

## **Meeting Summary**

### **Air Management Study Group Meeting**

Thursday, August 8, 2019

9:00 am

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

#### **Attendees**

|                                   |   |
|-----------------------------------|---|
| Renee Bashel, DNR                 | Joseph Hoch, Alliant Energy*              |
| Dave Bittrich, TRC                | Emily Houtler, DNR                        |
| David Bizot, DNR                  | Jeff Jaeckels, MGE*                       |
| James Bonar-Bridges, DNR          | Mike Kolb, WEC Energy Group               |
| Delanie Breuer, WI Paper Council* | Margaret Neff, Manitowoc Public Utilities |
| Craig Czarnecki, DNR              | Todd Palmer, Michael Best*                |
| Steve Dunn, Alliant Energy*       | Katie Praedel, DNR                        |
| Kevin Garstka, DNR                | Andrea Simon, Interested party            |
| Gail Good, DNR                    | Sheri Stach, DNR                          |
| Ashley Gray, DNR+                 | Sean Stephenson, WTBA                     |
| Erik Gulbranson, Dairyland Power  | Andy Stewart, DNR                         |
| Kristin Hart, DNR                 | Patti Stickney, SEH                       |
| Curtis Hedman, DHS                | Steve Tasch, Trinity Consultants          |
| Maria Hill, DNR                   |   |

\*AMSG member

+ Skype attendee

#### **Action Items**

**Next AMSG Meeting.** The next study group meeting will be held on **Thursday, November 7, 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, opened the meeting with introductions, then summarized the agenda and highlighted what would be covered during the meeting.

### **Hiring Update**

The Air Program has made several hires since the last AMSG meeting. Good said an LTE was hired to help manage the ongoing digitization effort.

The program has also filled a position that will work between the planning and permit group. That hire will begin in mid-August.

The monitoring section has also filled a position. The hire will be working out of Central Office with the data and quality assurance groups. They will also learn field operations.

The program also has two new operation permit writers working in the Green Bay office.

Good said the program intends to recruit for additional field engineers soon.

An AMMSG member asked how many open permitting positions the program currently had.

Andy Stewart, Air Program Field Operations Director answered the program would like to add two more permit writers, along with a few more compliance staff to fill roles left by recent retirements.

Stewart added the program has been happy with the recent hires, as it's helped with the back-log of permits. Stewart said even with the staff turnover, the program has been able to maintain the average permit turnaround time and hit the backlog goal of 10 percent. The program has put out a lot of renewals and continues to be on track.

### **Proposed Guidance and Rules Legislative Update**

Good started with proposed DNR guidance. There is nothing currently in process, but the program did have a request for the ROP-G instruction manual. Good said it is out and available for people who want to obtain a ROP-G.

Kristin Hart, Air Program Permit and Stationary Source Modeling Section Chief, said changes to NR 422.142 and 422.143 went into effect July 1. The rules clarify and streamline the requirements for lithographic printing facilities.

Hart said AM-24-12b, Air permit streamlining rule part two is moving forward. The proposal makes changes to improve operational efficiency and to simplify the permitting processes administered under chs. NR406 and 407, while remaining consistent with the federal Clean Air Act (CAA). The proposed rule is being prepared for adoption by the Natural Resources Board and governor in September.

David Bizot, Air Quality Planning and Standards Section Chief, said the program is drafting AM-20-18 VOC RACT, which updates two RACT rules in ch. 422 to meet current EPA guidelines for miscellaneous metal and plastic parts coatings, and miscellaneous industrial adhesives. Bizot said the program's goal is to have something out for public review by late August.

Bizot said the scope statement for AM-10-19 2015 Ozone NAAQS was approved by the Natural Resources Board in June. The proposal incorporates the 2015 Ozone NAAQS into state rule.

Katie Praedel said EPA has proposed extending the required start date by two years for Photochemical Assessment Monitoring Stations (PAMS). The PAMS requirements were changed under the 2015 Ozone NAAQS, originally the start date was set for June 2019, but the proposal has extended that start date out to June 2021.

