

Compliance & Enforcement

Richard Swartz

Air Pollution Control Program

Chief of Compliance & Enforcement Section

REGFORM Missouri Air Compliance Seminar

November 10, 2022, Columbia, MO

Overview of Presentation

- Air Offices and Staff
- State Oversight
- Common Compliance Issues
- Stack Test Oversight
- Asbestos
- Agricultural Anhydrous Ammonia

Air Pollution Control Program Compliance/Enforcement Contacts

- **Shelby Miller** – Stationary Source
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- **Josh Vander Veen** – Stack Testing
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- **Laura Guinn**– Asbestos
– laura.guinn@dnr.mo.gov

Regional Office Boundaries

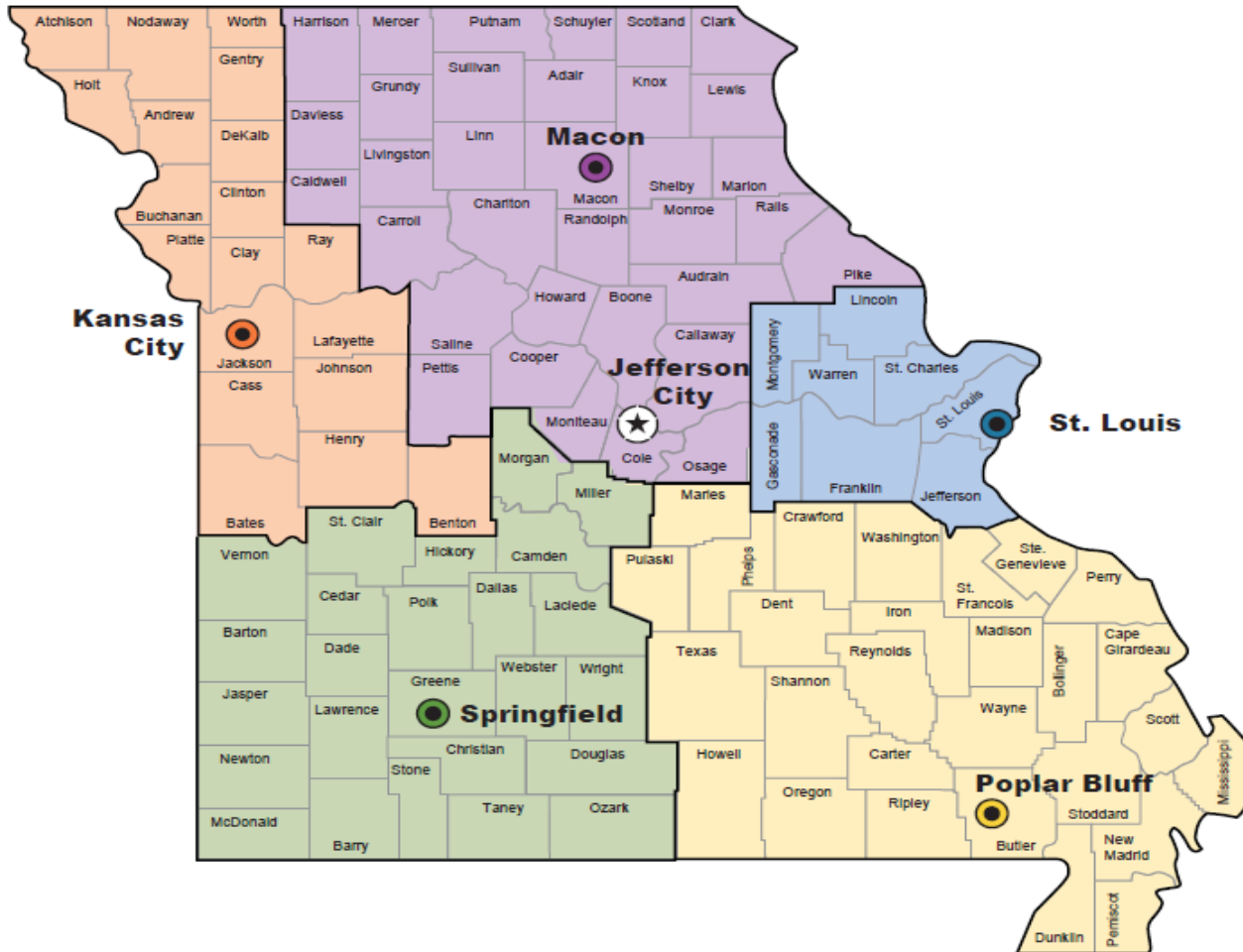
Kansas City Regional Office
Michael Cunningham
(816) 251-0700

