

IOWA DEPARTMENT OF NATURAL RESOURCES

LEADING IOWANS IN CARING FOR OUR NATURAL RESOURCES

Compliance Assistance and Ambient Air Monitoring

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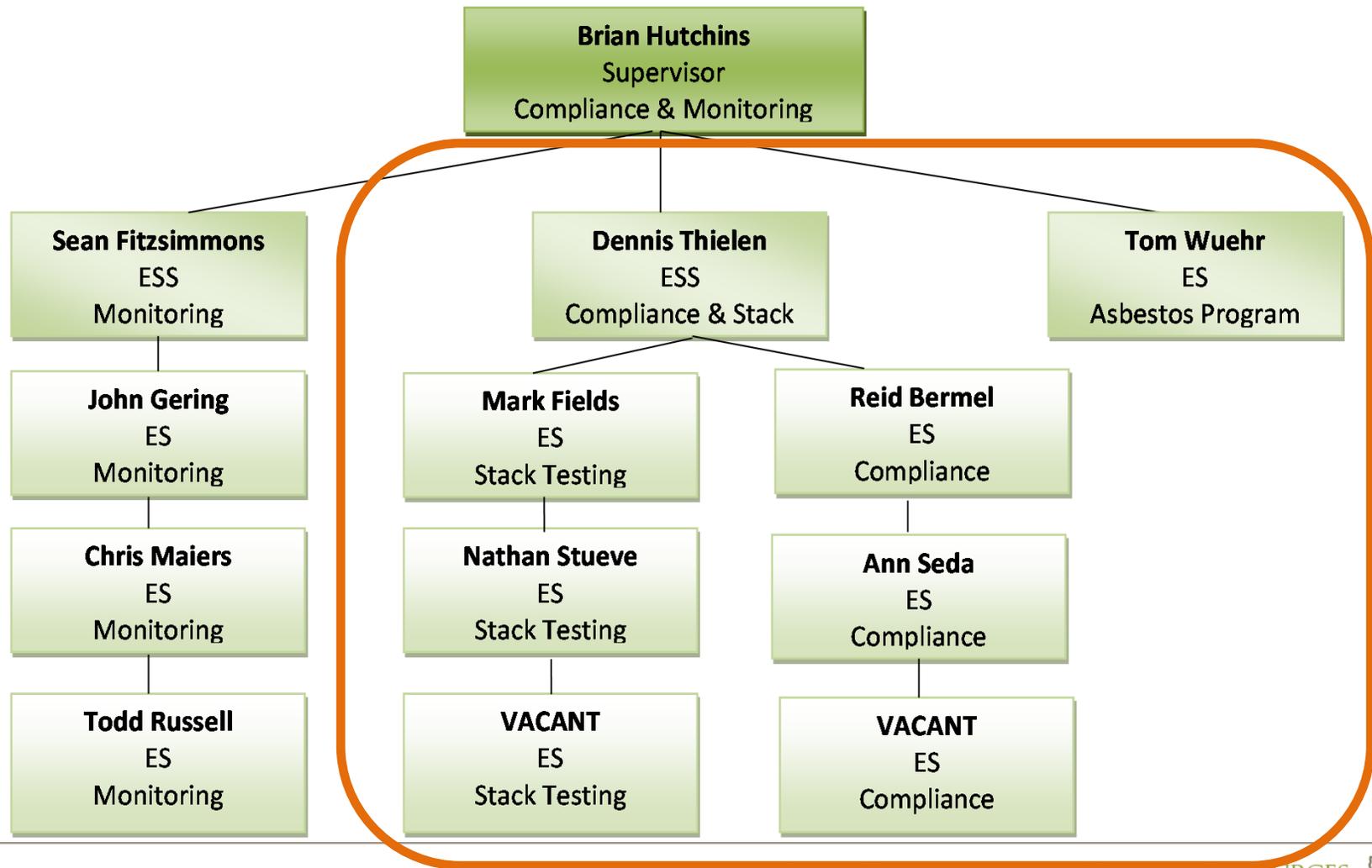
Compliance Assistance & Ambient Air Monitoring

- Iowa Compliance Assistance Services
 - Emissions Verification
 - Compliance Assistance
 - Service Efficiencies
- Iowa Ambient Monitoring Services
 - Monitoring Purposes
 - Quality Data
 - Public Resource



