Summary

Air Management Study Group Meeting

Thursday, August 27, 2015

9:00 am

Room G09, State Natural Resources Building (GEF2)

101 S. Webster St., Madison, WI

Attendees

Gilberto Alvarez, EPA Region 5
Holly Bender, Sierra Club*
David Bizot, DNR
Tyson Cook, Clean Wisconsin*
Ken Detmer, PSC
Kendra Fisher, DNR
Gail Good, DNR
Rob Harmon, Bemis Company, Inc.
Art Harrington, Godfrey & Kahn*
Kristin Hart, DNR
Erik Hoven, Dairyland Power Co-op
Scott Manley, WMC*
Andrea Morgan, EPA Region 5
Todd Palmer, Michael Best*
Zach Ramirez, Wisconsin Legislative Council
John Roth, DNR
David Seitz, TRC Environmental
Jasmine Sodemann, Gannett Fleming
Matthew Spencer, Wisconsin State Assembly
Andrew Stewart, DNR
Patti Stickney, SEH
Scott Suder, WPC*
Mark Thimke, Foley & Lardner
Lucas Vebber, WMC*
Karen Walsh, DNR
Tara Wetzel, WTBA*

* Air Management Study Group (AMSG) members

Action Items

- **Next meeting.** The next study group meeting will be held on **Thursday, December 10** at 9 a.m. at the State Natural Resources Building (GEF 2), Room G09, 101 S. Webster St., Madison.
- **Paperless permit preapprovals.** If members have feedback regarding the Air Program's intent to pilot electronic issuance of draft permits and preliminary determinations (see p. 3), they should contact Kristin Hart (608-266-6876, kristin.hart@wisconsin.gov).
- **Air Program organizational chart.** As the DNR moves forward with its strategic alignment initiative, the Air Program will keep the study group updated about staff contacts and responsibilities under the department's interim and final structure. The Air Program will also work on updating its organizational chart to show staffing and responsibilities once current hiring is complete. The program will share the new chart with the study group.
- **EPA Region 5 organizational chart.** In response to a member question, Alvarez provided the following link to the Region 5 organizational chart: http://www2.epa.gov/aboutepa/organization-chart-epas-region-5-office. He noted that the current chart is high-level, and that he will update the study group if the office develops a more detailed chart that includes staff names.

- **EPA's proposed revisions to the Guideline on Air Quality Models.** The deadline for submitting comments to EPA is October 27 (see https://www.federalregister.gov/articles/2015/07/29/2015-18075/revision-to-the-guideline-on-air-quality-models-enhancements-to-the-aermod-dispersion-modeling).

Meeting Summary

Opening remarks and agenda review

Andy Stewart, Deputy Bureau Director

Stewart opened the meeting and reviewed the agenda. He asked the study group members to introduce themselves because new representatives for Sierra Club and Wisconsin Manufacturers and Commerce were attending. He noted that the Air Program has a training program for staff and interested external individuals. If the new AMSG members are interested in receiving training, they should contact Stewart, Gail Good, or Karen Walsh. He added that he and the Air Program section chiefs would also be happy to sit down and talk about specific program elements.

Stewart stated that Bart Sponseller is no longer the Air Program Director because he has been promoted to Deputy Division Administrator for the new Environmental Management Division (which includes the Air Program). He announced that Gail Good is the acting director until the end of September [program update: Good will serve in the acting position until the new director is chosen in October]. Members should feel free to contact her with issues they would previously have taken to Sponseller. Stewart said that the Air Program is hoping to hire a director by the beginning of October. The program is currently evaluating applications and will be setting up interviews soon.

Program updates

Air quality trends report

Gail Good, Air Monitoring Section Chief and Acting Air Director

Good stated that the program has updated the study group in the past regarding its annual air quality trends report, which shows trends in statewide monitoring data over time. She said that the report addressing 2013 data has been released (available at http://dnr.wi.gov/topic/airquality/trends.asp). The program has developed three reports to date. The first included only ozone and fine particle data, and now they include all criteria pollutants. The program is currently working on the report for 2014 data (the program certifies its monitoring data by May 1 each year), and hopes to release the report by the end of the calendar year.

