 Ozone Design Values

West Alton Monitor (6 out of 9 potential days needed)	Maryland Heights Monitor (1 out of 4 potential days needed)
5/24/2023	
5/29/2023	
5/30/2023	5/30/2023
5/31/2023	
6/3/2023	6/3/2023
6/6/2023	6/6/2023
	6/9/2023
6/10/2023	
6/17/2023	
6/24/2023	



# Exceptional Event Demonstration for St. Louis

## Regulatory Significance: 2023-2025 Ozone Design Values

- On November 3, 2025, Illinois EPA posted an exceptional event demonstration for the Alton and Wood River ozone monitors requesting exclusion of one day (June 6<sup>th</sup>) in 2023 due to Canadian wildfires.

Monitor	2023	2023 Exceptional Event Excluded	2024	2025	Design Value 2023-2025	Design Value 2023-2025 Exceptional Event Excluded
Alton	78	76	69	66*	71	70
Wood River	77	74	68	68*	71	70

\* 2025 data is preliminary, not yet certified

# Exceptional Event Demonstration for St. Louis

## Missouri's - Exceptional Event Demonstration

Regulatory Significance: 2022-2024 PM<sub>2.5</sub> Design Values

- If EPA concurs with the seven highest days for measured PM<sub>2.5</sub>, which are requested for exclusion in the proposed demonstration, then it would bring the Blair Street monitor's 2022-2024 design value into compliance with the 2024 annual PM<sub>2.5</sub> standard.
- Proposed demonstration indicates the air program would not object if EPA were to act on the minimum number of PM<sub>2.5</sub> days to exclude at Blair Street monitor to bring the 2022-2024 design value into compliance and defer action on all other days/monitors until a later date.
- The proposed demonstration also indicates no objection if EPA defers until greater clarity is obtained regarding the 2024 PM<sub>2.5</sub> standard.

# Exceptional Event Demonstration for St. Louis

## Timeline

Milestone	Tentative Date
Department Submits Initial Notification to EPA	August 6, 2025
Department and EPA Collaboration	Mid August - Early September 2025
Department provides 30-Day Public Notice	September 16, 2025 - October 17, 2025
EPA Initial Notification Response	September 25, 2025
Department submits Final Exceptional Event Demonstration to EPA	November 3, 2025
Deadline for EPA Decision of Concurrence or Nonconcurrence	No later than November 3, 2026

# **St. Louis Ozone Nonattainment Area Path Forward**

# St. Louis Ozone Nonattainment Area - Path Forward

## Background - History of Events

Milestone	Date
EPA revises the ozone standard to 70 ppb (8-hr average)	October 1, 2015
EPA designates St. Louis marginal nonattainment for the 2015 ozone standard	August 3, 2018
Attainment deadline for marginal ozone nonattainment areas	August 3, 2021
Jefferson County (MO) and Monroe County (IL) added to St. Louis nonattainment area	June 14, 2021
Missouri submits marginal St. Louis ozone nonattainment plan to EPA	September 8, 2021
All MO and IL monitors in the nonattainment area attain the 2015 ozone standard	2019-2021
Missouri submits maintenance plan and redesignation request for St. Louis	April 8, 2022
Preliminary violation of 2015 ozone standard measured at Alton, IL monitor	July 11, 2022
EPA reclassifies St. Louis from marginal to moderate nonattainment	October 7, 2022
Canadian wildfires and numerous violations of the ozone standard measured	May/June 2023
Missouri submits moderate St. Louis ozone nonattainment plan to EPA	September 6, 2023
Attainment deadline for moderate ozone nonattainment areas	August 3, 2024
EPA reclassifies St. Louis (MO portion) from moderate to serious nonattainment	November 25, 2024

# St. Louis Ozone Nonattainment Area - Path Forward

## Background - History of Events continued

Milestone	Date
Missouri files petitions for reconsideration and stay and for judicial review of the reclassification of the Missouri portion of the nonattainment area from moderate to serious	January 24, 2025
EPA responds to Missouri petition granting reconsideration but denying the request to stay	March 5, 2025
Missouri files motion with Eighth Circuit to stay the effectiveness of EPA's November 25, 2024, reclassification rule	May 20, 2025
Eighth Circuit grants Missouri's motion to stay the effectiveness of EPA's November 25, 2024, reclassification rule pending the resolution of the case	June 6, 2025
EPA publishes a proposed rule to reconsider its November 25, 2024, reclassification rule. The proposed rule is to reclassify St. Louis to serious nonattainment, took public comments for 30-days	June 20, 2025
The air program submits comments to the federal docket on the June 20, 2025, proposed reconsideration of EPA's November 2024 reclassification rule	July 21, 2025