Compliance Assistance Services

Compliance & Ambient Air Monitoring Section



Facility Assistance with Emissions Verification

- Provide pretesting consultation services to troubleshoot testing procedures
- Provide on-site stack test assistance to help make sure testing meets federal requirements
- Help verify results through report review
- Assist with questions on test methods and requirements
- Assist facilities in developing workable compliance plans

Stack Tests and Reports for 2013

Activity	Number
Stack Test Reports	221*
On-site stack test observations	126
RATAs Conducted (# of units)	108
Quarterly CEMS/COMS Reports	272

*Totals include stack tests required by Title V Permits, Construction Permits, NSPS, and NESHAP

Compliance Assistance Services

- Respond to facility variance requests
- Assistance with rule implementation and interpretation
- Help facilities track compliance through review of periodic compliance reports
- Promote compliance with air quality requirements through cooperative and voluntary means
- Help facilities develop workable compliance plans

93% of all Variance Requests Approved in 2013

- Processed 112 requests from rule and permit conditions
- Supported facilities work to explore or obtain new business opportunities prior to permit issuance
 - Initiate construction or modifications to existing sources
 - Trial runs with new materials/products
- Prioritized approval of variances to help facilities continue operations following malfunctions or natural disasters
 - Temporary equipment such as boilers and generators
 - Address safety issues
- Routinely provided short term variances from permit conditions for unforeseen circumstances

Periodic Compliance Reports in 2013

Report	Number
Title V Semi Annual Monitoring Reports and Annual Compliance Certifications	526
Periodic NESHAP Reports	186
Other compliance reports/notifications include NESHAP notifications and one-time reports, NSPS reports, excess emission reports, portable plant relocation notices, construction permit reports, and self-disclosures	

Implementation of alternative compliance options in 2013 (567 IAC Chapter 17 Compliance Procedures)

Activity	Number
Calls with facilities to discuss compliance issues/questions	>1800
Letter of Non-compliance (LNC)	141
Notice of Violation (NOV)	88
Referrals to DNR Legal (11 for late emissions inventory reporting, 1 for ongoing emission limit violations, and 1 for construction and operation without obtaining construction permits)	13

Compliance Assistance and Outreach - RICE NESHAP Implementation

- Assisted facilities in understanding RICE requirements through stakeholder meetings
- Met with individual facilities to address specific implementation concerns
- Provided RICE implementation tools, guidance, and reporting forms
- Continue to provide ongoing assistance on RICE requirements
- Provided a smooth transition of RICE responsibilities from EPA to DNR to deliver more effective assistance

Construction Permit Amnesty for Engines

- October 23, 2013 – April 23, 2014
- Allowed facilities to “catch up” on permitting requirements without enforcement action

Resolution	Number of facilities	Number of Engines
Obtain Construction Permit	44	53
Submit Small Engine Registration	60	64
Submit Exemption "g" Notification	6	10
Totals	110	127

Compliance Assistance and Outreach – Dry Cleaner Initiative

- AQB and Field Office provided assistance to Dry Cleaning facilities that use perchloroethylene and subject to NEHSHAP Subpart M
- Provided compliance assistance tools to help facilities achieve and maintain compliance with requirements for control equipment, leak inspections and repair, and recordkeeping and reporting
- Conducted outreach visits at 43 dry cleaning facilities
- Found over 30 facilities that were having trouble meeting applicable NESHAP requirements and provided assistance
- Conducting follow-up compliance assurance visits this year

Asbestos Program Services

- Assist industry, businesses, institutions and individuals comply with federal asbestos regulations
- Provide on-site outreach and technical assistance
- Respond to complaints from businesses and citizens regarding building renovations and demolitions

Prioritizing Protections from Asbestos Exposure

- Inspections and enforcement at hospitals, schools, and community projects take priority due to the possibility of asbestos exposure of young children and a greater number of people
- Responding to complaints also consumes a lot of time each year. Many are valid and enhance compliance with the asbestos regulations

Activity	Number
Notifications Submitted	5,188
Asbestos Inspections	81
Outreach Visits	26
Complaint Investigations	92
Referrals to Legal	2

