

Air Management Study Group Quarterly Meeting

November 10, 2022

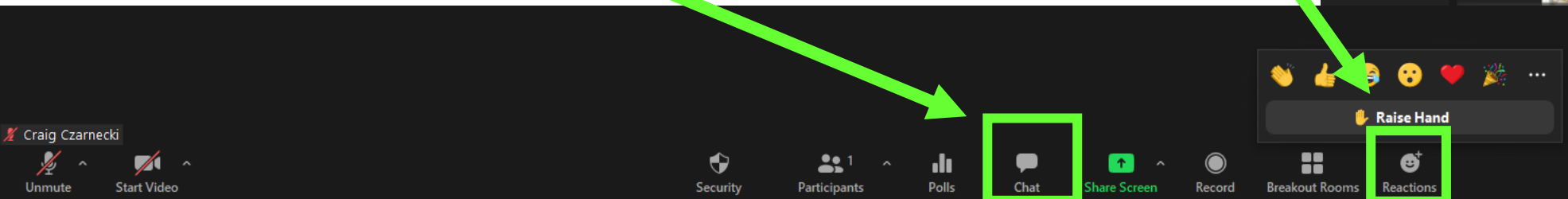
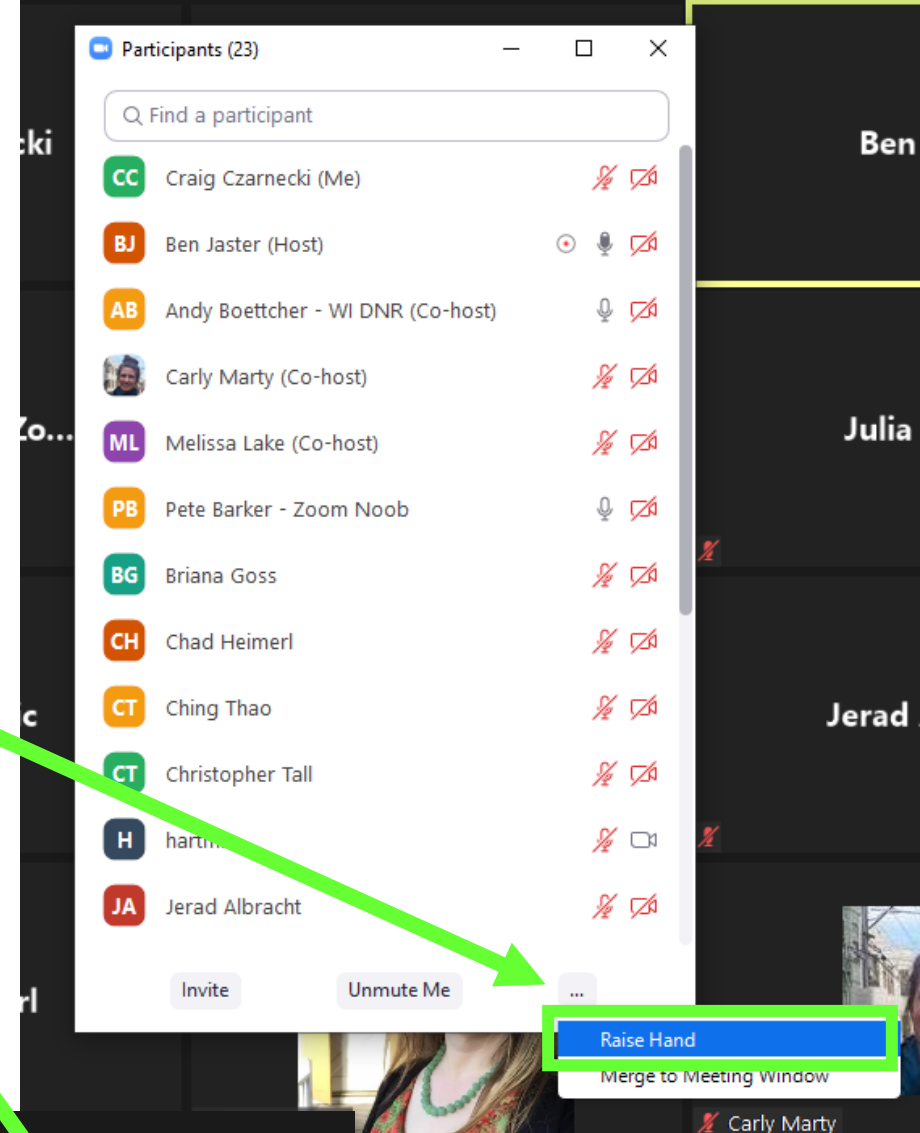
Zoom Guidelines

Hello Everyone,

We've developed some guidelines for this meeting, in the hopes of making this a smooth and enjoyable experience for all. Thank you in advance for your understanding.

Zoom Guidelines

- Questions will be addressed throughout the meeting.
- All participants will be muted during the meeting.
- If you'd like to speak, use the "Raise Hand" button and you will be unmuted when appropriate.
- Questions may also be asked in the chat.



Zoom Guidelines

- The host will attempt to respond to all messages received, but some messages may be missed.
- Participants will join the meeting with their video disabled. We ask that you keep your video disabled for the duration of the meeting.

Zoom Guidelines

- We ask for patience while the Air Program conducts this meeting with this setup.
- Zoom technical support: **support.zoom.us**

Air Management Study Group Quarterly Meeting Agenda

- Opening remarks & agenda review
- Proposed guidance, rules and legislative update
- Title VI and Environmental Justice
- DERA
- ARS Updates and Emissions Inventory Webinar
- Expanding E-Services
- Federal Funding
- Modeling Guidance Updates
- PFAS Manuscript
- Member Updates
- Ozone Topics
- Trends StoryMap
- AMSG Membership
- 2023 Priority Topics and Meeting Dates

Proposed Guidance and Rules Legislative Update

Kristin Hart, Permits and Stationary Source Modeling Section Chief

Jason Treutel, Air Quality Planning and Standards Section Chief

DNR Guidance

DNR Guidance in Drafting Phase	Description	Target Date
None		
DNR Guidance in Public Comment	Description	Date Posted
None		
DNR Guidance in Final Review Phase		Target Posted
None		
Finalized DNR Guidance	Location	Final Date
Landfill Gas and Air Emissions Guidance for Municipal Solid Waste Landfill Owners and Operators	Air Management and Solid Waste Programs have updated guidance to include new Federal Requirements.	08/16/2022

