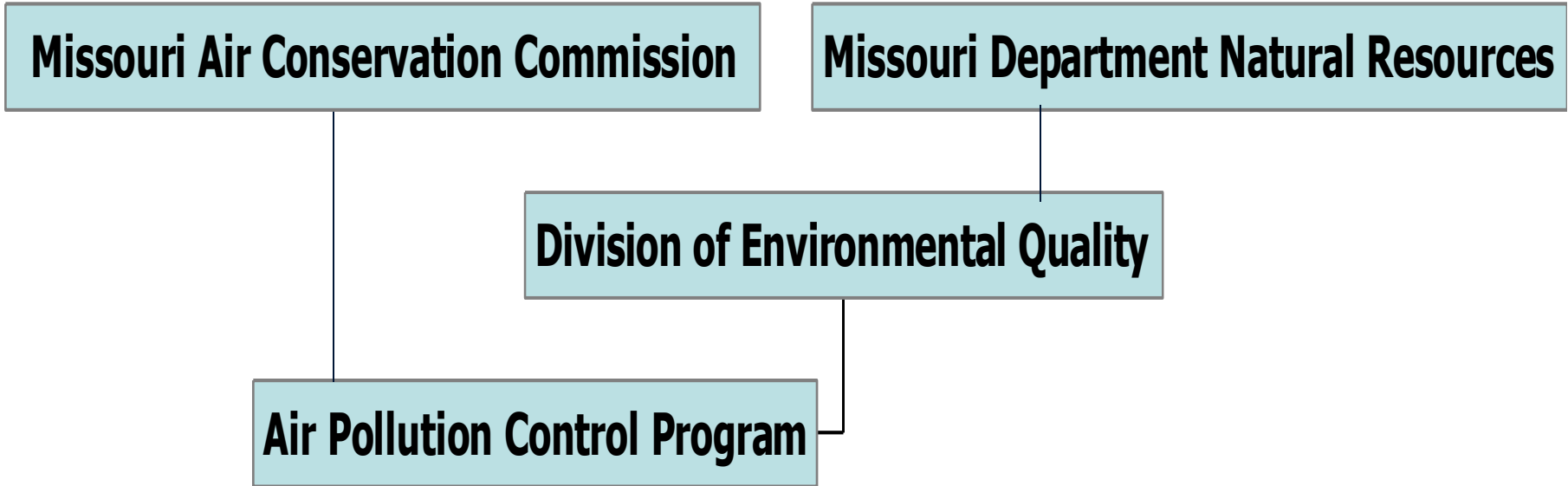


# Air Pollution Control Program REGFORM Air Seminar

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Air Pollution Control Program  
March 2018

*Presented at  
REGFORM's 2018  
Missouri Air  
Compliance Seminar*



# Department of Natural Resources

Carol Comer, Director

- Dru Buntin, Deputy Director
- Katie Jo Wheeler, General Counsel
- Don Willoh, Deputy General Counsel
  - Julia Katich Mudd, Legal Counsel
  - [Richard Waters](#), Legal Counsel
- Connie Patterson, Communications Director
  - [Lisa Nahach](#), Public Information Specialist

# Division of Environmental Quality

Ed Galbraith, Director

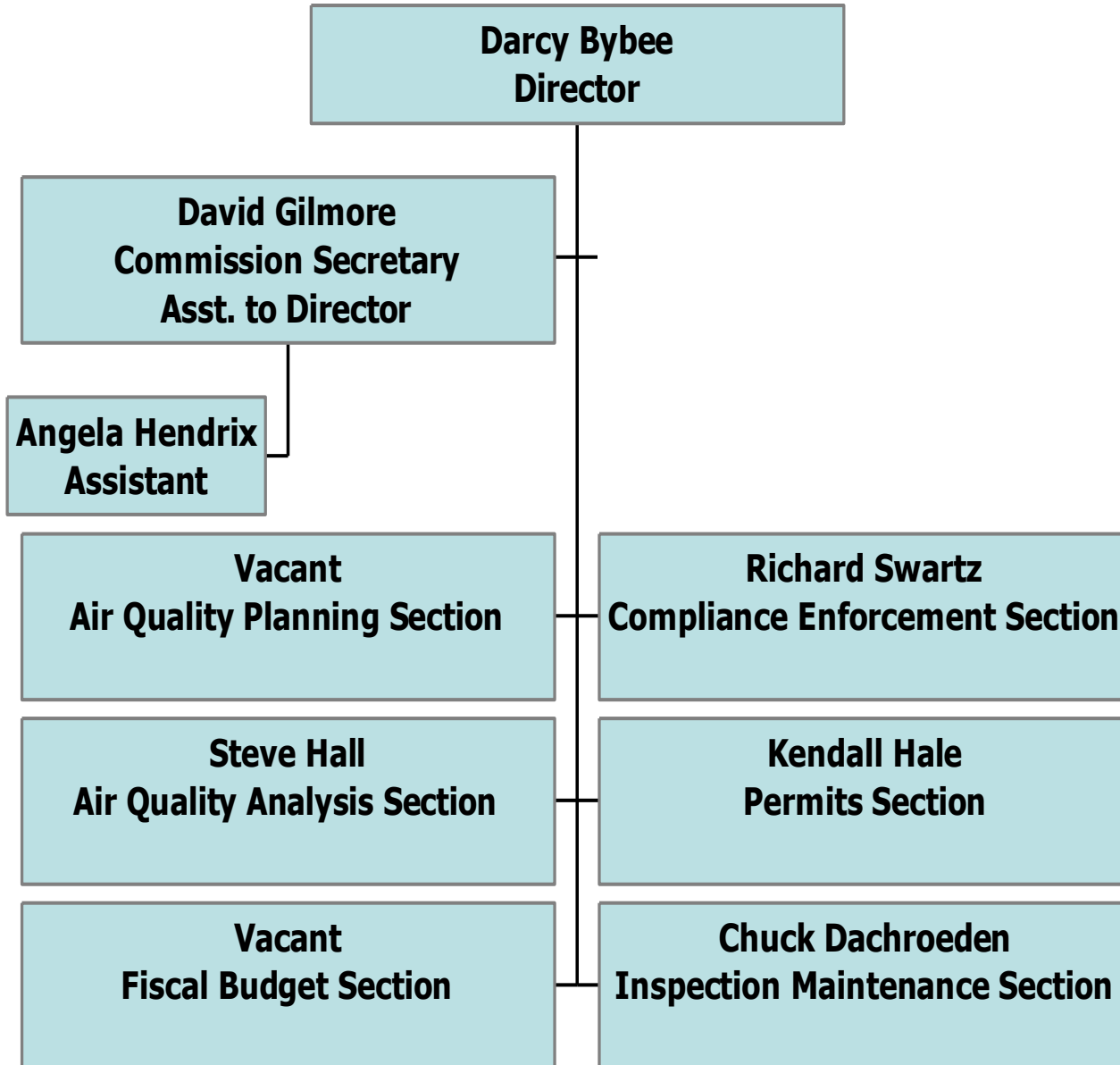
- [Kyra Moore](#), Deputy Director
- Carey Bridges, Deputy Director

Aaron Schmidt

Erin Lepper

# Missouri Air Conservation Commission

- Gary Pendergrass, Chair
- Jack Jones, Vice-chair
- Mark Garnett
- Kevin Rosenbohm
- Two vacancies, commission board page:  
[governor.mo.gov/get-involved/boards-and-commissions](http://governor.mo.gov/get-involved/boards-and-commissions)



# Air Pollution Work – Team Effort

- Air Pollution Control Program
- Five Department Regional Offices
  - St. Louis, Kansas City ([Steve Sturgess](#), [James Helgason](#), [Michael Cunningham](#)), Northeast (Macon-[Steve Boone](#)), Southeast (Poplar Bluff), Southwest (Springfield-[Camille Graves](#))
- Environmental Services Program
  - [Will Wetherell](#)
- Local Air Agencies
  - St. Louis County, St. Louis City, Kansas City, Springfield
  - Work dependent on agency