Process Efficiencies/Improvements

Collaborated with Industry to address stack testing issues

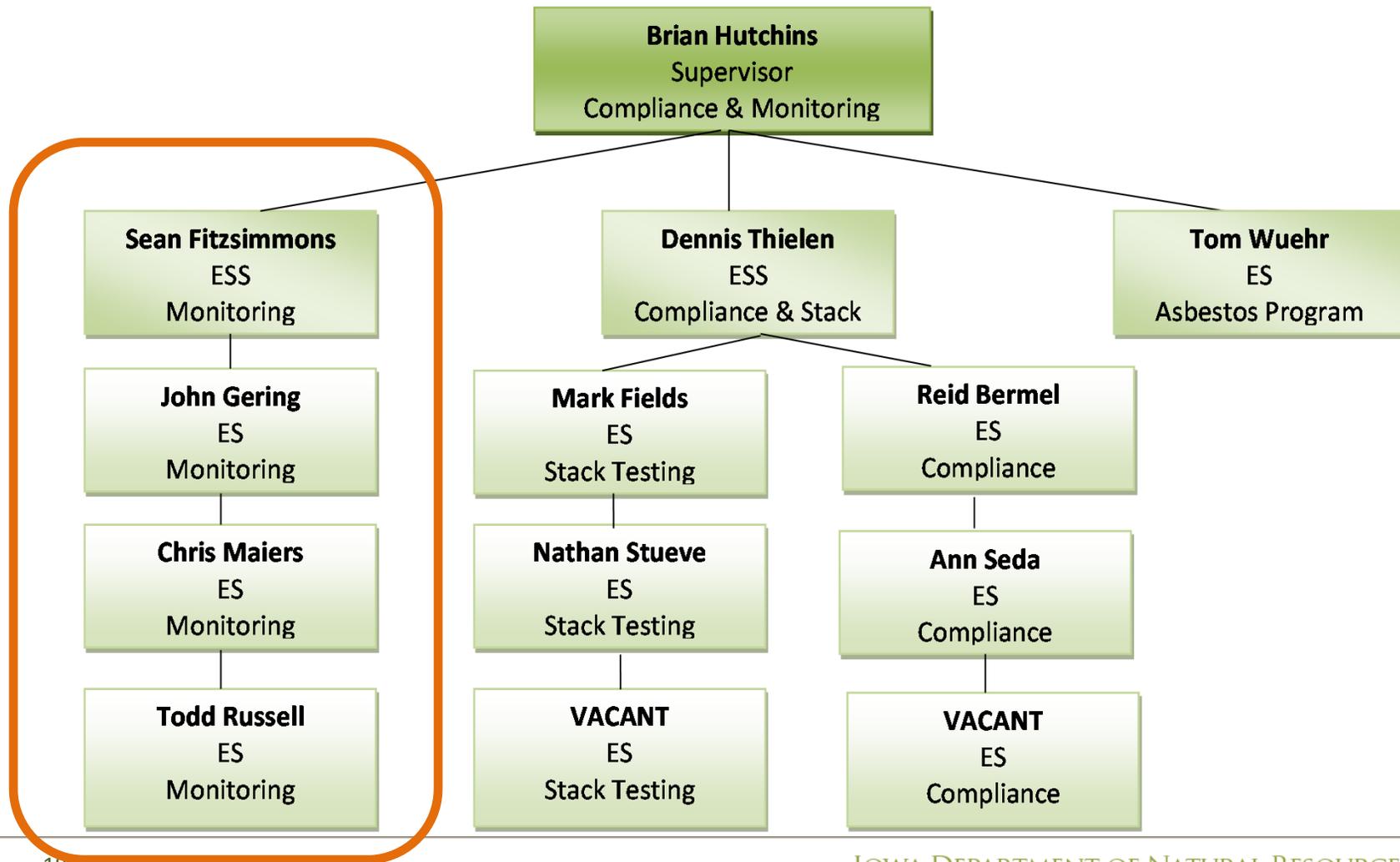
- Standardized stack test requirements by adopting federal test methods and eliminating conflicting Iowa Compliance Sampling Manual
- Petitioned EPA for flexibility on revised Methods 201A and 202
 - Provides option for some sources that want to simplify and reduce the cost of testing (Method 202)
- Shortened the duration of particulate tests that resulted in time and resource savings