Proposed/Final DNR Rules

Proposed DNR rule	Description	Phase
AM-05-21 NOx RACT Rule	Updates RACT rules in NR 428 to address implementation issues that have been identified since previous NR 428 revisions in 2001 & 2007	Rule Drafting
AM-05-22 Compliance Demonstration Rule	Updates to NR 439 testing, monitoring, recordkeeping, reporting requirements for compliance	Stakeholder Input and Rule Drafting Air Regulations, Policies and Guidance Public Notices Wisconsin DNR

Proposed EPA Rules/Guidance

Proposed EPA rule/guidance	Docket	Comments due
Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act; Safer Communities by Chemical Accident Prevention	EPA-HQ-OLEM-2022-0174	10/31/2022
Non-Rulemaking Docket - Reducing Greenhouse Gas Emissions from New and Existing Fossil Fuel-Fired Electric Generating Units	EPA-HQ-OAR-2022-0723	11/07/2022
Reconsideration of Fugitive Emissions Rule	EPA-HQ-OAR-2004-0014	12/13/2022

Final EPA Rules/Guidance

Proposed EPA rule/guidance	Docket	Effective Date
Determinations of Attainment by the Attainment Date, Extensions of the Attainment Date, and Reclassification of Areas Classified as Marginal for the 2015 Ozone National Ambient Air Quality Standards (Bump up)	EPA-HQ-OAR-2021-0742	11/07/2022
Amendments to Industrial, Commercial, and Institutional Major Source Boilers: NESHAP (Boiler MACT)	EPA-HQ-OAR-2002-0058	12/05/2022
Guidance for Ozone and Fine Particulate Matter Permit Modeling	SCRAM Guidance Link	Released 7/29/2022

Title VI and Environmental Justice

Gail Good
Air Management Program Director

Title VI and Environmental Justice

- Office of Environmental Justice and External Civil Rights
- *EPA Legal Tools to Advance Environmental Justice*
- *Interim Environmental Justice and Civil Rights in Permitting Frequently Asked Questions*
- EJ/Title VI concerns in the region
- OEJECR letter to Louisiana

DERA

Jason Treutel
Air Quality Planning and Standards Section Chief

DERA Background

- DERA (Diesel Emissions Reduction Act, 2010) provides funding for various clean diesel grant programs. This includes:
 - DERA (state)
 - DERA (national)
 - Tribal and Insular Grants (national)
 - School Bus Rebates Program (national)
- Eligible projects are not the same across grant programs, but national and state grants are similar.
- Historically, WI primarily funded school bus projects.
 - 2019 this was updated to include nonroad vehicles.

DERA FY2022

- Application Period for approximately \$360,000 in grant funding opened 10/25/2022
<https://dnr.wi.gov/Aid/CleanDiesel.html>
- Eligible Projects
 - School and Transit Buses
 - Cargo Handling
 - Construction Vehicles
 - Nonroad Engines
- Applications due by 12/09/2022
- Questions regarding this funding opportunity can be directed to DNRCleanDiesel@wisconsin.gov.

ARS Updates and Emissions Inventory Webinar

Maria Hill, Compliance and Emissions Inventory Section Chief

Air Reporting System Updates - Webinar

- Thursday, December 8, 10am - 11am
- Walk through ARS changes, beginning to end - approx. 30 min
- Open for attendee questions - remainder of time
- To register, visit:
<https://us02web.zoom.us/meeting/register/tZYtde2przMqGdZOWcQThLrsZ1bW8W0h-70>
- Posted to EI Tutorial:
[websitehttps://dnr.wisconsin.gov/topic/AirEmissions/Tutorials.html](https://dnr.wisconsin.gov/topic/AirEmissions/Tutorials.html)
- Will be presented at January FET

Expanding E-Services

Kristin Hart
Permitting Section Chief

Electronic Signature for permit applications

- After an electronic permit application is received, DNR will send an email with instructions for e-Signing
- The facility's responsible official (RO) can then e-Sign the permit application from the Switchboard
 - If new to the Switchboard, RO must sign and date Wisconsin DNR Electronic Signature Agreement and mail hardcopy to DNR first
 - Prior to first time e-Signing a permit application, RO must request access for the **Air Permit Action Submittal** role
- Assistance available at [AM613.pdf](#)
- E-Sign is optional, DNR still accepts wet ink signatures



E-Pay for construction permit fees



E-Pay processes have been made easier for construction permit applications, exemptions, and waiver requests

- Permit Application Form 4530-100 now has space to specify payment preference

C. Construction Permit Actions Application Fee:

How will the application fee be paid? (select only one)

- Check payable to Wis. Dept. of Natural Resources is enclosed with the application (paper copy submittals only).
- Check payable to Wis. Dept. of Natural Resources will be sent under separate cover (mail to: Department of Natural Resources, Air Management Program AM/7, Attn: Construction Permit Processor, P.O. Box 7921, Madison, WI 53707-7921).
- E—Payment. Upon receipt of the application, the department will send an email to the Billing Contact with an invoice and instructions for paying electronically. A processing fee of 2.5% is added to payments made by credit or debit card. E-check and ACH payment options are also available.

Federal Funding

Sheri Stach
Business Support and IT Section Chief

Katie Praedel
Air Monitoring Section Chief

Bipartisan Infrastructure Law (BIL)

EPA's Clean School Bus Grant

- Recipients announced
- Wisconsin awardees include
 - 19 school districts across the state, including two schools serving tribal students
 - \$25.8 million for 73 buses
 - 64 electric buses, 59 charging stations and 9 propane buses

American Rescue Plan (ARP)

Direct Funding for Wisconsin DNR

- Two-year grant (08/01/2022 – 07/31/2024)
- ~ \$200,000 for network upgrades to meet state cybersecurity requirements and upgrade existing equipment replacements

American Rescue Plan (ARP)

Competitive Funding available to many (\$20 million total)

- Air monitoring of pollutants of greatest concern in communities with environmental health outcome disparities stemming from pollution and Covid-19
- EPA expected to announce funding for selected applications by end of November 2022

Inflation Reduction Act (IRA)

- Federal and State partners are tracking this
- Federal funding will be made available
 - Timeline
 - Potential recipients
 - High level emphasis: ports, outreach in disadvantaged communities, GHG emissions planning, nonattainment areas.