# Air Quality Planning Section

- Rulemakings
- State Implementation Plan (SIP) development
- National Ambient Air Quality Standard (NAAQS) boundary recommendations
- Computer modeling to support SIPs and for attainment demonstrations

# Air Quality Planning Section *Vacant*, Section Chief

Cheri Morgan

## **Rules Unit**

*Wayne Graf*

Aaron Basham

Paul Myers

Shelly Reimer

Seanmichael Stanley

## **SIP Unit**

*Emily Wilbur*

Assem Abdul

Stacy Allen

Adel Alsharafi

Mark Leath

Cliff Li

Bob Randolph

# Permit Section

- Issues permits for all applicable sources of air pollution
  - Construction and Operating Permits
- Processes permit applicability requests
- Performs air quality analysis for proposed sources
- Oversees permitting for local air agencies

# Permits Section

## Kendall Hale, Section Chief

### **Operating Permits**

*Michael Stansfield*  
Mary Evelyn Barnes  
Adam Brooks  
David Buttig  
Bern Johnson  
Justin Spasovski  
Jill Wade  
Kasia Wasescha  
*Nicole Weidenbenner*  
Berhanu Getahun–StL

### **Construction Permits**

*Susan Heckenkamp*  
Sam Anzalone  
Alana Hess  
Jordan Hull  
Kathy Kolb  
David Little  
Hans Robinson  
Ryan Schott  
Chad Stephenson  
*Chia-Wei Young*

### **Permit Modeling**

Dawn Froning  
Kelly Robson

# Air Quality Analysis Section

- Obtains, tracks and analyzes air emission inventory questionnaire (EIQ) data
- Develops point emission inventory
- Coordinates statewide air monitoring network
- Manages several program databases
- Small business compliance assistance

# Air Quality Analysis Section

## Steve Hall, Section Chief

### **Monitoring Unit**

*Patricia Maliro*

Jerry Downs

Eric Giroir

Michael Maddux

*Brandi Prater*

### **Data Management Unit**

*Nathan O'Neil*

Jeanette Barnett

Jeanne Brown

Erin Henry

*Liberty Sitzes*

Jeffrey Stevens

Terry Stock

*Brenda Wansing*

Daronn Williams

Carlton Flowers

# Compliance/Enforcement Section

- Resolves enforcement actions from regional offices/local agencies; Refers cases to Attorney General, if necessary
- Conducts oversight of Vapor Recovery/IM, and stack tests
- Issues asbestos certifications, contractor registrations and training provider accreditations, and tracks notifications
- Provides general compliance assistance
- Works with regional offices/local agencies to investigate citizen concerns and conduct routine inspections
  - asbestos, vapor recovery, open burning, dust, odors and general compliance

# Compliance/Enforcement Section

## Richard Swartz, Section Chief

### **Asbestos Unit**

*Stan Payne*

Cari Gerlt

George Syrigos

### **Compliance Unit**

*Chris Wood*

*Cliff Johnson*

Ernest Wilson

*Jaime Rizo*

Heather Lehman

Derek Apel

### **Testing and Emissions Unit**

*Josh Vander Veen*

John Bullard

*Laura Guinn*

Stephanie Hamilton

Steve Sidebottom

Connie Kinney

# Fiscal and Budget Section

- Prepares budget, manages cash flow and time accounting, accounts payable and receivables
- Administers federal grant projects
- Coordinates state and federal work plans and local memorandum of agreements
- Maintains record retention and responds to sunshine requests
- Reviews legislation and fiscal note requests

# Fiscal and Budget Vacant, Section Chief

## **Grant Management**

Deedra Beye-Stegeman

## **Financial Operations Unit**

Tim Largent

Sharon Thompson

## **Fileroom Management**

Amber Evans

## **Receptionist**

Debbie Heinrich

# St. Louis Inspection and Maintenance

- Oversees vehicle inspection and maintenance program
- Performs covert and overt audits of emissions testing facilities
- Provides technical assistance and customer education

# St. Louis Inspection and Maintenance

## Chuck Dachroeden, Section Chief

### **Technical Services Unit**

*Joe Winkelmann*

Caroline Kargus

Neena Nallaballi

Jackie Heisler

### **Inspection Services Unit**

*David Offu*

Brett Parra

Antwane President

David Ruby

Mark Specht



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# Volkswagen Overview

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# Volkswagen (VW) Trust

- MoDNR - lead agency for Missouri

## Attend a meeting.

Access the meeting schedule.



## Get involved.

Join the VW Settlement Advisory Committee.



## Learn More.

Learn about the settlement, health effects and more.



## Stay informed.

Sign up to receive the latest Volkswagen email updates.



## Be part of the solution.

Share your ideas and project proposals here.



## Apply for funding.

Check back for funding opportunities in Missouri.





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# Anticipated Timeline

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<b>Timing</b>	<b>Milestone</b>
Oct. 2, 2017	Trust effective date (TED)
November 2017	Missouri filed its certification with the court and trustee
November 2017 - February 2018	Department holds outreach and advisory committee meetings to discuss Volkswagen settlement and solicit input
January 2018	Trustee approves certification forms for beneficiaries
March 2018	Missouri releases proposed plan for using settlement funds; public may comment on plan
May 2018	Missouri submits final plan to trustee
Summer 2018	Missouri begins accepting applications and implementing projects

# Air Quality Analysis Updates

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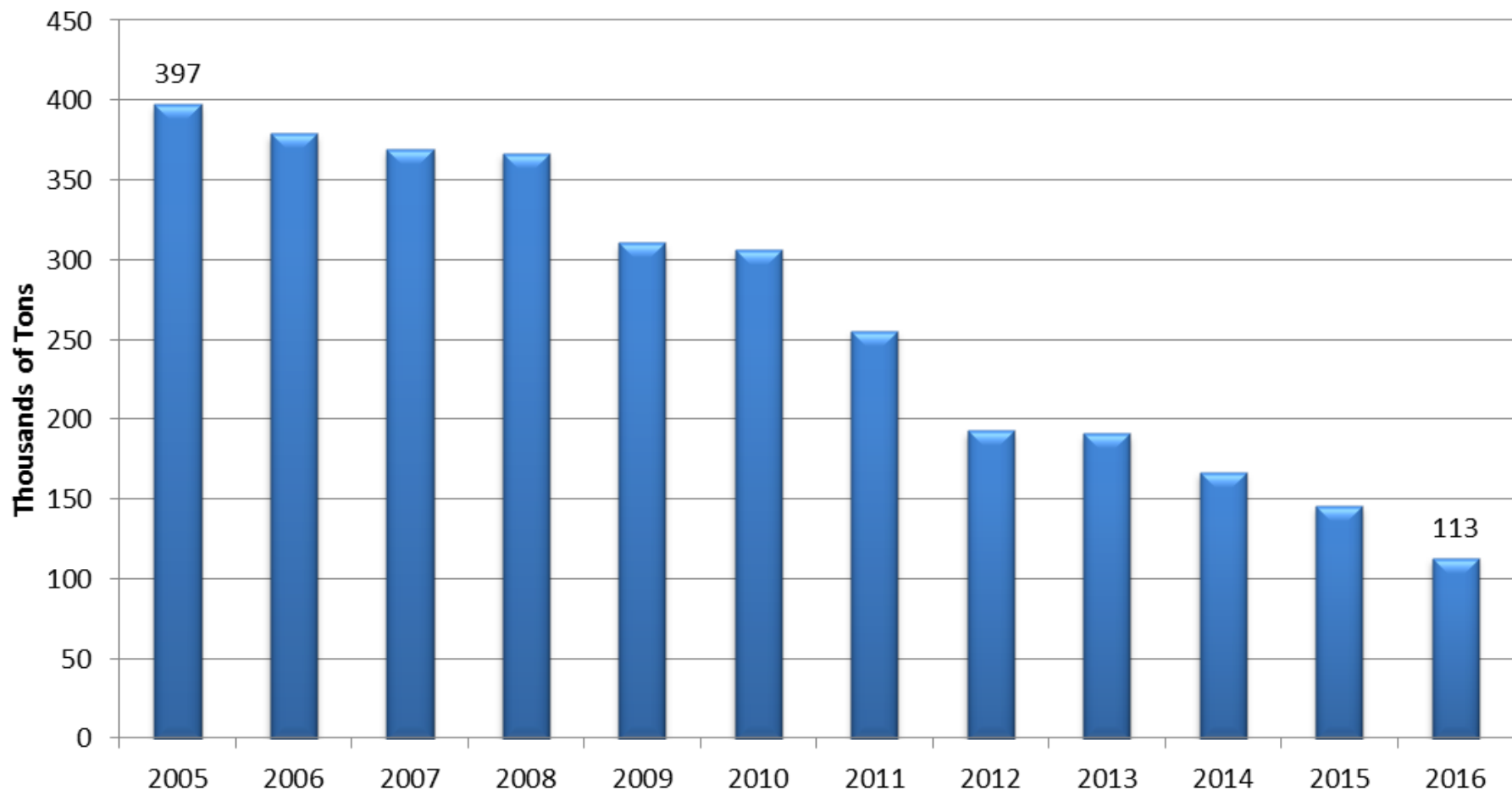
Steve Hall

