

Meeting Summary
Air Management Study Group Meeting

Thursday, May 23, 2019

9:00 am

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

Attendees

Joe Bauer Blackwell	Tracey Holloway, UW*
Delanie Bauer, WI Paper Council*+	Emily Houtler, DNR
David Bizot, DNR	Erik Hoven, Dairyland Power Group
Scott Blankman, Clean WI*	Mike Kolb, WEC Energy Group
James Bonar-Bridges, DNR	Brenda Kubasik, MG&E
Phil Bower, Husch Blackwell	Erica Lawson, Tetra Tech
Rebecca Clarke, Citizen	Katie Nekola, Clean WI*
Craig Czarnecki, DNR	Todd Palmer, Michael Best & Friedrich*
Steve Dunn, Alliant Energy	Katie Praedel, DNR
Art Harrington, GK law*	Lane Ruhland, WMC*
Kristin Hart, DNR	Brad Simms Exxon Mobil
Curtis Hedman, DHS	Andrea Simon, Interested party
Chris Hiebert, SEWRPC*+	Jasmine Sodermann, Gannett Fleming
Maria Hill, DNR	Sean Stephenson, WTBA*
Joseph Hoch, Alliant Energy*	Andy Stewart, DNR
Christina Hogan, DNR	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, August 8, 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

Andy Stewart, Air Program Field Operations Director

Stewart opened the meeting with introductions and reviewed the agenda. Stewart announced the program had late-breaking news related to proposed PFAS legislation. Stewart said he'd share details

during the legislative update portion of the meeting. Stewart added that Gail Good, Air Program Director was on annual leave, and sent her regrets for not being present.

Program updates

Hiring Update

Stewart commented that many attendees were likely experiencing the same hiring issues as the Air Program. Stewart says it's been a challenge. Over the last three years about 50 percent of staff are either new or in new positions. Stewart added since the last AMMSG meeting in February, the program has made six hires. Those hires include a meteorologist, a training coordinator, which has been a critical need, two air monitoring specialists and two engineers to write operation permits. Stewart said the program was trying to hire five engineers and was only able to hire two. The program will continue recruiting for engineers in the fall.

An AMMSG member asked what the two new air monitoring specialists would be working on. Katie Praedel, Air Monitoring Section Chief said one would be working in Green Bay and the other will be working in Milwaukee. Both will be responsible for field operations at monitoring sites in the respective regions. She added that both positions are backfills for promotions within the monitoring group.

Proposed Guidance and Rules Legislative Update

Kristin Hart, Permits and Stationary Source Modeling Section Chief

David Bizot, Air Quality Planning and Standards Section Chief

Hart said the program is not in process of developing any program guidance at this time.

Hart said the program has proposed two new rules. AM-18-13 is a lithographic printing rule that would clarify and streamline the requirements for lithographic printing facilities. Hart said this proposal is currently under legislative review and an effective date of July 1 or August 1 is expected.

Hart said AM 24-12-B, part two of the air permit streamlining rule, makes changes to improve operational efficiency and to simplify the permitting process. Comments on this rule have been received and are posted on the [Air Management Study Group webpage](#). Hart said the program is in the process of responding to the comments and the proposal will go to the Natural Resources Board for approval in September.

Bizot said the scope statement for the AM-20-18 VOC RACT rule was approved April 10, 2019. The proposal updates two RACT rules to meet current Environmental Protection Agency (EPA) guidelines related to miscellaneous metal and plastic part coatings and miscellaneous industrial adhesives.

Bizot then highlighted proposed EPA rulemakings, including approval of Nonattainment New Source Review requirements for the 2008 ozone standard, modifications to fuel regulations which would provide more flexibility for E15 and an approval of SIP requirements for the 2012 PM2.5 standard.

Bizot then highlighted finalized EPA rules and guidance, including guidance on the development of Modeled Emission Rates for Precursors (MERPS) and an EPA final action disapproving the redesignation request for the Wisconsin portion of the Chicago-Naperville, Illinois-Indiana-Wisconsin Area to Attainment of the 2008 ozone standard.

A study group member asked if the program was going to comment on a proposed combustion turbine residual risk rule. Bizot and Hart answered that the program does not usually comment on residual risk analyses, but if there is something the program should know about or think about, please let the program know.