New Asbestos Tracking Database

- Faster and more accurate data entry
- New reporting functions to help track projects and identify priorities

Ambient Monitoring Services

Compliance & Ambient Air Monitoring Section



Ambient Air Monitoring Services

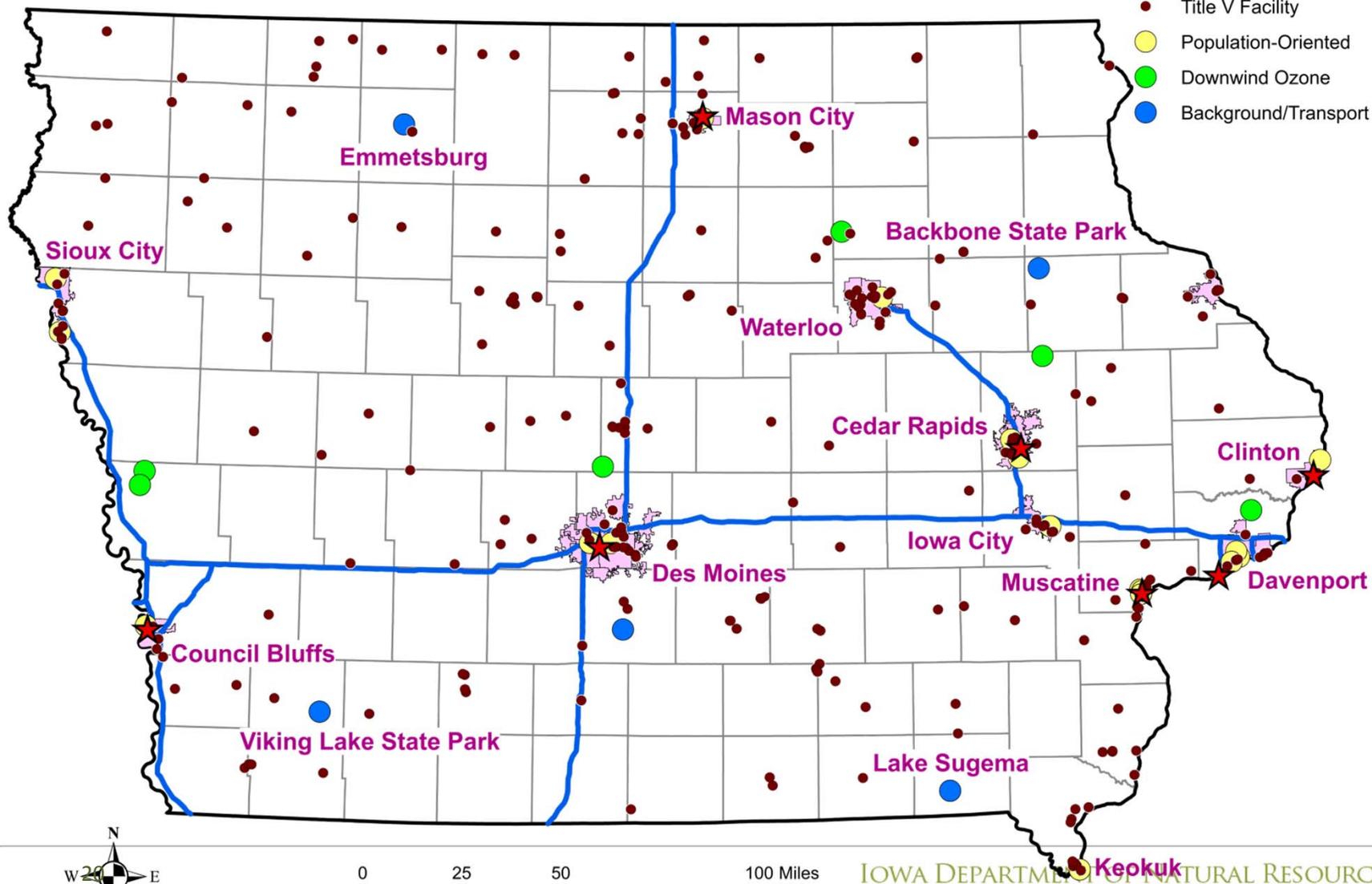
- Assure all Iowa citizens have clean air and meet the National Ambient Air Quality Standards (NAAQS)

