

Meeting Summary
Air Management Study Group Meeting

Tuesday, February 26, 2018

9:00 am

Room G27, State Natural Resources Building (GEF2)
101 S. Webster St., Madison, WI

Attendees

Frank Acevedo, EPA*+	Chris Hiebert, SEWRPC*
Renee Bashel, DNR	Maria Hill, DNR
David Bizot, DNR	Christina Hogan, DNR
Scott Blankmann, Clean WI*	Tracey Holloway*+, UW Madison
James Bonar-Bridges, DNR	Brenda Kubasik, MGE
Mike Cassidy, Kohler Co.	Erica Lawson, Tetra Tech
Craig Czarnecki, DNR	Dave Melum, WTBA*
Steve Dunn, Alliant Energy	Katie Praedel, DNR
Renee Exum, MBF*	Lane Ruhland, WMC*
Don Gallo, Axley +	Dave Seitz, TRC
Gail Good, DNR	Andrea Simon, WI resident
Ashley Gray, DNR+	Sheri Stach, DNR
Art Harrington, Godfrey & Kahn S.C*+	Sean Stephenson, WTBA*
Curtis Hedman, DHS	Andy Stewart, DNR
Joseph Hoch, Alliant Energy*+	Ken Yass, Hydrite
Mark Thimke, Foley & Lardner	

* Air Management Study Group (AMSG) members

+Skype attendee

Action Items

- **Next AMSG Meeting.** The next study group meeting will be held on **Thursday, May 23, 2019** 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. No additional items were suggested. Good thanked everyone for attending after having to reschedule the meeting. Good recognized there was a little lighter attendance due to the reschedule. A number of people attended the meeting over the phone or via skype. Good invited each person to introduce themselves and attendees went around the room with introductions.

Due to the reschedule, the Air program added a few updates to the Powerpoint slides since they were posted online prior to the originally scheduled meeting in early February. Good briefly ran through each agenda item. Good also invited attendees to include anything else not on the agenda, no one had anything to add.

Program updates

Hiring update

Good mentioned the Air program has had turnover in about half of its positions over the last three to four years. Good said the program just hired for the first time ever, a training coordinator. Good commented the program needs to be focused training staff and giving them tools they need to do their jobs well. The new training coordinator came to the program from another state agency and has been with the program for a few weeks.

Good mentioned the program had some retirements in the Monitoring group and have filled some of those positions with new hires. Good said several recruitments are in the works, the program is continuously hiring engineers and the program has several openings for permit engineers across the state. Good said the program is currently in the interview process for a new meteorologist.

Good said overall the Air program filled 32 positions in the last calendar year.

Proposed guidance and rules

David Bizot, Air Quality Planning and Standards Section Chief

Kristin Hart, Permit and Stationary Source Modeling Section Chief

Hart pointed out the Air program continues to hold on updates to the Air Dispersion Modeling Guidelines while waiting for Modeled Emission Rates for Precursors (MERPs), AERMOD and Significant Impact Levels (SILs), which have not yet been finalized by EPA.

Sean Stephenson asked for an EPA timeline for finalizing, and Hart replied saying the new timeline has been pushed back to Spring 2019. Hart added the program has been working on the permit streamlining rule and is preparing for a hearing that has been scheduled for April 17.

Hart said the Lithographic rule has been approved by the governor on February 22. Hart said the rule goes on to the legislature next and the program expects it to be finalized in Summer 2019.

David Bizot gave an update on the VOC RACT rule, saying the scope statement was approved by the governor on January 30. Bizot added the rule is on the Natural Resources Board agenda for February and the program needs authorization for a preliminary hearing and public comments.

Hart gave an update on EPA draft guidance, the revised policy on exclusions from “ambient air”. Hart summarized the proposal, stating the program is positive on it, since the program sees ambient air in the same way as mentioned in the guidance.

