

Meeting Summary

Air Management Study Group Meeting

Thursday, August 16, 2018

9:00 am

Room G09, State Natural Resources Building (GEF2)
101 S. Webster St., Madison, WI

Attendees

Gilberto Alvarez, EPA+	Jeff Jaeckels, MGE*
David Bizot, DNR	Maria Hill, DNR
Scott Blankman, Clean Wisconsin*	Emily Houtler, DNR
James Bonar-Bridges, DNR	Amanda Jutrzonka, DNR
Phillip Bower, Husch Blackwell	Jeremy Luebke, Short Elliott Hendrickson
Steve Dunn, Alliant Energy	David Melum, Michels Corporation*
Donald Gallo, Axley Brynelson+	Todd Palmer, Michael Best*
Gail Good, DNR	Rachel Rineheart, EPA+
Rob Harmon, Bemis Company	Diane Sackmann, Silgan Containers
Art Harrington, Godfrey & Kahn*	David Seitz, TRC Environmental
Kristin Hart, DNR	Sheri Stach, DNR
Curtis Hedman, WI Dept of Health Services	Andy Stewart, DNR
Chris Hiebert, Southeastern Wisconsin Regional Planning Commission*	Steve Tasch, Trinity Consultants
Joe Hoch, Alliant Energy*	Rob Thiboldeaux, WI Dept of Health Services*
Eric Hoven, Dairyland Power Cooperative	Mark Thimke, Foley & Lardner
	Lucas Vebber, WMC*

*Air Management Study Group (AMSG) members

+Skype attendee

Action Items

- **Next AMSG Meeting.** The next study group meeting will be held on **Thursday, November 1, 2018** at 9 a.m. at the State Natural Resources Building (GEF 2), Room G09, 101 S. Webster St., Madison.

Meeting Summary

Opening remarks & agenda review

Gail Good, Air Program Director

Good opened the meeting with introductions and reviewed the agenda.

Program updates

Hiring update

Gail Good

Good mentioned that the program is hiring for a meteorologist, as well as several other positions. Overall, recruitment and hiring are ongoing. Stewart reminded the group that Randy Matty is the new northeast regional supervisor. His contact information and the counties he is responsible for can be found on this map: <https://dnr.wi.gov/topic/AirQuality/documents/Supervisors.pdf>.

Palmer asked how many NSR and PSD permit writers the program has. Hart responded that the program has 10 NSR permit writers, with four that regularly write PSD permits and an additional three that will be trained on PSD permits in the fall.

Proposed guidance and rules

Kristin Hart, Permits and Stationary Source Modeling Section Chief

David Bizot, Air Quality Planning and Standards Section Chief

Hart mentioned that there are two pieces of program guidance in development. No guidance is out for public comment or has been recently finalized. The program is working on updates to the Wisconsin Air Dispersion Modeling Guidelines and hopes to finalize changes in the fall. The program is also working on guidance on Emission Reduction Credits (ERCs).

Stakeholders were interested in the ERCs guidance, and several stakeholders asked questions about the materials being prepared for ERCs. Hart responded that the program is working on informational materials, like web updates and fact sheets. Some of the content will be in FAQ format. The materials will provide basic information for a general audience, as well as more in-depth information for sources interested in generating, maintaining, and reporting ERCs. The guidance is still in progress.

Hoch asked how often the program has seen a need for finding offsets in nonattainment areas and the demand for ERCs. Hart responded that there has not been a demand in recent years, but there is anticipated to be more interest in the future.

Bizot continued by explaining that there are several proposed federal rules and guidance. There are three proposed approvals of SIP submittals, including Wisconsin's SIP submittals for Modification of Greenhouse Gases language, PM_{2.5} annual standard, and VOC Definition Update and Removal of Obsolete Gasoline Vapor Recovery Regulations.