Air Pollution Control Program

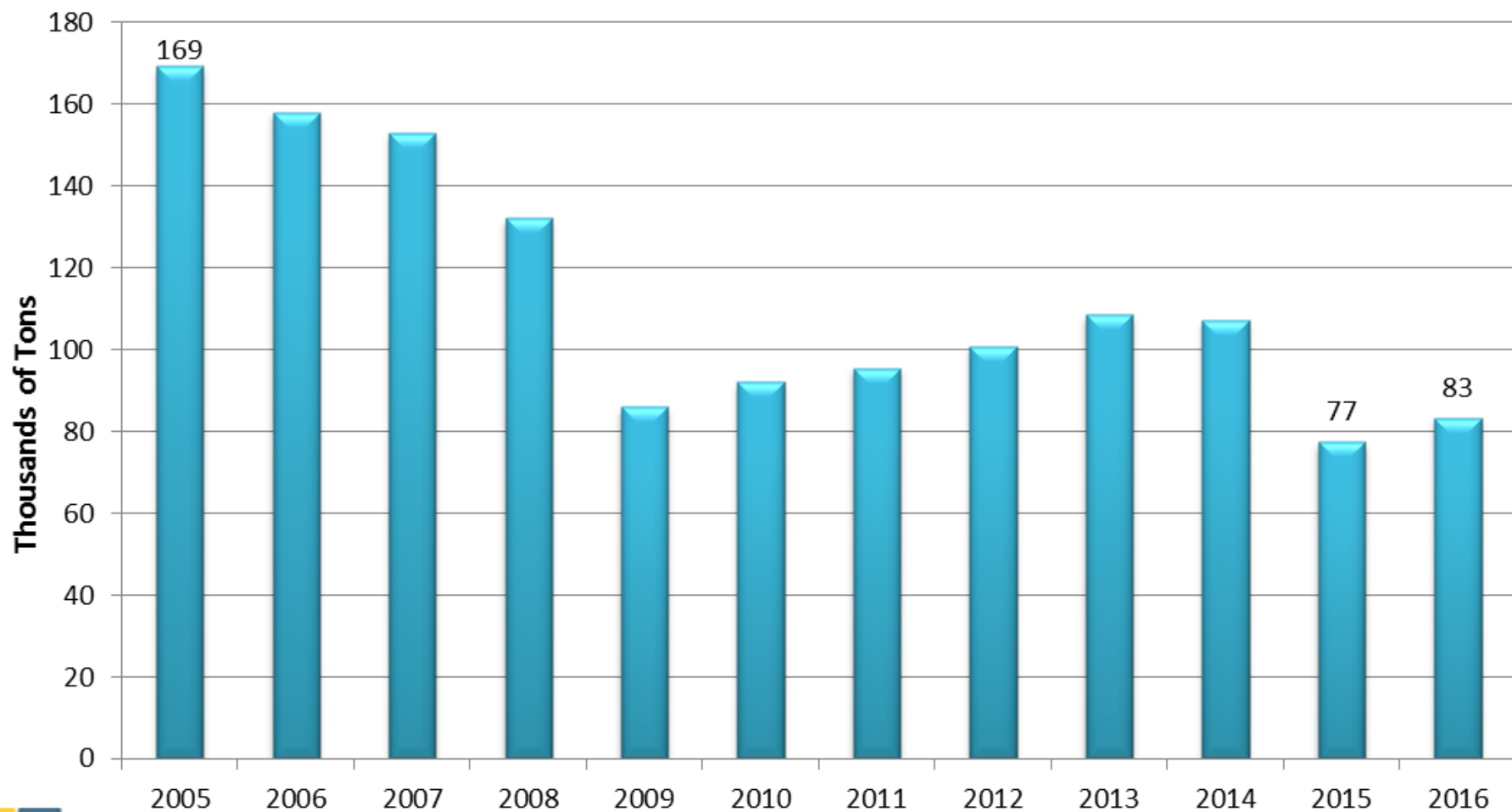
# Presentation Overview

- Sulfur dioxide ( $\text{SO}_2$ ) trends in emissions
- Nitrogen oxides ( $\text{NO}_x$ ) trends in emissions
- Ozone trends in ambient air monitoring
- Fine particulate matter ( $\text{PM}_{2.5}$ ) trends in ambient air monitoring