- Monitor Purposes
 - Population centers
 - Background to expedite permitting
 - Characterize interstate transport
 - Compliance and areas of industry concentration

2013 Monitoring Site Locations (38)

Legend

- ★ Near-Source
- Title V Facility
- Population-Oriented
- Downwind Ozone
- Background/Transport



Ambient Air Monitoring Partners

- State Hygienic Laboratory at the University of Iowa
- Polk County Public Works - Air Quality Division
- Linn County Public Health - Air Quality Section
- Industry

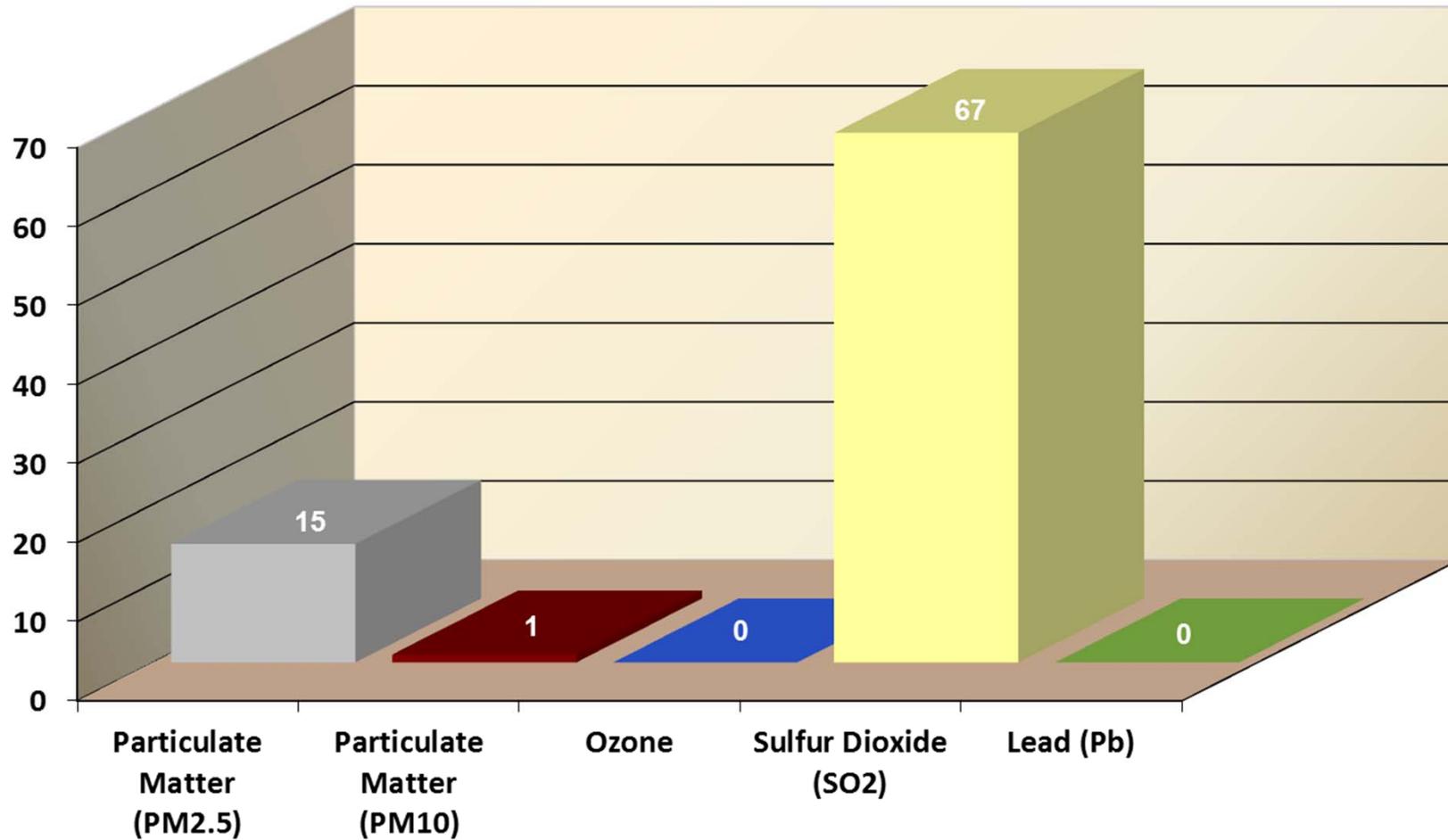
Monitoring Unit Activities

- Development of SHL and Local Program monitoring contracts
- Contract implementation and oversight
- Work with our partners on Quality Assurance to ensure data is valid for environmental decision making
- Annual data review and certification by May 1st