Bizot noted that EPA's Review of the Primary National Ambient Air Quality Standards for Sulfur Oxides is for maintaining the existing SO₂ standard. Comments were due August 9. There was also guidance on Increasing Consistency and Transparency in Considering Costs and Benefits in the Rulemaking Process, which closed for comment on August 13. Comments are due today, August 16, for Strengthening Transparency in Regulatory Science. Finally, there is guidance out for comment through August 31 for Determination Regarding Good Neighbor Obligations for 2008 Ozone NAAQS. This guidance is related

to interstate transport. Bizot explained that the Cross-State Air Pollution Rule (CSAPR) Update was not a complete solution for most states covered by that rule, and this is EPA's proposal on how to close out that issue.

Bizot continued by noting that three federal rules or guidance have been finalized since the last stakeholder meeting. In July, the state received final approval of the Wisconsin Regional Haze Progress Report. On August 3, designations for the 2015 ozone standard became effective. On August 31, the Wisconsin SIP on Modification of Greenhouse Gas Language will be effective.

Good explained that the meeting presentation now includes a placeholder for draft and final legislation, per a request at the previous stakeholder meeting. There is no legislation to mention at this time, but the slides will be used in the future when there is information to share.

Palmer asked if DNR is planning to submit comments on EPA's proposed CSAPR Close-Out rule. Bizot said the department is reviewing EPA's proposal and considering whether to comment.

Hoch asked for an update on the transport SIP for the 2015 ozone standard. Bizot said the infrastructure SIP for the 2015 ozone standard (which includes the transport SIP requirement) was out for public comment earlier this summer. Information can be found on the Air regulations and policies public notices webpage (<https://dnr.wi.gov/topic/AirQuality/Input.html>). The submittal is due October 1 and the program will meet the deadline for submittal. States are required to submit an infrastructure SIP three years after a new standard to demonstrate that the state has the proper authority to implement standards and that no further action is required. The interstate transport obligation SIP is also due October 1 and the program intends to meet the submittal deadline.

Hoch mentioned that there was a hearing about requirements for guidance. He said that what DNR is doing appears to meet the intent of the draft legislation.

Act 159 and Annual Network Plan status update

Gail Good

Good explained that Act 159 impacted the preparation of the Air Program's Annual Network Plan (ANP). Submittal of the plan is an EPA requirement to show that the state is meeting federal ambient air monitoring requirements. Act 159 required exclusion of the Kohler-Andrae monitor. The program submitted the ANP without the Kohler-Andrae monitor earlier this year. On June 21, EPA responded that the plan was not approvable because of the exclusion of that monitor. Act 159 allowed for the state to resubmit the plan with the Kohler-Andrae monitor included, so the program resubmitted the plan on July 27. The program has not yet received a formal letter of approval on the second submittal. EPA has 120 days to formally respond.

Good continued by noting that Act 159 also had a requirement to submit a request related to SIP requirements. The program did make a request on one SIP element, and there has been no formal action to date. The DNR will continue to work with EPA throughout this process, and has been following the law as written.

Digitization and OnBase update

Sheri Stach, Business Support and IT Section Chief

Stach explained that OnBase is a service provided by the Department of Administration's (DOA) Division of Electronic Technology for state agencies to use for document management, such as for digitizing records. It is a customizable system, not one size fits all, so individual agencies or programs within an agency can use the system in a way that will meet the needs of that organization.

Digitization is a priority for many DNR programs, and the DNR's Department Leadership Team (DLT) chartered a digitization steering team in 2017 to look for opportunities and create consistent and standardized processes across the agency, setting the foundation for all programs. The steering team considered many things, including 2 executive orders, EO 189 and EO 288. EO 189 is related to making electronic copies of records available to the public at no cost, and EO 288 directs agencies to submit a plan to DOA on how they will digitize their records.

The DNR completed some smaller pilot projects in OnBase and is in the process of developing tools that will be used for all programs. Looking ahead, the department will be expanding the system to accommodate different types of documents. In order to properly input the system agency-wide, the DNR's Bureau of Technology Services is hiring a staff person to lead the effort. The program is working closely with the Environmental Management division representative on the steering team.

Stach showed two examples of how other agencies are using OnBase, including the Ohio Environmental Protection Agency and the City of Bellingham. The examples show how the system is customizable to meet different needs.