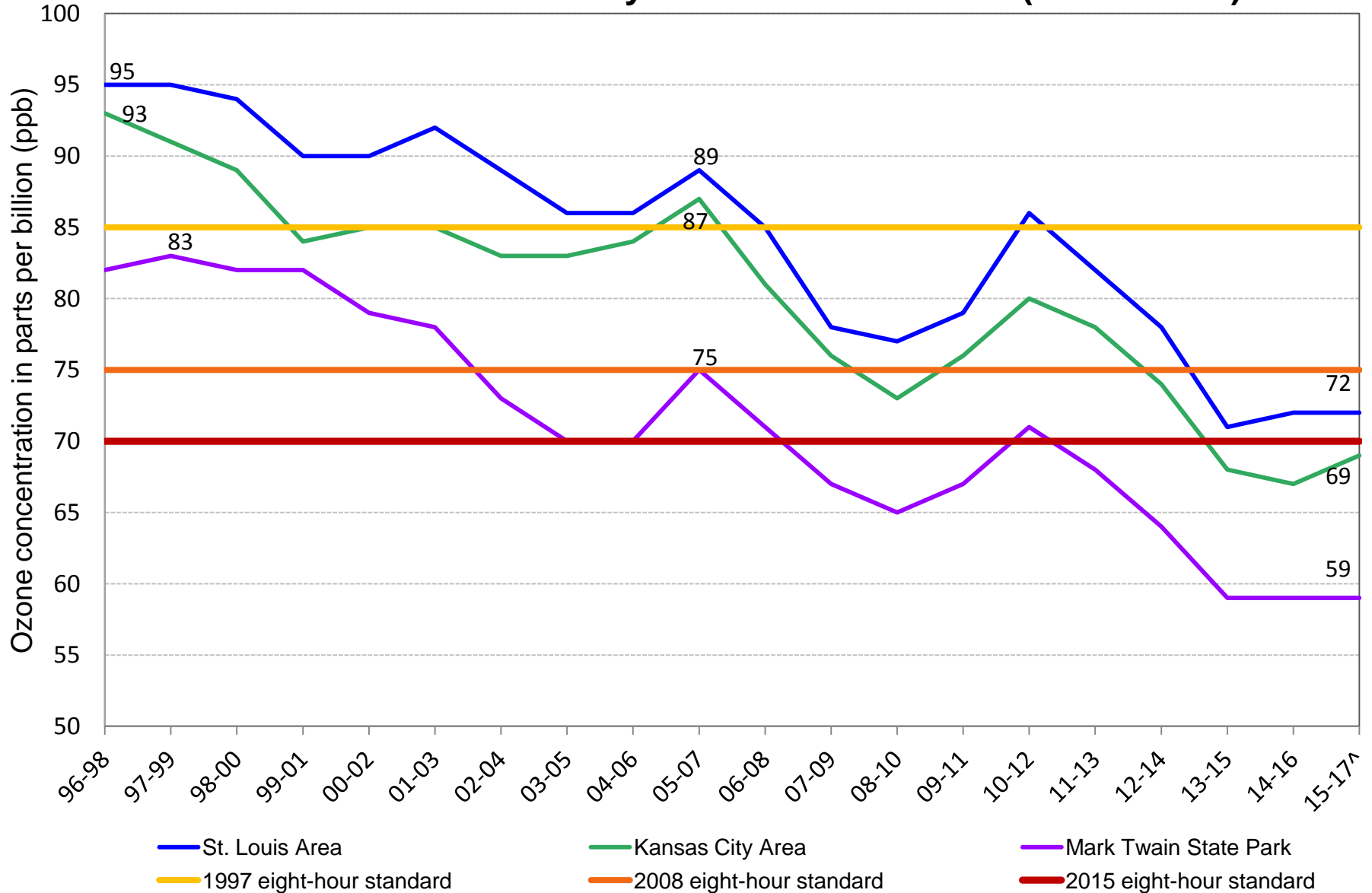
# Sulfur Dioxide (SO<sub>2</sub>) Emissions from Point Sources in Missouri



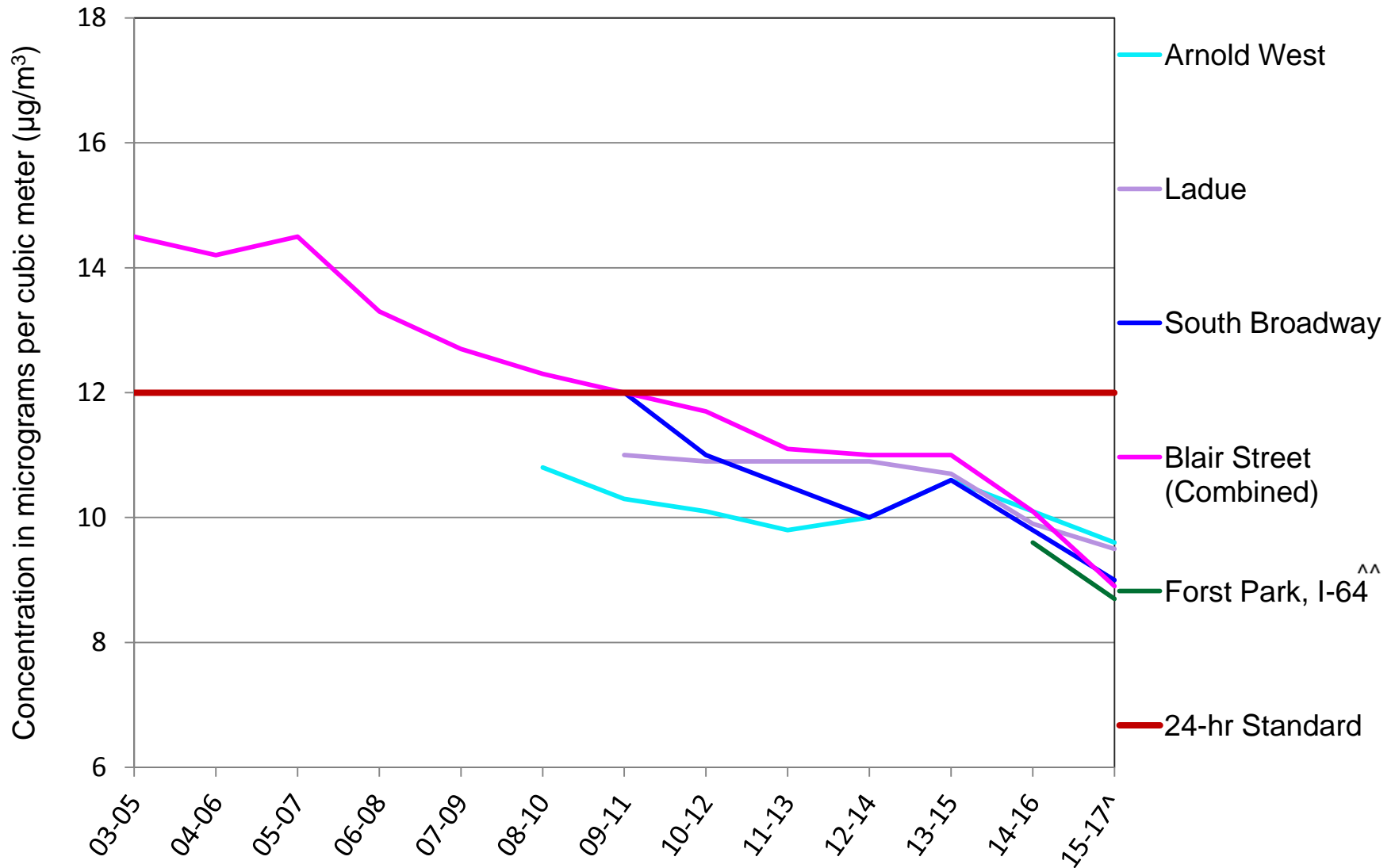
# Nitrogen Oxides (NO<sub>x</sub>) Emissions from Point Sources in Missouri



