



## Non-Regulatory Monitoring

Missouri Air Compliance Seminar  
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# Overview

- Non-regulatory monitoring
  - Why should we be concerned?
  - What technology is available?
  - Examples of data collected / used
  - What are the best ways to prepare your company / facility?

# Why should we be concerned?

- Data is power
- Lack of available information to respond can be crippling
- Environmental Justice and its impacts are coming!
- Operations can be affected

# What technology is available?

- Hand-held samplers



- Non-reference (low cost) stationary monitors

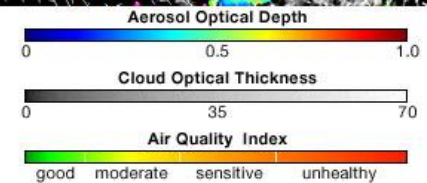
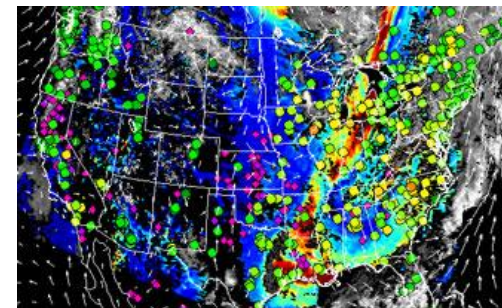
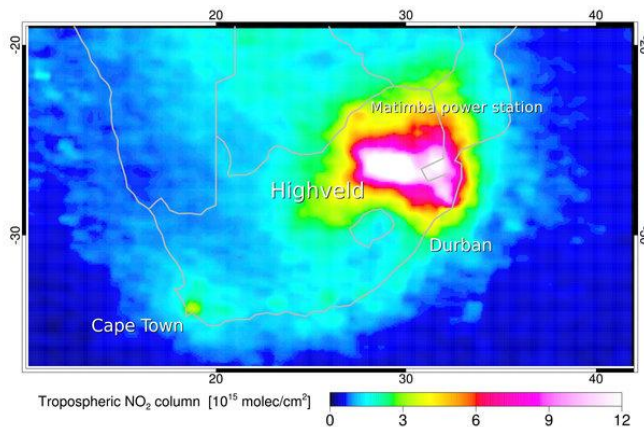


# What technology is available?

- Drones



- Satellite Data

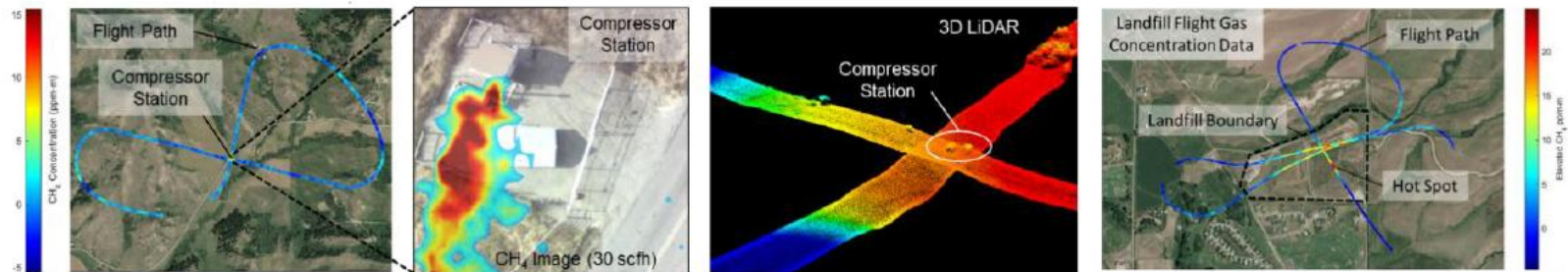


# What technology is available?

- FAQ - how do these technologies compare to traditional ambient air quality monitors?
  - Cheaper = less accurate
  - Not able to be utilized for compliance purposes
    - “screening”
    - “snap shots”
    - “guideposts”
  - More data being collected for comparisons all the time