Thimke mentioned that OnBase was a focus of a presentation he attended in Iowa. At this meeting in Iowa, he asked how the state was protecting the ability to maintain confidentiality of documents and prevent hacking, and received no answer. Stach said she does not know how Wisconsin is handling this concern. She said the Air Program will be uploading only public documents, so documents that are part of a confidentiality agreement would not be made available. Thimke asked how confidentiality would be handled if air permitting was completely electronic. Stach said the program has not taken that approach, and understands that the program is entrusted to keep information confidential and will be working to make sure information is kept safe. Good noted that this project is just at the development stage. Stach said she will share Thimke's concerns with the steering team. Thimke commented that this is a big concern for the private sector.

Report out on the Act 70 pilot project

Kristin Hart

Hart mentioned that the Act 70 Pilot Advisory Group met on August 10. The group is planning to schedule their meetings before the Air Management and Brownfields study group quarterly meetings. This pilot group is a collaboration between the Brownfields, Air Management, and Green Tier programs, and the goal is to remove regulatory barriers in order to encourage manufacturing facilities to locate on

brownfield sites. The idea is to get businesses back into urban areas. The August meeting focused on Tax Increment Financing (TIF) and included a report out on the development of a registration permit for companies in Tier 2 of the Green Tier program. Hart asked some of the representatives on the Act 70 group to share their thoughts.

Harrington noted that one of the challenges with the pilot project is there are three programs with their own requirements. For example, there is an audit requirement associated with Tier 2 Green Tier companies, which requires an environmental compliance audit. Another Tier 2 requirement is that companies are required to have an Environmental Management System (EMS) for establishing sustainability. The presentation about TIF at the August meeting focused on how to potentially recover the cost of setting up an EMS through TIF, and how Act 70 might provide greater flexibility for using TIF for environmental remediation.

Thimke commented that the group is looking at the issues both from the perspective of a single-facility operation to a business park redevelopment zone. The business park approach could be used to set up a TIF that covers a lot of the work on an EMS that all companies in that business park could take advantage of, and essentially get pre-approval for certain environmental aspects.

Jaeckels said the group is looking for examples of how these types of projects have been implemented. They are looking for feedback on where this idea could work and how it could attract manufacturing businesses.

Hart continued by explaining that one element the group is working on is a registration permit for Green Tier companies. The issue the group tackled in August involved timing needs of the Air Permit Program versus timing needs of the Green Tier Program. The Act 70 Pilot is for sources that are constructing or modifying on a brownfield. A facility needs to get an air permit before it can construct or modify. The Air Program is drafting a new registration permit for facilities that are in Tier 2, but typically, a facility is not able to get into Tier 2 until it is already constructed and operating. The solution the group has come up with is that the facility could first declare its intent to become a Tier 2 source and obtain coverage under a registration construction permit. This would allow the source to construct and begin operation and provide a timeframe to establish an EMS and gain Tier 2 status. Once the source signed a contract under Tier 2 of Green Tier, the department would grant coverage under the registration operation permit and the source would have access to the Act 70 benefit.

The group is working on drafting the permits relatively quickly so sources can get involved in the pilot phase. The goal is to have the draft permit ready for EPA to review in September and to get the permit documents into the public comment phase by November and issued by January, so the first facilities can obtain coverage in early 2019. The group is calling this permit type the Type G ROP. In parallel, the Green Tier side is looking at model language for charters and contracts, which will be ongoing in the fall, winter, and spring. It is anticipated that the first sources will have coverage granted under the new registration operation permit and be in the Act 70 pilot in 2020-2021. Hart thinks this is an ambitious, but achievable timeline.

Thimke commented that Cathy Stepp at EPA Region 5 has heard an initial description of the program and is excited to work with the state to make this happen. She has it listed as a priority for the region.

Member updates

Jeff Jaeckels, MGE – Said MGE is in the process of finalizing its sustainability and environmental report.

