

Air Management Study Group Meeting 4/8/20

Welcome

Guest Assistant Deputy Secretary Todd Ambs gave an overview of the Department's Covid-19 outreach efforts.

Question: Is the citizen hotline the same as for businesses to report concerns and where is this posted?

Answer: The hotline is posted on the [DNR webpage](#) and is primarily focused on directing the regulated community. The purpose of the new hotline is to get help in immediate health and safety situations and the online form should be used for non-immediate situations. There is also an existing violation hotline that can still be used by citizens. Please reach out directly to Gail for this number if needed.

Question: Is there something being put together for compliance assistance to address common questions or themes?

Answer: The department has been tracking questions coming in and may develop general outreach as themes emerge. Please bring DNR questions that not only apply to a specific company but also to sectors so the department can address those concerns.

Air program portion of meeting

Air Program Director Gail Good discussed the impacts to the program overall. Most staff are teleworking at this point. The Natural Resources board meeting for April 8 was moved to April 1 with a reduced agenda; the permit streamlining rule discussion was delayed to the June 24 meeting.

Business Support and IT Section Chief Sheri Stach discussed new mail processing procedures and changes occurring due to staff telework.

Air Quality Planning and Standards Section Chief David Bizot discussed work being completed as planned at this time.

Air Monitoring Section Chief Katie Praedel described critical monitoring work still being conducted and some of the precautions the group is taking.

Permitting and Stationary Source Modeling Section Chief Kristin Hart described some of the impacts to the permits and stationary source modeling group. Permit processing will not be held up waiting for ink signatures and permit fees can be submitted electronically. Since mail can still be checked, the program will be able to handle paper submissions as well. Public meetings are being held online, with no in-person option at this time.

Compliance, Enforcement and Emissions Inventory Section Chief Maria Hill described [the webpage](#) put together addressing compliance assistance during this health emergency. The department is granting waiver requests where authorized and is reviewing noncompliance case by case. Normal inspection procedures will be modified until at least mid-May and will be reevaluated as we get closer to that date. While site visits are temporarily postponed, records reviews and meetings are still being completed online.

Question: Has DNR considered delaying reporting deadlines?

Answer: Where the program has authority to grant extensions it is doing so. The program has been using EPA developed language to state that facilities are to return to a state of compliance as soon as practicable. The program has not put out any general deadline suspensions.

Question: How long might it take DNR to respond to emergency and non-emergency requests for case by case compliance determinations?

Answer: The program is trying to respond the same day whenever possible. The program is ready to respond to our sources and answer compliance questions. Where the online assistance form is being used, the request is delivered to a responsible program contact immediately and a summary of requests is delivered each morning to the air program.

Question: For compliance, will the DNR be issuing written advanced discretion?

Answer: No, the program is asking sources to submit the summary of information requested on the response webpage and are keeping this information in facility files for future determinations.

Question: If a facility has an adopted COVID-19 health and safety requirement, will the department follow those while on site in the future?

Answer: The program hasn't discussed this topic yet but will consider this as the program gets back to more normal operations. The program has been and will continue to be responsive to facility needs and requests. DNR will reevaluate operating situations closer to the May 18 date for beginning site visits.

Question: If most sources are self-reporting, how is compliance being reviewed?

Answer: There is a great deal of compliance review work that the program can do, and does in the normal course of business, without being on site. The program's compliance assistance work is going strong right now through records review (which is a majority of any inspection because it documents how a source's equipment has been functioning), monitor review, being available to answer questions for our sources, and more. When in person work can safely resume, site visits will be rescheduled..

Question: For applications, how will confidential information be handled? Should it be submitted online or in hard copy form?

Answer: The program has not yet discussed confidential information handling in these circumstances. These should be submitted in hard copy for now as the program is still able to check mail. The program can check with legal for further discussion.

Question: Will permit applications be considered complete without the hard copy and ink signature?

Answer: Yes, the program is considering applications complete with a scanned signature and electronic fee. Please still send in the hard copy so the program can keep the record complete.

Question: Will this meeting format be used on a frequent basis to keep in touch?

Answer: The program has not considered more frequent meetings at this time and the next scheduled meeting is June 4. During this meeting the program will have specific compliance

information to share and to answer further questions regarding COVID-19. The program can consider more meetings if it has additional specific information to share. Always feel free to reach out with questions or to make recommendations for group meetings.

Comment: Happy the MAML is still coming to Sheboygan for ozone monitoring this year.

Question: Will these presentation slides be available?

Answer: Yes, these will be posted on the [AMSG webpage](#) as soon as we are able.

Field Operations Director Andy Stewart commented: If anyone has questions, please reach out as soon as you can so the program can get ahead of any upcoming challenges.

Question: DNR was developing guidance on the ACE rule, is this still in the works?

Answer: Yes and the program should be getting that guidance out following the internal review process.

Comment: It would be helpful to have cell phone numbers for section chiefs

Answer: Contact information for the section chiefs and field supervisors has been added to the *slideshow*. The [staff directory](#) and [organizational chart](#) are still available as well.

Comment: The program received an email question earlier regarding facilities reaching out with compliance concerns. The program has been working on putting together a framework to address challenges and compliance staff are available to assist with COVID-19 requests. Please reach out and hopefully the program can make the process easier.

Closing

Gail asked if any members of the study group had updates to share. There was nothing shared.

Please reach out with any questions.