

Meeting Summary
Air Management Advisory Group Meeting
Tuesday, June 2, 2026

Julia Alberth, Healthy Climate WI
Renee Bashel, Interested party
David Bittrich, TRC Environmental
Ron Binzley, DNR
Anna Blaszkowski, WMC
Philip Bower, DNR
Noelle Brigham, A.O Smith Corp*
Megan Corrado, DNR
Craig Czarnecki, DNR
Brianna Denk, DNR
Bryant Esch, WI Cast Metals Assoc.*
Emily Files, WUWM
Ciaran Gallagher, Clean Wisconsin*
Don Gallo, Gallo Law LLC
Gail Good, DNR
Ashley Gray, DNR
Mark Hammers, SCS Engineers
Jeff Hanson, WUA*
Rob Harmon, U.S. Venture Inc.
Chris Hiebert, SEWRPC*
Jodi Jansen, Godfrey and Kahn
Scott Karbon, Manitowoc Public Utilities

Nathan Kilger, Bad River Band of Lake Superior
Chippewa*
Nathan Kloczko, DHS
Mike Kolb, WEC Energy Group*
Ashley Korrer, WEC
Matt Matrise, DNR
Ben Mckay, SEWRPC*
Jason Martin, Foth Infrastructure
Michael Moran, DNR
Rita Neff, TRC Companies
Bill Nelson, Godfrey and Kahn
Todd Palmer, Michael Best and Friedrich LLP*
Randy Poelma, Ho Chunk Nation*
Corey Prigent, All 4 Inc.
Patti Stickney, SHE
Troy Stucke, Charter Mfg.
Steve Stretchberry, WEC Energy Group
Eric Svingen, EPA*
Ethan Turiff, Interested party
Keren Vivas, Wisconsin Paper
Joe Van Rossum, DNR
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, introduced Ashley Gray as the new Compliance,

Enforcement and Emissions Inventory section manager. Good also said the program was planning to recruit for six engineers in the Fall.

Proposed Guidance, Rules and Legislative Update

Proposed/Final DNR Rules

NR 410 Rulemaking

Clearing House Rule No. CR 24-057 revising fees for construction permit actions contained in ch. NR 410 of the Wisconsin Administrative Code became effective on April 1, 2026

The department has created a webpage that contains all the revised fees and FAQ on the rule. The webpage is located here: <https://dnr.wisconsin.gov/topic/AirPermits/PermitFees.html>

The additional revenue generated by the revised fees will help the permitting program satisfy statutory requirements, ensure the protection of Wisconsin's air resources and better meet applicants' business needs.

VOC RACT Rulemaking

The Clean Air Act requires states that are classified as Moderate nonattainment or above to implement Reasonably Available Control Technology (RACT) requirements to limit emissions of VOCs, a precursor to ozone.

In this rulemaking, the DNR will incorporate the U.S. Environmental Protection Agency Control Techniques Guidelines (CTGs) into state code as required, and update VOC control rules for major sources to meet RACT requirements. Without VOC RACT rule revisions, the state will not be meeting all federal requirements and the state's nonattainment areas will be ineligible for redesignation to attainment, even if ozone concentrations are below the standard. This can impact economic growth as nonattainment areas would continue to be under stricter regulations. Additionally, this rule will limit emissions of ozone-forming substances and meet Clean Air Act requirements protecting air quality in ozone nonattainment areas.

- 11 CTG sources identified
- 21 non-CTG major source identified.

On April 30, the Air Management Program held an information session to discuss the purpose of the VOC RACT rulemaking. During the information session the group discussed the proposed revisions for each chapter as well as upcoming opportunities for public input.

There were a couple of general comments and questions about RACT, but one member specifically asked for this rule revision to clean up NR 423.03 which is the solvent metal cleaning rule. Based on that comment, staff have spent time reviewing that language and drafting changes.

As staff continue with the rule drafting phase, the Air Management program will hold two additional stakeholder feedback sessions. During these sessions, rule changes drafted to that point will be

discussed and those attending will have an opportunity to offer feedback.

- Non-CTG VOC RACT Informational Session: June 17, 10:00 A.M.
 - The first session will focus on the Non-CTG VOC RACT rules which are NR 419 and NR 424. These rules impact major sources that emit over the major source threshold in a nonattainment area.
- CTG VOC RACT Informational Session: June 30, 9:30 a.m.
 - The second session focuses on the CTG rules found in chapters NR 420, 421, 422 and 423. The most impactful changes to these rules is due to the addition of 3 new CTGs and a revision to one existing CTG. This may impact
 - Facilities that manufacture automobile components or complete surface coating for automobiles.
 - Facilities that complete surface coating on aerospace vehicles.
 - Facilities that manufacture fiberglass boat molds or components.
 - Facilities that complete surface coating during shipbuilding.

Feedback for the sticker requirement for gasoline delivery vehicles would also be valuable.

An email was sent June 3 with information about the first feedback session (non-CTG VOC RACT). Another will be sent later in June about the CTG feedback session.

Comments on any of the rule chapters (NR 419-425) can be sent to Emma Cleveland at Emma.Cleveland@Wisconsin.gov.