Joe Hoch, Alliant Energy – Mentioned that Alliant Energy recently released its corporate sustainability report. He encouraged study group members to look at the report and send feedback to him.

www.alliantenergy.com/sustainability.

Chris Hiebert, Southeastern Wisconsin Regional Planning Commission – Mentioned that the D.C. circuit vacated some 2008 ozone standard rules. SEWRPC still has to do transportation conformity demonstrations and determinations for the six-county metropolitan area. These counties are in attainment now, but they still have to demonstrate attainment because they are technically still in a maintenance period. There was federal approval of conformity, though U.S. EPA has requested the D.C. circuit to reconsider. SEWRPC will be doing a conformity demonstration later this year, and is just beginning the work of setting up their transportation conformity work. The next demonstration will include the 1997, 2008, and 2015 ozone standards. They do not have to demonstrate conformity for the 2015 standard yet, but plan to do so anyway while doing the demonstrations for the other standards.

Rob Thiboldeaux, DHS – Talked about the role of the DHS hazardous assessment group, which supports local health departments and other environmental agencies in responding to air quality issues and concerns at the community level. The DHS partners with the State Lab of Hygiene for analytical and field equipment needs. The goal of the field screening is to support regulatory activities of other groups. The State Lab recently received money from the CDC for preparedness funds for equipment, so they are looking at replacements, upgrades, and expansion of equipment. Thiboldeaux also noted that Dr. Curtis Hedman, who was previously part of the State Lab, joined DHS in the past year, which expands their capacity.

Todd Palmer, Michael Best – Mentioned that the replacement for the Clean Power Plan will be released very soon, in a matter of days. It is expected to be a substantial change from the original and will likely focus on emission control technologies within the fence line of the utility. Litigation is likely in the future. Palmer continued by mentioning a lawsuit pending in the D.C. circuit for the second version of the CSAPR rule. The oral argument date is set for early October, and the Wisconsin DOA will be participating in the oral argument. Finally, EPA filed a brief in the D.C. circuit, announcing the timeline for performing an anti-backsliding analysis under the RFS program. The U.S. EPA anticipates completing this analysis in the next 14 months. This goes along with a requirement in the Clean Air Act that EPA must evaluate the impact that renewable fuels would have on air quality. This was supposed to be done in 2010, and the Sierra Club sued to get a commitment with a court deadline to finish the report. This was a very hot topic about 10 years ago, especially regarding ethanol and the impact on midwestern air quality.

Mark Thimke, Foley & Lardner – Offered his thanks to Kristin Hart and DNR permitting staff on issuance of the first PAL permit in Wisconsin. Thimke continued by offering a suggestion that the ECHO

database be kept up to date. There is a law firm looking at the database and sending out notices to facilities based on ECHO data. If there is erroneous data that the state could help correct, it should do so to help display the compliance status correctly.

Rulemaking process/priorities

David Bizot

Bizot first responded to a member request for an update on the regional haze SIP. This SIP is due in 2021, and DNR is in the very early stages of working with LADCO and some national and regional groups on how to approach this next round of SIP development. The DNR is also considering recent EPA guidance. The program will have more to report next year.

Hoch mentioned that LADCO released a document a few days ago about interstate contributions to ozone. Bizot said that this was a technical document to support LADCO member state efforts to develop 2015 ozone transport SIPs, due October 1.

Bizot explained that program rulemaking work is a deliberate exercise and is folded into the annual work planning process that outlines what the program will try to accomplish in the next state fiscal year. Work planning happens in winter/early spring, so at that time, the program decides which rules to move forward with in the coming year. The program considers many factors, including: rule changes needed for the program to meet federal requirements; issues raised by stakeholders, regulated sources, the legislature, etc.; issues identified by staff and managers; legal considerations; and available/appropriate resources. Another factor is 2017 Act 39, which places a 30-month timeline on a rule beginning when a scope statement is published.