Another member asked about the guidance side of Act 369. Stewart responded the program is waiting for direction, and as the program has done before, thoughts are always welcome on guidance that's specific to the Air Program, but the program is taking a wait-and-see approach on Act 369 at this time.

Stewart then gave details on a proposed PFAS bill that was introduced May 23. Stewart said the level of detail in the bill is still being developed, but it will eventually establish standards, limits and applicability for sources.

Stewart said specifically for air emissions, the department must first determine that an emission standard for a substance is needed to provide adequate protection for public health and welfare, which is also required for other hazardous air contaminants under current law. Stewart said the bill also requires DNR to consider all PFAS to be air contaminants and to require reporting of any emission of PFAS.

A member asked if EPA were to act on PFAS, would the department need to work with their standard? Stewart answered that generally the statute is designed to align with the federal program, but there is an allowance by the agency to have a more stringent standard. A link to the proposed rule is provided on the [AMSG web page](#).

A member asked if there would be a provision requiring the reporting of PFAS emissions? Stewart said under the proposal, any source that emits PFAS will be required to report those emissions. Stewart added that it will be a challenge moving forward, since there is a lack of knowledge on PFAS air emissions at this time.

A member asked if there were provisions on using emergency rules if necessary. They asked even if this is enacted, how does a source know they are required to report? Stewart answered that it may not be immediately obvious, and it may take some investigation.

A member raised their concern asking if this is enacted, how will it be implemented? Stewart said the department is working with the Department of Health Services to create the standards.

A member asked if the bill would modify 285. Stewart said yes, the bill does make some changes, a paragraph would be created for the PFAS standard.

A member asked what the biggest sources of PFAS air emissions were. Stewart said at this point, the department doesn't know, however it's common knowledge that fire-fighting foam is a source of PFAS, so sources making those products could be possible air emission producers.

Stewart said information for other DNR programs is included in the PFAS legislation press release. For the Air Program, the focus is on identifying sources and determining a standard for all sources.

A member asked if the standard will only apply to stationary sources. Stewart answered yes, the Air Program does not regulate firefighting activities.

Stewart concluded the PFAS legislation will take a lot of investigation and work from the department and will be a future topic at AMMSG meetings as details become clearer.

EDGE Pilot Project Update

Kristin Hart, Permits and Stationary Source Modeling Section Chief

Hart said Act 70 is now known as the Economic Development and Green Environment (EDGE) pilot project. Hart said Act 70 is what authorized the creation of the EDGE pilot project. Hart said the Edge work group has been meeting regularly, with the latest meeting taking place May 15. Hart says the goal of the project is to look at ways to incentivize industrial sources to locate on brownfields. Hart says for a facility to be eligible, it must participate in either tier one or two of the Green Tier Program.

Hart said the EDGE workgroup has pivoted from the planning stage to the pilot project stage, forming two sub-groups, a performance measures group and an outreach and communication group. Hart said the group has walked through hypothetical projects, including the process for a single facility and a process for a developer or municipality to create a Green Tier Charter to attract businesses to locate on a brownfield.

Hart says two facilities have expressed interest in the program. One facility is moving forward with a Green Tier ROP, and they expect to have it in place within the next few months. Hart said this would be the first facility under this new program. Hart added the permit has the flexibility to include some site-specific conditions for this facility. There are also provisions to obtain a registration construction permit prior to attaining Tier 2 status, then move to a registration operation permit once Tier 2 participation is approved. Hart says the facility sees the Tier 2 designation as a competitive advantage in their industry. Hart said a second company has had a scoping meeting and has expressed interested in moving forward. Hart believes more businesses will be coming forward, once the EDGE Pilot project gets ramped up. .

Hart said the group is looking for more volunteers to join the Measures subgroup and Outreach subgroup. Interest parties can contact Hart.

DERA Grant

David Bizot, Air Quality Planning and Standards Section Chief

Bizot said EPA began awarding clean diesel grants in 2008 under the Diesel Emissions Reduction Act (DERA). The grant program was created by congress to provide funds for operators of heavy-duty diesel engines to help with engine replacements. Bizot said the Air Program has participated in the grant program since it began in 2008. The program is federally funded but includes an optional state match.

Bizot said through this program, the Air Program has typically given the funding to school bus operators and school districts, since there are many old school bus engines still on the road. Bizot added that the program will continue to include them but will expand the grants in the next cycle to include municipal transit fleets and off-road equipment.