Northeast Regional Office
Josh Hufford
(660) 385-8000

Southeast Regional Office
Todd Raney
(573) 840-9750

Southwest Regional Office
Tina White
(417) 891-4300

St. Louis Regional Office
David Ruby
(314) 416-2960



Local Agencies

- Kansas City Dept. of Health
Air Quality Program
Stacie Duitsman
2400 Troost Ave., Suite 3200
Kansas City, MO 64108
(816) 513-6315
- St. Louis County Dept. of Public Health
Air Pollution Control Program
Aaron Cadman
6121 N. Hanley Rd.
Berkeley, MO 63134
(314) 615-8900
- City of Springfield
Dept. of Environmental
Services Doug Durrington
840 Boonville Avenue
Springfield, MO 65802
(417) 864-1919
- City of St. Louis
Dept. of Health
Mary Foshage
1520 Market
St. Louis, MO 63103
(314) 612-5100

Oversight

- Facility inspections
 - Planning
 - Roughly 700 inspections per year
- Compliance reports
 - Over 2,000 reports per year
 - Reviewed by central office staff
 - aircompliancereporting@dnr.mo.gov
- Federally reportable violations

Area Sources

- Who has authority, Missouri DNR or EPA?

https://dnr.mo.gov/air/how-s-air/pollutants-sources/area-sources?field_40cfr63_subpart_value=&field_regulating_agency_value=All&field_title_v_permit_value=All&page=2&title=

Compliance Assistance Visits

- Explain regulatory requirements
- Help a regulated entity achieve and maintain compliance with permitting requirements
- Answer questions about permits
- Serve as an ongoing resource

Arrange a visit: <https://dnr.mo.gov/compliance-assistance-enforcement/request-visit>

Small Business Assistance – Air Program

<https://dnr.mo.gov/air/business-industry/assistance-technical-financial/air-pollution-compliance-regulatory-assistance>

Bob Randolph

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Common Compliance Issues

- Failure to Submit Operating Permit Renewal in a Timely Fashion
 - Loss of “Permit Shield”
 - Operating without a permit, **federal violation**
- Monitoring & Record keeping issues
- Start-up, Shut down, Malfunction (10 CSR 10-6.050)
- Odors & Open Burning

Oversight of Stack Tests

Testing & Emissions Unit:

- Receives and reviews test protocols
- Observes emission tests
- Reviews test report
 - Received approximately 400-500 test reports in each year
- CEMS audits

stacktesting@dnr.mo.gov

Oversight of Stack Tests

- Goals:
 - Successful test
 - Useable data (Consider CBI)
 - Passing results
- Key Factors:
 - Why are you testing? What's the “driver”?
 - Test methodology
 - Operating scenario(s)
 - Establishment of operating parameter limits

Asbestos

- Implement Asbestos NESHAP, Subpart M
- Demolitions and Renovations
 - Notification
 - Inspection
 - Certified contractors and workers
- asbestosnotifications@dnr.mo.gov

Agricultural Anhydrous Ammonia

- House Bill 3 – DNR to take delegation of Clean Air Act 112(r) requirements for agricultural anhydrous ammonia.
- Rule writing
- Delegation from EPA
- Build inspection and oversight capacity
- Supported by dedicated funds from regulated facilities

Convenient Email Addresses

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

Questions?

MoDNR

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