An AMAG member provided comment that alternative Non-CTG VOC RACT process may be a burden that could be streamlined, and asked whether the rulemaking process is a way to streamline that. They were encouraged to attend the June 17 feedback session.

EPA Rules and Guidance

Cross-State Air Pollution Allowances: The EPA has provided notice of the availability of data on emission allowance allocations to certain units under the Cross-State Air Pollution Rule (CSAPR) trading programs.

Updates to NESHAP for Ethylene Oxide from Sterilization Facilities: The EPA is amending the rule to rescind and revise multiple standards as well as providing technical corrections/clarifications

Updates to NESHAP for Polyether Polyols Production:

- The EPA is finalizing certain ethylene oxide (EtO)-specific standards and taking final action on issues raised in an administrative petition for reconsideration.
- The EPA also is finalizing maximum achievable control technology (MACT) standards for certain emission points, testing and reporting requirements, among other standards.

Updates to NESHAP for Chemical Manufacturing Area Sources: The EPA is finalizing new leak detection and repair (LDAR) requirements, testing and reporting requirements, among other standards.

Proposed approval of Moderate Ozone SIP: The EPA has proposed approving parts of Wisconsin's 2015 Ozone NAAQS Moderate Nonattainment Area SIP

Updates to NESHAP for Crude Oil and Natural Gas Production Facilities, Transportation and Storage Facilities: The EPA is not proposing any revision to the current standards in the NESHAP, but proposing standards for methanol from regulated emissions points that will require no additional control requirements and to change the definition of "associated equipment."

Begin Actual Construction in the NSR Preconstruction Permitting Program: The EPA is proposing revisions to the New Source Review (NSR) air permitting regulations to distinguish between the construction of a stationary source and non-emitting components or structure, including changing multiple definitions

Revision of Tier 4 Criteria Pollutant Standards: The EPA is reconsidering the Tier 4 criteria pollutant standards for new light- and medium-duty vehicles. This reconsideration will occur in two separate rulemakings.

EPA Title V Guidance

In April, the EPA issued [guidance](#) on streamlining Title V renewals.

This guidance reaffirms the EPA's position that where there are no changes to the permit terms or underlying applicable requirements, no new application is needed. The permittee may simply redate their previous application. Permitting authorities may allow sources to cross-reference or incorporate by reference material submitted in previous applications. Permitting authorities do not need to proactively explain the legal and technical basis for every permit term, rather they may focus on changes to the permit. The EPA reminds permitting authorities that during a renewal proceeding, all aspects of the permit are open for comment.

The department practice on processing Title V renewals is consistent with the streamlining practices given in this guidance.

In May, the EPA issued a second [guidance](#) on Title V, which addressed streamlining Title V reviews. This guidance addressed several issues, including:

- The ability of EPA to concurrently review Title V renewals during the public comment period for a permit.
- The ability of the EPA to expedite and conclude a review prior to the end of its 45-day review period.
- The correct method for calculating Title V permit review deadlines.

Several AMAG members asked during the meeting how the second guidance may change the timing of EPA's review of Wisconsin Title V renewals. The department will discuss the matter with the EPA.

As a reminder the department is not currently writing Title V renewals, as it has insufficient permitting staff to address renewals. The current Title V backlog is approaching 54% and will continue to grow.

Begin Actual Construction Proposed Rule

The [proposed rule](#) would broaden the scope of allowable pre-permitting activities by amending the regulatory text. The rule revises the definition of “Begin Actual Construction” and adds a definition of “pollutant-emitting activities” to codify distinction between “emission units” that require a permit and elements of a project that do not. If adopted as proposed, a state rulemaking would be necessary to make the final rule operative in Wisconsin.

Title V Emergency Affirmative Defense

On June 1, the EPA [rescinded](#) 2023 final rule that removed emergency-related affirmative defense. This action does not create new regulatory requirements but restores federal regulations as they were prior to the 2023 rule. These restored provisions allow sources that exceed permitted emission limits to assert an affirmative defense in civil enforcement litigation when they can demonstrate that excess emissions occurred as the result of qualifying “emergency” circumstances.

The restored provisions have never been in Wisconsin’s statutes or administrative code and are not part of the state’s approved Title V program

PFAS Legislation

Wisconsin Act 19 allocated \$125 million into a segregated fund for PFAS related activities, however additional legislation was necessary before the DNR could access these funds. Assembly Bills 130 and 131 were introduced in the State Legislature in 2025 and Gov. Evers and the DNR negotiated with the bill authors resulting in substitute amendments that passed the legislature and were signed into law as Acts 200 and 201. These laws release the funding and created a variety of grant programs and requirements.

Several discrete programs that were created and funded by these laws:

- Exemptions to Spills Law
- Codification of Interim Biosolids Strategy
- Airport and Industrial Process Grant Program
- Municipal and Private Well Grant Programs
- Other provisions
- Staffing

The DNR is currently accepting questions and feedback on the development of programs authorized by these laws. You can [use the survey monkey link](#) to access a survey to submit your input. On the DNR’s [website](#), you can also find updates on implementation as well as sign-up to receive updates through email.