MPAP guidance finalized

Andy Stewart, Deputy Bureau Director

Stewart announced that the Malfunction Prevention and Abatement Program guidance was finalized after the draft was available on the department website for a 21-day comment period. The guidance is intended to help internal staff consistently apply the rules and provide some direction for sources. He stated that because the Air Program lets the study group know when draft guidance is available for comment, the program also wants to inform the group when guidance has been finalized. Air staff will not report on finalized guidance in detail unless there are questions.

Harrington asked whether the guidance addresses start up and shut down. Stewart confirmed that it does. Harrington asked if the guidance is a follow-up to new EPA guidance. Stewart responded that the guidance is completely separate. The DNR guidance was developed because there was an inconsistent understanding of how and when to apply the regulations.

The final guidance is available at http://dnr.wi.gov/cias/guidance/guidanceexternal/GuidanceItem.aspx?item_seq_no=2330.

Paperless permit materials

Kristin Hart, Permits and Stationary Source Modeling Section Chief

Hart stated that the Air Program is planning to pilot paperless permit preapprovals. She explained that this is similar to something the program is already doing with draft air permit documents at public libraries. The program no longer sends the draft permits or preliminary determination documents to the public library. Instead, the program sends the signed public notice to the library with a link to the draft along with instructions to contact the department for a hard copy. Regarding permit preapprovals sent to the permit applicants, the program would like to send the preliminary approval letter and public notice to the applicant with instructions on how to access the draft permit and preliminary determination electronically and how to obtain a hard copy from the permit writer if desired. Hart is interested in hearing whether anyone objects to the change.

Palmer asked whether the preliminary determination is signed. Hart responded that the hard copy is, and the electronic copy includes a slash and date. Palmer pointed out that for the sake of the historical record, it is important that it is clear that the electronic copy is a final agency work product. He suggested including a signature block. Hart thanked him for the feedback and said the program will have to think about that issue.

Member updates

Palmer stated that the D.C. Circuit issued a decision on CSAPR last month. The rule has been subject to several challenges. This decision and the recent decision from the U.S. Supreme Court largely upheld the emission budgets EPA had established for states. However, Palmer interprets the rulings as suggesting that EPA may have a more difficult time establishing budgets in the future. Bizot agreed that was possible. Palmer stated that it is important to be aware of the challenges it may present for interstate trading under the new ozone standard. Bizot agreed and said that addressing overregulation appears to make trading more complicated. He said the Air Program will be looking at how the court decisions are reflected in the proposed transport rule for the next ozone standard.

Harrington asked Palmer whether he thinks the Circuit Court decision has implications for the Clean Power Plan. Palmer responded that he thinks this is a separate issue, and does not see it affecting the Clean Power Plan.

AMSG charter & priority topics

Andy Stewart, Deputy Bureau Director

Charter

Stewart presented final updates to the study group charter (appended to this document; see page 11). The Air Program had asked the study group to provide feedback over the summer on proposed revisions resulting from internal review. He said the group would probably revisit the charter in another couple years. However, if anyone has concerns before then they could be discussed by the group.

Stewart reviewed a chart summarizing the charter revisions (appended to this document; see page 10). He explained that the charter had originally included a provision for a study group co-chair to ensure that all members had an equal voice. The Air Program proposed removing the provision because the group has not had a co-chair to date, yet it seems the group has provided equal opportunities to all members, and the Air Program has not received comments to the contrary.

Stewart explained that the charter is being revised to allow members to call in to meetings as needed, but the meetings will not be supported by Live Meeting or Mediasite. The Air Program is not ready to broadcast the meetings live or have a standing conference line for the public. It may be possible in the future, but at present the program feels that providing the meeting materials on the website is sufficient, and interested individuals can attend the meetings in person. Stewart added that the Air Program hopes members find value in attending the meetings in person.

