Meeting Summary

Air Management Advisory Group Meeting

Thursday Sept. 17, 2026

Renee Bashel, Interested party
Ron Binzley, DNR
Noelle Brigham, A.O Smith Corp*
Megan Corrado, DNR
Craig Czarnecki, DNR
Brianna Denk, DNR
Bryant Esch, WI Cast Metals Assoc.*
Don Gallo, Gallo Law LLC
Gail Good, DNR
Ashley Gray, DNR
Art Harrington, Godfrey and Kahn
Jeff Hanson, WUA*
Rob Harmon, U.S. Venture Inc.
Chris Hiebert, SEWRPC*
Adam Jordahl, WMC*
Nathan Kilger, Bad River Band of Lake Superior Chippewa*
Mike Kolb, WEC Energy Group*
Ashley Korrer, WEC
Ben Mckay, SEWRPC*
Jason Martin, Foth Infrastructure
Rita Neff, TRC Companies
Bill Nelson, Godfrey and Kahn*
Todd Palmer, Michael Best and Friedrich LLP*
Randy Poelma, Ho Chunk Nation*
Patti Stickney, SHE
Troy Stucke, Charter Mfg.
Steve Stretchberry, WEC Energy Group
Eric Svingen, EPA*
John Trimberger, DHS
Keren Vivas, Wisconsin Paper
Ben Wolf, DNR
Jeremiah Yee, DHS*

*AMAG member

Meeting Summary

Opening remarks and agenda repair

Program Director Gail Good opened the meeting. Craig Czarnecki explained meeting procedures.

Operational Updates

Gail Good, Air Management Program Director provided a hiring update. The program is currently recruiting a Field Operations Director, with interviews in October. The role supervises field supervisors, with an emphasis on permit and compliance work across the state.

The program has an engineer recruitment in process, with focus on inspectors. The recruitment is scheduled to begin in October. The DNR will be attending a few upcoming career fairs to recruitment for the positions. The program has a goal of onboarding the new engineers in January.

Paul Yeung who has been with the program for 45 years, retired in October. The program celebrated Paul's retirement on Sept. 28.

Good discussed the DNR's move out of the GEF II building, and to the Hill Farms State Office Building, where several other state agencies are based. The move will take place in mid-October. The PO Box for the office will remain the same, which should help with mail delivery.

Good addressed the upcoming November election. The agency and the Environmental Management division are preparing for transition.

The agency budget is prepared and will be presented at Natural Resources Board meeting in September.

Proposed Guidance, Rules and Legislative Update

Proposed/Final DNR Rules

VOC RACT Rulemaking

The purpose of this rulemaking is to ensure the state is meeting federal requirements for VOC RACT. Two information sessions were held in June on Non-CTG VOC RACT and CTG VOC RACT.

The public comment period for the Economic Impact Assessment (EIA) for the rule is expected to begin in early 2027.

EPA Rules and Guidance

Moderate Attainment Plan Approval: Effective 9/21/2026, the EPA approved portion of plans for Kenosha, Milwaukee, and Sheboygan.

2026 Unified Agenda: Notice of publication

- **Proposed Rule**: Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources
- **Proposed Rule:** Additional Reconsideration of Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review
- **Proposed Rule**: Interstate Transport Plan Review for the 2015 Ozone NAAQS – Phase 2
- **Proposed Rule**: Reconsideration of Greenhouse Gas Reporting Rule: Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems (Subpart W)
- **Final Rule:** Carbon Pollution Standards Repeal
- **Final Rule:** Reconsideration of the Greenhouse Gas Reporting Program
- **Proposed Rule**: Reassessment of Adoption and Submittal of State Plans for Designated Facilities: Implementing Regulations Under Clean Air Act Section 111(d)
- **Proposed Rule:** Revision to "Begin Actual Construction" in the New Source Review Preconstruction Permitting Program

Oak Creek SIP: Comment period closed on 8/14/2026. The proposed rule approves alternative NOx emissions for the Oak Creek power plant.

Minor New Source Review Program Air Permitting Public Participation Requirements for SIPs: Comment period closed 8/21/20206. The proposed rule revises public participation requirements to

recognize that state regulatory authorities can determine when and to what extent public participation in minor NSR programs is necessary to achieve the NAAQS.