Bizot gave an update on a pair of EPA proposals regarding wood heating devices. The first proposes amending the 2015 New Source performance standards (NSPS) for new residential hydronic heaters and new forced-air furnaces by adding a two year sell through period for all affected heaters and furnaces that are manufactured before the May 2020 compliance date to be sold at retail stores through May 2022. The second proposal asked for comment on several aspects of the 2015 standards of performance for new residential wood heaters, new hydronic heaters and forced air furnaces, to inform future rulemaking. Bizot said comment periods for both proposals ended in mid-February.

Bizot also mentioned the comment period has been extended to March 18 for the GHG 111B rule, which proposes a review of standards of performance for greenhouse gas emissions from new, modified and reconstructed sources (electric utility generating units). Bizot said the comment period had been extended due to the government shutdown.

Bizot said the comment period had re-opened until February 22 for proposed determinations of attainment by the attainment date, extensions of the attainment date and reclassification of several areas classified as moderate for the 2008 Ozone National Ambient Air Quality Standards (NAAQS).

Bizot added that comment periods remain open for three other EPA proposed rules. Bizot said comments are due by March 14 for the SIP approval for nonattainment new source review requirements for the 2008 ozone NAAQS. There is a March 18 deadline for comments on the air plan disapproval which includes the redesignation request for the Wisconsin portion of the Chicago-Naperville, Illinois-Indiana-Wisconsin area to attainment of the 2008 Ozone standard. Bizot mentioned there is also a March 18 comment deadline for the revision of Sheboygan County's nonattainment designation for the 1997 and 2008 Ozone standards and clean data determination for the 2008 Ozone standards.

Bizot then covered finalized EPA rules and guidance, saying the implementation of 2015 Ozone NAAQS for nonattainment area SIP requirements has been finalized, as were many elements for moderate areas of Kenosha county.

Good then discussed 2017 Wisconsin Act 369 relating to legislative powers and duties. Good stated this is impactful in a number of ways, and the Air program has been getting a lot of questions on this legislation. Good said the program has been working with the legal staff when it comes to the guidance portion of the act and a lot of work is being done including looking at the process and interpretation of the rule. Good stated the program is currently waiting for direction. Good told the study group the Air program has a lot of guidance and if any member of the group has guidance items they use or can think of any guidance they'd like to see take priority, let the program know. Good mentioned if Act 369 remains as is, the Air program guidance will need to go back through the 21-day comment period. Good re-affirmed the programs request for feedback on these guidance items and identifying high priority items.

Sean Stephenson asked if the program was working under the assumption that all guidance will need to go back through the 21-day process.

James Bonar-Bridges answered that old items need to be published to the Legislative Reference Bureau (LRB) and get a certification statement.

Good added that the program needs a better understanding of what guidance is, as it's written in Act 369.

Art Harrington followed up, asking if everybody at the meeting understood Act 369. Harrington stated there is an important July date for old guidance and whether past guidance constitutes a rule or not. Harrington raised a concern saying the July date is coming up and there is a lot of guidance the group relies on. Harrington added he knows the department needs to prioritize guidance and would like a response from DNR on how the Air program will move forward.

Good replied to Harrington's concerns, saying the July date is important, and the program will continue to conduct program work consistently. Good said the program is aware of the July date and the legal team is working with the program to put together a process to most efficiently do what the program needs to do, but the program also needs to be patient to let the legal process play out.

Harrington mentioned he talked to Andy Stewart, who provided him with the following link (<https://dnr.wi.gov/topic/AirPermits/Policy.html>) where the public can find guidance. Harrington added he found the link very helpful.

Joe Hoch brought up the Sheboygan clean data finding proposal for non-attainment areas and asked if this is something the DNR would need to re-submit.

Bizot said the department has previously requested that EPA redesignate the entire area. Bizot said some of the technical work would need to be re-submitted given the new geographic areas proposed.

Good mentioned DNR has had a lot of change and covered the latest leadership changes. Good said Secretary-nominee Preston Cole has a team forming around him and while most positions are filled, some have not yet started. Good said there are plans to get Secretary-nominee Cole to a future Study Group meeting. Good also mentioned Darsi Foss was recently named the new Division Administrator for Environmental Management. Foss started Feb 17 and Good noted her familiarity with the division as a positive in the role. Good concluded saying most of the leadership roles are filled including Communications Director.