Kristin Hart said EPA is accepting comments on the Reclassification of Major Sources as Area Sources under S. 112 of the Clean Air Act. The program plans to submit comments on the proposal, also known as the once in, always in rule. Comments are due September 24.

Hart said the program has been reviewing a series of information collection activities on NESHAPS and NSPS as they come through the federal register. The program is reaching out to facilities and notifying them the items are available for comments.

Good said on June 7, 2019, EPA finalized Fiscal Year 20-21 Office of Air and Radiation National Program Guidance. Good said the program submitted comments and some of the items the program recommended were included in the final version.

David Bizot said EPA repealed the Clean Power Plan, finalized the Affordable Clean Energy rule and revised Emission Guidelines Implementing Regulations.

Bizot said on July 15, 2019, EPA approved the Revision of the Nonattainment Designation for the 1997 and 2008 Ozone Standards and a Clean Data Determination for the 2008 ozone Standards for Sheboygan County.

Good noted the PFAS legislation and indicated that potential PFAS work in the air program would be discussed later in the meeting.

### **WI Act 369 Update**

Good gave an update on Act 369, related to program guidance and the public comment process. The act noted a July 1 rescission date that has not taken effect. Good says the agency is working on a plan to put guidance through the public comment process. Good said the program will continue to keep Act 369 as a standing item on future AMMSG agendas.

### **EDGE Pilot Project**

Kristin Hart gave an update on the Economic Development and Green Environment (EDGE) pilot project. The project has moved from the planning phase to the implementation phase. Hart says two sub-teams have been formed, one to look at metrics with a goal of submitting a report to the legislature, and another that's focused on outreach and communication for raising awareness of what has been developed so far.

Hart says two facilities are being discussed as candidates for the EDGE pilot. In addition to facilities, Hart says the pilot will also work with municipalities and economic developers to find more candidates.

An AMSG member who is part of the EDGE team said this is good news for all involved. It's an opportunity to be part of a program that highlights exceptional environmental performance. Once the word gets out, this pilot will be attractive to many different groups.

### **Progress Bar Update**

Hart showed the group a new feature on the permit search page. The permit tracking bar has been added to easier visualize in real-time where a permit is in the process. Previously the permit search page had a key event tracker in table form with key events and descriptions. Hart says as the program evolves, and expectations have grown to become more visual, the program has created the progress bar system. For a selected permit a user can see how far along the permit is. There is a barrier icon that will display if the permit is on hold or if permit writer is waiting for more information before the permit can move forward. Once the permit is completed, the entire bar will be filled in blue. The program's goal was to create an easier way to show where the permit is in the process.

### **Title V Operation Permit Review Procedures**

Hart said there are several ongoing projects to improve the quality, consistency and accuracy of Title V Operation Permits. The program is encouraging complete information in applications upon submittal and is allowing the submittal of emission calculations in spreadsheets. In addition, the program is encouraging permittees to make sure they have up to date descriptions of their activities, listing updating regulations, construction permits or permit exemptions.

Hart says there will be more to come including how to streamline the inclusion of NESHAP and NSPS in a permit. Hart says these two areas are the largest workload for a permit writer, so the program is looking at other states to see what they do. When the program comes up with recommendations, it will provide more information to the study group.

Hart says the program has also developed a collaborative permit process guide. When applying for an air permit, an applicant with an existing air permit may wish to include a "redline strikeout" version of an existing permit as part of the application. The purpose of the guide is to provide air permit applicants with guidance on how to access an editable-electronic copy of an existing permit and prepare a redline strikeout version for an application. Hart says this will help speed up the permit renewal process.

The proposals will be presented at upcoming FET conferences where the program will get a chance to further discuss with permittees.

### **PFAS Plan**

Good introduced the group to the Air Programs PFAS plan. The program has working groups looking into the range of PFAS contaminants that include thousands of compounds the program needs to learn more about.