Stewart mentioned that the charter now includes a provision to invite EPA Region 5 representatives. Alvarez commented that Region 5 appreciates being invited. Palmer thanked the EPA representatives for attending. He said that EPA has attended these types of meetings in the past and there has been varying levels of attendance. He thinks it would be very helpful if Region 5 representatives could share their perspectives even if they are not official. And he encourages the representatives to come to the group with issues the group could help with.

Stewart concluded that the Air Program appreciates any thoughts and input on the charter.

Priority topics

Stewart presented final updates to the study group's current list of priority topics of interest (appended to this document; see page 13). The list reflects member feedback gathered at the last study group meeting, and will be posted to the study group website. Hart clarified that some of the topics are currently being addressed by the DNR (permit streamlining), or nearly complete (50% ROP development).

DNR strategic alignment

Andy Stewart, Deputy Bureau Director

Stewart updated the group on the DNR's strategic alignment initiative. The presentation slides are available on the AMSG website under the August 27, 2015 meeting at http://dnr.wi.gov/topic/airquality/amstudygroup.html (starting on slide 2).

Stewart explained that the department is starting a year-long process of working with its programs to identify core work and determine how to best align the programs under a new organizational structure. In the meantime, the department is operating under an interim structure (slide 3) that will be in place until the permanent structure is identified.

He stated that one of the biggest changes under the interim structure is that the Air, Waste, and Remediation and Redevelopment (AWaRe) Division has been combined with three water programs to create a larger Division of Environmental Management. This essentially doubles the size of the AWaRe Division. Pat Stevens is the administrator of the new division (and was formerly the AWaRe division administrator). Two deputy division administrators have also been appointed, Bart Sponseller (formerly the deputy division administrator for AWaRe), and Eric Ebersberger. Sponseller oversees the former AWaRe programs, and Ebersberger oversees the water programs. Stewart suggested that Sponseller and Ebersberger would be good initial points of contact under the interim structure. He added that members can also contact Stevens directly.

Harrington asked some questions about changes to the structure of the water program. Stewart clarified that the former division administrator of the Water Program, Russ Rasmussen, is now the department's special policy advisor. The bureau directors in the water program did not change. The district water leaders are expected to become deputy directors for their programs by the end of September. Under the interim structure, watershed management is not included in the new Division of Environmental Management, but instead is located in the Office of Business Support/External Services under Mark Aquino. Watershed Management includes wetlands, CAFOs, and nonpoint pollution (runoff).

Bizot explained that the interim structure implements line authority, and the program directors now report to the deputy division administrators, who in turn report to the division administrator (i.e., the air director reports to Sponseller, who reports to Stevens). He believes Stevens, Sponseller, and Ebersberger are currently determining their respective responsibilities.

Stewart reviewed the alignment process (slide 4). He explained that the core work analysis is happening down to the program level, and includes process mapping, gap analysis, and financial analysis. One of the goals of the process is to determine if there are any statutory, regulatory, or budgetary changes needed before the new alignment is finalized.

He stated that he believes the Air Program is already in good shape regarding the goals of the core work analysis and alignment effort. The program had already introduced line authority. The program's finances are well managed, ever since a budget deficiency was addressed 15 years ago. The program tracks the budget to activity codes that are directly tied to grants. The program's work activities have already been aligned with program priorities.

Palmer said that he understood that one of the goals of the Air Program was to ensure consistency among the regions. He asked whether that was going to continue. Stewart responded that it would. He said it is a continual challenge, but as they hire new regional managers, each new hire is an opportunity to improve consistency. The program just hired Susan Lindem as the new West Central Region supervisor. She had previously worked in the Air Program as a permit engineer and policy specialist.