Mike Cassidy asked if there was a new legal counsel. Good answered that Cheryl Heilman had been named to the position of Chief Legal Counsel.

E-signature update

Maria Hill, Compliance, Enforcement and Emission Inventory Section Chief

Maria Hill gave an update on e-signature. Hill mentioned the Study Group had been hearing about it for a year-and-a-half but the first chance for use by major sources was mid-year 2018 monitoring reports. Hill reported that 18% of the reports received by the program were e-signed. Hill added the program is working on expanding e-signature. Hill said minor sources also have the option to sign up for e-signature, and a substantial outreach effort is underway, including having inspectors help with sign-up for the service along with answering any questions. Hill said the program will keep the Study Group updated as e-signature efforts continue. Hill says the program is excited about using e-signature and the 18% who used it, reported that it worked out well.

Act 70 update

Kristin Hart, Permit and Stationary Source Modeling Section Chief

Hart summarized the Act 70 project as a collaboration between brownfields, Green Tier and air management programs with the goal of providing incentives for manufacturing facilities to locate on brownfields. Hart said an Act 70 stakeholders meeting was held January 18 and the meeting included plenty of discussion, including a focus on the progress of the Green Tier registration permit. Hart added that Curt Witynski from the League of Wisconsin Municipalities gave a presentation at the stakeholders meeting and outreach materials have been finalized.

Hart said the Green Tier Registration Permit Stakeholders met on January 29 to finalize the permit documents. The DNR continues to prepare outreach materials for registration permits and Green Tier. Hart added that DNR is looking for people to work in some of the Act 70 sub-groups and the next meeting is in May. Hart invited anyone who was interested to join the stakeholders at that meeting.

Art Harrington added that Act 70 can be a complicated pilot program to understand, in that to qualify for this flexible registration permit, facilities need meet tier two Green Tier standards. Harrington mentioned one of the program structures the Act 70 stakeholders group is thinking about is industrial redevelopment, where a developer would put in a building with potential for a number of industrial tenants. Those tenants could then be part of Green Tier and the group is also looking at some innovative financing for this structure. Harrington asked if anyone had any properties or clients, the Act 70 group would be interested in hearing from them to market the program.

Monitoring Length of Season Waiver

Katie Praedel, Air Monitoring Section Chief

Praedel gave an update on the Monitoring Ozone length of season waiver. Praedel reminded the group the 2015 Ozone NAAQS changed the length of the season in many states including Wisconsin, by adding six weeks to the beginning of the season. Praedel said the ruling required the Ozone season start on March 1 beginning in 2017, but due to the winter challenges in Wisconsin, along with low ozone levels in March, the program found the ozone concentrations did not justify the time or safety concerns for DNR staff.

Praedel gave more background on this process saying, in December 2015, DNR submitted a petition for reconsideration, which included a request to shorten Wisconsin's ozone monitoring season. In February 2017, DNR requested that EPA grant waivers for ambient ozone monitoring between March 1 and March 31 at 22 of the 28 Wisconsin ozone monitoring sites. The waiver request was based on data from over 20 years of year-round site data and documentation of safety and logistical concerns from early startup in 2016. That request was denied in May 2017, with EPA stating that more data was needed. In June 2017, with another year of March data, DNR submitted another waiver request to EPA for monitoring between March 1 and March 31 at the same 22 sites in Wisconsin. In December 2017, EPA deferred action on the second request, stating that at least three years of March data was needed. As requested by EPA, examination of Wisconsin March ozone data from all 30 sites for 2016, 2017 and 2018 was included in this waiver request. Praedel said despite a warmer than average temperature in March of 2016, no 8-hour ozone averages exceeded 60 ppb at any sites in the previous three years.