Annual Network Plan and Data Reports

- Develop Ambient Air Monitoring Network Plan and submit to EPA by July 1st
 - Annual review of monitoring needs and verify network meets EPA requirements
 - Inform public of plans for network changes
 - Plan is available for 30-day public input by June 1st
- Develop Criteria Pollutant Report
 - Review location and summary data for each monitor
- Report on Air Toxic Monitoring activities
 - Establish long term trends in air toxic concentrations
- Maintain exceedance report to track number of exceedances, locations, and dates

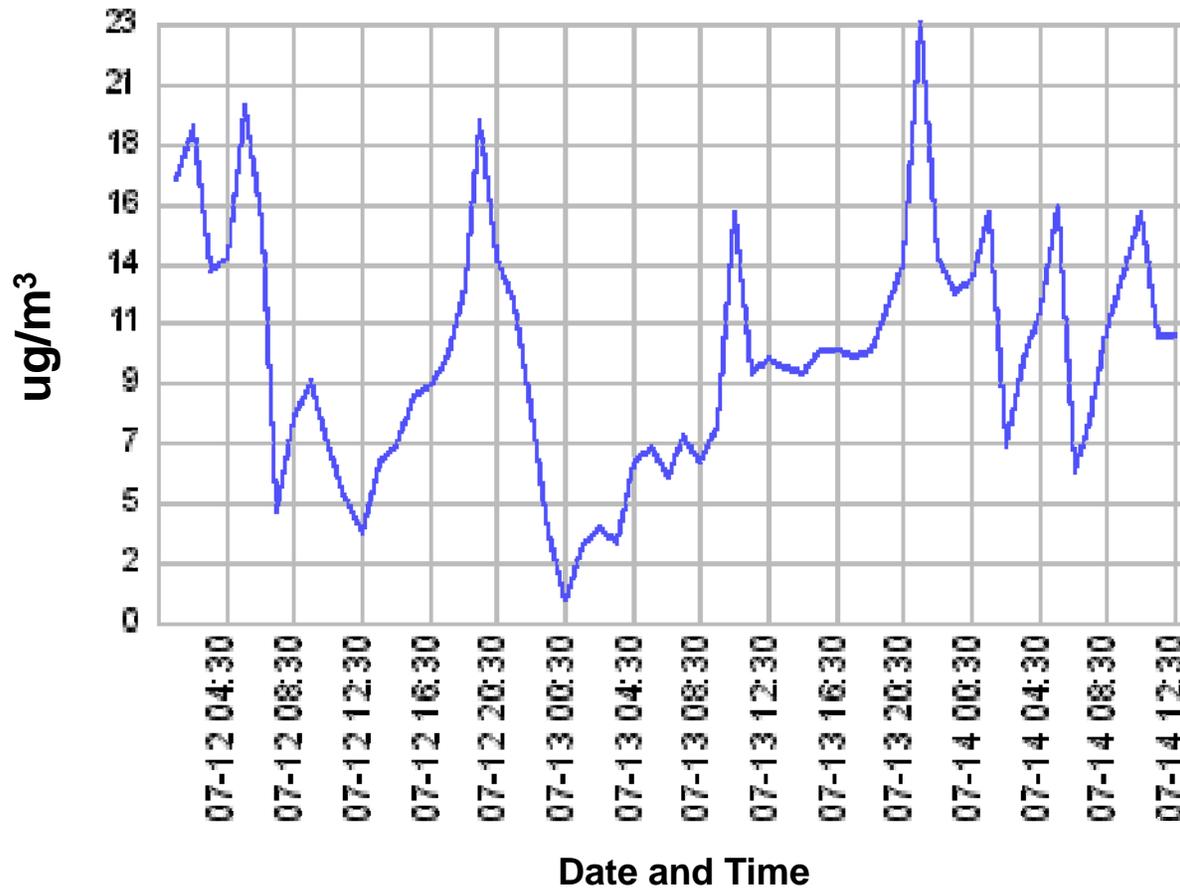
Iowa NAAQS Exceedances, 2013



Public Reporting

- Respond to public data requests and attend public meetings
- Track pollution levels and inform the public of elevated levels during regional pollution events
- Provide real-time data from continuous monitors
 - Data feeds to EPA and Local reporting systems