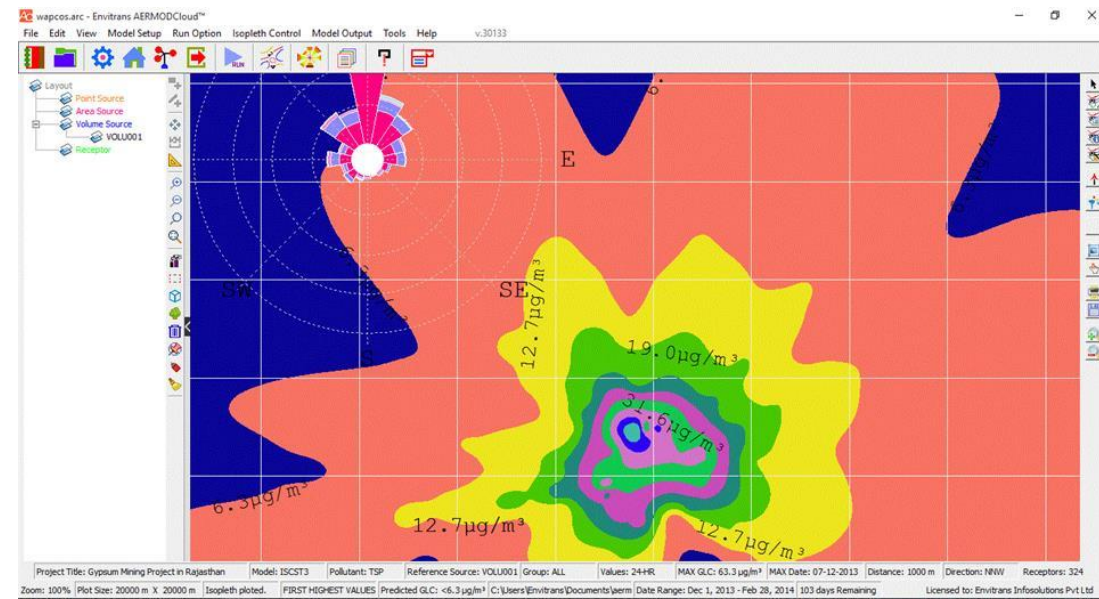
Modeling Guidance Updates

Kristin Hart
Permitting Section Chief

New U.S. EPA PM_{2.5} and O₃ Modeling Guidance

- EPA released the “Guidance for Ozone and Fine Particulate Matter Permit Modeling” in final form on July 29, 2022
- The guidance provides recommendations for how a source seeking a Prevention of Significant Deterioration (PSD) permit demonstrates that ozone (O₃) and fine particulate matter (PM_{2.5}) NAAQS and increments are met
- Assessment uses a holistic, rather than applicability, approach
- If ANY direct or precursor of O₃ or PM_{2.5} is reviewed under PSD regulations, then ALL components are considered in the ambient air assessment

New U.S. EPA PM_{2.5} and O₃ Modeling Guidance



- Applies ONLY to PSD air quality reviews
- Does not affect which pollutants are subject to BACT
- Does not invalidate the Wisconsin PM_{2.5} strategy
- DNR will continue to quantify PM_{2.5} for high temperature and high energy PM sources only, not from material handling
- EPA noted the importance of using representative information for the assessment

New U.S. EPA PM_{2.5} and O₃ Modeling Guidance

Effect on permit review timing

- No effect on most permit reviews. The new guidance applies only to PSD projects
- For PSD projects, additional pollutant quantification is likely and additional time for air quality modeling analysis is likely
- Communication keeps projects on track! Submit a dispersion modeling protocol prior to permit application to John Roth (john.roth@wisconsin.gov)



PFAS Manuscript

Katie Praedel
Air Monitoring Section Chief

2020 Wisconsin PFAS in Precipitation Study

- DNR partnered with Wisconsin State Lab of Hygiene
- Collected ~ 90 precipitation samples
- At eight WI monitoring sites



Figure 1. Precipitation collection sites for 2020 PFAS study

WI PFAS in Precipitation Study Results

- Combined PFAS concentrations at all 8 sites was generally low
- Average PFOA and PFOS Concentrations were 0.21 ng/L, and 0.12 ng/L
- Variation in certain PFAS species was location driven