Praedel said on December 21, 2018 EPA granted waivers for 22 of the Air program sites, with exception of Kenosha County. Praedel said this has been very important for site operator safety, adding that the program has had to shut down field operations five times this winter. Praedel said she didn't think the program could have started monitoring by March 1, 2019 in our northern regions. Praedel also mentioned the waiver exceptions have allowed program funding to be allocated more effectively to the federally required Enhanced Ozone Monitoring effort which is currently underway.

Member updates

Sean Stephenson, WTBA – Said he did not have much of an update as construction season has not started yet.

Lane Ruhland, WMC – Said WMC continues to monitor the EPA ruling on Sheboygan County's non-attainment area.

Scott Blankmann, Clean Wisconsin - Had a question on Governor Evers' announcement of joining the Climate Alliance. Good responded by saying the program will look to the governor's office to see what the priorities are. Good added the program anticipated it would be something of interest to the governor, as he campaigned with some of that in mind. Good said the program is looking at past actions and the Global Warming Task Force to see what was prioritized and try to understand across the sectors what has been going on. Good noted the program is also looking across other agencies to see what they do as far as climate change work. Good said it's a new announcement but the program is looking forward to working with the governor's office on the topic.

Curtis Hedman, DHS – Said he was happy to see federal employees back at work

Frank Acevedo, EPA – Had no updates, but mentioned this was his first meeting, it's very interesting, and will keep in mind bringing updates to future meetings.

Joe Hoch, Alliant Energy – Thanked the agency, and said there was a lot of reporting going on this time of year and the Air program has been very helpful.

Inspection Reports

Maria Hill, Compliance, Enforcement and Emission Inventory Section Chief

Hill said back in July 2018, the Air program put together a team of compliance engineers to look for improvements on inspection reports. Hill said the main goals were to have a consistent inspection report format across the state and to clearly identify any noncompliance. Hill said the recommendations were reviewed by the Air program and legal team, as well as a draft that was reviewed by an EPA contact.

Hill stated the program wanted to make an inspection report template that worked for the entire program. Hill added the program started using the template on January 1 and is piloting it for six months before conducting a review. Hill said the program wants staff to look at the inspection report as one piece of the entire inspection process at facilities, Hill sees the report as a tool.

Hill listed the benefits of the new report, which includes a new summary conclusion on the first page. Hill said this summary conclusion will include process information, observations, state code and statutes. Hill said the overall report length will be reduced and the Air program will no longer copy into the report any final documents. Hill said permits will be referenced outside of the report and will direct facilities to webpages. Hill said unless there is a specific concern, there will be reduced lookback during inspections, going back only to the previous inspection.

Hill said the report will no longer include the complaint table. Hill said the complaint information will stay in the compliance system but not in the report, unless a complaint is part of enforcement, then details will be in the observation portion of the report. Hill said the new report includes increased use of checklists to make sure each inspection is complete, what was looked at and what was reviewed.

Hill said the report is also utilizing more technology, with more drop downs and checklists for later incorporation with mobile devices in the field. Hill also said enforcement and compliance testing tables now match those generated from the program database for later programming to auto-populate, resulting in less chance of errors.

Steve Dunn asked if there was any external input before making this substantial change to the inspection reporting process.

Maria responded, saying the focus is currently on compliance in the field, and the Air program is taking feedback from sources over the next six months and would like comments and input to see what could be changed and improved.

Steve followed up and asked about facilities that may not be inspected in the next six months. Maria said the Air program can provide templates to those facilities, so they can still see what the new reports look like.

Scott Blankmann asked if these new resources were online for public regarding this new approach?

Maria said the template is available and checklists are included at the end of this document with some explanation and instruction.

