

Air Management Study Group Quarterly Meeting

November 11, 2020



Zoom Guidelines

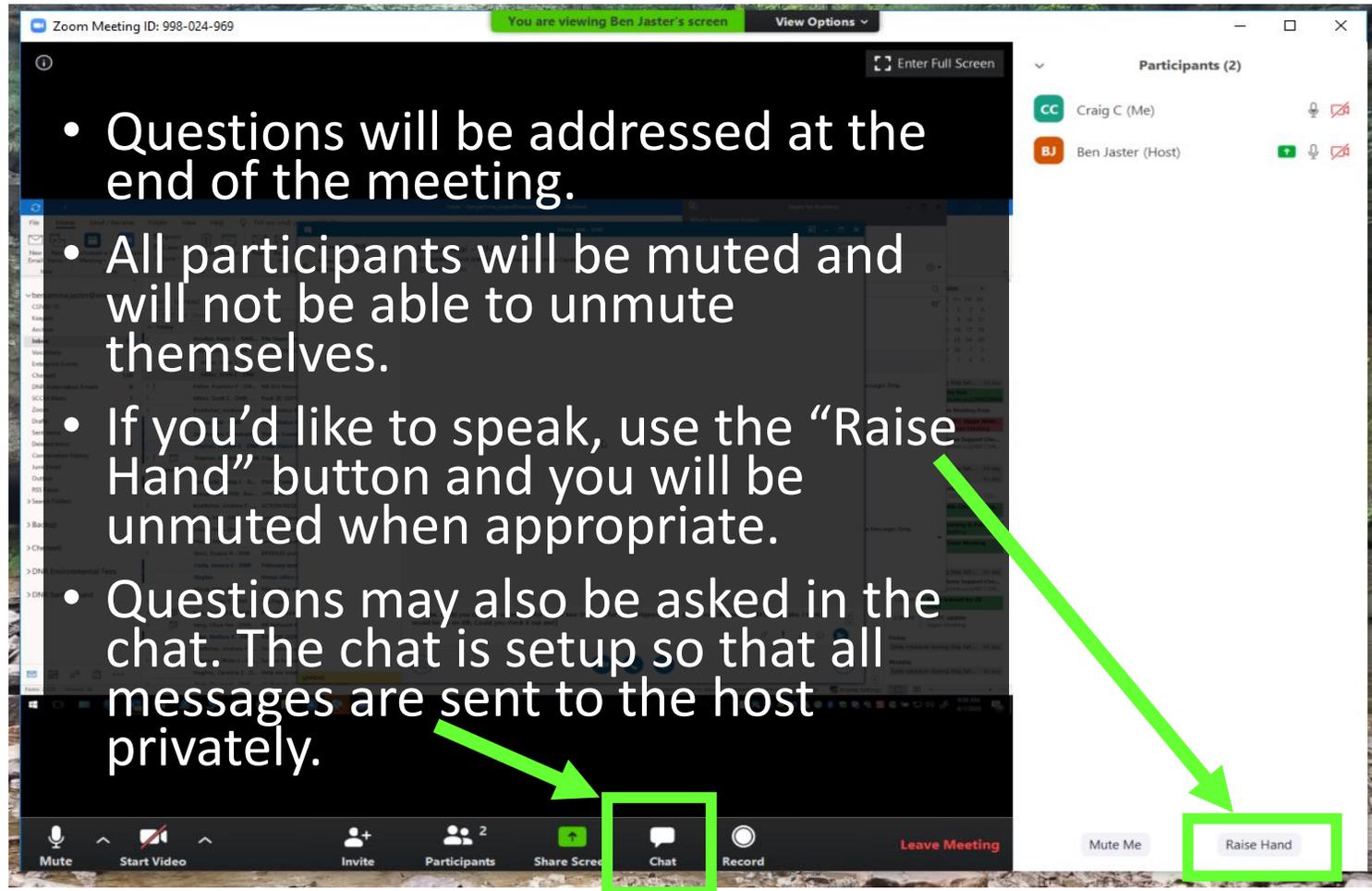
Hello Everyone,

We've developed some guidelines for this meeting, in the hopes of making this a smooth and enjoyable experience for all. Thank you in advance for your understanding.



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Zoom Guidelines



The image shows a Zoom meeting window with a dark overlay containing four bullet points. The meeting ID is 998-024-969. The participants list shows Craig C (Me) and Ben Jaster (Host). The bottom toolbar includes buttons for Mute, Start Video, Invite, Participants, Share Screen, Chat, Record, and Leave Meeting. The 'Chat' button in the toolbar and the 'Raise Hand' button in the bottom right are highlighted with green boxes. A green arrow points from the text 'sent to the host privately' to the 'Chat' button, and another green arrow points from the text 'use the "Raise Hand" button' to the 'Raise Hand' button.