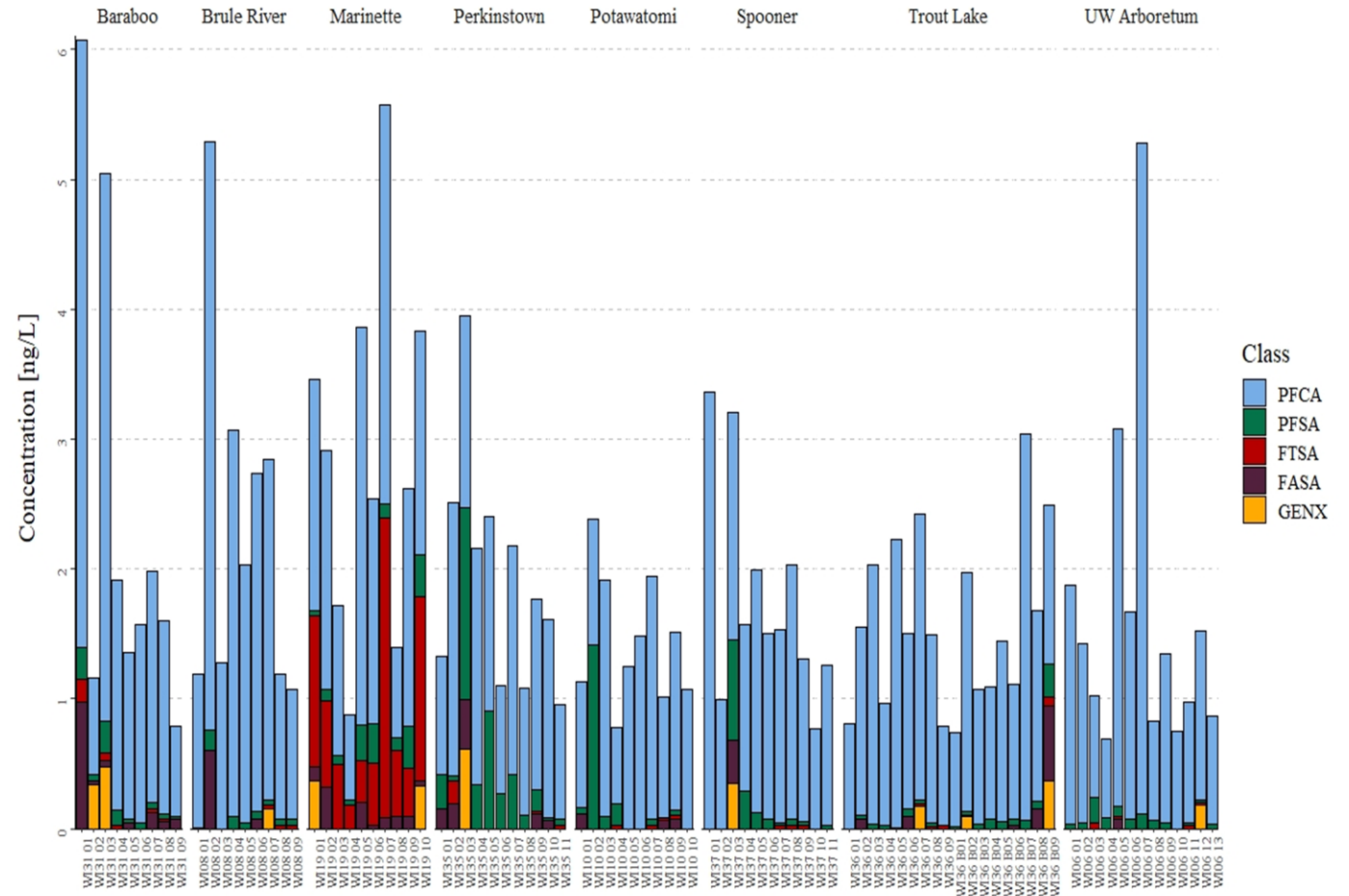


Figure 4 Bar chart of PFAS concentrations across all samples. Samples are grouped by site

Publication of Study Results

- Available via subscription to Atmospheric Environment
- PDF format upon request to: Katie.Praedel@Wisconsin.gov



Atmospheric Environment

Volume 291, 15 December 2022, 119368



PFAS concentrations and deposition in precipitation: An intensive 5-month study at National Atmospheric Deposition Program – National trends sites (NADP-NTN) across Wisconsin, USA

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Received 8 March 2022, Revised 16 June 2022, Accepted 30 August 2022, Available online 10 September 2022,
Version of Record 21 September 2022.

Member Updates

Ozone Topics

Katie Praedel
Air Monitoring Section Chief

Jason Treutel
Air Quality Planning and Standards Section Chief

Kristin Hart
Permitting Section Chief

Ozone Season

- Concluded at most sites on October 15th
- Concluded at Kenosha County Sites October 31st
- Off-season Maintenance and Certification of instruments begins



Preliminary Status of the 2022 Ozone Season

Four Highest 8-Hour Average Ozone Concentrations – as of October 24, 2022

Wisconsin Sites	Concentrations (ppb)				Fourth High Values		Current 2020-2022 2015 NAAQS "DV"
	1st high	2nd high	3rd high	4th high	2020	2021	
Bayside	83	83	75	74	74	72	73
Chiwaukee	91	85	84	70	78	79	75
Grafton	83	73	73	72	73	72	72
Harrington Beach	89	83	78	71	71	73	71
Kenosha-WT	77	72	71	71	78	72	73
Milwaukee-16 th	73	69	67	65	59	66	63
Milwaukee-UPark	81	78	71	70	75	71	72
Racine	91	81	75	70	77	78	75
Sheboygan-Haven	81	77	75	71	70	66	69
Sheboygan-KA	96	79	78	77	76	73	75
Waukesha	78	71	71	69	67	70	68