Bizot said the program will have approximately \$700,000 for grants this year. The program is targeting a larger universe of vehicles, specifically in areas in nonattainment for ozone and PM. Bizot said the program will be kicking off sometime in October, and wanted to raise awareness for AMMSG members, who can spread the word to interested parties.

Bizot said [DNR's Clean Diesel website](#) is available with information on past programs for those looking for more information. The Air Program will let AMMSG members know when the program launches this fall.

An attendee raised a question about school buses, asking if concerns about exhaust and emissions from the engine compartment getting into the cabin of the bus would be addressed by this program.

Bizot responded saying yes, emissions entering the cabin is a known issue of school buses, and the newest tiers of engines require a tighter crank case, reducing emissions that enter the cabin. Bizot added that a retrofit for a school bus is typically in the \$50,000-\$70,000 range.

Bizot concluded, saying the Air Program is happy to be able to participate in this program, which has a direct impact on improving air quality.

E-Signature Update

Andy Stewart, Field Operations Director

Stewart provided an update on the programs e-Signature pilot. Stewart said the program was the first at DNR to implement e-Signature and so far, the response has been positive. The program has trained staff to help sources through the e-Signature process, help sources get used to the process and to ensure

sources are registering properly. Stewart reported the program has seen a 90 percent success rate through early April, with 420 successful e-Signature submissions out of 467 attempts.

Stewart explained the latest efforts of the e-Signature outreach team included a survey to sources. Stewart said the team found that 70 percent indicated the system was very or fairly easy to use, while 92 percent were very or somewhat likely to use e-Signature in the future.

Stewart added additional survey results found the program's direct emails to sources were the most successful way to raise awareness, while a number of other respondents said staff assistance in walking through the process has also been very helpful.

Stewart said the program plans on making the process even easier for sources, by making e-Signature resources more visible on the website and increasing the number of email prompts during the e-Signature process. Stewart says the program will continue to expand e-Signature and continue to get feedback from sources so more improvements can be made.

Air Program Organization Chart

Andy Stewart, Field Operations Director

Stewart said the original ask for an organizational chart was made by AMMSG members at the May 2018 meeting. Stewart said over the last few months, the program has looked at a few different ways to provide that information to the group. Several drafts were created and discussed with program management. The organizational chart provided on the PowerPoint is nearly complete, Stewart said the only thing missing is photos of the management team. Stewart explained the chart starts with the management team and works its way down to program level staff and who they report to. Each staff member has a descriptive term of what they do, to make it easier for externals to determine who to contact. The chart is posted on [the programs Contact page](#).

Feedback was given by several attendees, asking if the color key could have more contrast. Attendees commented it was a little difficult to distinguish between the different levels of staff.

Air Monitoring Update

Katie Praedel, Air Monitoring Section Chief

Praedel said the annual trends report comes out every November and the study group has provided great feedback on ways to improve the report. Praedel told the group to email her with suggestions. One group member recommended adding satellite data to the trends report. Praedel said the program will take that into consideration during the trends report kick-off meeting in June.

Praedel then walked through the programs monitoring network plan. Praedel said the goal of the plan is to provide evidence that DNR's air monitoring network meets current federal monitoring requirements, to detail any changes proposed for the 18 months following publication, to provide specific information

on each of the department's existing and proposed monitoring sites and to provide the opportunity for the public to comment on air monitoring activities conducted by the Air Program. Praedel said that no one came to the public meeting, but the program has received a few written comments on the plan.

Praedel showed a map of the monitoring network, which includes more than 40 sites across Wisconsin. Praedel said in general, the state's sites monitor for criteria pollutants, tribal sites do their own monitoring and send it to the department, where it's incorporated into the system.

Praedel explained how statutes will impact the network plan. First, section 285.72(2), Wis. Stats. will; require the department to take over the Kaukauna monitor, beginning January 1, 2020. Section 285.72(3)(a) requires the department to exclude the Kohler Andrae monitor in the state's initial monitoring network plan and section 285.72(3)(b)(c) says if EPA disapproves the initial plan, the department may submit a revised plan that includes the Kohler Andrae monitor data. Praedel said they are approaching this statute in a similar manner to the approach the department took last year.

Praedel then listed the proposed network changes that will take place between May 2019 and December 2020. Changes include the relocation of the Racine monitor due to the quarry development project, the move of the Milwaukee Southeast Region site, the shutdown of BAM at the Milwaukee College Avenue Park & Ride and the final transition of particle monitors to a newer methodology.