- Questions will be addressed at the end of the meeting.
- All participants will be muted and will not be able to unmute themselves.
- If you'd like to speak, use the "Raise Hand" button and you will be unmuted when appropriate.
- Questions may also be asked in the chat. The chat is setup so that all messages are sent to the host privately.



Zoom Guidelines

- The host will attempt to respond to all messages received, but some messages may be missed.
- Participants will join the meeting with their video disabled. We ask that you keep your video disabled for the duration of the meeting.



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Zoom Guidelines

- We ask for patience while the Air Program conducts this meeting with this setup.
- Zoom technical support: **support.zoom.us**



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Air Management Study Group Quarterly Meeting Agenda

- Opening remarks & agenda review
- Hiring update
- Proposed guidance, rules and legislative update
- Proposed state legislation
- Non-Road Emissions and Stationary Sources
- Member updates
- Permit Projects
- 2020 Air Quality Trends Report
- Ozone Topics
- AMMSG Charter
- 2021 Priority Topics



Air Management Study Group Quarterly Meeting

Madison
November 11, 2020



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Hiring Update

Gail Good
Air Program Director



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Proposed Guidance and Rules Legislative Update

Kristin Hart
Permits and Stationary Source Modeling Section Chief

David Bizot
Air Quality Planning and Standards Section Chief



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DNR Guidance

DNR Guidance in Drafting Phase	Description	Target Date
Municipal Solid Waste Landfills	Updates to guidance for MSW Landfills	Early 2021
Regulation of Non-road and Motive Engine Testing Operations	Guidance on the stationary source status of different engine testing operations	2021
Next Day Deviations	Guidance on meeting next day deviation requirements	Fall/Winter 2020
Handling insignificant emissions units in emissions inventory reporting	Guidance on reporting if emissions from insignificant emissions units	2021
DNR Guidance in Public Comment	Description	Date Posted
None		
Finalized DNR Guidance	Location	Final Date
None		



Proposed/Final DNR Rules

Proposed DNR rule	Description	Phase
AM-24-12b Permit Streamlining	Changes to improve operational efficiency and to simplify the permitting processes administered under chs. NR 406 and 407, while remaining consistent with the Clean Air Act.	Final! Rule was effective on October 1.
AM-20-18 VOC RACT Revisions	Updates RACT rules in ch. NR 422 to meet current EPA Guidelines for Miscellaneous Metal and Plastic Parts Coatings, and Miscellaneous Industrial Adhesives, and other updates.	EIA solicitation ended Nov. 4. Next: public hearing & comment period
AM-10-19 2015 Ozone NAAQS	Incorporates the 2015 ozone NAAQS into state rule and makes related updates. Scope statement approved by NRB in June 2019.	Drafting rule and EIA
AM-31-19 Emissions inventory reporting	Revises NR 438 to align with federal Air Emissions Reporting Rule requirements, resolves inconsistencies between state and federal emissions reporting, and addresses ambiguities in current rule.	Scope statement approved by NRB in October 2020. Next: drafting rule and EIA.



Proposed EPA Rules/Guidance

Proposed EPA rule/guidance	Docket	Comments due
Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Other Solid Waste Incineration Units Review	EPA-HQ-OAR-2003-0156	10/15/20
National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters; Amendments	EPA-HQ-OAR-2002-0058	10/23/20
Standards of Performance for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984	EPA-HQ-OAR-2020-0372	11/30/20
Revised Cross-State Air Pollution Rule Update for the 2008 Ozone National Ambient Air Quality Standards	EPA-HQ-OAR-2020-0272	12/14/20



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Finalized EPA Rules/Guidance

Finalized EPA rule/guidance	Link	Date finalized
Reclassification of Major Sources as Area Sources Under S. 112 Reverses once-in-always-in applicability or NESHAP	EPA-HQ-OAR-2019-0282	Signed 10/01/20 not yet published
Test Methods and Performance Specifications for Air Emissions Sources	EPA-HQ-OAR-2018-0815	10/07/20 effective 12/07/20
Guidance: Inclusion of provisions governing periods of Startup, Shutdown, and Malfunctions in State Implementation Plans	https://www.epa.gov/air-quality-implementation-plans/guidance-inclusion-provisions-governing-periods-startup-shutdown	Posted 10/09/20
Project Emissions Accounting – affects netting analysis methodology in New Source Review permitting	EPA-HQ-OAR-2018-0048	Signed 10/23/20 not yet published