# St. Louis Ozone Nonattainment Area - Path Forward

## Current Status

Milestone	Date
Department submits Exceptional Event Demonstration to EPA	<b>November 3, 2025</b>
Department requests Clean Data Determination	<b>November 3, 2025</b>
Department posts maintenance plan and redesignation request for public notice and comment	<b>November 3, 2025</b>
Illinois EPA posts Exceptional Event Demonstration (two Illinois monitors) for public notice and comment	<b>November 3, 2025</b>
Department and Illinois early certify 2025 ozone season monitoring data	<b>Late November/ Early December 2025</b>
Public hearing on maintenance plan and redesignation request	<b>December 4, 2025</b>
Comment period deadline on maintenance plan and redesignation request	<b>December 11, 2025</b>
Propose maintenance plan and redesignation request for MACC adoption	<b>January 29, 2026</b>

# St. Louis Ozone Nonattainment Area – Path Forward

- Redesignation to attainment is the end-goal
- MO and IL pursuing maintenance plans and redesignation requests based on 2023-2025 monitoring data
- CAA Redesignation Requirements
  - Area has attained the standard
  - EPA has fully approved the applicable SIP for the area
  - Air quality improvement is due to permanent and enforceable reductions in emissions
  - EPA has fully approved a maintenance plan for the area
  - Area has met all applicable CAA Section 110 and Part D requirements



# St. Louis Ozone Nonattainment Area – Path Forward

## Area has attained the standard

- Will require EPA concurrence on six days in the exceptional event demonstration for the West Alton monitor and one day for the Maryland Heights monitor.
- Also requires EPA concurrence with the Illinois exceptional event demonstration for Alton and Wood River monitor (June 6, 2023)

## EPA has fully approved the applicable SIP for the area

- Missouri's moderate ozone nonattainment plan for St. Louis remains pending with EPA
- The plan addresses all moderate ozone nonattainment area SIP requirements from CAA Sections 172(c) and 182(b)
- Several SIP requirements could be suspended with a clean data determination (40 CFR 51.1318)

# St. Louis Ozone Nonattainment Area – Path Forward

## Clean Data Determination – Requested November 3, 2025

- If promulgated it suspends reasonably available control measure (RACM)/Attainment Demonstration, Reasonable Further Progress (RFP), the associated transportation conformity budgets, and the Contingency Plan
- The department requested EPA not to act on these elements of the moderate nonattainment SIP at this time since approval of the suspended elements is not needed for redesignation
- Keep the suspended SIP elements pending with EPA, and if the area is redesignated, we will withdraw the suspended SIP elements at that time

# **2024 PM<sub>2.5</sub> National Ambient Air Quality Standard**

# 2024 PM<sub>2.5</sub> National Ambient Air Quality Standard

## Timeline and Milestones

Milestone	Date
Trump administration final rule to retain all PM <sub>2.5</sub> NAAQS	December 7, 2020
EPA final rule – Reconsideration of the annual PM <sub>2.5</sub> NAAQS lowers it from 12.0 µg/m <sup>3</sup> to 9.0 µg/m <sup>3</sup>	February 7, 2024
Department holds public hearing on proposed boundary recommendations (included recommended nonattainment for two counties and one township in St. Louis due to monitored violation at the Blair Street monitor)	January 30, 2025
EPA announces 31 deregulatory actions it plans to revisit or reconsider	March 12, 2025
Department elects to indefinitely delay Commission adoption for boundary recommendations until greater clarity on the federal path forward	March 27, 2025
Department submits exceptional event demonstration for St. Louis (ozone and PM <sub>2.5</sub> data)	November 3, 2025

Trump Administration Releases its Spring 2025 Unified Regulatory Agenda	September 4, 2025
Target Date for proposed rule: Revisitation of the 2024 Reconsideration of the PM <sub>2.5</sub> NAAQS	July 2025
Target Date for proposed rule: Revisitation of the 2024 Reconsideration of the PM <sub>2.5</sub> NAAQS	January 2026