Good added that, through alignment, the division determined that there should be one person working on rule development to keep track of these factors and timelines. That staff person is Melody Marshall, the division rule coordinator. She was unable to attend this meeting, but will hopefully be able to attend a future meeting and introduce herself. Good noted that the program continues to refine its process, and there is also a division process that is relatively new and that ultimately helps coordinate work according to different timelines. All of this has been very instrumental in helping the program understand its obligations under new laws, and has been critical in understanding how to allocate resources.

Bizot continued by noting that, when the program receives ideas from this study group, those ideas are recorded and revisited as part of the program's annual rule planning process.

Permit streamlining and lithographic printing rules

Kristin Hart

Hart continued the rulemaking discussion by explaining that the program is currently working on two rules. First are revisions to the reasonably available control technology (RACT) rules affecting lithographic printing facilities in southeastern Wisconsin. These rules are currently organized into two parts. Some lithographic printing facilities are subject to both Parts 1 and 2 but because of how the rules overlap, both subject facilities and regulators for the requirements confusing. The program has been

working with several printing trade associations and EPA on ways to revise the rules to reduce the confusion and clarify requirements. The proposed rule changes result in no printer being subject to both parts 1 and 2 of the rule. Existing sources in two counties will be subject only to part 1, while new sources in those counties will be subject only to part 2. Seven other counties in the state will be subject only to the part 2. There are also a few other changes included in the proposed rule, including changes to conflicting definitions and clarifying monitoring requirements. Also, changes to stack testing requirements for smaller printing facilities are being proposed. Printing facilities with low emissions are currently required to test every four years, but historically, no printer has ever violated or shown that they could not meet the limits. Results of the most recent tests performed for all printers subject to the testing requirement were reviewed and showed that the all printers emitted half, or less than half, of the standard. Based on these results, the department is proposing to remove the ongoing testing requirements for small printing facilities, though any new printer will still be required to do an initial stack test to verify that the control device is properly installed and working as required.

The second rule that the program is working on is related to streamlining the permit processes while maintaining consistency with federal requirements. These proposed rule revisions include additional permit exemptions for external combustion furnaces burning ultra-low sulfur diesel and for incineration of confiscated drugs by law enforcement. Some language related to permit exemptions is also changed, including clarifying when and how an exemption can be used. There are also revisions to assure that DNR can more fully implement electronic reporting and digitization, as well as other cleanup and clarification.

Two topics for permit streamlining that have received a lot of stakeholder input and internal discussion. The first is the language for exclusion from commence construction. The proposal is to amend the language to be consistent with the federal interpretation of “commence construction.” This language should be approvable by EPA as a SIP revision. Hart noted that the waiver rule is still in place and is SIP approved and allows minor construction and minor modifications to commence prior to construction permitting. The program has proposed some clarifications in the waiver regulations to provide more certainty to sources seeking a waiver.

There have also been several meetings with external stakeholders and many internal discussions about the statutory requirement to define “cause or exacerbate”. The historical records were reviewed and many different ideas were proposed. Stakeholders ultimately suggested that the program rely on how it has implemented the statute for 40 years, and to not try to write a definition in rule. At this point, the program is recommending not including a definition in this rule package. Hart asked stakeholders for suggestions on how the program should document this decision. She noted it will be part of the analysis that goes with the board order, and the discussions and decision have been recorded in meeting notes. Stakeholders can send any feedback to Kristin. The idea is to have a record of this that will be accessible in the future if the issue is raised again about defining cause or exacerbate.

The next steps for both rules are as follows:

- Soliciting Information for Economic Impacts
 - o Lithographic Printing RACT – August 2018
 - o Streamlining – Sept/Oct 2018
- Public Hearings – typically held 6 months after solicitation

- Lithographic Printing RACT – November 2018
- Streamlining – January 2019
- Final Rule Adoption
 - Lithographic Printing RACT – June 2019
 - Streamlining – August 2019
- Effective Date – typically 6 months after adoption
 - Lithographic Printing RACT – January 2020
 - Streamlining – March 2020

Hart noted that the solicitation for information on the economic impacts of the proposed changes to the lithographic printing RACT rule just concluded and there were no comments.