Rescission of Title V Emergency Affirmative Defense Rule: Rule effective 6/1/2026. This action rescinds the 2023 Affirmative Defense Rule, which removed emergency affirmative defense provisions from Federal regulations regarding title V operating permit programs.

Hazardous Waste Combustor NESHAP: Rule effective 6/3/2026. This action finalizes residual risk and technology review, promulgates emission standards, work practice standards for SSM, and new reporting requirements.

Plywood NESHAP: Rule effective 6/6/2026. This action updates maximum achievable control technology (MACT) for multiple HAPs, responds to the 2007 partial remand and vacatur of the 2004 rule, and responds to a petition for reconsideration.

CRA for Rubber Tire Manufacturing NESHAP: Published 6/22/2026. Removes the provisions of the 2024 Rubber Tire Rule

Permit Streamlining

In 2026, the NR 410 rulemaking to revise construction permit fees was completed, with the adoption of revised chapter NR 410 early in 2026. The rule became effective in April 2026.

The revised fees, together with financial support provided to the construction permit program from other revenue sources, has helped address staffing levels, allowing the construction permit program to better meet applicants' needs and protect Wisconsin's environment.

In addition to revised fees, the final NR 410 rule created two department reporting requirements.

- An annual financial report on the state of the construction permit program account
- A one-time report, to be completed no later than September 30 2027, describing the permit streamlining measures the department has completed or intends to undertake supported by the fees assessed under this rule.

These reporting requirements help ensure transparency and sound financial stewardship of the construction permit program and will stimulate innovation. The department decision to include these reporting requirements was informed, in part, by feedback received from stakeholders during the rulemaking process.

The department continually seeks and evaluates opportunities to streamline the permit process and, in collaboration with stakeholders, has undertaken many efforts to maximize resources, increase permit application and processing efficiency, and address specific stakeholder requests. These include:

- Developed new permit types
- At the request of stakeholders, completed two air permit streamlining rules in 2015 and 2020. These rules included, among other changes, the expansion of construction permit exemptions and clarifying what activities can be undertaken by a source prior to permit issuance.
- Implemented electronic signatures and e-payment options for permit applicants.
- Created permit application checklists which specify the information that applicants should or can include in permit applications.

- Improved step-by-step instructions for permit writers to use when processing air permit applications and a user guide for the department's internal air permitting software system.
- Developed and implemented a comprehensive training plan for new permit writers.

The Air Management Group will convene a Subgroup on Permit Streamlining. The subgroup will consider current opportunities for permitting improvements as well as any suggestions brought by subgroup members. Anyone interested in providing input on permit streamlining can send email Craig Czarnecki.

Members requested some communication in advance of the meeting to understand limits to near-term streamlining options given the DNR's current AI policy.

Members requested the DNR reach out to consultants to make them aware of the permit streamlining subgroup.

Compliance Updates

Ashley Gray, Air Compliance, Emissions Inventory and Enforcement Section Manager announced more file types are now accepted when uploading within the Switchboard. Users may now upload a variety of file types to the "Other Reports, Plans and Notifications tab" within the system.

The Air Program will host an air emissions inventory webinar on December 10, 2026, from 10-11:30 a.m. This is an opportunity for those who submit reports to the air program to prepare for the air reporting season. Attendees can register to attend via Zoom.

Members Update

Jeff Hanson, WUA- is reviewing EPA's recent repeal of EGU greenhouse gas standards and expects the repeal to be litigated. WUA also is anticipating the endangerment finding repeal may still have additional regulatory impacts, particularly with regard to New Source Review and GHG BACT. Other regulatory requirements (GHG reporting) are challenging because customers want to know what the GHG impact is. Hanson expressed appreciation to Ron Binzley and Ashley Gray and their respective teams. The permit and compliance groups are seeing increased interest in projects, and he commended the approaches to public hearings and comment response, saying the program makes it clear on what authorities are and what they are not.

Mike Kolb, WEC Energy Group - Regulation changes, he agreed with Jeff on support of the Air program.

Todd Palmer, Michael Best & Friedrich - Gave a Clean Air Act update with Gail Good, along with and other environmental topics. Encouraged looking at state bar website to view the recording.

Adam Jordahl, WMC - Permits and permitting times are a reoccurring concern. He echoed what Jeff stated, on the data center side, seeing permits get a lot of attention. Lots of input received. Trying to educate on the facts of air permitting. Air is cleaner now than was in the past.