# Trends in Eight-Hour Ozone Design Values St. Louis and Kansas City Areas and Rural Site (Mark Twain)



# St. Louis (Mo.) Trends in PM<sub>2.5</sub> Design Values Based on Annual Averages, 2003-2017



<sup>^</sup>Quality assured data through Sept. 30, 2017

<sup>^^</sup>Near roadway monitor

# Air Quality (SIP) Planning Updates

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Emily Wilbur




Air Pollution Control Program

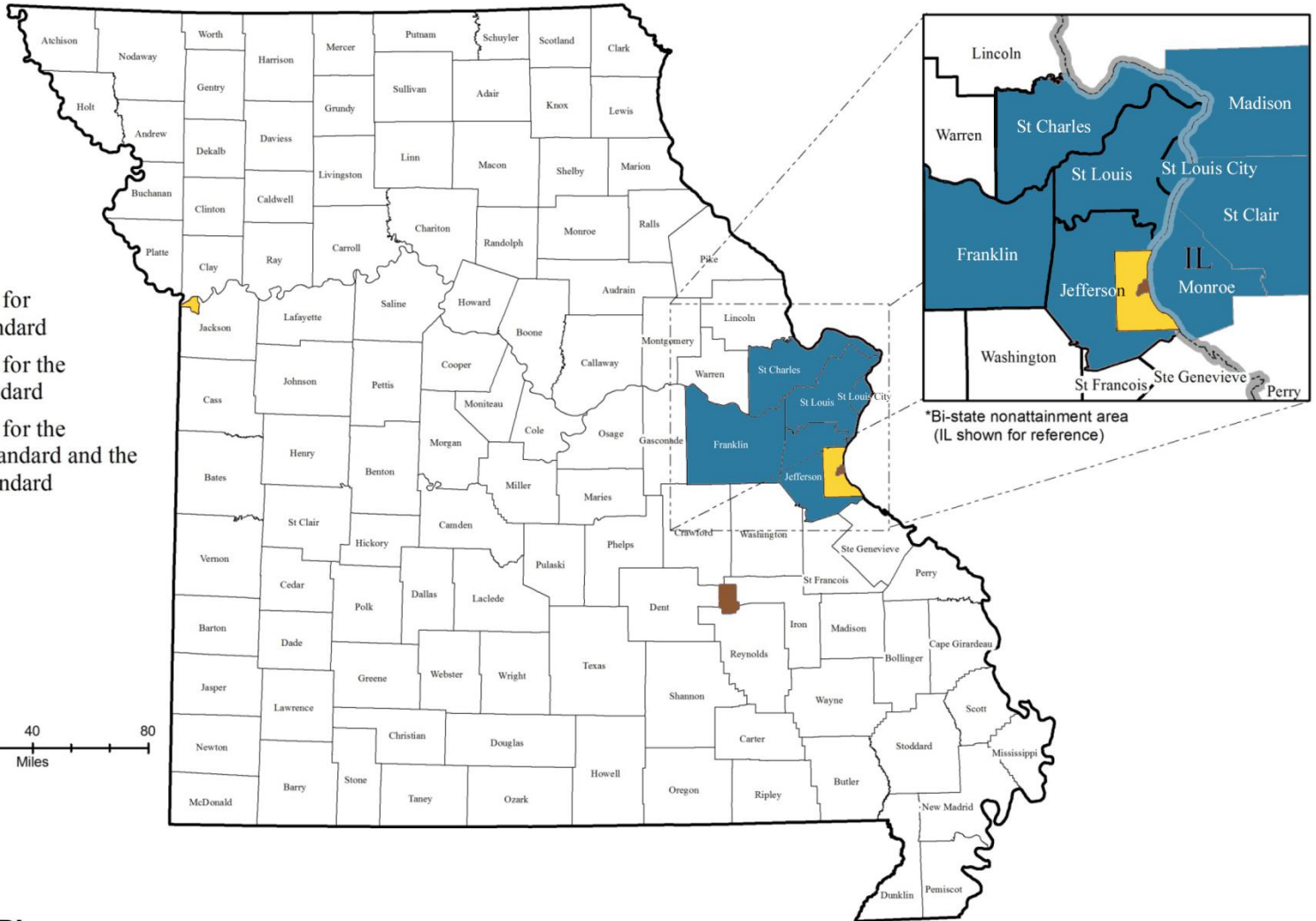
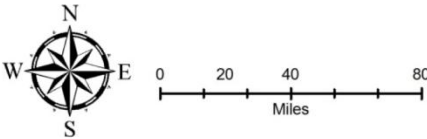
# Status of:

- Ozone
  - 2008 Standard
  - 2015 Standard
- Sulfur Dioxide (SO<sub>2</sub>) Standard
- Particulate Matter (PM<sub>2.5</sub>)
  - 1997 Standard
  - 2012 Standard
- Volkswagen

# Current Nonattainment Areas

## Legend

-  Nonattainment for 2008 Lead Standard
-  Nonattainment for the 2010 SO<sub>2</sub> Standard
-  Nonattainment for the 2008 Ozone Standard and the 1997 PM<sub>2.5</sub> Standard



Division of Environmental Quality  
Air Pollution Control Program  
Prepared: Feb. 6, 2017



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# Ozone Status

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# 2008 Ozone Standard (75 ppb)

- Based on 2013-2015 air monitoring data, Missouri has attained the standard in St. Louis  
[dnr.mo.gov/env/apcp/airpollutants.htm](http://dnr.mo.gov/env/apcp/airpollutants.htm)
- Submitted Redesignation Request and Maintenance Plan to EPA (Sept. 2016 and Feb. 2018) [dnr.mo.gov/env/apcp/sips.htm](http://dnr.mo.gov/env/apcp/sips.htm)

# 2015 Ozone Standard (70 ppb)

- EPA designated most counties in Missouri as “attainment/unclassifiable”
- EPA expected to designate remaining areas in Spring 2018
  - One monitor in Missouri violated the NAAQS (in St. Charles County) based on 2015-2017 data
  - Air program recommended nonattainment for the City of St. Louis and St. Louis and St. Charles counties

# 2015 Ozone Standard (70 ppb)

- Other obligations:
  - Infrastructure SIP (Oct. 2018)
  - Transport SIP (Oct. 2018)
  - Nonattainment Area Plan (2020)



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# Sulfur Dioxide (SO<sub>2</sub>) Status

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# 2010 SO<sub>2</sub> Standard (75 ppb)

## Round 1: Existing Monitors

- 2013: Two nonattainment areas designated (portions of Jackson and Jefferson counties).
- 2018: Attainment for both.

## Round 2: Consent Decree

- 2015-2016: Three areas considered. EPA did not designate any nonattainment areas

## Round 3: Data Requirements Rule (Modeling)

- Dec 2017: EPA designated remaining areas in Missouri as unclassifiable/attainment.
- Except Iron and New Madrid counties

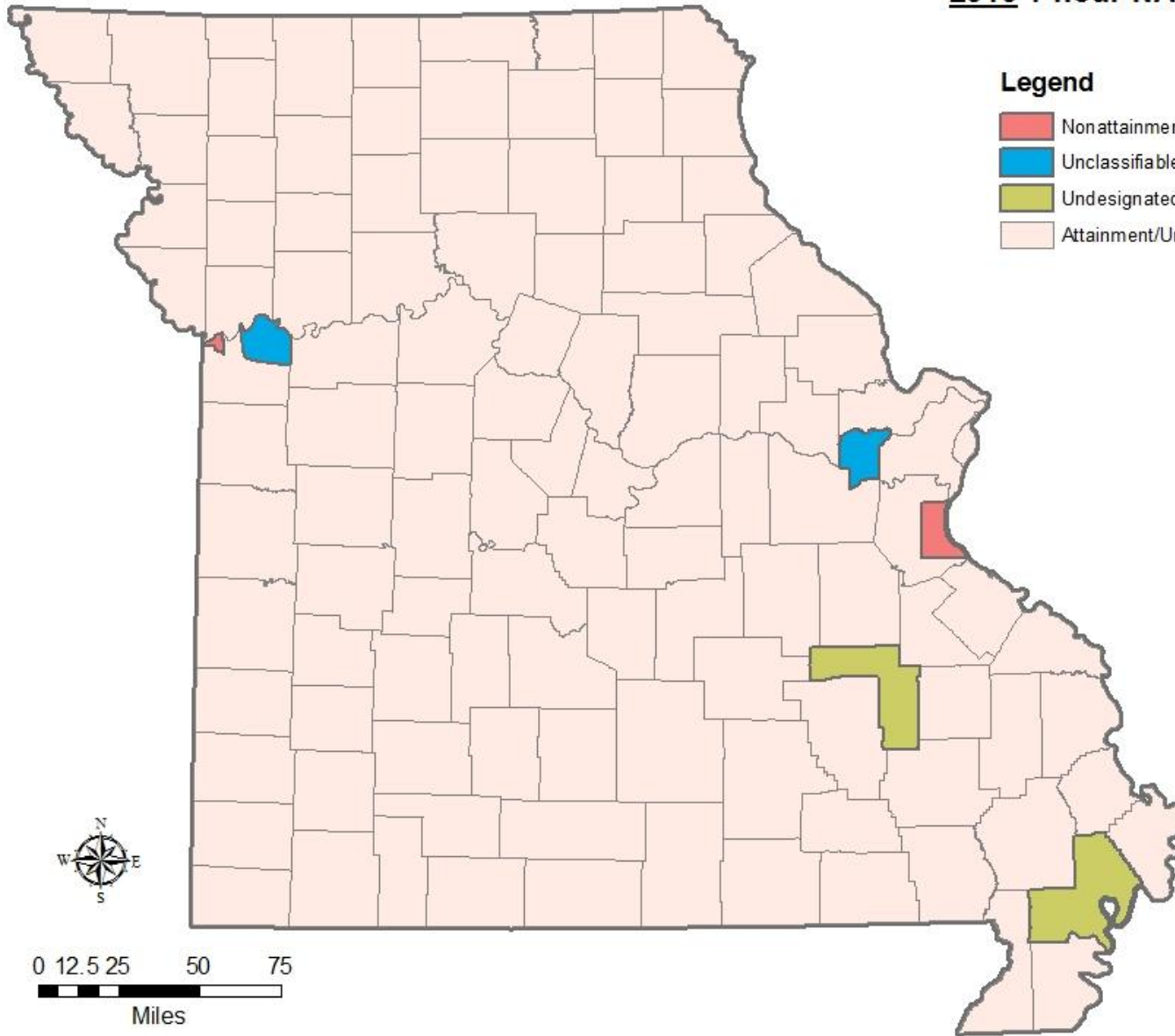
## Round 4: Data Requirements Rule (Monitoring)

