

Compliance & Enforcement

Richard Swartz

Air Pollution Control Program

Chief of Compliance & Enforcement Section

REGFORM Missouri Air Compliance Seminar

November 6, 2024, Columbia, MO

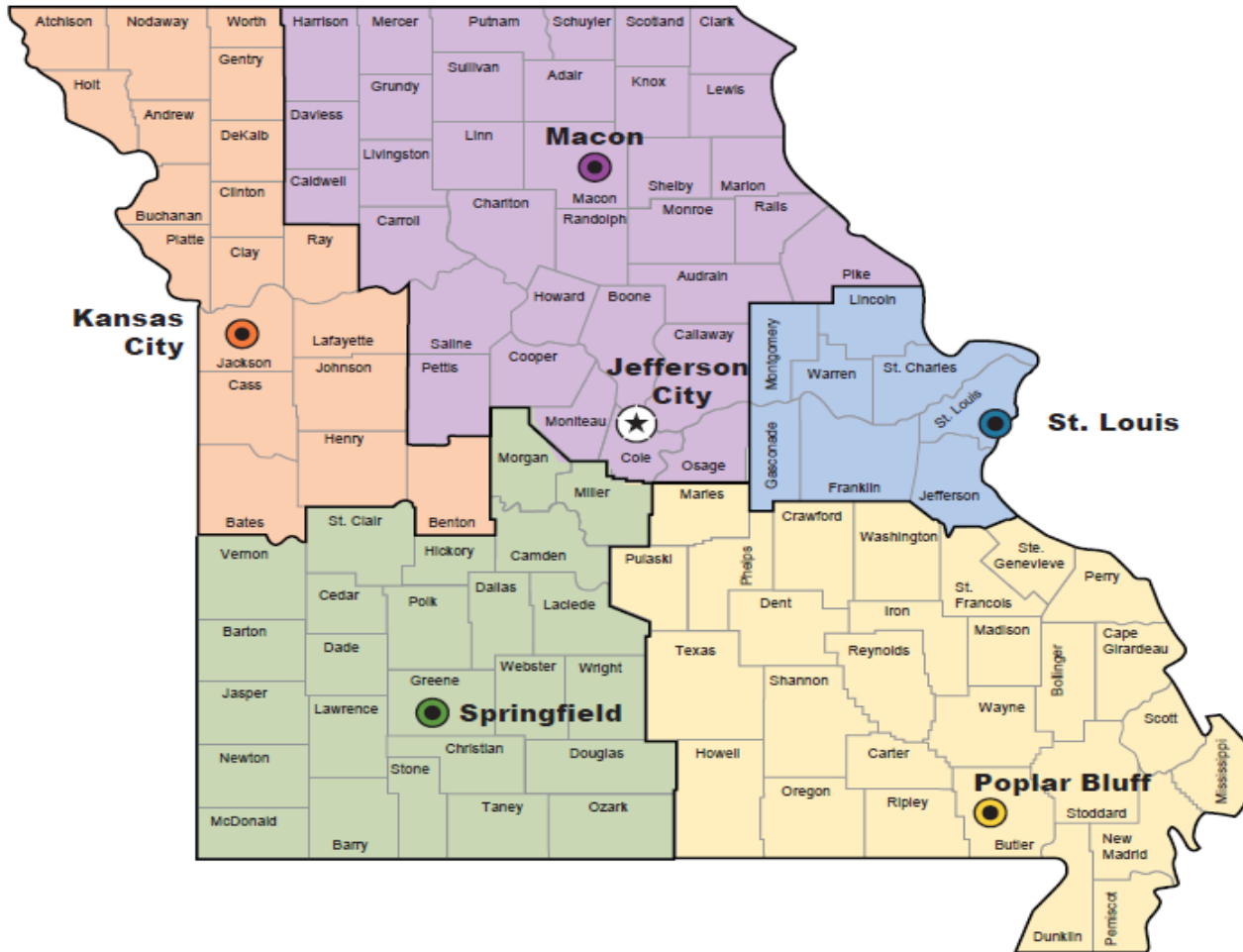
Overview of Presentation

- Air offices and staff
- Common compliance issues
- Odor investigations
- MATS reporting
- Agricultural anhydrous ammonia
- Gateway Vehicle Inspection Program

Air Pollution Control Program Compliance/Enforcement Contacts

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- Laura Guinn– Asbestos
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- **Ethan Smith** – Agricultural Anhydrous Ammonia
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Regional Office Boundaries



Kansas City Regional Office
Michael Cunningham
816-251-0700

Northeast Regional Office
Josh Hufford
660-385-8000

Southeast Regional Office
Jesse Evans
573-840-9750

Southwest Regional Office
Tina White
417-891-4300

St. Louis Regional Office
Robert Andrews
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Local Agencies