2008 NAAQS: 75 ppb
2015 NAAQS: 70 ppb

2015 NAAQS: Reached critical value or exceeded standard
2008 NAAQS: Reached critical value or exceeded standard

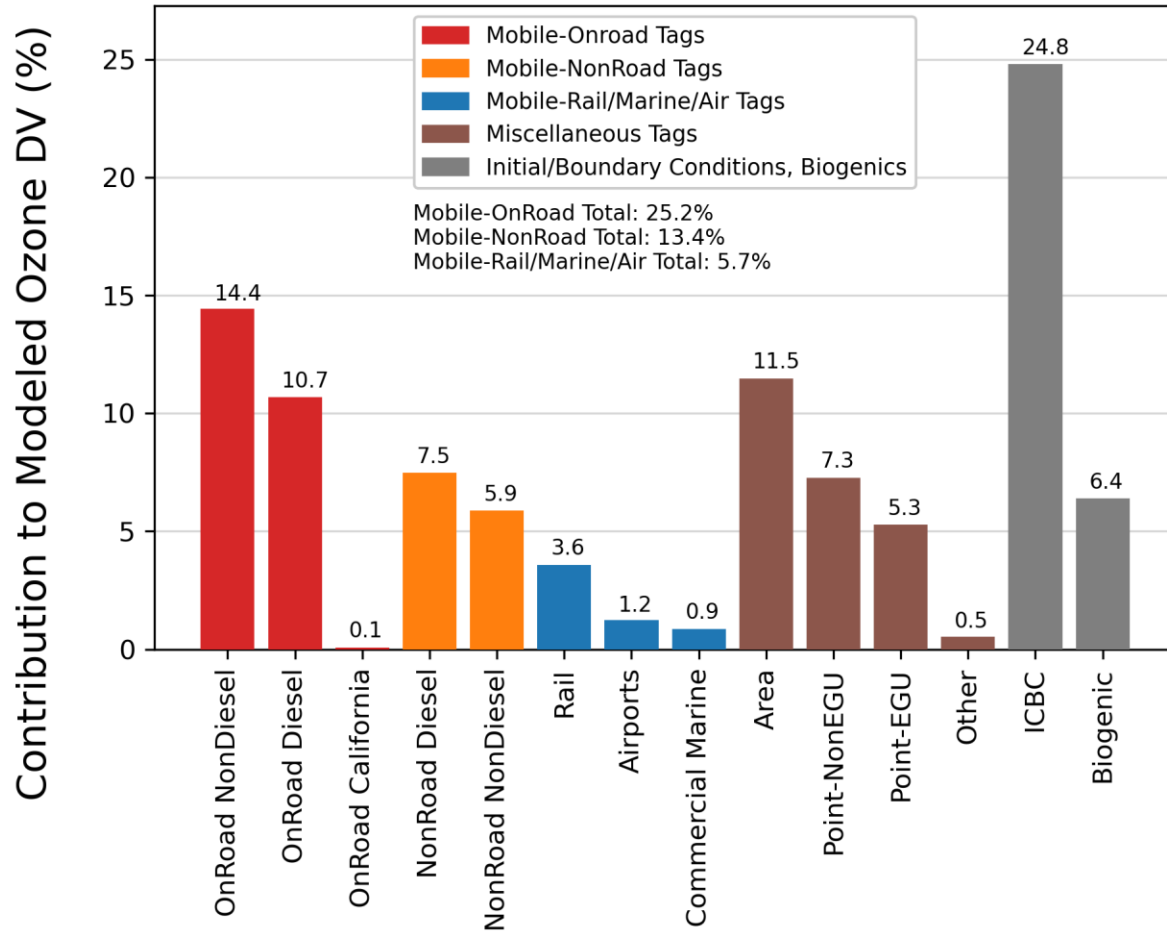
Note: Data have not yet been QA'ed or certified and are subject to change. Values are only shown for monitors in current nonattainment area counties.

*Highest DV monitor in Chicago area is at 74 for several monitors

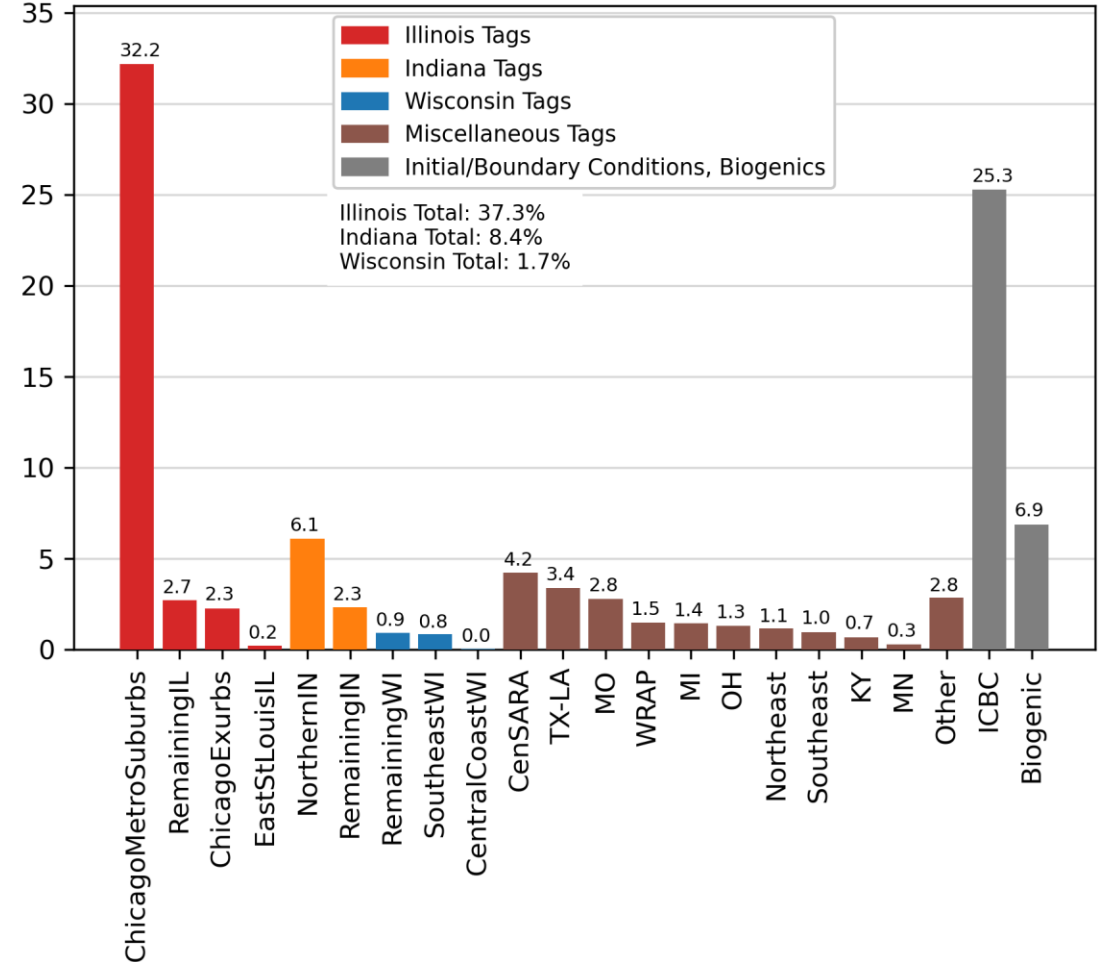
Source Apportionment - Kenosha

Chiwaukee (550590019)