Hoch asked if EPA has seen the proposed lithographic printing RACT rule changes. Hart responded that they have and provided excellent comments that have been incorporated into the proposed revisions. They were also active participants in several of the stakeholder meetings for the streamlining rule.

LON recoding

Maria Hill, Compliance, Enforcement and Emission Inventory Section Chief

Hill began by explaining that the Air Program is required to send compliance and enforcement data to EPA's Integrated Compliance Information System (ICIS). Currently, when information on a state Letter of Noncompliance (LON) is sent to ICIS, the LON gets coded as a "warning letter". EPA Region 5 has requested that the state LON now get coded as noncompliance in ICIS. Hill clarified that Wisconsin is already meeting EPA requirements for actually notifying EPA of a violation. Right now, Wisconsin is the only state in Region 5 not currently coding an LON as noncompliance in ICIS. There is a sensitivity related to this suggested change because ICIS data is what the public sees, and there is concern that any changes may impact the public's perception of the compliance action.

Refer to slide 37 of the presentation for a screenshot of ECHO with illustrations of what the change would look like to the public. The red boxes at the top show a high priority violation (HPV) and the yellow box shows a non-high priority violation (non-HPV). Hill noted that a non-HPV only shows for one quarter, while the HPV shows for every quarter until the HPV is resolved. The arrow at the bottom of the screenshot shows the action type as "notice of violation" or "warning letter". The change would be that a non-HPV letter would move from "warning letter" to "notice of violation". The designation of non-HPV in yellow at the top would remain the same.

Stakeholders had several questions and DNR responded to each question as shown below:

- Question: Is this something DNR is going to do or considering doing?
- Answer: EPA has been asking DNR for a few years to address this, so it needs to be addressed somehow, but the program is open to how.
- Question: Why does EPA have to list this as violation?

- Answer: This action is already being listed as a violation, which is correct. The change would be from a “warning letter” label to “notice of violation”.

- Question: What are other Region 5 states doing?
- Answer: Minnesota designates the difference between the two letters, and Wisconsin is not sure of what other states do. Michigan has more citation authority than Wisconsin and does not submit warning letters to EPA.

- Question: If a source gets an LOI or LON, and DNR makes a decision that an issue has been resolved, how does it get reflected in ECHO?
- Answer: ECHO is updated quarterly, so the violation may show for one quarter and then be updated (removed). A letter of inquiry does not show up in the EPA system and is not considered an enforcement action.

- Question: A fair number of LONs are resolved with an acknowledgement by both parties that there was a mistake, and that is not being shown. The public does not have the information to understand other actions or discussions. Can a description of what the language means be added?
- Answer: ECHO is EPA’s website. The DNR has had discussions with EPA about this website and has talked about other options.

- Question: Is there is a conference for every LON?
- Answer: The DNR does not typically offer a formal conference when sending an LON but is always open to having a face-to-face discussion with the facility.

- Question: Is there a process for EPA to remove an event from the system?
- Answer: The DNR can resend or correct data. If an LON is sent and it was discovered that there was no violation, DNR can work with EPA to remove the violation from the system.

- Question: What would be indicated as a warning letter?
- Answer: The DNR does not have anything that would be considered a warning letter in ECHO, according to EPA’s direction of how to use the system.

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- Question: Why is there a warning letter option, if it is not used?
- Answer: This is EPA’s system, and other states, or other programs within the state, may use it.

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- Question: So, why hasn’t the DNR used the notice of violation designation?
- Answer: EPA equates the language of DNR’s LON, which alleges a potential violation, to the violation category. But the DNR considers an LON more as a warning, so the program has been categorizing it as a warning. EPA is taking a harder line on insisting that the program be consistent with other states.

- Question: Has the state considered adding another step in the enforcement process?
- Answer: The program has discussed the possibility of issuing more LOIs prior to LONs.

- Question: EPA will not correct errors in ECHO for private sources. Is DNR willing to talk to EPA on behalf of a company to fix an error?
- Answer: Yes, contact Maria with additional information.

