



June 16, 2022

U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20004

**RE: Federal Implementation Plan Addressing Regional Ozone Transport for the 2015 Ozone National Ambient Air Quality Standard, Docket ID No. EPA-HQ-OAR-2021-0668-0007**

Dear Michael S. Regan,

Missouri Coalition for the Environment (“MCE”) appreciates the opportunity to comment on the Federal Implementation Plan Addressing Regional Ozone Transport for the 2015 Ozone National Ambient Air Quality Standard, EPA-HQ-OAR-2021-0668-0007.

MCE is a non-profit, grassroots, citizen action group committed to clean water, clean air, clean energy, and a healthy environment. Our mission is to educate, organize, and advocate in defense of Missouri’s people and their environment. As an organization working for the health of residents and the environment of Missouri, a state that EPA proposes to find is contributing to downwind nonattainment or interfering with maintenance of the 2015 ozone NAAQS in other states, we are grateful for the efforts of the EPA to address the health concerns coming from our state and others through interstate transport of ozone precursor emissions, like NO<sub>x</sub>. We know that ozone can cause respiratory problems such as asthma or even premature death. Major sources of NO<sub>x</sub> emissions - fossil fuel-fired power plants, industrial facilities, and gas-powered vehicles - are found throughout Missouri and the surrounding states. We are grateful that EPA is taking action to reduce the emissions coming from these operations. Our state and our country desperately need environmental protections that keep communities safe from toxic pollution.

MCE supports the EPA’s plan to include 25 states, including Missouri, in a revised and strengthened Cross-State Air Pollution Rule (CSAPR) “NO<sub>x</sub> Ozone Season Group 3 Trading

Program” beginning in the 2023 ozone season in order to address NO<sub>x</sub> emissions from fossil fuel-fired power plants. According to the U.S. Energy Information Agency, approximately 82% of Missouri’s power comes from fossil fuels.<sup>1</sup> In addition, in 2016, the U.S. Department of Energy reported that Missouri had 135 fossil-fuel fired power plants - a total of 1% of all plants in the nation.<sup>2</sup> It is clear Missouri is potentially contributing a significant amount of NO<sub>x</sub> emissions in our air - risking the health of citizens and the environment in Missouri and downwind.

MCE also supports EPA’s plans for NO<sub>x</sub> emissions standards for certain emission units in identified large industries in 23 states, including Missouri, with an initial compliance date of 2026. Missouri has multiple cement plants, steel plants, glass manufacturers, basic chemical manufacturers, and pulp, paper, and paperboard mills. It is important that these operations are held to standards that ensure they are not endangering the health and wellbeing of the surrounding communities as well as downwind.

We are grateful for the EPA’s proposal to ensure emission reductions as quickly as possible and ensure states achieve the 2015 ozone NAAQS by the corresponding Clean Air Act deadlines, with initial emission reductions taking effect in 2023 and further reductions phasing in through 2026.

As EPA’s Fact Sheet on this rule indicates, “the proposed rule would prevent approximately 1,000 premature deaths, reduce hospital and emergency room visits for thousands of people with asthma and other respiratory problems, help keep hundreds of thousands of children and adults from missing school and work due to respiratory illness, and decrease asthma symptoms for millions of Americans.”<sup>3</sup> By reducing these health care costs and loss of life, the proposed Good Neighbor Rule would far outweigh the cost of compliance, which the EPA has articulated: “Annually, the net benefits of EPA’s proposed rule – after accounting for the costs of compliance - would be \$15 billion (2016\$, 3 percent discount rate) each year over the period from 2023 to 2042.”<sup>4</sup> Missouri would also benefit from a variety of unquantified benefits

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<sup>1</sup> *Missouri - End-use energy consumption 2019, estimates*, U.S. Energy Information Administration, <https://www.eia.gov/beta/states/states/mo/overview>.

<sup>2</sup> U.S. Department of Energy, *State of Missouri Energy Sector Risk Profile* (2016), [https://www.energy.gov/sites/prod/files/2016/09/f33/MO\\_Energy%20Sector%20Risk%20Profile\\_2.pdf](https://www.energy.gov/sites/prod/files/2016/09/f33/MO_Energy%20Sector%20Risk%20Profile_2.pdf).

