

Compliance and Enforcement Updates

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Air Pollution Control Program

Chief of Compliance and Enforcement Section

REGFORM air seminar

March 7, 2019, 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:

- * navigating red tape reduction changes
- * 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



MO.gov Governor Parson Find an Agency Online Services



Programs ▾

Forms and Permits

Publications

Laws and Regulations

Online Services

Calendar of Events

Requests for Compliance Assistance Visits

The Missouri Department of Natural Resources wants to help businesses, communities and industrial facilities better understand environmental regulations — and avoid associated violations. Regulated entities may request compliance assistance visits by completing the form, below, or by contacting one of the department's **regional offices**.

A compliance assistance visit would benefit a new facility as well as a facility facing changes in permits or regulatory requirements. In addition, when facilities undergo a change in status or management, a compliance assistance visit can help smooth the transition.

What occurs during a visit?

The itinerary of a visit depends on the request. In general, a department representative will meet with staff at the facility and do some or all of the following:

- * Explain regulatory requirements and provide updates, as applicable.
- * Help a regulated entity achieve and maintain compliance with permitting requirements.
- * Answer questions about permits, offer suggestions and discuss issues that arise during the meeting.
- * Serve as an ongoing resource. After an in-person visit, the department representative can continue to provide assistance via email, telephone or another in-person visit.

Please note that the department does not intend compliance assistance visits to serve as comprehensive inspections or to result in final determinations of compliance or noncompliance. However, if the department representative observes problems with compliance, the representative will provide recommendations on handling the issues and ask the facility to address the situation. If the representative sees a violation that poses imminent harm to human health or the environment, the representative will notify the facility of the serious violation, and the department will perform a compliance inspection.

MoDNR – Compliance Visit Request

Form to request a compliance visit by MoDNR Staff

Contact Name *

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 Concern

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

Small Business Assistance – Air Program

dnr.mo.gov/env/apcp/smbus.htm

Air Pollution Control Program

P.O. Box 176

Jefferson City, MO 65102

(573) 751-4817 (APCP)

(800) 361-4827 (DNR)

(573) 751-2706 (Fax)

[Carlton Flowers](mailto:Carlton.Flowers@dnr.mo.gov)



Enforcement

- Letter of Warning
 - Documents a violation
 - Will offer compliance assistance
 - Will require specified time frame to respond and return to compliance
- When compliance is achieved a return to compliance letter will be issued
- Insufficient response leads to follow up & potential elevation and/or enforcement

Enforcement

Referral Notice of Violation (RNOV)

- Most serious and significant violations
- Impacts or threats to human health or the environment
- Almost always result in formal enforcement action

Enforcement

- No longer issue notices of excess emissions (NOEEs)
- Accept Start up, Shut down, Malfunction justification, according to state rule

Compliance Unit

- Compliance Reports – Received just over 2,200 in year 2018
 - Annual Compliance Certifications/Semi-Annual Monitoring Reports– 856
 - MACT & NSPS – 621
- Coordinate with regional office staff
- aircompliancereporting@dnr.mo.gov

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

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



Oversight of Stack Tests

Testing & Emissions Unit:

- Receives and reviews test protocols
- Observes emissions test
- Reviews test reports
- Received 438 test reports in 2018
- CEMS audits – four in 2018

stacktesting@dnr.mo.gov

Asbestos Unit 2018

- Occupation Certificates Issued – 2,721
- Notifications Processed – 1,127
- Contractor Registrations Issued – 113
- Training Providers Accredited – 21

Asbestos Unit

- Continue to streamline internal processes
- Accredited online Supervisor Refresher course now available
- Working to expand online accredited courses to project designer and management planner
- Class notifications received electronically:
asbestostraining@dnr.mo.gov

Asbestos Unit

- Web based occupational certification system
- Notification databases updated daily
- Compliance assistance

asbestosnotifications@dnr.mo.gov

Convenient Email Addresses

- aircompliancereporting@dnr.mo.gov
- stacktesting@dnr.mo.gov
- asbestosnotifications@dnr.mo.gov

Questions?

MoDNR

Air Pollution Control Program

PO Box 176

Jefferson City, MO 65102-0176

dnr.mo.gov/env/apcp

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