Harrington suggested that it would be helpful to the regulated community for the Division of Environmental Management to provide an organizational chart that shows contacts for different program areas, especially for the water programs. He also asked whether the Air Program specifically has an organizational chart showing staffing and general responsibilities. He pointed out that the staff directory is difficult to use. Air Program staff concurred that an organizational chart [representing the former structure] is available on the department intranet. Stewart said that the regional managers have been in flux but the Air Program could work on updating the chart and making it available. Walsh agreed to follow up.

Harrington also asked Alvarez and Morgan if EPA Region 5 has an organizational chart showing staffing and responsibilities. Alvarez responded that he believes their chart includes responsibilities at the manager level, but not for the staff under them. The Region 5 chart can be viewed at http://www2.epa.gov/aboutepa/organization-chart-epas-region-5-office.

Air Program core performance metrics

Andy Stewart, Deputy Bureau Director

Stewart discussed the AWaRe Division's upcoming FY 2015 performance report. He stated that the Air Program is serious about tracking its performance for accountability. The program will let study group members know when the 2015 report is available on the department website (usually sometime in the fall). He showed the 2014 report as an example (http://dnr.wi.gov/about/documents/aw/fy14pmreport.pdf), explaining that the performance objectives for the Air Program have not changed since last year and that the two reports will probably be consistent. He mentioned that the program does expect to make some changes to the objectives for FY 2016, as other outcomes and measures may be identified as part of the strategic alignment effort. He mentioned that the program might also discuss potential new objectives with the study group in the future.

Stewart reviewed the Air Program objectives listed in the 2014 report, as discussed by section below:

Protecting human health and the environment

Stewart explained that for the goal of reducing health risk due to air pollution, the program uses air trends data and emissions inventory reports to demonstrate improvements. It has been a challenge to make this demonstration,

because the program wants to use internal data that directly reflect the program's efforts, rather than outside data such as emergency room admissions, or illness and premature deaths. The program is always looking to improve its ability to show health improvements. Compliance is another measure that can be used.

Providing excellent customer service

The Air Program customer service objectives include improving the timeliness of issuing construction and operation permits, and developing permit guidance and rules to facilitate efficient permit issuance. The program tracks permit issuance time on a monthly basis, and sends a monthly report to the division administrator. The program therefore is able to see when the timing is slower and examine potential causes. Stewart added that the program has seen distinct improvements in timeliness in the last five years since launching a new IT system that brought legacy databases together. A Lean Six project completed three years ago also resulted in a marked decline in permit issuance time. Stewart also stated that permit actions to reduce the program's permit renewal backlog had reached a historic high, and the program is now working towards getting the backlog down to zero. This is another metric that is reported to the division administrator on a monthly basis.

Manley asked whether the Air Program tracks the amount of time between initial permit applications and the completeness determinations. Stewart responded that while the program does not use that metric in the performance report, it is tracked. The program has cut that period of time in more than half. It represents a success that the program has not emphasized publicly. Manley said that that is good to hear, because historically his organization has heard that the time between the initial application and completeness has been the source of delays. He understands that the process relies on good communication from both ends, but anything the Air Program can do is appreciated. Stewart agreed that he thinks there is more the program can do, and that the Air Program could report on incremental improvements at future meetings.

Harrington asked whether the Air Program monitors inspections, because it is important to incentivize compliance. Stewart responded that the program tracks inspection completion and compliance rates. However, he does not like the compliance rate metric. It tends to be about 85 percent and has been stable over time. A source is considered noncompliant if it violates one requirement, though a large source may have hundreds of requirements and meet the vast majority. He believes the metric underreports compliance. He expects that the compliance rate would be 98 to 99 percent if it was measured at the level of individual requirements.

Supporting conservation of resources

Good explained that the Air Program implemented broadband remote operations in 3G (hopefully 4G in the future). The program can now access equipment remotely, and so tasks that used to require someone to visit the site, such as biweekly checks, can be done remotely. This saves staff time, reduces trips to monitoring sites, and improves staff safety since they spend less time on the road. In the past, operators recorded trips saved manually, but now the program can look at how often staff are making use of remote access. This may become a performance measure for FY 2016. The program has measured 200 hours per month in staff time saved over the last few months.