<sup>3</sup> EPA’s Proposed “Good Neighbor” Plan to Address Ozone - Overview, Environmental Protection Agency, [https://www.epa.gov/system/files/documents/2022-03/fact-sheet\\_2015-ozone-proposed-good-neighbor-rule.pdf](https://www.epa.gov/system/files/documents/2022-03/fact-sheet_2015-ozone-proposed-good-neighbor-rule.pdf).

<sup>4</sup> *Id.*



including improved visibility in our beautiful public places and greater protections for the wildlife in these spaces.

We are grateful that EPA recognizes the public health implications of this proposed regulation. Air pollution is an environmental justice issue. In Missouri, communities of color and economically disadvantaged populations are disproportionately exposed to air pollution. The proposed regulation would benefit communities living in non-attainment areas and that live adjacent to electric generating coal-fired power plants. MCE supports the proposed regulation that addresses air pollution in overly burdened communities like St. Louis and Sikeston. It is urgent and timely that EPA sets NOx emissions limitations for additional industrial stationary sources and phases down NOx emissions budgets for power plants in order to reduce exposure to air pollution in neighboring and downwind communities, and to act upon the Agency's commitments to environmental justice.<sup>5</sup>

St. Louis is located in the eastern part of Missouri and is a region that would be positively impacted by proposed regulation. According to the Missouri Census Data Center the total population of St. Louis is about 304,709 people.<sup>6</sup> Compared to Missouri as a whole, St. Louis is a diverse area. The Census Data provides that the Black population in Missouri is 11.4% while in St. Louis, Black residents make up 48% of the city's population.<sup>7</sup> Data gathered by the CDC shows that the average household income in St. Louis City is about \$11,000 less than the state average. In addition, 20.4% of the city's residents live below the poverty line.<sup>8</sup> These factors can lead to potential environmental justice issues.

The neighborhoods in St. Louis that contain a majority of Black residents tend to have a high percentage of air pollution sources and subject the residents to a variety of health risks. These communities would benefit from the proposed regulation because it reduces the amount of pollution that already overburdens these communities. For example, compared to the rest of the United States, the Ozone levels in St. Louis City ranks in the eighty-seventh percentile and

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<sup>5</sup> Environmental Protection Agency, EJ Screen, located at <https://ejscreen.epa.gov/mapper/> (last visited June 1, 2022).

<sup>6</sup> ACS Profile Report: 2016-2020/ Missouri Census Data Center located at <https://mcdc.missouri.edu/applications/acs/profiles/report.php?period=5&year=2020&g=05000US29510%7C04000US29%7C01000US> (last visited June 1, 2022).

<sup>7</sup> *Id.*

<sup>8</sup> National Environmental Public Health Tracking Network - CDC located at <https://ephtracking.cdc.gov/showInfoByLocationExt/?&FIPS=29510> (last visited June 1, 2022).

eighty-eighth percentile for Particulate Matter 2.5.<sup>9</sup> Due to the location of the neighborhoods in relation to the pollution sources, these residents are exposed to higher levels of pollution than other areas in the state and country.

According to the Regulatory Impact Analysis for Proposed Federal Implementation Plan Addressing Regional Ozone Transport for the 2015 Ozone National Ambient Air Quality Standard (“RIA”) there is a larger percentage of minorities living within 5 km and 10 km of an affected Electric Generating Unit.<sup>10</sup> The data shows that when compared to the national reference groups, some population subgroups may experience slightly elevated seasonal average ozone concentrations.<sup>11</sup> The regulatory options under consideration regarding ozone exposures do not pose any potential environmental justice concerns.<sup>12</sup> In addition, the change in ozone concentration that would be a result of the new regulation does not show any evidence of increased environmental justice concerns.<sup>13</sup> Therefore, the pollution reduction would have a positive effect on St. Louis.

The other highlighted community is Sikeston, Missouri. Sikeston is in the southeastern part of our state. The United States Census Bureau estimates that 16,135 people live in Sikeston.<sup>14</sup> The racial makeup of the city is 71.1% White, 24.1% Black, and the remaining population is made up of American Indian, Asian, or Native Hawaiian.<sup>15</sup> Compared to the demographics of the entire state, Sikeston is also a diverse community like St. Louis. In fact, Sikeston has double the state’s average of Black residents.<sup>16</sup> The degree of income variation is also diverse. However, some residents of the community are economically disadvantaged. A review of Sikeston’s Census Data estimates that the median household income is almost \$15,000 less

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<sup>9</sup> U.S. Environmental Protection Agency, EJ Screen, located at <https://ejscreen.epa.gov/mapper/> (last visited June 1, 2022).