- 4 areas installed new air quality monitors
- 2017-2019: Collect air monitoring data
- Dec 2020: Deadline for EPA designations

# SO<sub>2</sub> NAAQS Area Designations (2010 1-hour) 2010 1-hour NAAQS

## Legend

- Nonattainment Areas
- Unclassifiable Areas
- Undesignated Areas
- Attainment/Unclassifiable Areas



# Particulate Matter (PM<sub>2.5</sub>) Status

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# 1997 PM<sub>2.5</sub> Standard

- Redesignation request for St. Louis area “on hold” due to validation issues with Illinois monitoring data
- Jan. 5, 2018 Federal Register Notice: Advanced Notice of Proposed Rulemaking (ANPR) for approval of the Redesignation Request/Maintenance Plan
- Current monitoring data shows compliance with the NAAQS for both Missouri and Illinois

# 2012 PM<sub>2.5</sub> Standard

- EPA designated the St. Louis area “unclassifiable” due to validation issues with Illinois monitoring data
- Current monitoring data shows compliance with the NAAQS for both Missouri and Illinois
- Air program will seek redesignation to attainment



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# Other

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# Clean Power Plan

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# EPA Announcement

Oct. 16, 2017: “Repeal of Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units” [gpo.gov/fdsys/pkg/FR-2017-10-16/pdf/2017-22349.pdf](https://www.gpo.gov/fdsys/pkg/FR-2017-10-16/pdf/2017-22349.pdf)

– Comment deadline: Originally Dec. 15, 2017

Jan. 11, 2018: *EPA Schedules Three Listening Sessions on Proposed Repeal of Clean Power Plan*  
[epa.gov/newsreleases/epa-schedules-three-listening-sessions-proposed-repeal-clean-power-plan](https://www.epa.gov/newsreleases/epa-schedules-three-listening-sessions-proposed-repeal-clean-power-plan)

– Feb. 21, 2018 – Kansas City, MO

– Feb. 28, 2018 – San Francisco, CA

– March 27, 2018 – Gillette, WY



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# Greenhouse Gas Emission Regulations

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# Federal Register Notice

Dec. 28, 2017: *“State Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units”*

- [gpo.gov/fdsys/pkg/FR-2017-12-28/pdf/2017-27793.pdf](https://www.gpo.gov/fdsys/pkg/FR-2017-12-28/pdf/2017-27793.pdf)
- Advanced Notice of Proposed Rulemaking
- Public comment period: Closes Feb. 26, 2018

# Questions?

Contact information:

Emily Wilbur

Air Pollution Control Program

1659 E. Elm Street

Jefferson City, MO 65102

573-751-7725

[emily.wilbur@dnr.mo.gov](mailto:emily.wilbur@dnr.mo.gov)

Find us on the web at [dnr.mo.gov](http://dnr.mo.gov)

Call toll-free 800-361-4827

# Compliance and Enforcement Updates

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Richard Swartz

Air Pollution Control Program

Chief of Compliance and Enforcement Section

REGFORM air seminar

March 1, 2018, Columbia, Mo.

# Overview of Presentation

- Compliance Assistance
- Enforcement
- Compliance Unit
- Area Sources
- Oversight of Stack Tests
- Gateway Vehicle Inspection Program
- Asbestos Unit

# Compliance Assistance

We always are available to assist you by:


- \* interpreting applicable rules
- \* discussing nuances of your permit
- \* helping you move toward compliance

We can visit with you via email, over the telephone or in person at your site or in our office

# Arrange a Visit: [dnr.mo.gov/cav/compliance.htm](http://dnr.mo.gov/cav/compliance.htm)

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## Compliance Assistance Visit Requests

The Missouri Department of Natural Resources wants to help businesses, communities and industrial facilities better understand the requirements of their environmental regulations – and avoid future violations of those permits. Beginning July 1, 2014, the department's Division of Environmental Quality will offer compliance assistance visits (CAVs) to those regulated by the department. These voluntary visits can be requested by answering the questions below or by contacting one of the department's **regional offices**.

A CAV would be beneficial to a facility faced with a change in permit or regulatory requirements, or when there is a change in operational status or management at the facility. CAVs will assist with understanding regulatory requirements, help with achieving and maintaining compliance, and provide a continuing resource for technical assistance. CAVs are also a good opportunity to ask questions about permits or other environmental requirements.

During a CAV, a department representative will come to the facility to meet with the person requesting the visit, as well as any other staff that person invites. CAVs will vary depending on the nature of the request. In general, the department representative will look at the aspects of the facility requested, go over any requirements, answer questions, offer suggestions and discuss any issues they see that need to be addressed. Upon completion of such a visit, recommendations, if applicable, will be made regarding operations or regulatory compliance. A CAV is not intended to serve as a comprehensive inspection of the facility and will not result in a determination of compliance or noncompliance. However, if any non-compliant issues are observed, the facility will be asked to address them. In addition, it should be noted that if a violation that poses imminent harm to human health or the environment is observed during an assistance visit, the inspector will notify the facility and a compliance inspection will be made.

### DNR – Compliance Visit Request

Form to request a compliance visit by DNR Staff

**Contact Name \***

First Last

**Contact Number \***

 -  - 

### ### ####

**Contact Email \***

- [Air Information](#)
- [Broadcast Email Lists](#)
- [Commissions and Boards](#)
- [Commission Meetings and Events](#)
- [Contact Us](#)
- [Grants and Loans](#)
- [Land and Geology Information](#)
- [News and Multimedia](#)
- [Organizational Chart](#)
- [Public Meetings and Notices](#)
- [Report an Environmental Problem](#)
- [Rules in Development](#)
- [Site Directory](#)
- [Waste and Recycling](#)
- [Water Information](#)

### Contact Information

Department of Natural Resources  
P.O. Box 176  
Jefferson City, MO 65102  
800-361-4827  
573-751-3443

**Contact Us**

**Report an Environmental Concern**

# Small Business Assistance – Air Program

<http://dnr.mo.gov/env/apcp/smbus.htm>

Air Pollution Control Program

P.O. Box 176

Jefferson City, MO 65102

573-751-4817 (Main)

800-361-4827 (Direct)

573-751-2706 (Fax)

[Carlton Flowers](#)



# Enforcement

- Issue fewer notices of violation (NOVs)
- Issue more letters of warning (LOWs)
- No longer issue notices of excess emissions (NOEEs)
- Accept Start up, Shut down, Malfunction justification, according to state rule