One member raised a concern about moving a monitor out of a non-attainment county (Milwaukee). The member added the department might want to engage EPA on this. Praedel answered the department has been in close communication with EPA, the department initially discussed the possibility of shutting down the monitor, saying the Air Program meets more than enough requirements for ozone monitoring in Milwaukee county. They have since discussed possible sites for relocation with EPA.

Another member asked about the benefits of the new particulate matter monitors. Praedel said the program's new monitors use a method known as scattered light spectroscopy, which gives a reading every second, provides more data, is more precise and results in less lab costs and less operator time.

Bizot then gave an update on the SO₂ Data Requirements Rule (DDR). Bizot explained the rule requires Wisconsin to submit an annual report to the Regional Administrator that documents the annual SO₂ emissions of each applicable source in each area where modeling of actual SO₂ emissions served as the basis for designating such area as attaining the 2010 1-hour SO₂ NAAQS. Bizot said sources could show compliance by either monitoring and modeling limits to show the standard is met, or sources can model actual emissions. Wisconsin had two sources that elected to model actual emissions. Bizot said that in both cases, emissions have gone down substantially. Bizot says the program is electing to submit additional modeling in Sheboygan County to model new limits reflecting the shutdown of the Edgewater 4 unit. Bizot says the modeling shows this area will continue to meet the standard by a wide margin; by submitting this to EPA for approval, the department won't need to go through this annual assessment process for the county in future years. Bizot said this proposal is included as an appendix in the network plan because that is recommended by EPA as this annual assessment is required to go through public

review prior to submittal by July 1.

Member Updates

Tracey Holloway announced the NASA team she leads will be meeting July 10-12 in Pasadena, CA. Holloway said the team was initially part of a three-year initiative, but it's been extended by one year. Next summer the group will present at NASA headquarters. Holloway says her group funded a number of stakeholders from across the U.S. to attend the Pasadena meeting. Holloway expects to have about 125 attendees.

Joe Hoch reported there are a number of items of interest on the horizon, including 111(d) carbon rules, SIP planning, EPA's cost-benefit rules, Ozone NAAQS review, plus many items EPA is finalizing soon.

Curtis Hedman announced that Robert Thiboldeaux, a long-time member of AMSG has announced his retirement from DHS.

Todd Palmer said he was interested in a few items included in EPA's recently released unified agenda. Among them, the once-in-always-in policy revocation that looks to be heading for finalization in quarter two or quarter three.

A citizen in attendance asked about the Annual Monitoring Network Plan submittal and the possibility of shutting down the Sheboygan Kohler Andrae monitoring site. Katie indicated that the DNR was required to go through the same process when submitting the 2018 network plan and that in the event that the EPA disapprove the original plan Act 159 allows for a resubmittal of a plan that includes the Sheboygan Kohler-Andrae monitoring site, which is what occurred in the previous network plan process. Katie went on to explain that through the process, the Kohler Andrae monitor remained in place and is expected to remain in place for the future because it does not meet federal monitoring site shutdown requirements.

Ozone Update

Kristin Hart, Permits and Stationary Source Modeling Section Chief
David Bizot, Air Quality Planning and Standards Section Chief

Bizot began with an update on the 2008 Ozone NAAQS Sheboygan County split. Bizot said EPA has proposed to split the current Sheboygan County 2008 ozone nonattainment area into two areas: Inland Sheboygan County and Shoreline Sheboygan County. Bizot said EPA has not yet finalized this proposal.

Bizot said in anticipation of EPA's final action, DNR has drafted and put out for public comment a redesignation request for Inland Sheboygan County. Bizot said the department will hold a public meeting June 7 at the Plymouth Public Library and public comments will be accepted through June 17.

Bizot said neither the partial Kenosha County nor the Sheboygan County nonattainment areas attained the 2008 ozone NAAQS by the July 20, 2018 deadline. The department expects EPA to take final action to reclassify Kenosha County to “serious” in July, while Sheboygan County is proposed to be granted a one-year extension to attain, to July 20, 2019. Bizot said the Sheboygan County extension will have no meaningful impact because, based on draft 2018 data, the area will not attain; a bump up to serious is expected in late 2019.