## Regional Haze - Next Steps

# Regional Haze - Next Steps

## Timeline and Milestones

Milestone	Date
Department submits Missouri Regional Haze Plan for the Second Planning Period	August 26, 2022
EPA final rule - Finding of Failure to Submit Second Round Regional Haze Plans	August 30, 2022
EPA proposed rule - partial approval/disapproval of Missouri Regional Haze Plan for the Second Planning Period	July 3, 2024
Department submits comments opposing EPA's proposed partial approval./disapproval	August 30, 2024
EPA finalizes approval of West Virginia Regional Haze Plan for the Second Planning Period (includes new EPA policy on approvability based on the uniform rate of progress glidepath)	July 7, 2025
Department initiates state-to-state consultation on a planned update to the Missouri Regional Haze Plan for the second planning period based on the new federal policy	October 2025
Tentative target date to post the Update to Missouri's Regional Haze Plan for the Second Planning Period for public notice and comment	Spring 2026

# Ozone Good Neighbor Update

# Ozone Good Neighbor Update

## Timeline and Milestones

Milestone	Date
Department submits Missouri Good Neighbor Plan for 2015 Ozone Standard	June 10, 2019
EPA proposes to disapprove Missouri's Good Neighbor Plan for 2015 Ozone Standard	February 22, 2022
EPA proposes Federal Good Neighbor Plan for the 2015 Ozone Standard	April 6, 2022
Department submits a Supplement to the Missouri Good Neighbor Plan	November 1, 2022
EPA finalizes disapproval of Missouri's 2019 Good Neighbor Plan. EPA does not act on the Supplement submitted in November 2022.	February 13, 2023
Missouri Attorney General files petition for judicial review and motion stay the EPA disapproval of Missouri's Good Neighbor Plan	April 13, 2023
U.S. Court of Appeals for the Eighth Circuit grants Missouri's motion to stay the EPA disapproval of Missouri's Good Neighbor Plan	May 26, 2023



# Ozone Good Neighbor Update

## Timeline and Milestones continued

Milestone	Date
EPA finalizes Federal Good Neighbor Plan for Missouri and 21 other states	June 5, 2023
EPA publishes interim final rule to stay the federal good neighbor plan for Missouri and five other states where courts had granted stays of EPA's disapproval actions	July 31, 2023
The U.S. Supreme Court grants an emergency stay of the Federal Good Neighbor Plan	June 27, 2024
EPA proposes to disapprove Missouri's Supplement to the Good Neighbor Plan	August 6, 2024
Eighth Circuit hears oral arguments on the challenge to EPA's disapproval of Missouri's Good Neighbor Plan	October 22, 2024
EPA publishes interim final rule staying the Federal Good Neighbor Plan in all remaining states that had not received stays of the EPA disapproval actions	November 6, 2024
EPA announces 31 deregulatory actions it will be revisiting or reconsidering	March 12, 2025
The Supreme Court rules in Oklahoma v. EPA that the proper venue for EPA disapprovals of state good neighbor plans are the applicable regional circuit courts	June 18, 2025

# Ozone Good Neighbor Update

## EPA Spring 2025 Regulatory Agenda

Milestone	Date
Trump Administration Releases its Spring 2025 Unified Regulatory Agenda	September 4, 2025
Target Date for proposed rule: Interstate Transport Review for the 2015 Ozone Standard Phase 1	August 2025
Target Date for proposed rule: Interstate Transport Review for the 2015 Ozone Standard Phase 2	October 2025
Target Date for final rule: Interstate Transport Review for the 2015 Ozone Standard Phase 1	December 2025
Target Date for final rule: Interstate Transport Review for the 2015 Ozone Standard Phase 2	August 2026

# EPA Deregulatory Agenda

# EPA Deregulatory Agenda

- On January 20, 2025, President Trump signed 26 Executive orders
  - Unleashing American Energy
  - Declaring a National Energy Emergency
- On March 12, 2025, EPA announced 31 deregulatory actions it intended to take by revisiting or reconsidering environmental regulations
- On September 4, 2025, the Trump Administration released its Spring 2025 Unified Regulatory Agenda
  - Included over 100 planned regulatory and deregulatory actions for EPA
  - See the full list at <https://www.reginfo.gov/public/do/eAgendaMain>
  - Unclear how federal government shutdown will impact EPA's schedule

# Questions?

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