Good said not a lot is known about PFAS when it comes to air and inhalation, and the plan is to continue to work with other states and organizations to gather as much information as possible. Each of the many compounds may have different characteristics in the atmosphere so the program has a lot of work to do to better understand PFAS in the air. The program has chartered a project for fiscal year 2020 that will focus on information gathering, including stack test methods and monitoring methods. The program is trying to learn as much as possible and is working alongside the other Environmental Management programs and has great contacts both in and out of the state.

The program wants to understand PFAS emissions from an air perspective, including the types of sources that may be emitting PFAS to the air. The program also wants a deeper understanding of incineration and other control methods for PFAS chemicals including the right temperatures and residence time to destroy the chemicals. The program would coordinate with the waste program to better understand these aspects. The program would also like to coordinate with the DNR lab, EPA and other states to understand what they're working on.

Good said a group of DNR staff recently traveled to Michigan to meet with the Michigan PFAS Action Response Team (MPART). The meetings focused on PFAS across different environmental programs. Good said the MPART staff were very knowledgeable and were able to provide valuable information, including how the Michigan agencies are working together to better understand PFAS.

Good said the program will develop communication materials focusing on the findings and what the program will be doing. This will be a regular topic at future PFAS meetings, and Good anticipates there will be a future role for AMMSG members in a subgroup sometime in the future.

### **Member Updates**

Jeff Jaeckels of Madison Gas and Electric said utilities are engaged and focused on the Affordable Clean Energy (ACE) rule. He said MGE has been in contact with DNR and is looking forward to working with the department to get a common understanding of the rule and creating future plans.

Jaeckels added a lot of utilities are busy putting together their Environmental, Social and Corporate Governance (ESG) reports. Jaeckels said in addition to other voluntary reporting, including sharing metrics with the public, one thing that has evolved is that all utilities have been reporting under EEI's template for sustainability metrics that investors and consumers ask for, including emissions. MGE is drafting the report now and will be coming out in October.

Curtis Hedman, Wisconsin Department of Health Services said he listened in on the MPART PFAS meetings with DNR staff and was grateful they were available via Skype. He said it was very helpful and very informative.

Todd Palmer, of Michael Best & Friedrich said a vast majority of companies and states that have challenged the repeal of the Clean Power Plan have moved to have their appeals rescinded. Palmer said it's a significant event for the legal review of the Clean Power Plan. Palmer added that the EPA's Sheboygan County ozone designation has been legally challenged by the city of Chicago and state of Illinois.

Sean Stephenson with Wisconsin Transportation Builders Association (WTBA) thanks David Bizot for bringing up the DERA grants at the May meeting and was happy the grants would be available for use on construction equipment. Stephenson said he was looking forward to receiving updates on DERA.

Joe Hoch with Alliant Energy said Alliant has released its ESG report. He says a lot of time and effort goes into it. He said Alliant is finishing a powerplant in Beloit and it will be fired up in a couple months.

### **Ozone Topics**

David Bizot said on July 15, EPA finalized a split of the Sheboygan County 1997 and 2008 ozone nonattainment area into two areas, inland Sheboygan County and shoreline Sheboygan County.

EPA also made a clean data determination for inland Sheboygan County. Bizot said the two areas are now considered independent in terms of Clean Air Act planning purposes.

Bizot said the program is working on a redesignation request for the inland Sheboygan County nonattainment area based on data from the Haven monitor showing the area has attained the 2008 ozone NAAQS.

The program will also need to update the attainment plan for shoreline Sheboygan County, which will be coming later this year.

Bizot then gave an update on the 2019 ozone season. Bizot said it's been an interesting ozone season, in that typical ozone patterns were not seen until hot weather arrived in July. The state currently doesn't have any sites that are exceeding the 2008 standard, however Chiwaukee Prairie is close, needing one more day above the critical value, while the Kohler-Andrae site needs two more days above the critical value.

Bizot said there are a few sites that are above the 2015 ozone standard, including Chiwaukee Prairie, Kenosha, Manitowoc, Racine and Kohler-Andrae.