SO_2 & ozone monitoring update

David Bizot, Regional Pollutants & Mobile Sources Section Chief

Gail Good, Air Monitoring Section Chief and Acting Air Director

Good and Bizot updated the group on ozone monitoring data for the year to date, the final data requirements rule for implementation of the SO_2 NAAQS, and monitoring data affecting SO_2 NAAQS area designations. The presentation slides are available on the AMSG website under the August 27, 2015 meeting at http://dnr.wi.gov/topic/airquality/amstudygroup.html (starting on slide 5).

Ozone data

Slide 6 shows the four highest ozone concentrations in 2015, as of mid-August, which is a little more than halfway through the ozone season (the season runs through October 15 or October 31, depending on the site). The last column shows what the 2013-2015 design values would be if the data represented ozone concentrations for the full season. The Kohler-Andrae site would have a design value of 75, which is the level of the standard. Every other site has a lower design value.

Harrington commented that the data are sobering given the proposed levels for the 2015 ozone standard. Good agreed that the Air Program will need to evaluate where things stand once the standard is finalized (the rule is due October 1). Bizot added that under the new standard, 2015 will be the first year of data used for final nonattainment designations.

Manley asked whether the Air Program would pursue redesignation of Sheboygan County to attainment under the 2008 ozone standard since the design value for Kohler-Andrae is currently under the standard, at least to date. Bizot responded that it will depend on the final design value at the end of the ozone season, and whether there are outstanding requirements that would need to be implemented before EPA would approve a redesignation request. Manley also asked about Sheboygan's attainment status under the 1997 ozone standard. Bizot responded that the Air Program has clean data for the county, but cannot request redesignation because the standard has been revoked. This means the county is technically on the books as a nonattainment area, but that there is no longer any meaning to the designation.

Manley asked whether the Air Program knows the current design value estimates for the Zion, Illinois monitor and the other Illinois monitors located in the same nonattainment area as the Chiwaukee monitor (which is in eastern Kenosha County). He asked whether Wisconsin might be in a position to request redesignation of eastern Kenosha County to attainment under the 2008 ozone standard. Good responded that she believes the Zion and Chiwaukee monitor readings have been similar. Bender added that the Chicago nonattainment area that includes eastern Kenosha County was bumped up to moderate nonattainment status, and she expects the Air Program will be doing moderate nonattainment area SIP planning for the area. Bizot clarified that the bump up has been proposed but not yet finalized, so the program has not started the associated SIP work. He has not seen monitors in the Chicago area that have been exceeding the standard. However, the Air Program is keeping an eye on them because they can register ozone that does not reach the Chiwaukee monitor. Bender pointed out that without seeing the Sheboygan design values for 2013 and 2014, it is not clear that the area has been consistently meeting the standard. Bizot agreed and provided the values: 78 in 2013 and 72 in 2014.

SO_2 data requirements rule

Good explained that the SO_2 data requirements rule was recently finalized. Slide 7 shows the significant differences between the final and proposed rule. She explained that the DNR had commented on the ongoing monitoring requirements in the proposed rule, which seems to be reflected in the final rule.

SO_2 monitoring data

Slide 9 shows 2013-2015 design value estimates for the Green Bay area (Brown County) based on monitoring data collected to date. As a result of a consent decree, a second round of designations under the 1-hour SO_2 NAAQS will be based on the final 2013-2015 design values. The 1st and 2nd high values for the Green Bay area are approximately at the critical value. Other SO_2 monitoring sites are included on the slide to provide context.

Bender asked what sources of SO_2 are primarily contributing to the concentrations monitored in Green Bay, in addition to the Pulliam plant. Good responded that there are a number of paper mills that are sources of SO_2. The Air Program traveled up to Green Bay in June and spoke to some of the larger sources to keep them informed about planning for the standard.