Ozone Topics

David Bizot, Air Quality Planning and Standards Section Chief

Bizot started with a discussion on the 2008 Ozone NAAQS. Bizot said there are two areas that remain in nonattainment. The attainment date was not met for Kenosha County and the eastern half of Sheboygan County. Bizot said both are currently listed as moderate but the EPA has proposed a rule to reclassify Kenosha County to serious, with a new attainment date of July 20, 2021. EPA has also extended the attainment date for Sheboygan to July 20, 2019. Bizot noted that in 2017 the fourth highest value at Sheboygan County's Kohler-Andrae monitor did not exceed the standard, which is why the county received the one year extension. Bizot said despite the extension, Sheboygan County is not expected to attain by the July deadline, based on 2016-2018 data and the program is assuming all of Sheboygan county will be bumped up to serious after a finalized EPA proposal later in 2019. Bizot told the group the program is working with LADCO on attainment plans for both Kenosha and Sheboygan counties. When asked about timing, Bizot noted EPA received 600 comments nationally on the rule.

Mike Cassidy asked if the comment on 2016-2018 data impacts EPA's decision, and if a one year extension of attainment date also pushes back a bump up?

Bizot responded by saying it shouldn't, looking at past practice by EPA, any time after attainment has been past, EPA can propose the bump up. Bizot said typically there is a lag between the attainment date and bump up proposal.

Dave Melum asked if the program was working to get the western portion of Sheboygan county to attainment.

Bizot responded saying the proposed split of Sheboygan County will allow for potential redesignation to attainment for the inland portion of the county for both the 1997 and 2008 NAAQS.

Hart said there are air permitting implications for these counties going from moderate to serious, and she specifically addressed the impact on the operation permit program. Hart says one piece of info that's critical is the major source threshold will go from 100 tons per year to 50 tons per year for VOC and NOx. Hart said major sources will remain major sources, while non-title V permits will need to be looked at. Hart said facilities with potential to emit (PTE) VOC and NOx exceeding 50 tons per year are major sources and will be required to obtain a Title V permit. Hart said facilities with actual emissions of VOC and NOx below 50 tons per year can take new permit limits on PTE to remain a synthetic minor source.

Hart then discussed how registration permits (ROPs) will be impacted by the bump-up, saying when the major source threshold (MST) decreases, emission caps decrease as well. Hart said a Type A ROP limits facilities to 25% of the MST. Hart then gave an example saying for a facility located in a serious non-attainment area, VOC and NOx emissions may not exceed 12.5 tons per year for each. Hart said a Type B ROP limits facilities to 50% of the MST and a Type C ROP limits printers to 25% of MST for criteria pollutants and 50% of MST for hazardous air pollutants.

Hart said all facilities in the affected area of Kenosha County are being contacted. A few sources with Type A Registration Permits in Kenosha County were close to the threshold and they have been contacted and were able to apply for a Type B ROP, which gives them the increase to 50% of the MST. Hart added the program is not working with sources in Sheboygan County at this time.

Hart said there are a number of small facilities in eastern Kenosha County that do not have permits at all, they are either natural minor sources or sources with a 10-ton exemption. Hart said no changes will be needed for the sources operating under the 10-ton exemption, however natural minor sources operating under the natural minor exemption will need to be re-examined. Hart says the natural minor threshold will change to 50 tons per year of NOx or VOC and if maximum capacity to emit either of these pollutants exceeds 50 tons, the facility would no longer be considered a minor

source. In such a case, the facility would need to apply for and receive a federally enforceable state operation permit. Hart said the program has not discovered any sources that are exceeding those thresholds in Kenosha County.

Hart said there are additional sources operating under the state operation permit application shield or a state operation permit and had to adjust limits on two sources, which have already have come to the program for new applications.

Hart concluded saying that most sources have emissions that are quite low and the workload wasn't as large as initially thought.

Bizot then discussed EPA's proposal to split the current Sheboygan County 2008 nonattainment area into two areas: Inland Sheboygan County and Shoreline Sheboygan County. Bizot said the boundary separating these two areas is proposed to be the same boundary finalized for the 2015 ozone NAAQS. Bizot said EPA is proposing a clean data determination for the Inland Sheboygan County area based on data from the Haven monitor. Bizot said the Haven monitor measures ozone levels considerably lower than the Kohle-Andrae shoreline monitor. Bizot said the proposal would allow for a potential redesignation to attainment for the inland Sheboygan County area for both the 1997 and 2008 NAAQS.