State Draft and Final Legislation

Draft legislation	Link

Final legislation	Link





Non-Road Emissions and Stationary Sources

Kristin Hart

Permits and Stationary Source Modeling Section Chief



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Engine Testing Guidance

- Historically, emissions from engine test stands and product engine testing have been considered stationary source emissions and were included in air pollution control permits
- In 2012 General Motors asked EPA to consider engine testing on automobile assembly lines to be considered mobile sources
- In 2016 John Deere asked EPA to consider non-road engine testing on assembly lines to be considered non-road engine sources
- DNR has received requests from several facilities to remove from air permits, process line emissions from non-road engine testing during assembly and consider them to be non-stationary sources



Engine Testing Guidance

- DNR is reviewing information and drafting guidance on whether emissions from testing non-road engines may be removed from stationary source permitting
- DNR continues to exclude from air permits non-road engines used at stationary sources such as
 - Forklifts
 - Snow blowers
 - Leaf blowers
 - Portable generators that do not stay in the same place for more than 12 consecutive months



Engine Testing Guidance

- A virtual listening session for engine manufacturers and other interested parties is scheduled for November 17, 2020
 - How do engine testing requirements in stationary source permits affect facility operations? Consider:
 - Compliance demonstration requirements
 - Operational limitations
 - Stack testing requirements
 - Other
 - How do engine testing requirements in stationary source permits affect business decisions?



Member Updates



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Permit Projects

Kristin Hart

Permits and Stationary Source Modeling Section Chief



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E-Signature for Permit Applications

- CROMERR – Cross-Media Electronic Reporting Rule
 - Lays out process for e-Signature
 - Not the same as a photocopy of a signature
 - Only a CROMERR certified e-signature process can substitute for ink signature
- Programming is underway to allow applicants to e-sign air permit applications
- e-Signature is already available for compliance certification and monitoring reports and next day deviation reports
 - Look for roll out of e-Signature for permits early in 2021



Public Notice Website Improvements

- Improve and modernize the look of the website
- Provide additional explanation on public comment process
- Improve ease of access to review documents
- Include easy access to recent applications received and final decision made



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visions for public participation and input on air permit application reviews. The table below lists air permit within the last 180 days along with the deadline for providing comments and the date of a tion, draft permit and analysis documents are viewable by clicking on a facility name or permit [link of upcoming public hearings and meetings.](#)

just 1, 2012. This act requires DNR to post hearing and permit notices on the department's one day in the Wisconsin State Journal, the date of posting on the DNR website is the official en the public comment periods end. Contact [Kristin Hart \(608-266-6876\)](#) about air permit public

ation, including personal or contact information, submitted to the department may be used and could be searchable on the internet and/or included in department records in paper

Public hearings and notices

posting date

County	Permit Number	Posting Date	Public Comment Deadline	Hearing Date	Title V Petition Period End	
	08260-F30	10/19/2020	11/18/2020	(none requested)	N/A	Public
	12	10/19/2020	11/18/2020	(none requested)	N/A	Public
		10/12/2020	11/11/2020	(none requested)	N/A	Public
		2020	11/11/2020	(none requested)	N/A	Public

Renewal Application Improvement Project

To improve the **quality** and **completeness** of the applications received to facilitate the timely and efficient renewal of consistent and accurate operation permits



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Background

- Part 70 and ch NR 407 list detailed application requirements:
 - Emission calculations
 - Applicable requirements
 - Methods to demonstrate compliance
 - Certification of compliance status
 - Compliance plans and schedules
- Operation permits expire and must be renewed every 5 years
- Renewal application requirements are the same as initial operation permit requirements



OVERVIEW

Renewal Application Improvements

UPDATES:

- Renewal Application Checklist
- Application Forms
- Instructions
- Webpages

NEW:

- Form Indexes
- Tutorials



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RENEWAL APPLICATION CHECKLIST

- **Where to find it:**

<https://dnr.wisconsin.gov/sites/default/files/topic/AirPermits/RenewalAppChecklist.pdf>

- Contains links to required forms, instructions and other resources:
 - Insignificant Emissions Units guidance
 - Electronic 40 CFR
 - U.S. EPA's CAM Technical Guidance
 - Collaborative Permit Process guidance on submitting a redline/strikeout version of a permit
- Checklist Tutorial



AM-578 – August 2020



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RENEWAL APPLICATION CHECKLIST TUTORIAL

- Checklist Tutorial
- **Where to find it:** <https://dnr.wisconsin.gov/topic/AirPermits/Forms.html>
- Available to sources on-demand
- Explains how to:
 - Complete the checklist and Forms 4530-100 through 4530-102B (including examples).
 - Provide emissions, applicable requirements and compliance status information using Form Indexes
 - Submit copies of off-permit documents referenced in the current permit
 - Provide a redline/strikeout version of the permit
 - Submit the renewal application