Emission Sector Tags

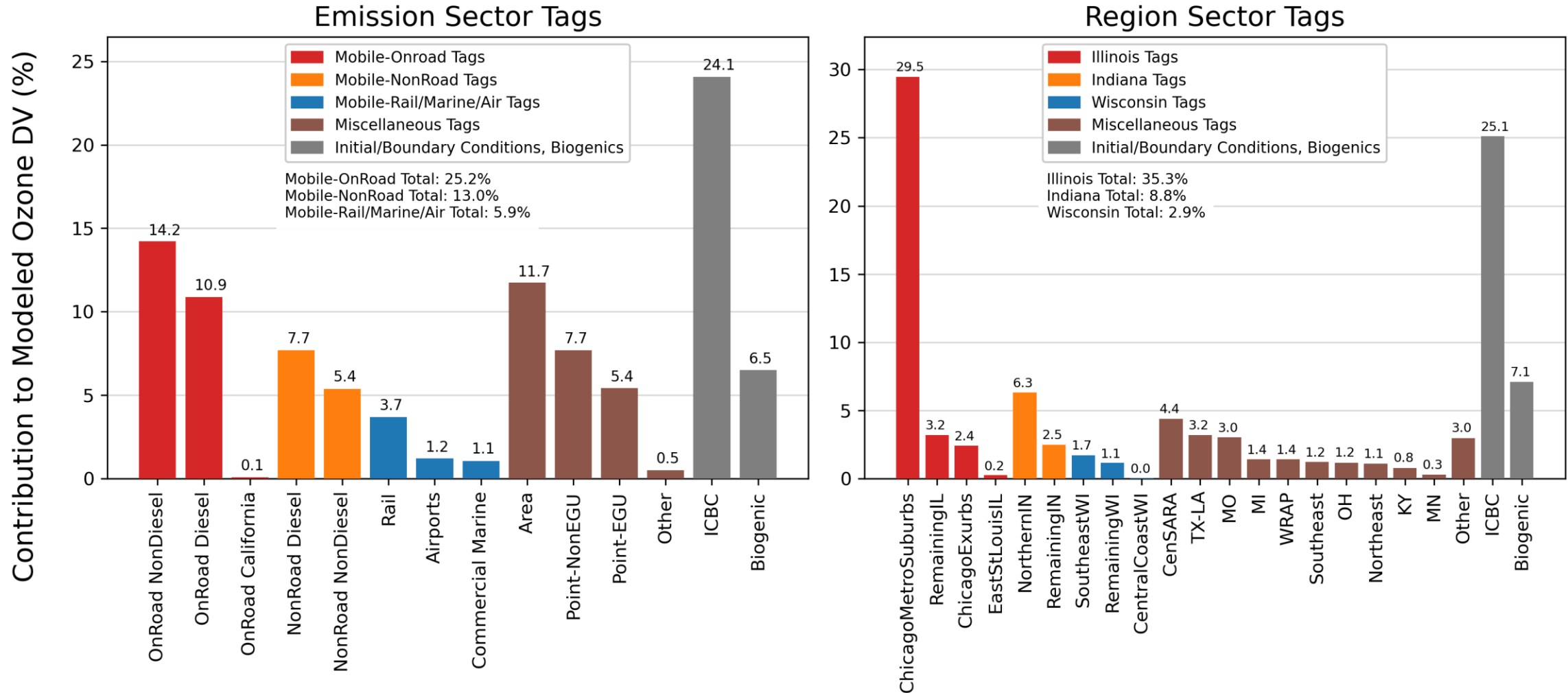


Region Sector Tags



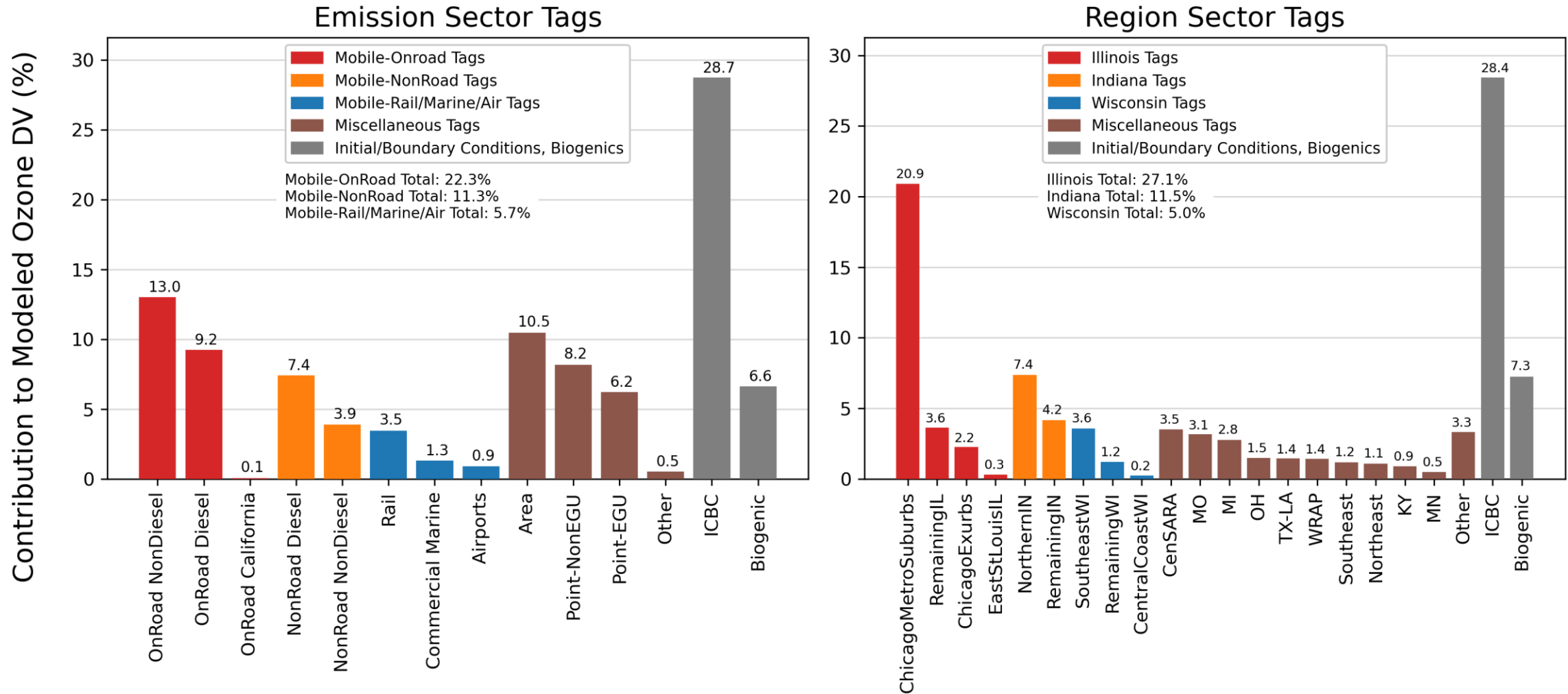
Source Apportionment - Milwaukee

Racine-P&D (551010020)