Emissions Inventory

The department had 2,266 sources report on emission inventory in 2025. This includes 635 under

threshold notifications. This reporting year, users transitioned from WAMS to MyWisconsinID. The Air Management Program assisted many users through the process and provided additional time for compliance assistance to account for the change. Schedule for 2025 emission inventory data:

- Environmental fee statements have been issued to facilities (by May 31)
- Payments are due within 30 days upon receipt
- Certifications are due by June 30, 2026

The air program is billing \$4,186,979 for air environmental fees for 2025. This value includes TV and Non TV source fees.

- 2024 \$4,131,383
- 2023 \$4,122,147
- 2022 \$4,434,009

For 2026 emission data:

- In fall of 2026, the Air Emissions Inventory Updates Fact Sheet will be updated.
- The program is planning another webinar in December 2026 and the updates in the fact sheet will be discussed.

The program is open to suggestions from users on improvements. Reach out and share your feedback on the reporting procedure with [Ashley Gray](#) or our [Emission Inventory Coordinator Megan Corrado](#).

Annual Network Plan

The Wisconsin Air Monitoring Network Plan is an annual report required under the EPA's Code of Federal Regulations (40 CFR 58 § 58.10(a)(1)). The goals of this plan are to demonstrate that the DNR air monitoring network meets current federal monitoring requirements, detail any changes proposed, provide specific information on each monitoring site, and provide the opportunity for the public comment on air monitoring activities conducted by the DNR.

Responses to the plan are gathered through a 30-day public comment period, a public meeting and EPA approval. The plan is submitted to EPA prior to July 1. EPA is required to approve or disapprove of the plan within 120 days of submittal.

Changes to the air monitoring network are intended to improve the effectiveness of DNR's monitoring efforts. Last years network plan proposed several changes that were approved by EPA and implemented by DNR. These completed changes include:

- Shutdown of ammonia monitoring at the Bad River tribal site
- Shutdown of barometric pressure at the Waukesha site
- Industrial monitors and special purpose monitors associated with enhanced ozone monitoring were started or shutdown as needed

- Shutdown of the industrial sand mine monitor at AMI Silica sandmine following the approval of a monitoring variance application
- Replacement of several aging monitoring shelters that had reached the end of their usable lifespan

Proposed network changes for the upcoming 2027 network plan include:

- Relocating the Milwaukee 16th Street site located on the roof of a Sixteenth Street Community Health Center property due to uncertainty surrounding site access. Suitable locations proximal to the current monitoring site are being considered including Mitchell Park 0.9 miles away or Southside Health Center 0.6 miles away. All locations under consideration will be representative of the neighborhoods surrounding its current location.
- Adding Meteorological parameters (planned) at both Ho-Chunk Tribal sites
- Replacement of several aging monitoring shelters
- Start-up and shutdown of industrial monitors and SPM monitors associated with Enhanced Ozone Monitoring (EOM)

Clean Air Month

Craig Czarnecki, Air Management Outreach Coordinator provided a summary of Clean Air Month activities. Events began in April with attendance at the Breathe Easy Play Hard event at the Madison Children's Museum on April 11. The Air Management Program shared information about air monitoring equipment and offered air trivia. This event was a celebration of a new PurpleAir monitor on the museum's roof, part of the Love my Air campaign in partnership with Children's Health Alliance.

The Clean Air Month [news release](#) was published May 4. Social media posts went on NextDoor, LinkedIn and Instagram. Webpage updates were made to the [Clean Air Month page](#), and the Program visited Huegel Elementary School in Madison to talk with Fourth grade students about the Air Quality Index and wildfire smoke.

Clean Air Month wrapped up with the announcement of this year's Air, Air Everywhere Poetry contest winner. Blake Johnson from Samuel Clemens school in Milwaukee took first place. His winning poem as well as the two runners up can be read on the [poetry contest webpage](#).

Members Update

Jeff Hanson: Described peaking units and stack testing concerns related to MISO direction during times of grid congestion. Bryant Esch: Noted attention to energy demand in the state, especially for foundries as larger energy users.

Todd Palmer: Noted renewable energy and transmission projects, as well as data center projects.

Bill Nelson: Shared appreciation for Regional Supervisors and the assistance they have provided on recent issues, especially as vacancies are high in the AM Program.

Ciaran Gallagher: Shared that the HAQAST event in Madison had a variety of attendees and there was significant coordination between scientists and implementers. Also noted that Clean Wisconsin is

reviewing and assessing diesel generators at data centers. CW is also reviewing and commenting on federal rule rollbacks.

Program Funding Update

Gail Good and Ron Binzley described the recent AMAG subgroup meetings and how the input shared at those meetings was incorporated into the biennial budget process. Interested stakeholders can keep up to date with next steps through brief monthly meetings and AMAG updates.

Ozone Topics

Brianna Denk provided an update on the 2026 ozone season, which began on April 1. DNR Attorney Philip Bower provided an update on 2015 ozone bump up litigation.

Next AMAG Meeting. The next study group meeting will be held on **Thu. Sept. 17** at 9 a.m.