# Compliance Unit

- Compliance Reports – Expect roughly 1,400
- Annual Compliance Certifications/Semi-Annual Monitoring– 380
- MACT & NSPS – 1,000
- Coordinate with regional office staff
- Coordinate variances
- [aircompliancereporting@dnr.mo.gov](mailto:aircompliancereporting@dnr.mo.gov)

Chris W.			Derek A.			Heather L.			Cliff J.			Ernest W.			Jaime R.		
Subpart	Name	#	Subpart	Name	#	Subpart	Name	#	Subpart	Name	#	Subpart	Name	#	Subpart	Name	#
<a href="#">NSPS F</a>	Portland Cement Plants	3	<b>Commercial Solid Waste Incinerators Operator Training</b>			<b>Odors</b>			<b>Particulate Matter</b>			<b>EIQ Checklist</b>			<b>Printing Electronic Submittals from R/O's</b>		
<a href="#">NSPS HH</a>	Lime Manufacturing	2	<b>Wastewater Treatment Sludge Incinerators Operator Training</b>			<b>1110P database</b>			<a href="#">NESH AP V</a>	Equipment Leaks (Fugitive Emission Sources)	1	<b>Major Source Boiler MACT</b>			<a href="#">NSPS Ec</a>	Hospital/Medical/Infectious Waste Incinerators Commencing After 6/20/96	1
<a href="#">N</a>	Chromium Electroplating	29	<a href="#">NSPS Cc</a>	Municipal Solid Waste Landfills	5	<a href="#">NSPS I</a>	Hot Mix Asphalt Facilities	71	<a href="#">NSPS L</a>	Secondary Lead Smelters	2	<a href="#">NESH AP H</a>	Radionuclides Other Than Radon From Department of Energy Facilities	1	<a href="#">NSPS S</a>	Primary Aluminum Reduction Plants	1
<a href="#">2X</a>	Ethylene Manufacturing Process Units: Heat Exchange Systems and Waste Operations	1	<a href="#">NSPS O</a>	Sewage Treatment Plants	4	<a href="#">NSPS X</a>	Phosphate Fertilizer Industry; Granular Triple Superphosphate Storage Facilities	1	<a href="#">NSPS R</a>	Primary Lead Smelters	1	<a href="#">NSPS D</a>	Fossil-Fuel-Fired Steam Generators Commencing After 8/17/71	5	<a href="#">NSPS IIII</a>	Stationary Compression Ignition (Diesel) Internal Combustion Engines	79
<a href="#">3E</a>	All Hazardous Waste Incinerators	6	<a href="#">NSPS CC</a>	Glass Manufacturing Plants	2	<a href="#">NSPS DD</a>	Grain Elevators	10	<a href="#">NSPS EE</a>	Surface Coating of Metal Furniture	1	<a href="#">NSPS Da</a>	Electric Utility Steam Generating Units Commencing After 9/18/78	5	<a href="#">NSPS JJJ</a>	Standards of Performance For Stationary Spark Ignition Internal Combustion Engines	?
<a href="#">3I</a>	Flexible Polyurethane Foam Production	1	<a href="#">NSPS KK</a>	Lead-Acid Battery Manufacturing Plants	4	<a href="#">NSPS UU</a>	Asphalt Processing and Asphalt Roofing Manufacture	5	<a href="#">NSPS MM</a>	Automobile And Light Duty Truck Surface Coating Operations	2	<a href="#">NSPS Db</a>	Industrial-Commercial-Institutional Steam Generating Units	16	<a href="#">NSPS KKK K</a>	Stationary Combustion Turbines	8
<a href="#">3L</a>	Portland Cement Plants	5	<a href="#">NSPS WWW</a>	Municipal Solid Waste Landfills	28	<a href="#">NSPS VVa</a>	Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry Commencing After 11/7/06	7	<a href="#">NSPS RR</a>	Pressure Sensitive Tape and Label Surface Coating Operations	1	<a href="#">NSPS Dc</a>	Small Industrial-Commercial-Institutional Steam Generating Units	186	<a href="#">O</a>	Ethylene Oxide Sterilizers	1
<a href="#">3M</a>	Pesticide Active Ingredient Production	1	<a href="#">NSPS CCCC</a>	Commercial and Industrial Solid Waste Incineration Units Commencing After 11/30/99	5	<a href="#">NSPS NNN</a>	Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Distillation Operations	9	<a href="#">NSPS SS</a>	Industrial Surface Coating of Large Appliances	2	<a href="#">NSPS Y</a>	Coal Preparation Plants	18	<a href="#">2D</a>	Off-Site Waste and Recovery Operations	5
<a href="#">5A</a>	Lime Manufacturing	2	<a href="#">NSPS DDDD</a>	Commercial and Industrial Solid Waste Incineration Units Commencing After 11/30/99	1	<a href="#">NSPS OOO</a>	OOO Test Observations	279	<a href="#">NSPS TT</a>	Metal Coil Surface Coating	1	<a href="#">NSPS GG</a>	Stationary Gas Turbines	31	<a href="#">2L</a>	Primary Aluminum Reduction Plants	1
<a href="#">5G</a>	Site Remediation	1	<a href="#">NSPS MMM M</a>	Sewage Sludge Incinerators	4	<a href="#">NSPS RRR</a>	Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Reactor Process	10	<a href="#">NSPS WW</a>	Beverage Can Surface Coating Industry	1	<a href="#">NSPS JJJ</a>	Petroleum Dry Cleaners	5	<a href="#">3C</a>	Wastewater Steel Pickling	1
			<a href="#">2I</a>	Shipbuilding and Ship Repair	1	<a href="#">NSPS UUU</a>	Calciners and Dryers in Mineral Industries	7	<a href="#">NSPS VVV</a>	Polymorphic Coating of Supporting Substrates	2	<a href="#">M</a>	PERC Standards for Dry Cleaners	274	<a href="#">3G</a>	Pharmaceutical Manufacturing	5
			<a href="#">2G</a>	Aerospace Mfg. & Rework	4	<a href="#">F</a>	Synthetic Hazardous Organics	1	<a href="#">T</a>	Halogenated Solvent Cleaning	13	<a href="#">2J</a>	Wood Furniture	11	<a href="#">3R</a>	Secondary Aluminum Production	12
			<a href="#">2K</a>	Printing and Publishing	4	<a href="#">G</a>	Storage of Hazardous Organics	2	<a href="#">X</a>	Secondary Lead Smelters	2	<a href="#">4D</a>	Plywood and Composite Wood Products	1	<a href="#">4Y</a>	Combustion Turbines	11
			<a href="#">3J</a>	Group IV Polymers and Resins	1	<a href="#">H</a>	Equipment Leaks of Hazardous Organics	5	<a href="#">3T</a>	Primary Lead Smelters	1	<a href="#">5D</a>	Industrial/Commercial/Institutional Boilers & Process Heater	86	<a href="#">4Z</a>	RICE	186
			<a href="#">4A</a>	Municipal Solid Waste Landfills	18	<a href="#">I</a>	Organic Hazardous Air Pollutants for certain processes subject to the negotiated regulations for equipment leaks	2	<a href="#">4I</a>	Surface Coating of Auto and Light Duty Trucks	2	<a href="#">5H</a>	Miscellaneous Coating Manufacturing Facilities	3	<a href="#">5E</a>	Iron and Steel Foundries	1
			<a href="#">4E</a>	Organic Liquids Distribution (non-Gasoline)	2	<a href="#">4F</a>	Miscellaneous Organic Chemical Manufacturing (MON)	10	<a href="#">4J</a>	NESHAP for Paper & other Web Surface Coatings	3	<a href="#">5U</a>	MATS	?	<a href="#">5J</a>	Brick and Structural Clay Products	1
			<a href="#">4G</a>	Solvent Vegetable Oil Extraction	5	<a href="#">4P</a>	Plastic Parts Surface Coating	3	<a href="#">4K</a>	Metal Can Coating	1				<a href="#">5P</a>	Engine Test Cells/Stands	1
			<a href="#">5M</a>	Flexible Polyurethane Foam Fabrication Operations	1	<a href="#">4V</a>	New and Existing Boat Manufacturing Facilities	6	<a href="#">4M</a>	Misc. Metal Parts and Products Surface Coating Operations	21						
						<a href="#">4W</a>	Reinforced Plastic Composites Production	8	<a href="#">4N</a>	Surface Coating of Large Appliances	2						
									<a href="#">4O</a>	Printing, Coating and Dyeing of Fabrics and Other Textiles	1						
									<a href="#">4Q</a>	Surface Coating of Wood Building Products	1						
									<a href="#">4R</a>	Surface Coating of Metal Furniture	2						
									<a href="#">4S</a>	Metal Coil	1						