Source Apportionment - Sheboygan

Sheboygan KA (551170006)



Nonattainment Areas and Permits

2015 ozone nonattainment areas

- As of November 7, 2022 the areas are classified as moderate nonattainment for ozone
- Major source construction permitting thresholds:
 - 100 TPY VOC
 - 100 TPY NO_x
 - 250 TPY for all other criteria pollutants
- Major nonattainment area construction permitting requirements for new major sources and major modifications:
 - Lowest Achievable Emission Rate
 - Offset emissions of VOC or NO_x by a ratio of 1.15 to 1



Emission Reduction Credits (ERCs)

- ERCs can be used to offset emission increases from projects subject to nonattainment area (NAA) major new source review (NNSR)
- ERCs are generated from qualified NO_x and/or VOC emission reductions in a NAA
- DNR created the [Wisconsin ERC Registry](#) to help sources advertise or find ERCs or emission reductions that can potentially be used to generate ERCs
- DNR has developed new processes and forms for ERC-related permitting
 - [Form 4500-198](#) - Notification of Interest to Establish ERCs
 - [Form 4530-186](#) – Generation and Banking of ERCs
 - [Form 4530-187](#) – Transfer of ERCs
 - [Form 4530-188](#) – Identification of Emission Offsets for a NNSR Permit
- [Air Program Fact Sheet: Emission Reduction Credits \(AM-611\)](#) updated to reflect new ERC permitting processes and forms

Reasonably Available Control Technology

- VOC RACT is required for sources covered by EPA's Control Techniques Guidelines (CTGs) in Moderate (and higher) ozone nonattainment areas
- EPA periodically updates CTGs
- In order to be redesignated to attainment, DNR must show that sources in the nonattainment areas are meeting up to date RACT



Nonattainment Areas and Permits



- New RACT Standards apply to sources located in the ozone nonattainment areas classified as moderate or higher
 - [NR 422.084](#) (Plastic parts coating – part 2)
 - [Factsheet for ss. NR 422.083 and 422.084 \(AM-466\)](#)
 - [NR 422.128](#) (Use of adhesives – part 2);
 - [Factsheet for ss. NR 422.127 and 422.128 \(AM-409\)](#)
 - [NR 422.151](#) (Miscellaneous metal parts and products – part 2);
 - [Factsheet for ss. NR 422.15 and 422.151 \(AM-456\)](#)
- Sources in the Sheboygan and Kenosha nonattainment areas have until 12/1/2022 to comply and an additional 60 days to certify compliance
- Sources in the Milwaukee nonattainment area have 180 days from the effective date of the reclassification to moderate to comply and an additional 60 days to certify

Nonattainment Areas Mapping Tool

- Newest nonattainment designations affect partial counties.
- In order to assure sources in moderate or above ozone nonattainment areas are meeting the newest VOC RACT and NOx RACT applicability, language was updated in recent rules.
- e.g.
 - s. NR 428.20(1)(a)3. The facility is located in an area that, at any time on or after July 20, 2012, had been classified as a moderate, serious, severe, or extreme ozone nonattainment area...*

Use DNR's [Nonattainment area mapping tool](#) to determine if the facility is in an area that must meet NOx or VOC RACT in ss. NR 428.22, 422.083, 422.128 or 422.151, Wis. Adm. Code.