Ozone season ends October 15 for all sites, except for Chiwaukee Prairie, which ends at the end of October.

Katie Praedel, Air Program Monitoring Section Chief said the program submitted the final 2020 annual air monitoring network plan on June 24, 2019. Praedel said the process included a 30-day public comment period. Act 159 required the exclusion of the Sheboygan Kohler-Andrae monitor from the submitted network plan. Due to official comment from EPA, the final version of the plan included both the Sheboygan Haven and the Sheboygan Kohler-Andrae monitoring sites.

Praedel said two different federal requirements are impacting Wisconsin in relation to enhanced ozone monitoring and the Photochemical Assessment Monitoring Stations (PAMS). The program is required to have an enhanced ozone monitoring plan because of the Sheboygan County bump-up of non-attainment to moderate for the 2008 standard. However, the 2015 ozone NAAQS and changes to the PAMS network removed the requirement to have PAMS monitoring in Wisconsin. Praedel said the program shut down the PAMS site in 2017 which was unfortunate, but the enhanced ozone monitoring requirement gave the program an opportunity to get more creative with monitoring efforts.

Praedel then described the 2019 Wisconsin Enhanced Ozone Monitoring Objectives. The goal is to implement additional monitoring of ozone and ozone precursor compounds to better understand the impacts of ozone precursors on ozone concentrations in Wisconsin. The Monitoring group has been working closely with the Air Quality Planning and standards group to determine what data would be most useful. The plan includes determining how out of state emissions are impacting Wisconsin ozone values, will provide data that can be used to improve regulatory meteorological and photochemical models that are used in the State Implementation plans to estimate future ozone values and to ground truth Volatile Organic Compounds (VOCs) and Nitrogen Oxide (NOx) inventories and determine what elements of the regional emissions inventory require improvement.

Praedel said the programs Mobile Air Monitoring Lab (MAML) has been rolled out this year at several predetermined locations along the lake shore. The MAML includes a suite of criteria pollutant analyzers, including a homemade VOC instrument and a pandora, which measures nitrogen dioxide in the vertical air column. Praedel said the MAML was in Grafton, downwind of Milwaukee and it's currently in Chiwaukee Prairie, downwind from out of state sources.

Praedel then described the different phases of the Wisconsin Enhanced Ozone Monitoring Strategy. Praedel says Phase one has been going well, phase two will focus on ozone seasons over the next two

years and look at improvements to the MAML instruments. Phase three includes some unique ideas the monitoring section would like to try, including adding ozone analyzers to lighthouses, sending drones over Lake Michigan and adding ozone analyzers to the Lake Guardian, an EPA research vessel that serves on the Great Lakes.

On August 1, 2019 EPA completed a technical change in the background of the AirNow.gov website and updated the algorithm associated with Nowcast, which is used to estimate the Air Quality Index (AQI) in real time. Praedel says EPA anticipates the revised algorithm will improve the accuracy of ozone predictions at the local level. The Air Program hopes to have this change implemented onto the WAMDAS website in the next 30 days.

An AMSG member noted that we have known the chronic ozone problems and their potential causes for some time. Additional research will likely reinforce what we already know. The member encouraged more aggressive action by the state with respect to this issue.

### **Emissions inventory and confidentiality**

Maria Hill, Compliance Enforcement and Emissions Inventory Section Chief, says the program is working with the EPA on PM2.5 and confidentiality. Hill says changes are being made to the way Wisconsin has been reporting emissions to EPA, but will not create changes in the way sources report emissions to the state.

The Air Program will report 2018 stationary source PM2.5 emissions to satisfy Section 110 (a) (2) (F) and the Air Emissions Reporting Rule (AERR). Emission factors have been added to the reporting system that aligns with the PM2.5 February 2016 strategy. Hill says the PM2.5 emissions will be uploaded to the National Emissions Inventory per the normal process and deadlines.