DNR policy for regulating $PM_{2.5}$

Kristin Hart, Permits & Stationary Source Modeling Section Chief

John Roth, Natural Resources Program Coordinator, Permits & Stationary Source Modeling Section

Roth and Hart provided an overview of the DNR's new policy for regulating $PM_{2.5}$. The presentation slides are available on the AMSG website under the August 27, 2015 meeting at http://dnr.wi.gov/topic/airquality/amstudygroup.html (starting on slide 10).

The DNR developed a new policy for regulating fine particulate matter ($PM_{2.5}$) to reflect increased understanding of its sources and formation. Roth explained that regulators used to assume that particle pollution always included $PM_{2.5}$. However, data shows that this is not the case, and $PM_{2.5}$ is only directly emitted from the stack by some sources and primarily forms in the atmosphere from precursor pollutants. In particular, $PM_{2.5}$ formation is largely driven by large smoke events and specific meteorological conditions.

Under the previous policy, $PM_{2.5}$ emissions were modeled from individual sources to demonstrate that the ambient air quality standards are protected. However, the emission rate modeling inputs, which were based on traditional PM rates (because it is difficult to achieve the right conditions for $PM_{2.5}$ stack testing), were not very accurate. In addition, demonstrating compliance by modeling direct emissions and raising stacks where necessary does not address the secondary formation of $PM_{2.5}$. EPA does not require modeling for compliance with the $PM_{2.5}$ NAAQS, except in the PSD program, so the DNR examined other ways to demonstrate that the standards are protected.

The proposed policy considers combustion sources and high temperature operations to be the only sources of significant direct $PM_{2.5}$ emissions. These sources would be required to provide $PM_{2.5}$ emissions estimates, and the Air Program would determine whether other less significant sources are direct emitters on a case-by-case basis. Rather than modeling direct $PM_{2.5}$ emissions (except where required to meet PSD requirements), a weight of evidence approach would be used to determine whether the emissions would cause or contribute to a violation of the $PM_{2.5}$ NAAQS.

Roth emphasized that the new policy does not reduce the seriousness of $PM_{2.5}$ pollution, which has serious health effects. The DNR wants to regulate it responsibly, and believes that the proposed approach better addresses the true sources of $PM_{2.5}$ and is better supported by science.

Cook asked whether the Air Program conducted speciation studies to determine the sources of $PM_{2.5}$. Good responded that the program has four speciation monitoring sites in the state. Roth added that the modeling guidance appendix outlines the scientific support for the program's proposed approach and includes references to the monitored speciation data.

Cook asked how the Air Program determines what sources are considered high temperature sources. Hart responded that the program had wanted to assign high temperature status on a case-by-case basis. However, the program has received comments on that approach and will consider whether it should be changed.

Bender asked how the Air Program determines that sources' emissions of $PM_{2.5}$ precursors, SO_2 and NO_x, are not causing or contributing to $PM_{2.5}$ violations. Roth said that the Air Program will be following federal guidelines that were issued in May, 2014 and additional guidance that is being issued this fall. The guidelines include thresholds to determine when photochemical modeling or a weight of evidence approach should be used. Stewart clarified that permit determinations must show that precursor emissions do not cause or exacerbate violation of the standard (rather than cause or contribute). Bender asked how the Air Program can make that determination without modeling precursors. Stewart responded that the program would use a weight of evidence approach showing that improvements in utility emissions and improvements from the mobile sector correlate with decreasing $PM_{2.5}$ concentrations. While nationally, industrial sources have not reduced emissions, $PM_{2.5}$ concentrations have been falling (as shown in slide 12). This can be attributed to federal fuel standards that reduced SO_2 emissions. Stewart

added that the Air Program relies on existing regulations to limit SO_2 emissions, in the same way that the program relies on RACT rules for VOCs to demonstrate compliance with the ozone standard.

Manley asked how many minor sources have significant SO_2 or NO_x emissions. Stewart responded that it is probably less than 10 percent of minor sources. Bender asked whether synthetic minor sources start as PSD sources or whether they start as minor sources. Stewart answered that it depends on the source, but that they typically start as minor sources. Bender responded that that would mean there are synthetic minor sources that are emitting just below the major source threshold. Stewart and Hart confirmed that is correct.

