

Compliance & Enforcement

Richard Swartz

Air Pollution Control Program

Chief of Compliance & Enforcement Section

REGFORM Missouri Air Compliance Seminar

November 8, 2023, Columbia, MO

Overview of Presentation

- Air offices and staff
- Common compliance issues
- Enforcement process
- National enforcement compliance initiatives
- Agricultural anhydrous ammonia

Air Pollution Control Program Compliance/Enforcement Contacts

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- **Derek Apel** – Stack Testing
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- Laura Guinn– Asbestos
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Regional Office Boundaries

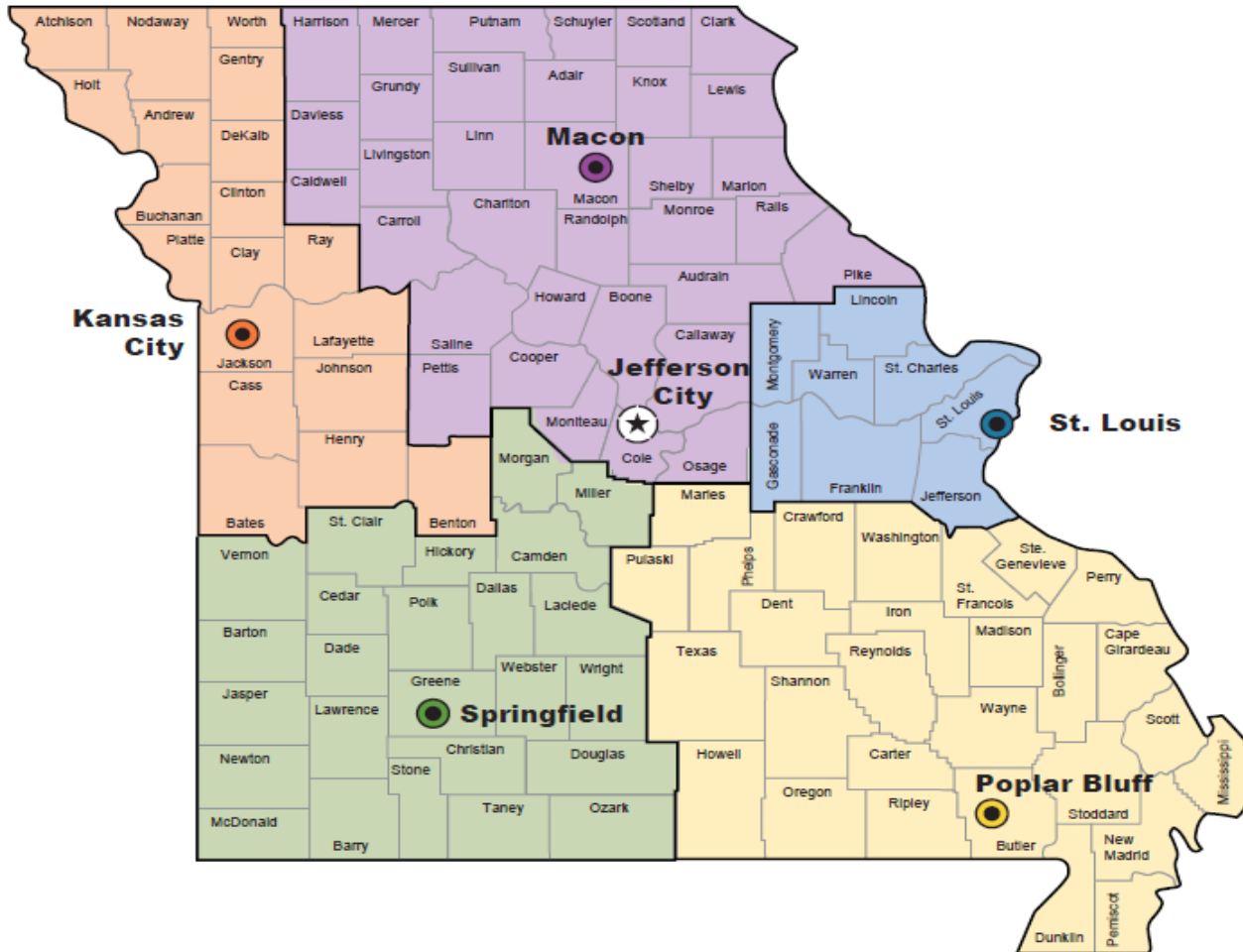
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Michael Cunningham
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Northeast Regional Office
Josh Hufford
(660) 385-8000

Southeast Regional Office
Todd Raney
(573) 840-9750

Southwest Regional Office
Tina White
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St. Louis Regional Office
Robert Andrews
(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
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- City of St. Louis
Dept. of Health
Mary Foshage
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St. Louis, MO 63103
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Common Compliance Issues

- Failure to submit operating permit renewal in a timely fashion
 - Loss of “application shield”
 - Operating without a permit, **federal violation**
- Monitoring & record keeping issues
- Start-up, shut down, malfunction (10 CSR 10-6.050)
- Odors & open burning

Enforcement Process

- Initiate contact
- Discuss corrective actions
- Draft consent agreement (administrative order on consent)
- Internal review process
- Draft consent agreement to responsible party (negotiations)
- Signatures and execution of agreement

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

Air Pollution Control Program

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National Enforcement Compliance Initiatives

- Mitigating climate change (new)
- Addressing exposure to PFAS (new)
- Protecting communities from coal ash contamination (new)
- Reducing air toxics in overburdened communities (modified)
- Increasing compliance with drinking water standards (continued)
- Chemical accident risk reduction (continued)

Agricultural Anhydrous Ammonia

- Revisions to Chapter 643 RSMo requires DNR 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

Area Sources

- Who has authority, Missouri DNR or EPA?

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

Convenient Email Addresses

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

Questions?

MoDNR

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