Hill says to better meet the requirements of 40 CFR 51.15 (b) (1) and AERR, the program will be looking to report all data for confidential sources except the throughput and emissions factors beginning with emissions year 2019. This will have the Wisconsin annual emissions data more accurately reflected in the national inventory.

Hill says the program is looking for any concerns or comments from facilities in the next year and then will move forward starting with the 2019 emissions year. The program will provide further communication and outreach on this topic.

### **Work Planning/Digitization**

Good said the program wants to be clear on the variety of projects being done and the scope of those projects. Work planning identifies specific improvement projects and outlines responsibilities and expectations of staff and supervisors.

Andy Stewart said work planning is part of an approach that directs program activities over the course of the fiscal year. Planning ensures the projects align with agency and program priorities, focuses on the understanding of anticipated staff hours and adheres to budgets for the upcoming fiscal year.

Stewart said the work planning process goes through the Air Management Leadership team beginning with the new calendar year, so projects can start with the fiscal year begins on July first.

Stewart said the program had about 20 specific projects last year and with a few exceptions, the program has completed a majority of the projects with successful delivery. The program has more than 20 projects planned for fiscal year 2020. Highlights for new projects include WARP 2.0, the program's integrated

database and software application system, the expansion of e-docs and e-signature so more documents can be signed and filed electronically, and further innovation and automation in the air monitoring network.

Sheri Stach, Air Program Business Support and IT section Chief said there are three related charters in fiscal year 2020 related to digitization.

The first charter implements phases one and two from a previous charter, and involves consolidating region files with central office files, scanning, applying metadata and uploading. The program has started with facility files from the Superior Office.

The second charter will assess the digitization needs and priorities for the planning and monitoring sections, and the third charter will develop processes and procedures for new records creates, both electronic and paper, once a facility file has been digitized.

Stach said the program met with other's in the agency to determine what kind of equipment would be needed. After working through the process, a Fujitsu 7700 scanner was selected for the digitization project. Locations have been secured for the scanner and to store records and prep them for scanning.

As part of these charters, the program has also worked on metadata for the scanned documents. Metadata describes an item and provides various access points, or ways to search for an item. Program developers are in the process of creating a new uploader tool for the scanning and digitization. It will be automated and will allow the program to upload files directly into WARP.

Stach says the process for digitizing begins with collecting the various records from a facility. Regional files will be combined with central office files, non-records and records that have met their RDA lifecycle will be removed. The files will then be scanned, go through a detailed quality assurance and then will be uploaded using the uploader tool. This will involve adding the various elements for the meta data that have been identified. The digitized records will then be available, and the cycle will begin again with the next facility file. The first few months will be used as a pilot to determine the best processes so the program can move faster and more accurately in the future.

### **ACE Rule**

On July 8 EPA published the ACE rule, regulating greenhouse gas emissions from existing coal-fired electric utility generating units (EGUs).

David Bizot said the action was finalized in conjunction with two related, but separate rulemakings: the repeal of the Clean Power Plan, and revised implementing regulations for all future emission guidelines for existing sources issued under the authority of Clean Air Act section 111 (d).

ACE establishes heat rate improvement (HRI) or efficiency improvement as the best system of emissions reduction (BSER) for carbon dioxide (CO<sub>2</sub>) from coal fired EGUs. ACE also lists six HRI technologies as well as additional operating and maintenance practices. Bizot said each state is to evaluate applicability to their existing sources of the six candidate technologies and improved operating and maintenance practices and take into consideration source-specific factors in establishing a standard of performance at the unit level. States have three years to submit plans to EPA.

Bizot said there are 14 affected units at eight different facilities in Wisconsin that meet the criteria for applicability of the ACE rule. The program has invited the affected facilities to a meeting on September 26 to further discuss the ACE rule impact.

Good said the program is interested in receiving comments from facilities regarding the ACE rule, and would like to know how they'd like the program to engage with their sources in other states.

**Closing**

Good said the final AMSG meeting of 2019 is scheduled for November 7. At that meeting, the group will look at dates for the 2020 calendar year and discuss priority topics that should be covered.