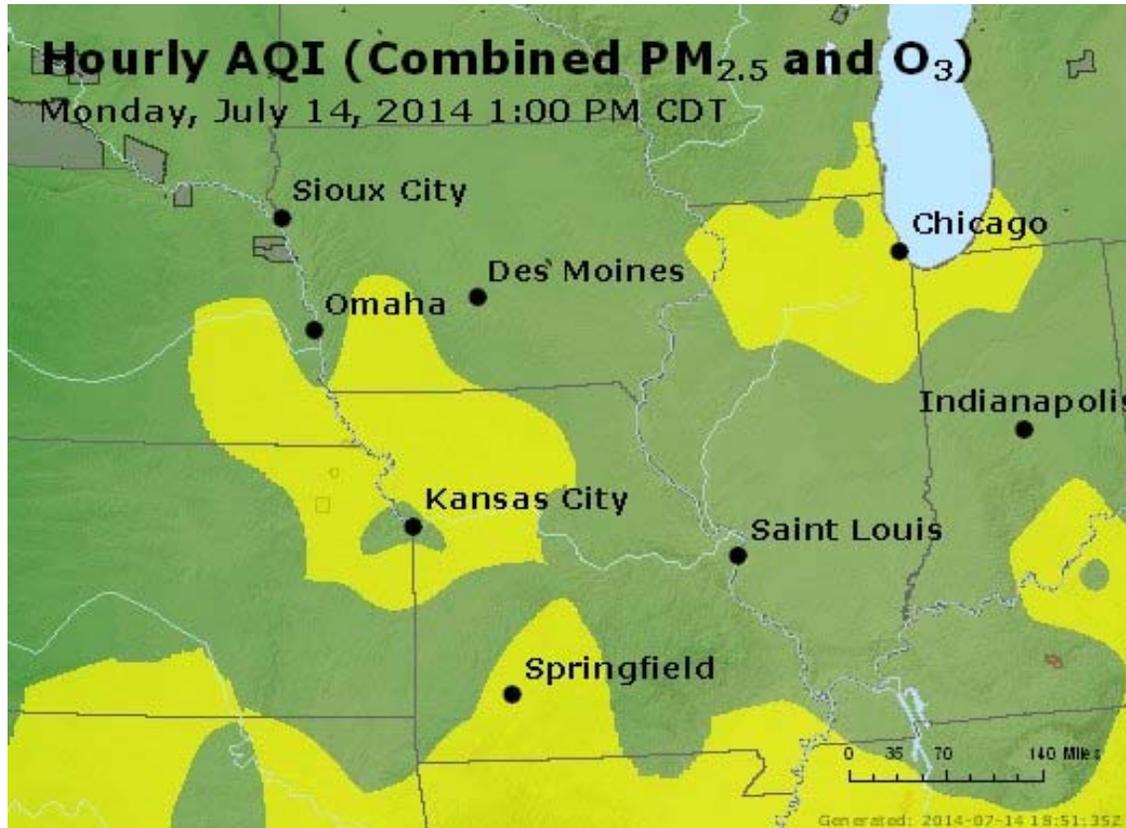
Real-time Monitoring Data (Davenport, Jefferson School)



■ PM2.5

PM2.5 = 35.5 $\mu\text{g}/\text{m}^3$ over a 24 hour period

Air Quality Index (July 14, 2014)



Provided by:
EPA - AIRNow

Links to Data, Reports, and Network Plans

<http://www.iowadnr.gov/InsideDNR/RegulatoryAir/MonitoringAmbientAir.aspx>



Questions?

Compliance and Ambient Air Monitoring

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