Updated Forms

- 4530-100 – Facility Details and Permit Actions Summary
- 4530-101 – Facility Plot Plan
- 4530-102 – Source and Site Description
- 4530-102A – Source Description - Supplemental
- 4530-102B – Source Description - Supplemental
- 4530-126 – Emission Unit HAP Summary
- 4530-127 – Facility HAP Summary
- 4530-128 – Criteria Pollutant Emissions Unit Summary
- 4530-129 – Facility Criteria Pollutant Emission
- 4530-130 – Current Emissions Reqs and Status of Unit
- 4530-132 – Current Emissions Reqs and Status of Facility
- 4530-131 – Emission Unit Compliance Plan and Schedule
- 4530-133 – Facility Reqs Compliance Plan and Schedule

- **Where to find:**

- <https://dnr.wisconsin.gov/topic/AirPermits/Forms.html>

- Links to instructions: **(AM-300 & AM-565)**

- <https://dnr.wisconsin.gov/topic/AirPermits/Apply.html>



Form Indexes

Instructions and Tutorials

- Each Form Index has:
 - Associated color-coded instructions at the back
 - Tutorial
- Tutorial video sources can watch on-demand
- **Where to find tutorials:**
<https://dnr.wisconsin.gov/topic/AirPermits/Forms.html>



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Webpage Updates

AIR POLLUTION CONTROL OPERATION PERMIT RENEWAL FAQ page

<https://dnr.wisconsin.gov/topic/AirPermits/Renew.html>

- Language updates
- Updates to instructions for submitting renewal applications

AIR PERMIT AND COMPLIANCE FORMS page

<https://dnr.wisconsin.gov/topic/AirPermits/Forms.html>

- Language updates
- SOURCE SPECIFIC PERMIT APPLICATIONS FORMS tab



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2020 Air Quality Trends Report

Katie Praedel
Air Monitoring Section Chief

Craig Czarnecki
Air Management Outreach Coordinator



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2020 Trends Report Highlights

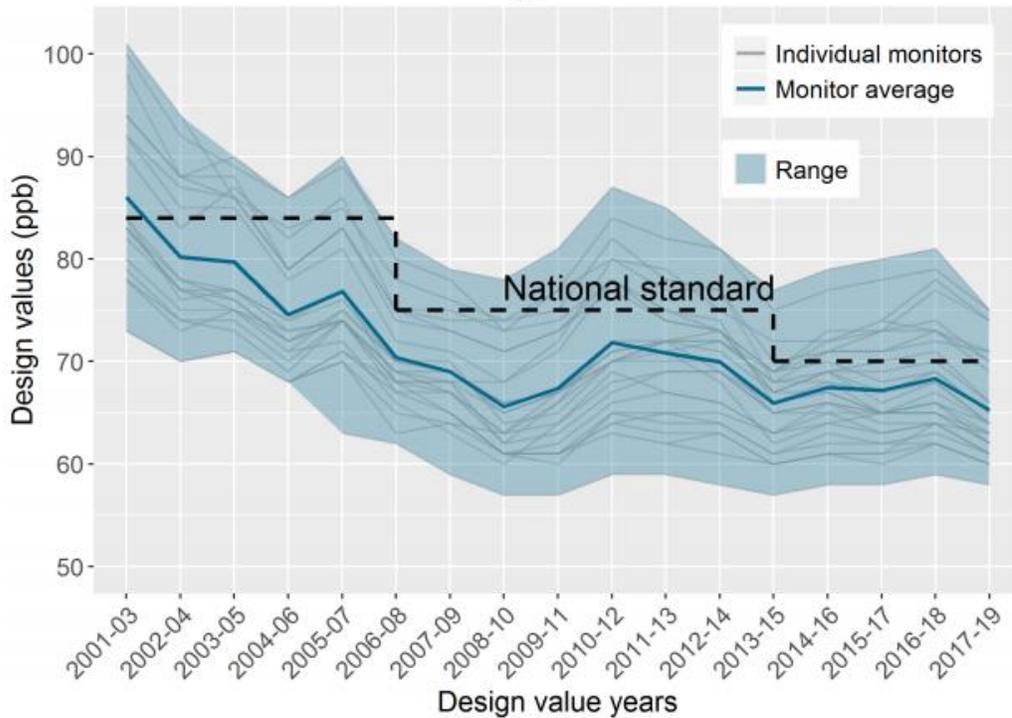
- Shows a long history of air pollution reductions across the state (2001-2019)
- The report includes Wisconsin air quality monitoring data of all criteria pollutants through 2019
- National Emissions Inventory data through 2017