Bizot said Sheboygan County was never redesignated for 1997 NAAQS, because it was never acted on by EPA before the agency revoked the NAAQS. Bizot said once a NAAQS is revoked, there were no further obligations, but as part of court decision, the court said that decision by EPA wasn't right. Bizot said the court ruled areas need to be formally redesignated to attainment, and this is something the Air program will have to work on in the 1997 redesignation of attainment request.

Bizot then showed the map of the two proposed Sheboygan County areas, which included the locations of the two monitors. Bizot noted that the inland Haven monitor is measuring attainment level values about 10 ppb lower than the Kohler-Andrae monitor.

Bizot said as far as the bump up, it will continue to happen for both areas in Sheboygan County until the inland area is redesignated to in attainment. Bizot said the program will need to submit a redesignation request for the inland area and once approved by EPA, it will turn off the moderate/serious classification.

Mike Cassidy asked if the department supports the proposals EPA has made.

Bizot said the program has applied for redesignation based on data from the Haven monitor. Bizot said the program is supportive of this partial step forward and it's a step in the right direction. Bizot added the program will submit comments to EPA.

Mark Thimke asked if the program will comment to EPA, if they finalize, would DNR submit a redesignation request for inland Sheboygan county?

Bizot responded saying the redesignation request would be something the Air program will be working on.

Chris Hiebert said that while this is good news for Sheboygan County, is there any potential to do the same thing for Kenosha County? Hiebert says he raised the point since it's a great opportunity for Sheboygan, and what about Kenosha?

Bizot answered that it's not something the program has looked at yet. Bizot added the program needs to look at ozone gradient in Kenosha county, and a lot of things go into boundary requests and what EPA is comfortable with, including a workable boundary that's easy to understand, all of those things would need to be considered.

Good added the program has not looked at Kenosha County yet and offered to talk with Hiebert and address some of his thoughts on how this could be approached in the future.

Bizot then discussed South Coast II ramifications from the 1997 revoked ozone standard court case. Bizot said there are implications for "orphan areas" which were designated as maintenance for 1997 NAAQS and initially designated as attainment for 2008 NAAQS. Bizot said this includes Kewaunee, Door, and Manitowoc counties, along with the six-county Milwaukee-Racine area. Bizot said when EPA revokes a standard, all planning is "turned off". Bizot added that when areas are in attainment, DNR needs to submit two ten-year maintenance plans showing how the department will continue to maintain the standard. Bizot said the court says these areas need to continue to show maintenance plans.

Bizot added that transportation conformity will still apply to the orphan areas, plus a second 10-year maintenance plan will also be required. Bizot said some of these second maintenance plans were due in 2016, some were due last year and some are due next year. Bizot said the Air program has not had to go through this whole process very often, and the program is working on second 10-year maintenance plans for all areas and will be submitting to fulfill the requirement. Bizot said these Wisconsin areas are not alone, as there are around 50 areas nationally that are in the same situation.

Mark Thimke asked what the elements of the plan would be.

Bizot responded the Air program needs to continue to show the monitoring data to show the monitors are meeting NAAQS, in addition, the program must show updated emission inventories, the implementation of state and federal rules and typical SIP elements.

Thimke followed-up by asking if the program would include in these maintenance plans any rules or regulations that are currently not provided for under law. Bizot responded that the program could not and would not do that.

Mike Cassidy asked about lawsuits challenging boundaries. There is one from Chicago/State of Illinois, is it DNR's intention to intervene on EPA's behalf to defend boundaries? Cassidy added, we are making progress on Sheboygan County and we appreciate work DNR has done.

Good responded saying the Air program cannot comment on any current lawsuits.

Dave Melum asked about any additional emission offsets, and where reductions stand with respect to being admissible?

Good responded the Air program has [a fact sheet](#) and has done a bit of work on emission offsets and how the program would look at that. Good told the group if they had specific questions about a source, they could contact the Air program to discuss.