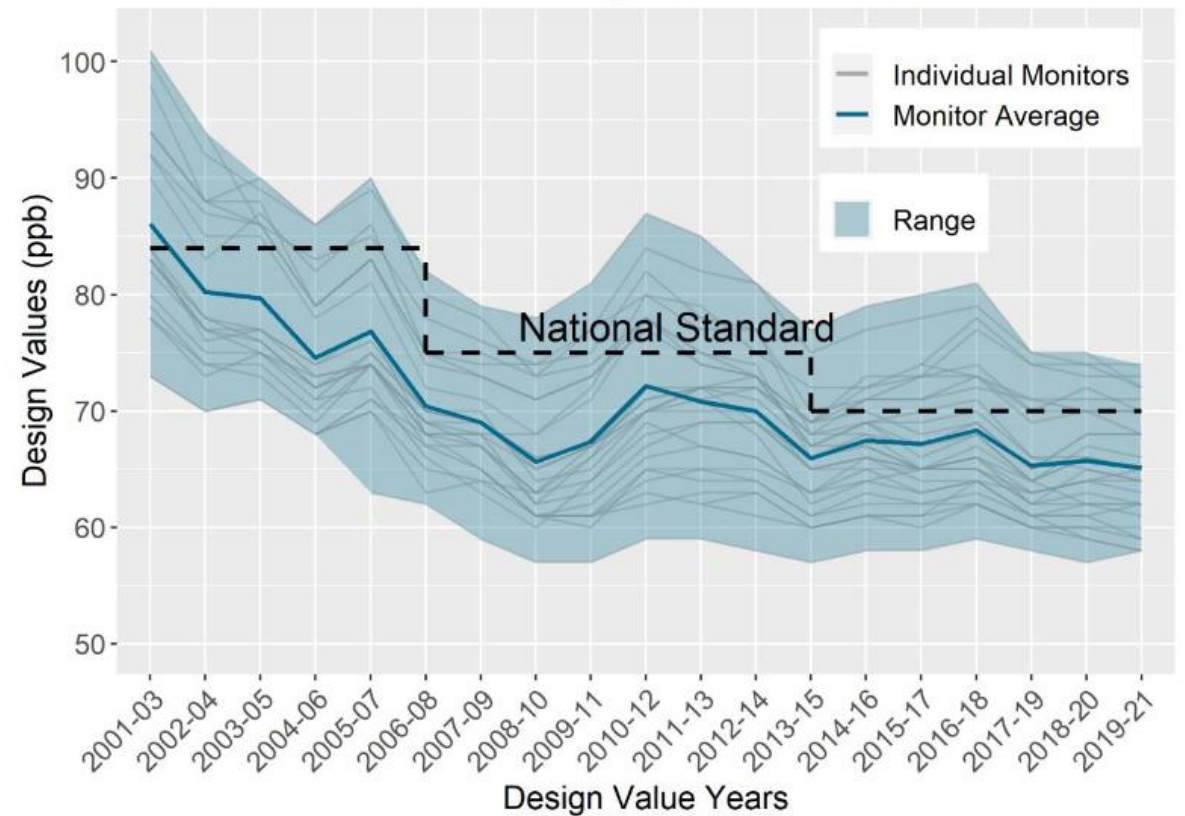
Trends Report and StoryMap

Katie Praedel
Air Monitoring Section Chief

2022 Wisconsin Air Quality Trends Report

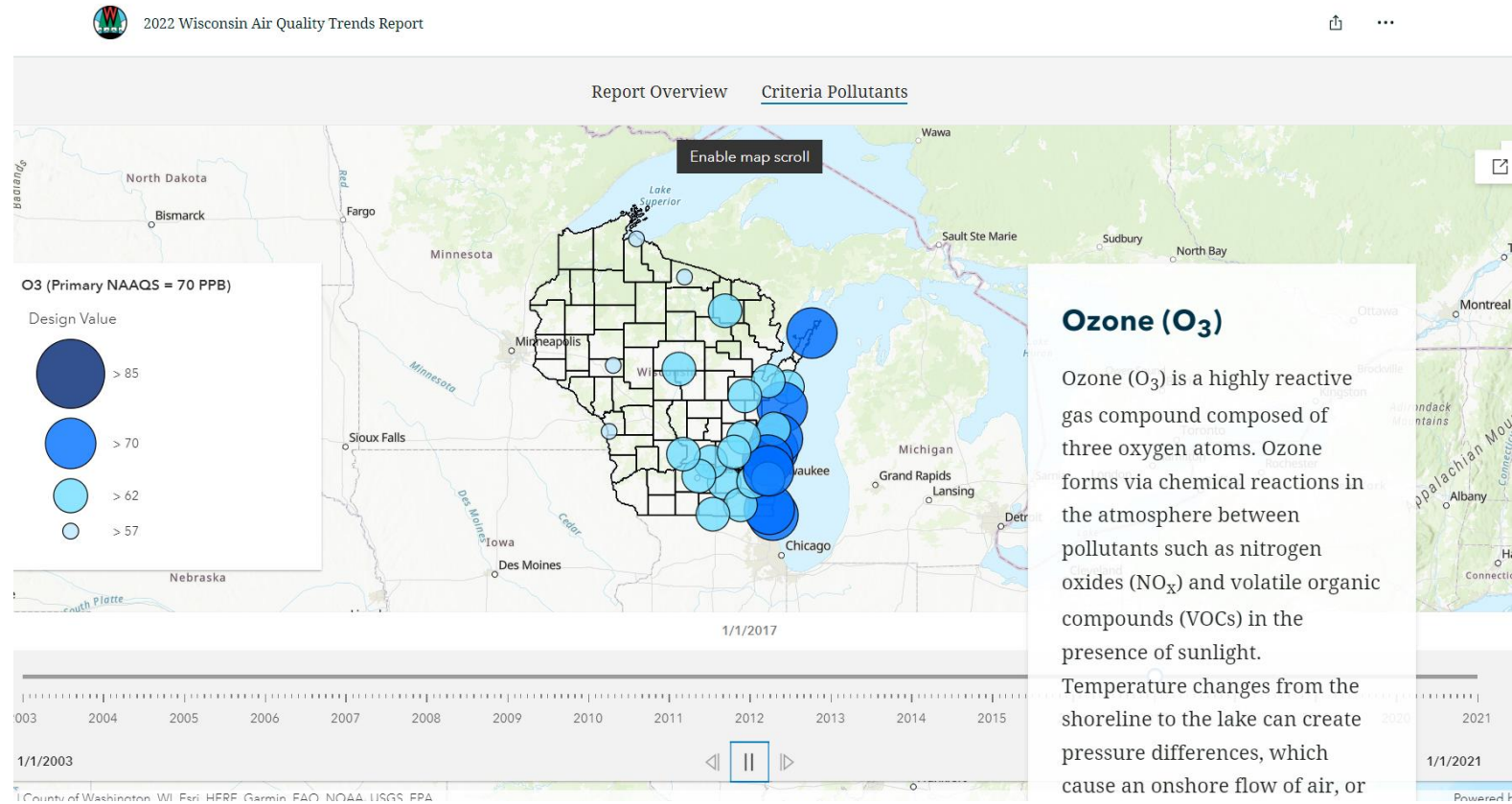
- Detailed information on Wisconsin's historic air quality trends over the past 20 years
- [2022 Wisconsin Air Quality Trends Report - data through 2021 \(AM-620\) \[PDF\]](#).

8-Hour Ozone Design Values in Wisconsin



2022 Wisconsin Air Quality StoryMap

- As part of its effort to communicate air quality improvements over time, the DNR released the interactive [2022 Wisconsin Air Quality Trends StoryMap](#).



AMSG Membership

Gail Good
Air Management Program Director

Changes

- Will be called the Air Management Advisory Group (AMAG)
- Members will discuss ongoing membership with Director/Field Operations Director each year
- Participation described in charter

Comments Received

- Utility membership
- Industry membership
- Expand membership cap should topics warrant it

Final Steps

- Conversations with members to discuss ongoing membership
- Finalize charter

2023 Priority Topics and Meeting Dates

Gail Good
Air Management Program Director

Priority Topics

- Emerging federal regulation o
 - Emerging contaminants (PFAS)
 - Federal permit actions
 - Long term planning at the federal level
 - Climate initiatives
 - Environmental justice
- Ongoing efforts
 - 2008/2015 ozone NAAQS implementation
 - SIP submittals and redesignation requests
 - Regional haze
 - Rulemaking
- Opportunities
 - Transparency in information
 - Goals and vision of DNR
 - Working with other states and organizations

2023 Meeting Dates

- Suggesting a shift of one month
- March 2
- June 1
- September 7
- December 7

CONNECT WITH US

Next Meeting

Thursday March 2, 2022



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/WIDNRTV



"WILD WISCONSIN:
OFF THE RECORD"