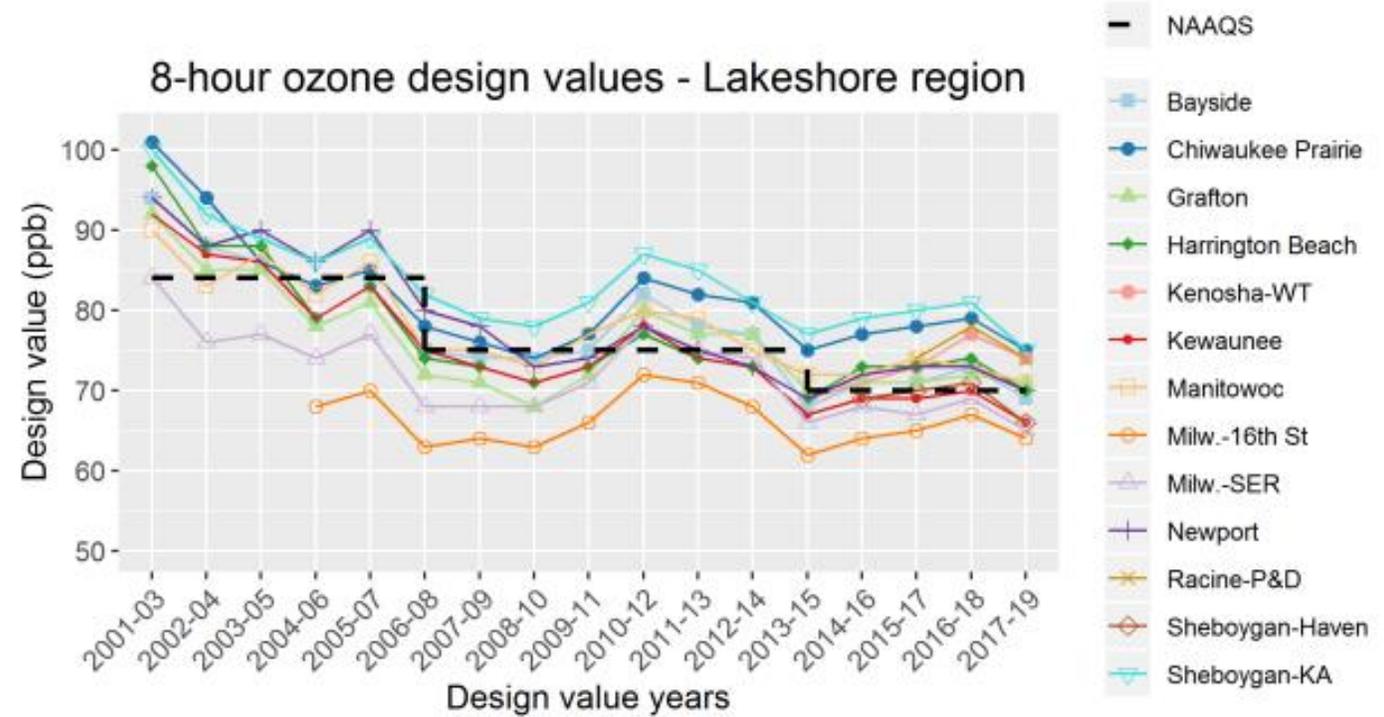
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2020 Trends Report Highlights - Ozone