# Area Sources: Who Has Authority?

- For some federal rules MoDNR does not have enforcement authority
  - These rules still show up in your permit
  - It can get confusing
- Website clarifies authority

[dnr.mo.gov/env/apcp/areasource.htm](http://dnr.mo.gov/env/apcp/areasource.htm)

Questions? Call us! 573-751-4817

# Gateway Vehicle Inspection Program

## Safety and emissions testing in St. Louis

MoDNR and Missouri State Highway Patrol  
operate it in coordination  
with Department of Revenue

- 5,000 licensed inspectors
- 850 licensed shops
- 750,000 vehicles inspected each year

[www.gatewayvip.com](http://www.gatewayvip.com)



# Oversight of Stack Tests

## Testing & Emissions Unit:

- Receives and reviews test protocols
- Observes emissions test
- Reviews test reports
- Received 425 test reports in 2017
- CEMS audits – three in 2017

[stacktesting@dnr.mo.gov](mailto:stacktesting@dnr.mo.gov)

# Asbestos Unit

- Streamlined internal processes
- Implemented web based occupational certification system
- Notification databases updated daily
- Compliance assistance

[asbestosnotifications@dnr.mo.gov](mailto:asbestosnotifications@dnr.mo.gov)

# Convenient Email Addresses

- [aircompliancereporting@dnr.mo.gov](mailto:aircompliancereporting@dnr.mo.gov)
- [stacktesting@dnr.mo.gov](mailto:stacktesting@dnr.mo.gov)
- [asbestosnotifications@dnr.mo.gov](mailto:asbestosnotifications@dnr.mo.gov)

# Questions?

MoDNR

Air Pollution Control Program

PO Box 176

Jefferson City, MO 65102-0176

[dnr.mo.gov/env/apcp](http://dnr.mo.gov/env/apcp)

[Richard.Swartz@dnr.mo.gov](mailto:Richard.Swartz@dnr.mo.gov)



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# Permit Updates

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Kendall Hale

Air Pollution Control Program

# Construction Permit Rule Rewrite (10 CSR 10-6.060)

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# Primary Goals for Rule Rewrite

- Improve ability for all to read and understand the permitting rule
- Modernize the rule
- Add ability for applicants to obtain a voluntary construction permit
- Add provisions for a “general permit”

# Goal #1: Improve ability to read and understand the rule

- Reorganize the rule so that it flows better
- Update rule to match what we consider to be the department's intent and historical interpretation
- Make rule language more intuitive, less chances for different interpretations
  - Use of plain language
  - Clarify language so that applicants know when they are subject to the permit rule
  - Clarify language so that applicants know which requirements apply to them (such as modeling)

## Goal #2: Modernize the rule

- Make every line in the rule mean something
  - Several requirements have lost meaning over the years or were never implemented or fully utilized in the first place such as the “hourly de minimis” provision, “special case de minimis” and “unified review” section
    - Review all provisions, determine their need, and either update language or remove them from the rule
- Update rule to match current vernacular
- Allow for electronic submittal

## Goal #3: Add Voluntary Permit Option

- Purpose: Gives an avenue for applicants to take practically enforceable limits in a construction permit
- Examples of applicable situations
  - Grandfathered installations (that did not initially require a permit) that would like to make control devices federally enforceable
  - Addition of insignificant emission increases (that do not require a permit on their own) to an installation-wide emission cap

## Goal #3: Add Voluntary Option (cont.)

- Other applicable situations:
  - Make conditions in a consent decree permanent
  - Allow facilities to take HAP limits below major source levels
  - Others??

# Goal #4: Add General Permit Rule

- The rule will outline the process used to establish permit criteria for a general permit
- The process outlined in the rule will be used to develop *pre-determined* control technology and associated emission limits for a source category.
- Similar to current permit-by-rule in that permit criteria is established upfront and a company can choose to adhere to the established criteria or obtain a site-specific permit.
- Differs from a permit-by-rule in that the permit-by-rule involves the rule-making process each time a new permit-by-rule for a source category is established; whereas, a general permit goes through the rule making process once and then public comment at a later date when an industry or emission unit-specific general permit is proposed.

# General Permit Rule

In general:

- The general permit will serve as an alternative to a site specific permit.
- Sources will request coverage under a general permit
- A general permit will be the same as any construction permit except all the terms and conditions of the permit will be developed in advance.
- It is an EPA concept, has SIP approvability. EPA recently developed a general permit rule for the minor source program in Indian country
- It is easier to update general permit requirements, because it doesn't involve a rule change.

# Other Possible Changes

- Add language to the rule that will allow Plant-wide Applicability Limits (PALs) for de minimis / minor sources

# Not planning to change

- No plans to make any significant changes to Section (7), (8) or (9) which are the “major” permits (PSD, nonattainment NSR, case-by-case MACT).
  - May move relevant definitions to these sections

# Other Permitting Updates

- 10 CSR 10-6.062 Permit-by-Rule
- Operating Permits
- Once-In-Always-In Policy

# Helpful Permitting Links

- Air Pollution Control Program's Permit Webpage:  
<http://dnr.mo.gov/env/apcp/permits.htm>
  - Operating and Construction Permit Fees
  - Permits on public notice
  - Issued permits
  - Construction Permit Guidance
  - Permit Modeling Guidance
- SMAL and RAL for hazardous air pollutants  
<http://dnr.mo.gov/env/apcp/docs/haps-table-rev-12.pdf>

# Questions?

Contact information:

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1659 E. Elm Street

Jefferson City, MO 65102

573-751-7725

[kendall.hale@dnr.mo.gov](mailto:kendall.hale@dnr.mo.gov)



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# General Updates

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Air Pollution Control Program

# General Program Updates

- Red Tape Reduction Process
- Electronic Fileroom
- Sunshine Law Process
- Check out the department's Twitter Feed



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# Other Air Program Reminders

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# How To Stay Informed

Public notices – rules, permits, state plans:

[dnr.mo.gov/env/apcp/public-notices.htm](http://dnr.mo.gov/env/apcp/public-notices.htm)

Air Program Advisory Forum :

[dnr.mo.gov/env/apcp/airadvisory/apcpstakeholder.htm](http://dnr.mo.gov/env/apcp/airadvisory/apcpstakeholder.htm)



**Get Updates  
on this  
Issue**

# Air Program Contact Information

Air Program's webpage:

[dnr.mo.gov/env/apcp/index.html](http://dnr.mo.gov/env/apcp/index.html)

- [firstname.lastname@dnr.mo.gov](mailto:firstname.lastname@dnr.mo.gov)
- Front desk 573-751-4817

Darcy A. Bybee, Director  
Air Pollution Control Program  
1659 E. Elm Street  
Jefferson City, MO 65102  
573-751-7840  
573-751-7946 direct line  
[darcy.bybee@dnr.mo.gov](mailto:darcy.bybee@dnr.mo.gov)  
Find us on the web at [dnr.mo.gov](http://dnr.mo.gov)  
Call toll-free 800-361-4827



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Thank you!!