

Meeting Summary  
Air Management Advisory Group Meeting  
Thursday, March 5, 2026

Zac Adelman, LADCO	
Noelle Brigham, AO Smith*	Nathan Kilger, Bad River Band of Lake Superior
Ron Binzley, DNR	Chippewa*
Craig Czarnecki, DNR	Mike Kolb, WEC Energy Group*
Megan Corrado, DNR	Ben McKay, SEWRPC
Brianna Denk, DNR	Jim Mertes, WTBA*
Bryant Esch, WI Cast Metals Assoc.*	Bill Nelson, Godfrey and Kahn*
Ciaran Gallagher, Clean Wisconsin*	Todd Palmer, Michael Best*
Ashley Gray, DNR	Jessica Parrott, DHS
Gail Good, DNR	Randy Poelma, Ho Chunk Nation
Jeff Hanson, WUA*	Eric Svingen, EPA*
Art Harrington, Godfrey and Kahn*	Josh Trimmerger, Sixteenth Street Health Center
Chris Hiebert, SEWRPC*	Keren Vivas, Wisconsin Paper*
Tracey Holloway, UW*	Ben Wolf, DNR
Adam Jordahl, WMC*	Jeremiah Yee, DHS*

\*AMAG member

## Meeting Summary

### Opening remarks and agenda repair

Program Director Gail Good opened the meeting. Craig Czarnecki ran through meeting procedures.

### Operational Updates

Good noted a 3rd-party assessment of program revenue fees supporting the Title V and Non-Title V permit and compliance programs. The contractor will present their findings at a future meeting. Anyone interested in providing input about program revenue fee structure should let Craig Czarnecki know.

### Proposed Guidance, Rules and Legislative Update

#### Proposed/Final DNR Rules

#### VOC RACT Rulemaking

An overview of VOC RACT requirements was given by DNR staff. The purpose, status, timeline, and upcoming stakeholder engagement opportunities were discussed.

The DNR will offer VOC RACT overview webinar listening sessions in April, May and June.

EPA provided a letter of current VOC RACT issues needing to be addressed which can be made available by the DNR as requested. This rulemaking is intended to meet federal requirements as they currently stand.

### **Final NR 410 Rule**

The NR 410 rulemaking has come to completion. Revised fees for construction permit related actions become effective on April 1. The department sent out an email communication on March 2 to the AMAG subscriber list and to all permitted sources.

The additional revenue generated by the new fees will help the permitting program satisfy statutory requirements, ensure the protection of Wisconsin's air resources and better meet applicants' business needs. The [Construction Permit Fees](#) website addresses the most frequently asked questions.

The NR 410 revisions that go into effect April 1 include a required adjustment of fees to occur every four years to reflect any non-represented general wage adjustments made by the Department of Administration in an approved state compensation plan. The first such adjustment will occur in 2030.

The Revised NR 410 rule also includes an annual reporting requirement on the financial account funded by construction permit fees to give an understanding of where the programs stand.

### **EPA Rules and Guidance**

A list of final and proposed EPA actions since the last AMAG meeting was presented. Additional detail was provided for three specific rules.

### **Status of 2024 PM<sub>2.5</sub> NAAQS**

A status update was given on the 2024 PM NAAQS. The revised 2024 standard is still in effect until either the EPA or the courts take further actions to either vacate the standard or extend the designation deadline.

An Industry group petition on alleged positive bias of current Federal Equivalent Methods (FEM) monitoring technology despite a recent EPA correction factor was discussed. There was no update on a response from the EPA on this petition. The group discussed how this could affect PM<sub>2.5</sub> background calculations and Prevention of Significant Deterioration (PSD).

### **Greenhouse Gas Endangerment Finding**

The endangerment finding was a prerequisite for implementing future GHG emission standards for vehicles and other sectors, however its rescission will not affect criteria pollutant emission requirements still in effect for vehicles.

## Phase 1 Transport Rule

An overview of EPA's Phase 1 transport rule was given. This action proposed approval of State Implementations Plans (SIPs) for ten states. The DNR submitted comments on the proposed rule, identifying where changes appear to be inconsistent with case law, and reflecting concerns that these changes will limit the number of states that must address transport impacts on Wisconsin.

## EPA Permitting Reform Agenda

The EPA has prioritized New Source Review (NSR) permitting reform as part of its effort to facilitate the development of data centers and Artificial Intelligence (AI). Revisiting historic EPA policy regarding activities allowed before obtaining an NSR permit is a key reform objective. A proposed rule altering the definition of "Begin Actual Construction" in the major NSR regulations is expected from the EPA this Spring.