8-hour ozone design values in Wisconsin

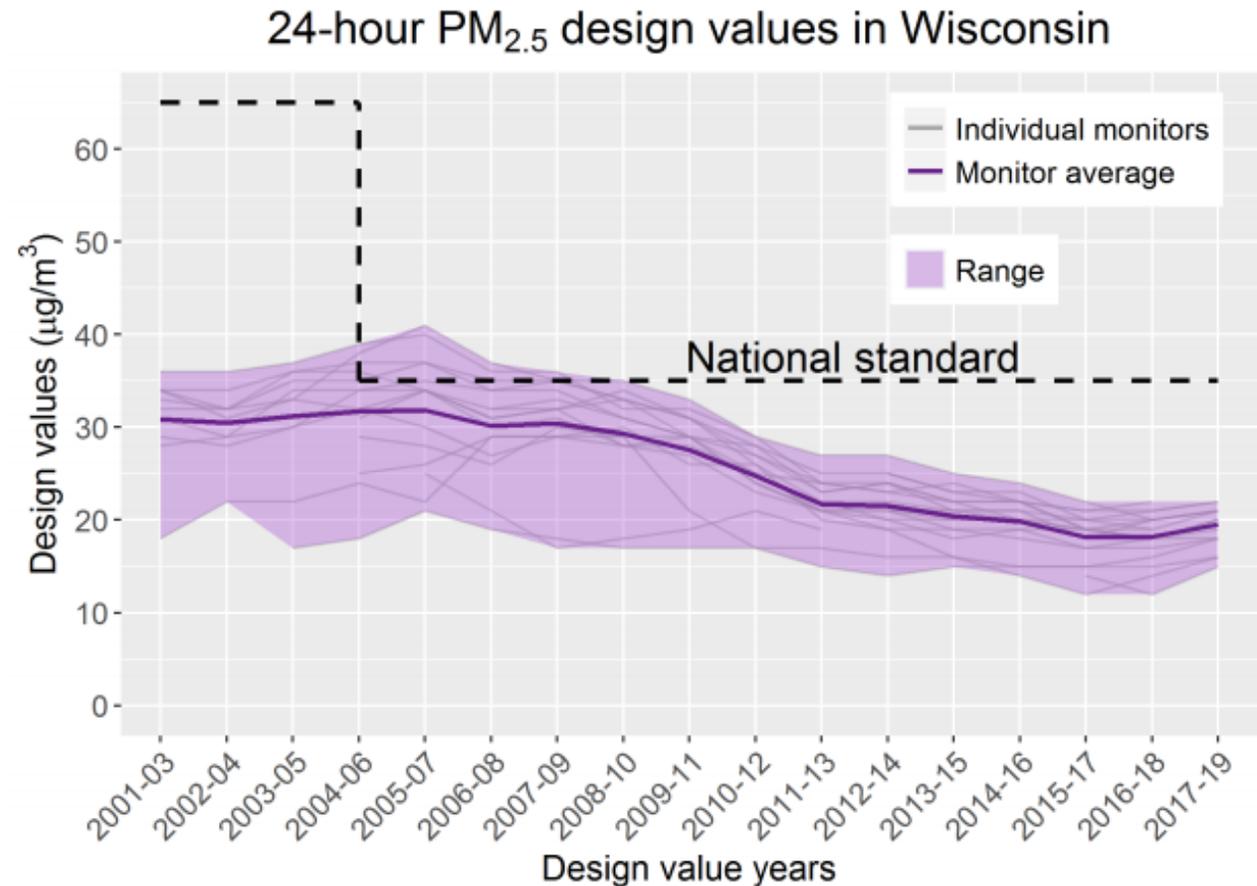


8-hour ozone design values - Lakeshore region



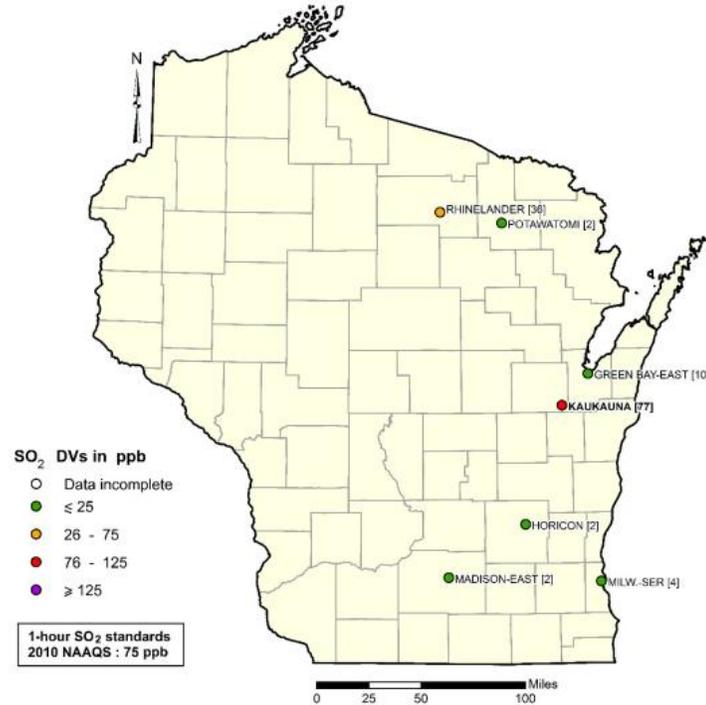
2020 Trends Report Highlights – PM_{2.5}

- Wisconsin is “in attainment” of federal PM_{2.5} standards
- Since the early 2000s PM_{2.5} concentrations have decreased by over 35 %