Priority Topics

Gail Good, Air Program Director

Good said at the last meeting in November the group talked about priority topics for 2019, and at this meeting wanted to get in agreement that these were the things the group wanted to cover this year.

Before running through the list of topics, Good noted that member presentations are welcome and should be addressed with the program.

Good then ran through the list of 2018 topics which included permit streamlining, new source review, Ozone, opportunities to provide more information to the public and long-term planning under the new federal administration.

Before summarizing the 2019 priority topics, Good said the program heard from AMMSG members on a lot of items they'd like discussed. Good wanted to make sure the program is focused on the group's priorities. Good said 2019 priority topics included emerging contaminants (PFAS), new source review reform and long-term planning at the federal level, specifically the ACE rule. Good said ongoing efforts and standing agenda items include 2008/2015 ozone NAAQS implementation, regional haze, permit streamlining and other rule making.

Good mentioned a pair of opportunities for the Air program including transparency in information and taking a closer look at what other states and organizations might be doing in relation to the study group's priority topics.

Good then asked the group for input.

Steve Dunn said he'd like to see climate change added to the list, since it is one of the governor's priorities. Dunn also said on the data side of things, he'd like to see how the program deals with confidentiality in the digital age, and any provisions or NESHAP approaches when it comes to PFAS.

Good responded that there is a division effort on PFAS right now. Good said from an air perspective, a lot of data gathering still needs to be done. Good added that the Environmental Division is looking to fill a position to investigate these issues.

Mark Thimke asked about Act 369 issues, how is the department going to handle federal and state guidance, especially with the approaching July 1 deadline?

Good responded, saying the department is waiting on direction from the legal team, and the program is looking for help in identifying the highest priority items.

Good said the program will incorporate these new items into the priority topics list and it will be put on the AMMSG webpage.

Good asked for any other questions, or any other items anyone wanted to talk about. No one had anything else to add. Good thanked everyone for coming and hoped to see everyone at the next meeting on May 23.

**WISCONSIN DEPARTMENT OF NATURAL RESOURCES
COMPLIANCE MONITORING REPORT (CMR)**

FID:	Site Visit Date:
-------------	-------------------------

Facility Name:

Location: Address City, State Zip County	Mailing Address: Address City, State Zip
--	---

Air Compliance Evaluation Type:	Choose an item.
EPA Committed Compliance Evaluation:	Choose an item.
Announced Compliance Evaluation:	Choose an item.
Credentials Shown:	Yes
Codes and Description:	SIC: NAICS:
EPA Class Code:	Choose an item.

Compliance Monitoring Report (CMR) Conclusion:			
Based upon a site visit and the review of XYZ Corp records, construction permit(s) 14-XYZ-123 issued January 1, 2000, and operation permit 123123000-P01 issued January 1, 2001, the following violations have been identified:			
<u>Federal Code/Statute/State Code/Permit Condition. Order Reference</u>	<u>Pollutant(s)</u>	<u>Date(s)</u>	<u>Description</u>

Air Pollution Control Permits:

For the basis of this inspection report, permits and applications found at the following DNR Air Management link were utilized: https://dnr.wi.gov/cias/am/amexternal/AM_PermitTrackingSearch.aspx

Emission Inventory Reports:

For the basis of this inspection report, certified emission inventories for years X through Y found at the following DNR Air Management link were utilized: https://dnr.wi.gov/cias/am/amexternal/AM_PermitTrackingSearch.aspx

Primary Inspection Participants and Contact Information:**Applicable Programs**

<input type="checkbox"/>	SIP	<input type="checkbox"/>	P62 NESHAP
<input type="checkbox"/>	NR 445	<input type="checkbox"/>	P63 NESHAP (MACT)
<input type="checkbox"/>	NR 405 PSD	<input type="checkbox"/>	P63 NESHAP (GACT)
<input type="checkbox"/>	NR 404 NAA	<input type="checkbox"/>	P64 CAM
<input type="checkbox"/>	P60 NSPS	<input type="checkbox"/>	P75 CEM
<input type="checkbox"/>	P61 NESHAP	<input type="checkbox"/>	P76 ACID RAIN