## Ozone Litigation Updates

DNR Bureau of Legal Services provided a status update on ozone litigation.

## Members Update

Jeff Hanson – Wisconsin Utilities Association: Most WUA members have projects requiring air permitting in order to meet capacity needs. Utilities are anticipating and will carefully review federal actions affecting the 111(b) and (d) rules for GHG emissions. WUA members remain very interested in having Title V permits renewed, as out-of-date permits affect the ability of sources to demonstrate compliance.

Adam Jordahl – Wisconsin Manufacturers and Commerce (WMC): WMC and its members are interested in the stakeholder group on Title V fees as well as the VOC RACT rulemaking. He will be reaching out to members to gather their thoughts. WMC and its members also will continue to carefully watch ozone nonattainment because of its potential impacts on businesses.

Ciaran Gallagher – Clean Wisconsin: Clean Wisconsin is continuing with its Wisconsin health initiative, which involves data chats with communities to understand their environmental burdens. They have seen greater participation and are collaborating with others, including researchers at UW – Milwaukee. Clean Wisconsin is involved with a challenge of EPA's decision to repeal its endangerment finding for GHGs.

Art Harrington – Art highlighted the large energy issues (e.g., increasing demand, financial burdens) being created by hyper-scale data center development. He noted that there is tremendous public interest in proposed data center development and the likely impacts of that development. He mentioned several recent and upcoming public venues on this issue, including one at Marquette University and another at Oshkosh Trucks.

## LADCO

Zac Adelman, Executive Director of the Lake Michigan Air Directors Consortium (LADCO) provided a presentation on trends in Ozone and PM2.5 concentrations, along with precursor emissions in Wisconsin.

Ozone Precursor Trends: Large reductions in oxides of nitrogen (NO<sub>x</sub>) have been observed over the past 20 years. Emissions from Volatile Organic Compound (VOC) sources have flattened or slightly increased. Sulfur Dioxide (SO<sub>2</sub>) emissions have dropped significantly. Reducing VOCs has the trifecta benefit of reducing Ozone, PM 2.5 and air toxics.

The 2023-2025 Ozone Design Values in Wisconsin and Chicago along western shore of Lake Michigan were the highest in the region. Ozone has dropped in Milwaukee since 2001 but has plateaued and slightly increased beginning in 2014. Precursors continue to be transported from mobile sources and large industrial areas to the South. Nitrogen Dioxide (NO<sub>2</sub>) continues to decrease but is flattening, as an ozone precursor. This correlates with flattening ozone values.

Most areas of the state have decreasing ozone values when adjusted for meteorology and wildfire smoke. Ozone values are increasing across much of Chicago, demonstrating a continued need for VOC and NO<sub>x</sub> controls in the Chicago area.

Additional ozone decreases can be achieved by continuing to reduce VOCs in Southeast Wisconsin. Medium and heavy-duty mobile source emissions reductions are the best way to decrease ozone but remains difficult due to federal jurisdiction of this sector.

PM<sub>2.5</sub> Trends: 2025 was worse than previous years due to wildfire smoke from Canada, however all statewide PM<sub>2.5</sub> monitor design values are below the PM<sub>2.5</sub> NAAQS.

Local pollution control is most effective for regional strategies and drives long-term average air quality trends more than background/transport pollution. Nonattainment area control programs continue to be effective at reducing pollution and exceptional event demonstrations can be useful in meeting near term attainment goals.

LADCO proposed stakeholder conversations for continued brainstorming of solutions as part of a regional coalition to determine a regional strategy to reduce emissions.

### **Satellite Data**

Tracey Holloway, UW Department of Atmospheric and Ocean Sciences, presented a 2025 paper that appeared in the Journal of the Air & Waste Management Association.

In general, stakeholders (e.g., regulators, public policy makers) have not considered satellite data useful. Tracey pointed out how satellite data fits into the air management process: (1) setting standards, (2) assessing status and monitoring progress and in (3) implementation.

- Satellite data has a role in epidemiological studies and health impacts and other factors to set standards.
- Satellite data has a role in assessing status and monitoring progress, for example in air quality forecasting and trends analysis.
- Data also has a role in model evaluation, improved emissions inventories, exceptional event demonstrations and ozone sensitivity to precursors.

[HAQAST has a website](#) and routine meetings. The next meeting is scheduled for May 13-14 in Madison. These meetings are also live streamed and archived.

**2026 Meeting Dates**

- Tue. June 2, 2026
- Thu. Sept 17, 2026

**Next AMAG Meeting.** The next study group meeting will be held on Tuesday, June 2 at 9 a.m.