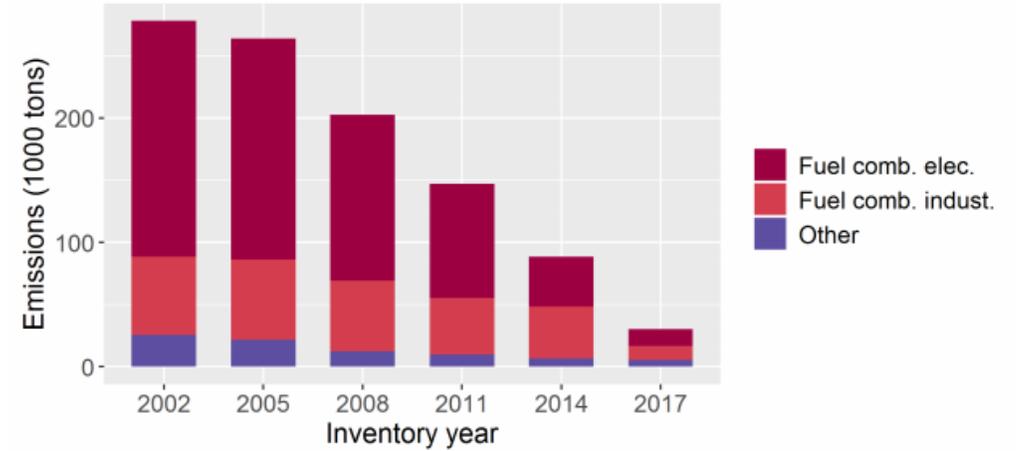


2020 Trends Report Highlights – SO₂

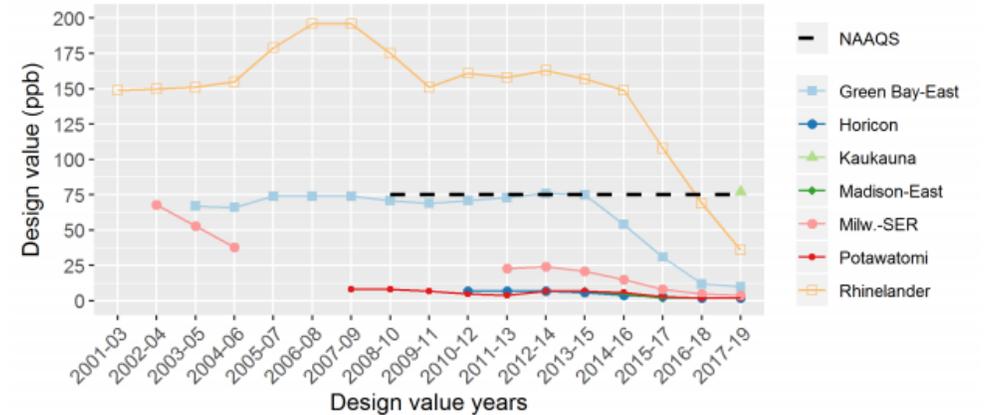
1-hour SO₂ design values: 2017-2019



Wisconsin total SO₂ emissions

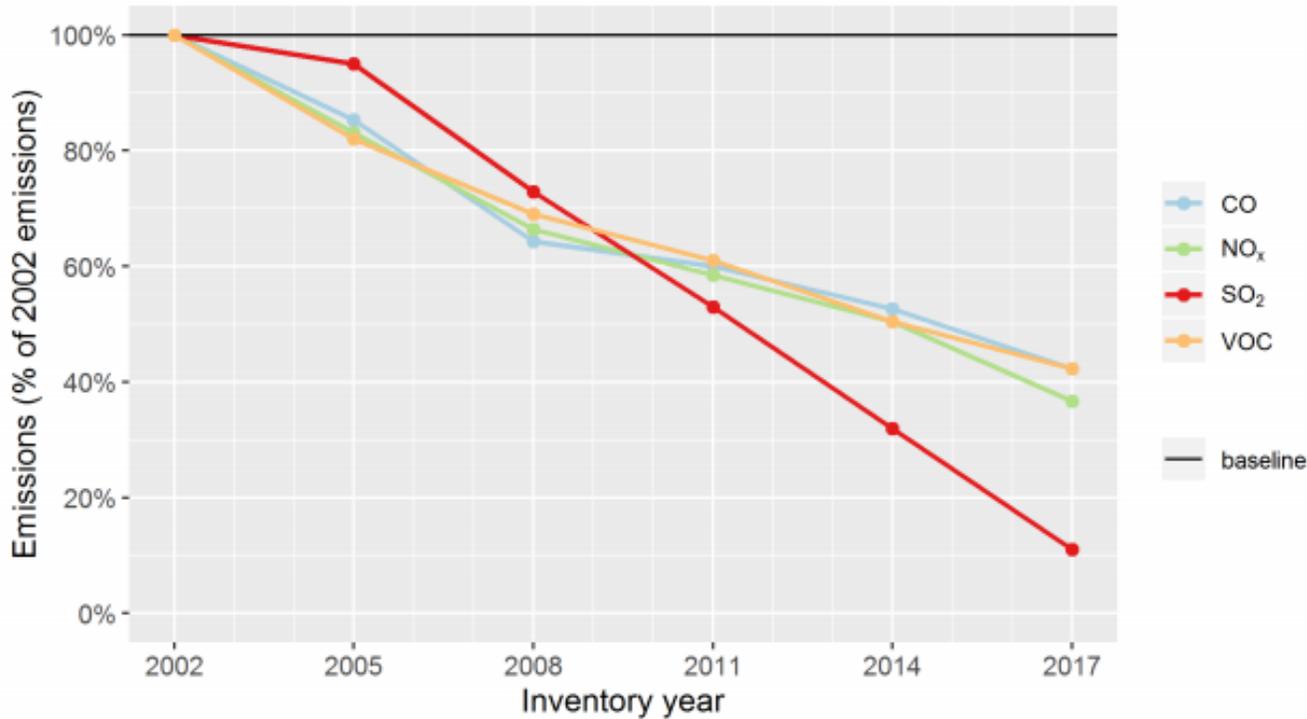