<sup>10</sup> Regulatory Impact Analysis for Proposed Federal Implementation Plan Addressing Regional Ozone Transport for the 2015 Ozone National Ambient Air Quality Standard located at [https://www.epa.gov/system/files/documents/2022-03/transport\\_ria\\_proposal\\_fip\\_2015\\_ozone\\_naaqs\\_2022-02.pdf](https://www.epa.gov/system/files/documents/2022-03/transport_ria_proposal_fip_2015_ozone_naaqs_2022-02.pdf) (last visited May 31, 2022).

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

<sup>14</sup> U.S Census Bureau, Quick Facts: Sikeston City, Missouri located at <https://www.census.gov/quickfacts/sikestoncitymissouri> (last visited May 31, 2022).

<sup>15</sup> *Id.*

<sup>16</sup> U.S Census Bureau, Quick Facts: Missouri <https://www.census.gov/quickfactsMO> (last visited May 31, 2022).

than Missouri's median household income.<sup>17</sup> In sum, the Sikeston community displays some of the indicators of a community more susceptible to environmental injustices.

The residents of Sikeston live in close proximity to a coal-fired power plant. The Sikeston Power Station is approximately one mile west of the center of Sikeston.<sup>18</sup> This power station is an electric generating coal-fired power plant.<sup>19</sup> According to EPA's Enforcement and Compliance History Online, the Sikeston Power Station emitted more than 1.8 million pounds of nitrogen oxides in 2020.<sup>20</sup> Similar to the trends reported in the RIA, the communities living in close proximity to the Power Station are predominantly Black.<sup>21</sup> Because of their proximity to the power plant, these residents are exposed to air pollution at higher rates. In fact, EPA's EJScreen database reports that the western portion of the city is in the eighty-six percentile for Ozone and eighty-five percentile for Particulate Matter 2.5 compared to the rest of the United States.<sup>22</sup> The proposed regulation would have a positive effect on the Sikeston community by reducing several types of air emissions.

The proposed regulation could address existing disproportionate NO<sub>x</sub> emissions in minority and economically disadvantaged communities in the state of Missouri. The proposed regulation could mitigate environmental justice concerns that affect communities like Sikeston. As reported in the RIA, regulating NO<sub>x</sub> emissions to meet the obligations under the Good Neighbor provision may reduce NO<sub>2</sub> and PM<sub>2.5</sub>. As previously noted, one of these pollutants is overwhelmingly present in the western portion of Sikeston. Reducing these two pollutants would have a positive effect for the communities living near the Sikeston Power Station. MCE supports the proposed regulation for not only reducing NO<sub>x</sub> emissions that contribute to nonattainment areas in other states, but also the positive effect it will have on communities living near coal-fired power plants.

Thank you for the opportunity to present these comments on the Good Neighbor Rule to Address Ozone. If you have any questions about the information presented above or if you

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<sup>17</sup> U.S Census Bureau, Quick Facts: Sikeston City, Missouri located at <https://www.census.gov/quickfacts/sikestoncitymissouri> (last visited May 31, 2022).

<sup>18</sup> Sikeston, Missouri Utilities, located at <http://www.sikestonpower.com/> (last visited May 31, 2022).

<sup>19</sup> *Id.*

<sup>20</sup> U.S Environmental Protection Agency, Detained Facility Report: Sikeston Power Station, located at <https://echo.epa.gov/detailed-facility-report?fid=110000442548> (last visited May 31, 2022).

<sup>21</sup> U.S Environmental Protection Agency, EJ Screen, located at <https://ejscreen.epa.gov/mapper/index.html?wherestr=Sikeston%2C+Missouri> (last visited May 26, 2022).

<sup>22</sup> *Id.*



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would like to discuss MCE's comments further, please do not hesitate to reach out at the contact information below.

Sincerely,

A handwritten signature in blue ink that reads 'Melissa Vatterott'.

Melissa Vatterott, JD  
Policy Director  
Missouri Coalition for the Environment

In Support:  
Madeline Semanisin  
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