- Kansas City Dept. of Health
Air Quality Program
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816-513-6315
- St. Louis County Dept. of Public Health
Air Pollution Control Program
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314-615-8900
- City of Springfield
Dept. of Environmental
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417-864-1919
- City of St. Louis
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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**
 - Reminders are being sent
- Stack testing issues
- Monitoring & record keeping issues
- Start-up, shut down, malfunction (10 CSR 10-6.050)
- Odors & open burning
- Asbestos

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

Odor Investigations

- Odor concerns are investigated at regulated facilities
- Odors from a facility that exceed the limit may receive a Notice of Violation
- Corrective actions are required
- Rule exemptions
 - *Missouri Type Charcoal Kiln*
 - *Raising crops or management of livestock*
 - *Odorized Natural Gas*
- Class IA CAFOs are required to have an odor control plan and are not exempt

Nasal Ranger

Standard Operating Procedures

- Maintenance & Calibration
- Odor Evaluation Process
- Documentation of an odor violation
 - *Outside installations property boundary*
 - *Detectable at 7/1 dilution threshold*
 - *2 detections, 15 minutes apart, within 1 hour*
 - *Identify source with sufficient certainty*
- Training
- Data Sheet
- [Odor, Dust, Asbestos, Open Burning and Freon Emissions - PUB2200 | Missouri Department of Natural Resources \(mo.gov\)](#)

Mats Reporting

- 40 CFR 63, Subpart UUUUU - National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units
- AKA Mercury Air Toxics Standards (MATS)

<https://www.epa.gov/stationary-sources-air-pollution/mercury-and-air-toxics-standards>

- Missouri has delegated authority
- Frequent Questions about the CAPD Re-engineering Effort

<https://www.epa.gov/power-sector/frequent-questions-about-capd-re-engineering-effort#general1>

Mats Reporting

- Beginning in 2024 there are changes to MATS reporting requirements
 - *Quarterly reporting now instead of semi-annual*
 - *ECMPS – Emissions Collection and Monitoring Plan System*
 - *XML format required*
 - *CEMS - hourly emissions, monitoring plan data, certification, recertification, and quality-assurance test reports*
 - *30-boiler operating day rolling averages in the quarterly compliance reports*
 - *Quarterly compliance reports*
 - *Stack tests used to demonstrate compliance, RATAs, PM CEMS correlations, RRAs and RCAs (all data, not a summary)*

Mats Reporting

- **PROBLEM**

When the rule was finalized, it anticipated ECMPS 2.0 would be in production on or before the beginning of 2024 using the same XML reporting format as ECMPS 1.0. However, due to development delays of ECMPS 2.0 and planned changes to reporting format (changing from XML to JSON) there is currently a mismatch between the required XML reporting formats specified in the rule and the records available for reporting in ECMPS 1.0

Mats Reporting

- **SOLUTION**

EPA recommends sources work with their state, local, or regional delegated authority(ies) to ensure the data is submitted in an agreed upon format. EPA recommends that affected sources work with their delegated permitting authority(ies) to ensure that any MATS reports or records required to be submitted to ECMPS beginning 1-1-2024 through the ECMPS submission process are also submitted (in a format specified by the delegated permitting authority) directly to the permitting authority if required or requested to do so. The following reports should be discussed with delegated authority to be submitted in PDF files until ECMPS 2.0 is fully developed.

Mats Reporting

What is Missouri doing?

- Submit MATS compliance reports in the PDF format on a quarterly basis (60 days after the end of each quarter)
- The reports should contain the required information from the regulation prior to January 1, 2024 (§ 63.10031(c)(1) - (9))
- Stack test reports and RATA reports should be submitted directly to the Missouri DNR Stack Testing group 60-days after the tests were conducted
- A summary of the stack test results should be included in the MATS compliance reports, but the test reports themselves will not be included

Agricultural Anhydrous Ammonia

- Revisions to Chapter 643 RSMo requires DNR take delegation of Clean Air Act 112(r) requirements for agricultural anhydrous ammonia.
- Proposed Rule - 10 CSR 10-6.255 – Public Comment Period Closed September 5
- Delegation from EPA
- Build inspection and oversight capacity
- Supported by dedicated funds from regulated facilities

Gateway Vehicle Inspection Program

- Joint Program with Missouri State Highway Patrol
- Emissions & Safety Inspection in St. Louis Metro Area
- New Contract Awarded to Opus Inspection
- Complete Transition early 2025

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>

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Convenient Email Addresses

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Questions?

MoDNR

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