Bill Nelson – Godfrey & Kahn - obtaining an air permit (prepare/plan/construction) and identifying issues ahead of time. Staffing of Air Management remains a challenge, limited resources, and want to identify issues.

Ron Binzley responded, saying that construction permit numbers have improved over the last several months. Following the adoption of the FY26 budget, which provided additional resources for the

construction permit program, the program reassigned all operation permit writers to construction permits. The additional state funding allowed the program to hire new permit writers in late 2025. Due to improved staffing, the average processing time for all construction permits is now roughly 6 months, down from a high of 8 months or more.

Ron also stated that further improvement in construction permit review times is being impeded by the current pause of the Title V permit program. When operation permit renewals and revisions are not addressed, construction permit reviews tend to become more complex and time consuming.

Art Harrington, Godfrey and Kahn - Advancements and announcements related to nuclear energy are increasing, including small scale nuclear. Incredibly complex area and a rising issue for Wisconsin. Art serves as Chairman of the Board for Kenosha Innovation Neighborhood, and shared a link to a half-day seminar on quantum computing on September 24.

PM2.5 Updates

July Wildfire Smoke Event

Craig Czarnecki, Air Management Outreach Coordinator shared that Wisconsin experienced one significant wildfire smoke event this year. It started in early July, when wildfires, likely resulting from lightning strikes, were detected by satellite in northern Ontario.

On July 6 thunderstorms ignite more fires, and extreme fire weather arrived on July 13.

Smoke descended into Wisconsin starting July 14-15, progressing throughout the week.

On July 16, 13 of 15 monitors set new records for PM2.5 concentrations, the old records were set during wildfire smoke events in both 2023 or 2025. Many monitors in the state were in the unhealthy range through the July 19 before clearer air started moving in.

Czarnecki showed a comparison of a clean PM2.5 filter, a filter after 24 hours on an average day, and a filter on July 16 after 20 hours. The monitoring equipment shut down after just 20 hours because the filter was too clogged.

Anytime the DNR issues an advisory, a notification is sent to fellow state agencies, giving them an advance warning.

The Department of Health's Summer Health Hazards Dashboard showed how the wildfire smoke impacted hospital visits. July 16 was the largest single day spike for Severe Asthma Emergency Department (ED) visits since 2018. Milwaukee County had the highest number of visits for severe asthma, and rates increased in every region of the state that day.

The number of ED visits for severe asthma in July of 2026 was quite a bit higher than past Julys. July on average sees around 1600 ED visits, in 2026 saw over 2000 ED visits for severe asthma. Both 2025 and 2023 (other years with bad wildfire smoke) had less ED visits than 2026.

Each division and program has actions and performance measures in the department's Climate Adaptation Plan. Air Management has a performance measure related to wildfire smoke events like the

one experienced in July. Air Management will partner with the Office of Communications to improve coordination and communication regarding severe, climate-driven air quality events.

To help accomplish this goal, beginning in Spring 2027 prior to ozone and wildfire smoke season, Air Management will annually host a Forecasting and Advisories webinar for anyone interested, including media and local health departments.

Ozone Updates

All three Wisconsin Nonattainment Areas (NAAs) violated the 2015 standard based on preliminary design values.

Many monitors in the NAA had lower 4th high values than in previous years, though several monitors remain above the standard in 2026. Some monitors are lower in 2026 compared to the past several years.

Question on how if 2026 data is representative of a long-term trend of decreasing ozone.

> Lower ozone in 2026 is positive for public health. Three years of data is considered when determining a design value for regulator purposes. Design values at several monitors in the nonattainment area remain above the 2015 ozone standard. Meteorology and emissions in future ozone seasons will impact whether ozone values continue to decrease. The federal deregulatory agenda for sectors like mobile sources puts future anticipated emissions reductions in jeopardy.

Reclassification of NAA from moderate to serious, litigation is ongoing. This remains stayed. The EPA is reconsidering the bump up, and that may include a public comment period.

On June 30, the governor requested that the Milwaukee NAA be split into two areas. The request included some other technical info (exceptional event, correcting designation dates).

2027 Meeting Dates

Air Management will work with the AMAG to determine CY2027 dates. When announced, dates will be posted to the Air Management Advisory Group webpage.

Next AMAG Meeting

The next study group meeting will be held in February/March 2027.