Hart said Kenosha County’s bump up to serious was supposed to occur around April but has been delayed. Hart says the bump-up to serious will impact emissions of Volatile Organic Compounds (VOCs) and NO_x. Hart said the major source threshold for those pollutants will drop from 100 tons per year to 50 tons per year.

Hart said despite the bump-up to “serious” no changes to operations permits are needed for Title V major sources in Kenosha County. The Air Program will put out a news release when the bump-up happens, so sources know it’s occurring.

Hart said synthetic minor sources with emission caps over 80 tons per year but under 100 tons per year (also called SM80 sources) on VOC or NO_x would need to be adjusted by a revision to their operation permit, or the facility would need to apply for a Title V permit. However, Hart said there are no sources affected in Kenosha County.

Hart said the potential to emit will drop to a 40-ton limit on NO_x and VOC for synthetic minor sources capped at less than 80 percent of the major source threshold (also called SM sources). Hart says three facilities in Kenosha have been contacted directly and have applied for revisions to adjust emission caps.

Hart said no changes are required for general permits because general permits already restrict relocation into ozone nonattainment areas.

Hart said Registration Operation permit coverage will need to be adjusted for sources whose actual emissions of VOC or NO_x exceed the new permit thresholds. Hart said no ROP sources have reported emissions exceeding the new thresholds in Kenosha County. The department will be sending out emails and making phone calls to all ROP holders in the county, notifying the sources of the new thresholds in their permits.

Hart said what defines sources as a natural minor will change as a result of the bump-up. Hart said only one source in the area had a natural minor exemption and that source has confirmed its maximum theoretical emissions of NO_x and VOC are less than 50 tons per year, so a synthetic minor operation permit was not needed.

Hart said no changes are needed for sources operating under the 10-ton exemption in s. NR 407.03(1m), Wis. Adm. Code, since all emissions including VOC and NO_x are capped at less than the new 50 ton per year thresholds.

Hart said facilities with pending state operation permit applications and facilities with no permit applications have been contacted individually. Of the 18 contacted, one is closed, 11 have been confirmed as exempt, and six are deciding between exemption and ROP coverage.

An AMMSG member asked if the program has planned any outreach to the general public, particularly to explain what a serious bump-up means.

Hart responded, saying yes, the program will put out an article in Air News, in the Small Business Advisor and updates will be made to the website explaining the bump-up.

Another member asked about the shutdown of the Pleasant Prairie plant and if the emission reduction credits from that plant will need to stay in Kenosha County or if they could be transferred to Chicago. Bizot answered the program has not been approached on that and if anyone has questions about a specific credit issue, to approach the program directly.

Clean Air Month

Craig Czarnecki, Public Information Specialist

Czarnecki said every May, the Air Program celebrates Clean Air month, celebrating program successes and efforts over the last year.

Highlights of Clean Air Month included the launch of part two of a three-part video series: Committed to Clean Air. The three-minute video focuses on the reduction of particle pollution across the state, what particle pollution is and how residents can reduce particle pollution. The video was launched on May 6 and can be found on [DNR's YouTube Channel](#) and on the [Air Program's Clean Air Month page](#).

To coincide with the video the Air Program hosted its very first Facebook Live, from a monitoring site in Madison. During the Facebook Live, Katie Praedel, Air Program Monitoring Section Chief, talked about how the programs monitoring stations work and how the program monitors air pollutants. Praedel also highlighted WAMDAS, the programs brand-new monitoring web mapping tool. Czarnecki said the Facebook Live had some great audience interaction and has had approximately 3,700 views to date. Czarnecki said the Facebook Live can be found on [DNR's Facebook page](#), just click on videos and look for the video titled "Celebrate Clean Air Month with the DNR Air Program!"

Czarnecki said the annual Bike to Work week had great staff participation. One staff member took video of their ride to work along Monona Terrace, resulting in 4,800 views on DNR's Facebook page. Czarnecki added, for the first time, the program started the Environmental Management Division Commuter Challenge alongside Bike to Work week. Throughout the challenge, staff compete to see who can save the most vehicle miles traveled by taking other forms of transportation (bike, bus, carpool, walk).

Czarnecki said the program announced the winner of the Annual Air, Air Everywhere poetry contest on May 20. Third grader Deema Arman wrote a great poem, which can be found on the Air Program's [poetry contest page](#).