Pollutant Specific Source Classifications:

<u>PM</u>	<u>PM10</u>	<u>SO2</u>	<u>NOx</u>	<u>VOC</u>	<u>CO</u>	<u>Federal HAPs</u>
A	SM80	A	SM	B	SM	A

INSPECTOR SIGNATURE: _____

SIGNATURE DATE: _____

TITLE: _____

Air Management Engineer

SUPERVISOR SIGNATURE _____

SIGNATURE DATE: _____

TITLE: _____

Supervisor

Cc: Bureau of Air Management - Compliance, AM/7

Region File, Office Location

XYZ Corp

FACILITY DESCRIPTION

Description of the facility.

Facility Observations:

Records reviewed during this compliance evaluation:

<input type="checkbox"/> Malfunction Prevention and Abatement Plan	<input type="checkbox"/> NESHAP Records
<input type="checkbox"/> Malfunction Prevention and Abatement Plan Records	<input type="checkbox"/> NSPS Records
<input type="checkbox"/> Fugitive Dust Control Plan	<input type="checkbox"/> PSD Records
<input type="checkbox"/> Fugitive Dust Control Plan Records	<input type="checkbox"/> Non-Attainment Area Records
<input type="checkbox"/> CAM Plan	<input type="checkbox"/> Results of Monitoring Reports
<input type="checkbox"/> CAM Plan Records	<input type="checkbox"/> Compliance Certification
<input type="checkbox"/> SSM Plan	<input type="checkbox"/> Emission Inventory Submittal
<input type="checkbox"/> SSM Plan Records	<input type="checkbox"/> Next Business Day Deviations
<input type="checkbox"/> Acid Rain Plan	<input type="checkbox"/> NESHAP Compliance Reports
<input type="checkbox"/> Acid Rain Plan Records	<input type="checkbox"/> NSPS Compliance Reports
<input type="checkbox"/> QA/QC Plan	<input type="checkbox"/> PSD Compliance Reports
<input type="checkbox"/> QA/QC Plan Records	<input type="checkbox"/> SSM Compliance Reports
<input type="checkbox"/> Odor Control Plan	<input type="checkbox"/> CAM Compliance Reports
<input type="checkbox"/> Odor Control Plan Records	<input type="checkbox"/> CEM Compliance Reports
<input type="checkbox"/> Compliance Monitoring Report History	<input type="checkbox"/> Fuel Sampling and Analysis Reports (FSA)
<input type="checkbox"/> Complaint History	<input type="checkbox"/> Other (Identify)

Compliance Emission Testing Since Previous Inspection:

<u>Test Date</u>	<u>Process</u>	<u>Pollutant</u>	<u>Facility Reported Results</u>	<u>Limit</u>	<u>Reviewed Y/N</u>

Compliance Emission Testing Comments:

Enforcement History (past 10 years):

<u>Action Description</u>	<u>Action Date</u>	<u>Violation Found</u>	<u>Closed</u>	<u>Referred</u>

Safety Equipment:

- Hearing Protection
- Hard Hat
- Safety Glasses
- Safety Shoes
- Safety Vest
- Other (hair net, dust mask, etc.)

General Facility Comments and Findings:

PROCESS INFORMATION

A. Process B01, Stack S01, Control C01 (Description of Process and Control)

- Observations
 - Factual observations (instrument readings, equipment viewed)
- Records Reviewed
 - Discuss the records reviewed for the process/stack/control
- Findings
 - Discuss deviations

B. Etc.

- Observations
 - Factual observations (instrument readings, equipment viewed)
- Records Reviewed
 - Discuss the records reviewed for the process/stack/control
- Findings
 - Discuss deviations

C. Other, Non-permitted Processes

- Observations
 - Factual observations (instrument readings, equipment viewed)
- Records Reviewed
 - Discuss the records reviewed for the process/stack/control
- Findings
 - Discuss deviations