# Examples of data collected / used

- Sometimes non-regulatory monitoring is used by a public agency...
- Upper Midwest state used drone technology near a landfill to “identify areas of concern” for concentrations of methane ( $\text{CH}_4$ ) as a marker for hydrogen sulfide ( $\text{H}_2\text{S}$ ) gas



# Examples of data collected / used

- Used to help “resolve odor complaints” by siting monitors for “evaluation”
- Needed permission from the source
- Resulted in a long-term monitoring commitment



# What are the best ways to prepare ourselves?

- Respond promptly to external monitoring at/near your facility

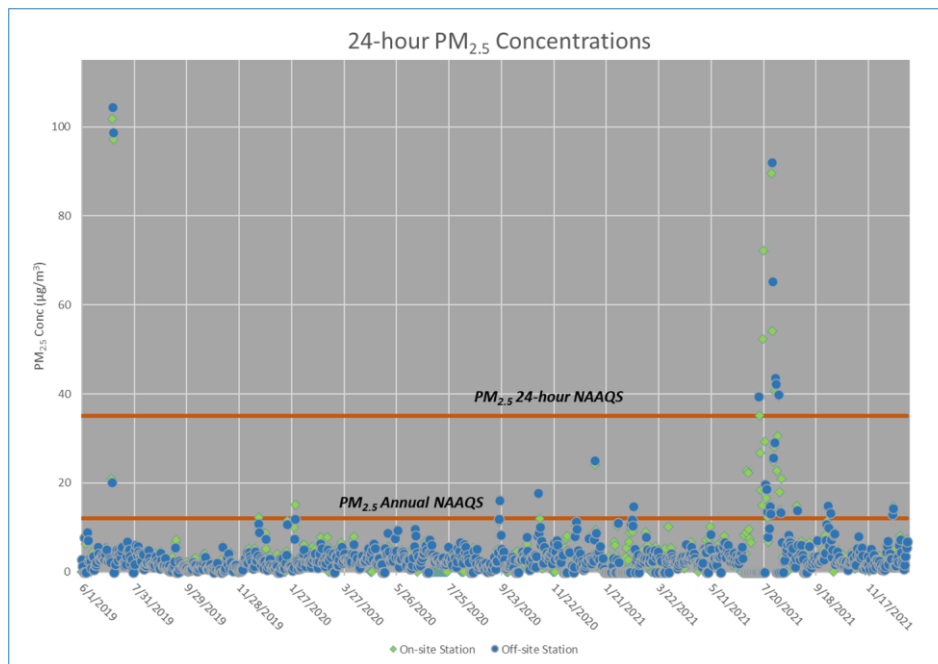
Data is power!

- Don't be an --



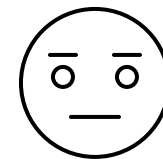
# What are the best ways to prepare ourselves?

- Be proactive – Collect and/or develop data that shows “limited air quality impacts”
  - No problems here



# What are the best ways to prepare ourselves?

- Consider proactive stakeholder engagement
  - First, understand concerns from communities
  - Provide information developed to ease concerns



# What are the best ways to prepare ourselves?

- Craft a message
  - preferably with Counsel / Air Quality experts
  - develop a plan to deliver that message
- Example – reporter shows up at your plant office and says, “XYZ has collected data that shows your emissions are impacting Acme Daycare, care to comment?”



# What are the best ways to prepare ourselves?

- Acme Daycare

- Bad → “Uhhh..., No comment, we aren’t”



- Good → “We have collected our own data and investigated our emission impacts on Acme Daycare. Our analyses demonstrate impacts are minimal and in compliance with all applicable regulatory requirements.”



# Old time advice...

- Better to have insurance and not need it



- Than to not have insurance and need it!!



# Stay tuned...

- Changes in air quality monitoring technology are coming – more data are becoming available
- More use of non-regulatory data is likely and the desire for instantaneous information is prevalent



# Summary

- Non-regulatory monitoring is here and is becoming more prevalent!
- Some agencies are using these methods and assigning more weight to the data
- Be prepared for questions and have a plan to respond

Not --  , but --



# Questions?

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