Czarnecki then highlighted the program's [new WAMDAS page](#). The page went live in late April and includes a new interactive air quality mapping tool for the public to get up-to-date air quality information, new air quality report options and specific monitor information. In association with the new WAMDAS system, the program has also launched the WISCONSINAQM mobile app for Android devices. The app is available now in the Google Play Store and allows the public to receive air quality updates from anywhere using their mobile device. Czarnecki mentioned the Apple version is still in development and will be available later this summer.

Pre-Draft Permit Review

Kristin Hart, Permits and Stationary Source Modeling Section Chief

Hart told the group the Air Program wanted to get feedback on what's called the pre-draft review. Hart explained a pre-draft permit review is when a draft of the draft permit is shared with the applicant prior to the public comment period. Hart said permit writers work closely with facilities to make sure all information is accurate and correct. The program often puts together this pre-draft review to catch typos and technical errors. Hart said after this pre-draft review, a final draft permit is prepared and made available to the applicant and the public for a 30 day public comment period. The pre-draft permit document is a public record and is part of the permit file, but currently, the pre-draft permit is not posted to the public website.

Hart says changes to this process have been proposed to increase transparency. Hart explained once the pre-draft permit is written, the applicant could decide whether it wants to do the pre-draft review. If the applicant says yes, the pre-draft permit would be uploaded and posted to DNR's public website with a name that clearly indicates its pre-draft status. The applicant can then review and provide feedback to the department. Hart said by posting the pre-draft to the website, the public would be able to view the difference between the pre-draft and final draft versions.

Hart continued, after the pre-draft review, a final draft permit would be posted and notice would be published on the public website as usual. Hart said feedback received during the pre-draft review would not preclude additional comments from the permittee during the public comment period. The pre-draft permit would remain on the public website as a permanent part of the permit file.

Hart added some questions still had to be answered, including, whether the program requires this process for every source, or if the process will be enacted more on a request basis from the applicant.

An AMSG member commented saying this is a big issue, given the complexities of the permit, it is standard practice for the applicant and permit writer to work together to get things correct and final before it goes out for public comment. This member said he believes there is some great value to have some give and take between the applicant and permit writer to make sure there is an accurate product

coming out. The member asked how long a pre-draft period would last, and what would all be open for public comment.

Hart replied saying it would be up to the permittee and draft writer, adding that anything between one week and one month is typical. Hart added the program would need to define a timeframe and the purpose of the review is for technical accuracy.

Bizot added currently, pre-drafts are public documents, someone could pull a record and ask about what changed between the pre-draft version and public draft version. Bizot added this process would make it more transparent for everyone and would eliminate questions the program might receive down the line.

An AMMSG member asked when would this pre-draft process would be implemented?

Hart replied that it probably wouldn't take more than six months to finalize and implement this process. The program already has the technology but procedures and outreach would need to be created. The program would need to work out details such as which permit types should have a pre-draft process, and how much time should the source be allotted for pre-draft review.

An AMMSG member commented that there is a lot of impromptu discussion between the permit writer and the facility, and the sharing of a draft would be a written extension of the discussions that occur. The member continued, adding to the potential confusion would be when a permit is issued or drafted in phases. How would that fit in? The member encouraged the department to do more outreach to the trade associations before a decision is made to proceed with this proposal.

An AMMSG member asked what the department's policy would be on any comments received from a third party during the pre-draft process?

Hart and Stewart responded those details are yet to be worked out, that the purpose of pre-draft review is to ensure technical accuracy with the applicant, and comments related to that purpose may need to be considered.

An AMMSG member voiced his concerns, saying there could be confusion with these documents floating around. The members said it seems that the program is attempting to formalize a process where the benefit has always been that it's informal.

Another member said the increased transparency is great but worries about timelines related to putting a pre-draft out in another comment period.

A final attendee commented that more openness is great. Then asked, if this is formalized, would there be a set time for the pre-draft review period. The attendee worried about what could be mentioned during the pre-draft review process like emissions limitations. The attendee reiterated the goal of being open and transparent with the public is fantastic.

Hart concluded the program wanted to get some initial reactions from the membership group to get perspectives and will take everything into consideration. Hart added this topic will be something the program will bring back to future meetings for further discussion.

Closing

Stewart reminded the group the next two meetings are scheduled for August 8 and November 7. Stewart thanked everyone for coming and looks forward to seeing them again at the next meeting.