Stakeholders noted additional feedback, including:

- The ECHO database has been used for citizen suit actions, and violations can trigger lawsuits.
- There is an unrecognized tax issue because of the 2017 Tax Act. For anything that is declared by a state to be a violation, the costs incurred to come into compliance are not deductible.
- If the goal is to have cooperative compliance and not enforcement action, consider the implications of this decision.
- From the private sector's perspective, a letter of noncompliance is not a notice of violation, but this change makes the action seem more severe than what it actually is.
 - o Hill noted that an LON has always been listed as a violation in ECHO. There are only two choices possible for the designation: warning letter and notice of violation. EPA has told DNR that the program is using warning letter inaccurately.
- This system may show an HPV for an event that occurred on one day, but that has not been resolved for several quarters, and this does not represent that there was just one bad incident. This gives the impression that something bad has been going on for a long time.
 - o Hill noted that an LON only shows for one quarter, regardless of how long it takes to close out. Stewart noted that DNR does not have any control over EPA's website, but the program does have control over how fast a resolution is uploaded to ECHO for NOVs. Hill said that all LONs and NOVs should have close-out letters, once resolved.
- There is no regulatory reason to have an LON. The state could use something else as method to alert a potential issue, such as a letter of alleged potential violation.
- The state should not be penalized for the approach it has been taking.
- There was a suggestion to form a subcommittee for externals to talk about their concerns with the department.
- Some companies are unable to get work if there is a violation listed.

Good thanked stakeholders for their active participation. The program will evaluate the feedback and give thought to the next steps. More information on this topic will be shared in the future. In the meantime, the DNR will not make any changes.

Asbestos and ARDN update

Maria Hill

Hill mentioned that there is a new staff person, Liesl Stewart, for the asbestos program, offering administrative support to asbestos inspectors. This position is helping prioritize workload, increase customer service, coordinate inspector certifications and safety tests, and develop the ARDN system. ARDN is an online system that stands for Asbestos Renovation and Demolition Notification. Having this additional support allows the inspectors to be in the field more. Hill noted that the ARND enhancements include: redesigning online Notification pages, streamlining the Notification form, removing the notarization requirement for online submittal, and improving enforcement tracking capabilities.

Cooperative compliance

Maria Hill

Hill mentioned a guidance memo released in January from EPA encouraging collaboration between EPA and states. Collaborative efforts include joint work planning and sharing information on compliance issues and priorities, inspection priorities and resource sharing, and EPA audits. It has been recognized that the state has primacy in authorized programs. This means that states should be the primary day-to-day implementers of their delegated programs. Exceptions include: where states have not addressed a significant issue, in emergency situations, when there is a significant threat to public health, and to address widespread noncompliance problems. Regions will provide progress reports to EPA headquarters, and EPA will update the guidance based on the reports and input from states. Hill noted that there have been a lot more conversations in the recent months.

Harrington asked how the compliance staff in the department is organized, and about the chain of command for enforcement. Hill responded that the Air Program works with the Environmental Enforcement program at DNR. When an NOV is elevated, the Air Program is assigned an enforcement specialist from Environmental Enforcement, and they and their supervisor work with the Air Program.

Harrington asked if there is a department org chart. Good responded that there is a very general org chart available externally, but it does not include a great level of detail. Harrington noted that DNR's Legal program created an org chart that shows who is responsible for what, and something similar for the Air Program would be really helpful. Good said the program is looking into making an org chart that includes more than just a person's job title, and more information about what they do in the program.

Closing remarks

Harrington noted that he appreciates EPA's engagement in the AMMSG meetings. There are different advisory committees in different programs that he encouraged EPA to be active in as well. Harrington commented that he finds these meetings really valuable. Good noted that all programs in the division have set up a study group like this, so if there is interest in other groups, there are other groups, some of which have been newly formed through alignment.

Good noted that the November AMMSG meeting will include a discussion about priority topics for 2019, as well as potential meeting dates for next year. Good said this will include a discussion about program priorities and that the program would like to hear about stakeholder priorities. Good appreciates the feedback from stakeholders about agenda items prior to these meetings.