Cook asked how the Air Program would know if emissions from low-temperature sources start to increase. Roth responded that the program will continue to monitor $PM_{2.5}$ in the ambient air using the existing network, which would show any increases. In addition, existing NO_2 and SO_2 regulations would continue to limit emissions of these precursor pollutants, and any increases would be tracked. Stewart emphasized that there is no evidence suggesting that low-temperature sources might be significant sources of $PM_{2.5}$.

Cook asked whether $PM_{2.5}$ is a component of course PM. Stewart responded that where the program has data that $PM_{2.5}$ is a component, the program is evaluating it.

Stewart concluded the presentation by stating that the next steps for the Air Program will be to consider and respond to the comments it has received on the proposal.

EPA's proposed revisions to the Guideline on Air Quality Models

John Roth, Natural Resources Program Coordinator, Permits & Stationary Source Modeling Section

Roth summarized EPA's proposed revisions to the Guideline on Air Quality Models, also known as Appendix W. The presentation slides are available on the AMSG website under the August 27, 2015 meeting at http://dnr.wi.gov/topic/airquality/amstudygroup.html (starting on slide 21).

Roth stated that Wisconsin is submitting comments to EPA and largely likes the proposal. The proposed guidance affects modeling, in part, for all facilities and permit types. It would result in more consistent application of the guidelines in Region 5. He said that if others are interested in submitting comments, the deadline is October 27.

Air Management Study Group Charter Revisions

August, 2015

The AMSG charter will be reviewed periodically to ensure that it continues to meet the needs of the study group. The table below summarizes revisions to the charter that have been reviewed by the membership in July, 2015. The full text of the revised charter is provided on the following pages.

Charter section	Item	Revisions
Throughout document	N/A	Minor language revisions (e.g., changed tense from present to past, word adjustments for clarity, etc.)
Study group operating guidelines	Co-chair appointed from membership by DNR Secretary for a two-year term.	Item removed because the study group does not currently have a co-chair.
	Meetings will primarily be in person, supported by Mediasite and Live Meeting, as appropriate.	Meetings will primarily be in person, with the option to call in by request (revision encourages in-person attendance).
	Draft meeting notes will be distributed to members for comments and approval approximately 8 working days after each meeting.	"Soon after each meeting" instead of 8 working days. Also applies to subgroup meeting notes (revision provides more time for internal staff review, as needed).
	N/A	Added item stating that EPA Region 5 representatives will be invited to attend the meeting.
Ad hoc subgroups operating guidelines	Draft subgroup meeting notes will be distributed to the subgroup for approval and then the study group for approval before being posted to the website.	Approval from the subgroup members is sufficient.

Charter: Air Management Study Group Structure

This charter outlines the purpose, structure, membership, and meeting organization for the Air Management Study Group.

Background

The Bureau of Air Management largely implements an air program that reflects federal requirements. Because federal requirements change frequently, the Bureau often comments on the proposed changes, and ultimately implements the changes that are adopted. Recognizing the benefits of working with a broad group of stakeholders, the Bureau of Air Management created a stakeholder group, the Air Management Study Group, as a forum to receive input from and provide information to interested parties. The Bureau previously convened a stakeholder group called the Clean Air Act Task Force (CAATF) that focused largely on ozone issues. The Study Group replaced the CAATF. The new group was formed to address a broader range of issues and focus more on receiving input from stakeholders.

Purpose and Scope of Responsibilities

To receive input and feedback on the following topics:

- General state and/or federal air policies, including rule-making, guidance development, and other initiatives
- Specific state and/or federal air topics or regulations
- Opportunities and challenges with implementation plans
- Collaborative efforts with other DNR programs and outside partnerships

Membership

- 10 - 12 members
- Appointed by the DNR Secretary with input from member's interest group
- Terms are open; members serve at the pleasure of the DNR Secretary
- Supported by ad hoc subgroups as needed

Operating Guidelines: Timing and Structure of Meetings

The meetings of the Air Management Study Group and the ad hoc subgroups will follow these operating guidelines to foster understanding of meeting logistics and operations. The guidelines are also intended to facilitate group participation and enhance discussion of the issues.

Study Group

- Members are selected by the DNR Secretary.
- The Study Group chair is the Air Management Bureau Director.
- The Study Group is a working group and members may be asked to provide information to the group on various issues. DNR staff will also give presentations and provide documents to the group.
- The recommended frequency of meetings will be quarterly, timed to coincide with major policy decisions and as needed for input on issues. Meetings will primarily be in person, with the option to call in by request.

- Each meeting will be public noticed. No later than 2 weeks prior to Study Group meetings, all Study Group members and interested parties will be notified of meeting times and locations.
- Meeting agendas and materials will be prepared for each meeting. This information will be sent electronically to the Study Group members about one week prior to the meetings. Agendas and materials will also be posted to the Department's public website.
- All meetings of the Study Group and its subgroups are open to the public.
- EPA Region 5 representatives will be invited to attend Study Group meetings (and subgroup meetings, as relevant).
- A draft of notes from each Study Group meeting will be distributed to the membership for comments and approval soon after each meeting. A final draft of the meeting notes will be distributed to the Study Group and put on the Study Group's web page shortly after approval is received from Study Group members.
- Ad hoc subgroups will be established by the Study Group for specific topics. In addition, individual Study Group members may be asked to fulfill certain assignments.
- The Study Group will review the draft recommendations from the subgroups.
- The format for recommendations will include a background narrative, followed by the proposed recommendation, type of recommendation (administrative, statutory, or regulatory) and any resources needed (staff and/or funding).
- The success of the Study Group discussions will be enhanced by regular attendance of the members. Group members are asked to place a high priority on attending the meetings. If members cannot attend a meeting, they are asked to discuss this with the chair in advance.
- Substitution of Study Group members will be discouraged in order to maintain the collaboration and dynamics of the group.
- Every Study Group member's participation and contribution is valuable. Each Study Group member will be allowed to present his/her opinion on topics being discussed and is asked to listen attentively to other group members.

Ad Hoc Subgroups

- Each subgroup will have a chairperson, who is a member of the Study Group.
- Membership may include Study Group members and /or nonmembers.
- Each subgroup meeting will be public noticed. No later than 2 weeks prior to a subgroup meeting, the chairs will notify DNR staff and DNR staff will ensure that all subgroup members and interested parties are notified of meeting times, locations, and agendas.
- Membership in the subgroups will be from a wide variety of interests, to ensure a balanced group and the broadest base for input.
- The chair will provide DNR staff the names and associations of those on the subgroup.
- Each subgroup will take meeting notes, and forward a draft of the notes to DNR staff for distribution to the subgroup for approval soon after each meeting. A final draft of the notes will be distributed to the Study Group and put on the Study Group's web page.
- The Study Group or subgroups will establish the charge of subgroups. A charge may include the following:
    - Identifying options or priorities for resolving air issues
    - Identifying whether an issue should be addressed via statutory, regulatory, or administrative (e.g. fact sheet or training) changes
    - Identifying the amount of resources (e.g. staff or money) needed to implement a change

Priority Topics

Air Management Study Group

Updated August, 2015

- Permitting topics
    - 50% Registration Operation Permit (ROP) development
    - Permit streamlining

      Includes defining "cause or exacerbate"
    - $PM_{2.5}$ permit modeling/Significant Impact Levels (SILs)
    - Permit shield
    - Permit application materials
- Sulfur dioxide NAAQS implementation
- New Source Review Emission Reduction Credits
- Clean Power Plan
- Implementation of the 2008 and 2015 ozone standards, including interstate transport
- Incorporation by reference
- Additional time-sensitive topics as relevant