1-hour SO₂ design values

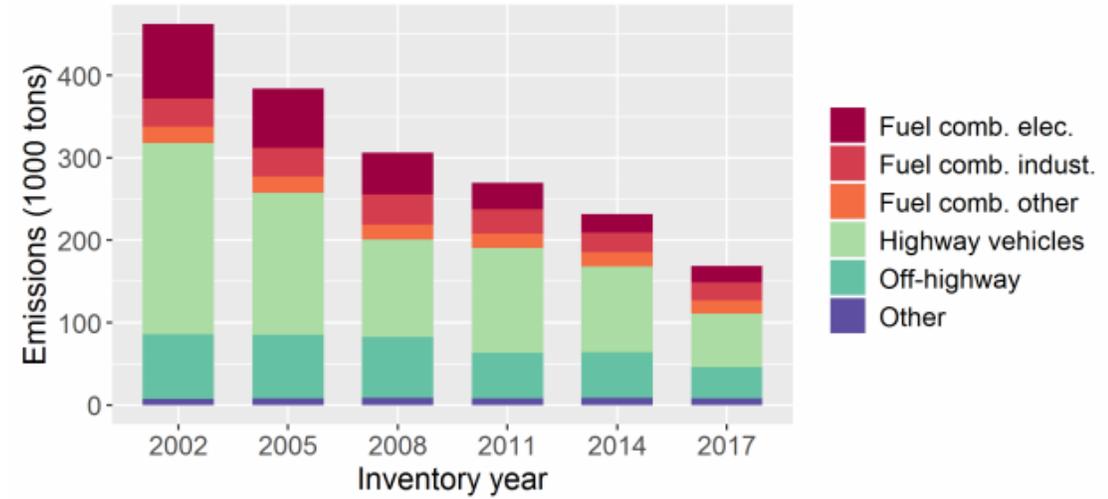


2020 Trends Report Highlights - Emissions

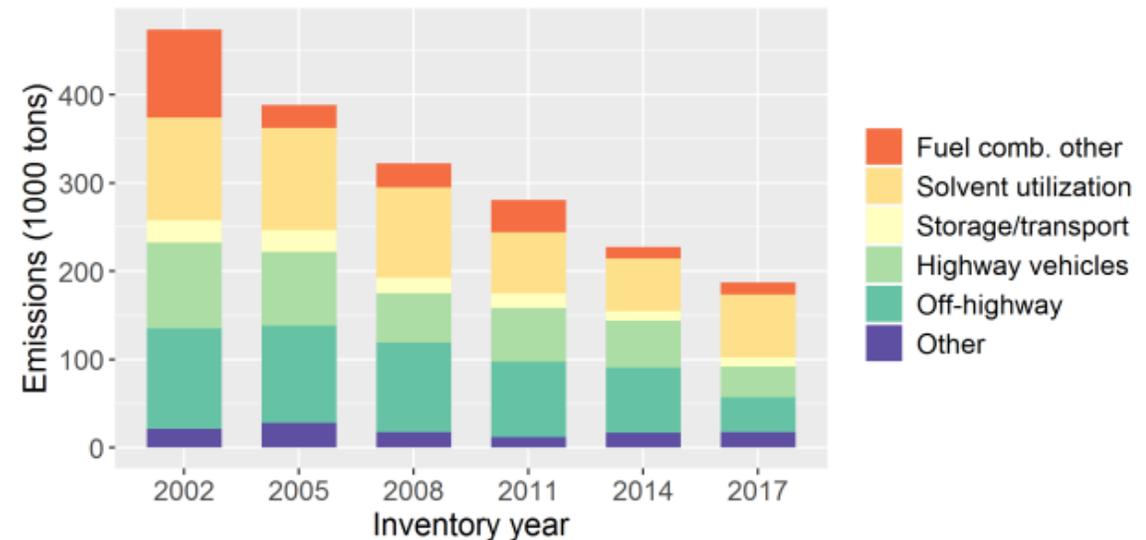
Wisconsin emissions relative to 2002



Wisconsin total NO_x emissions

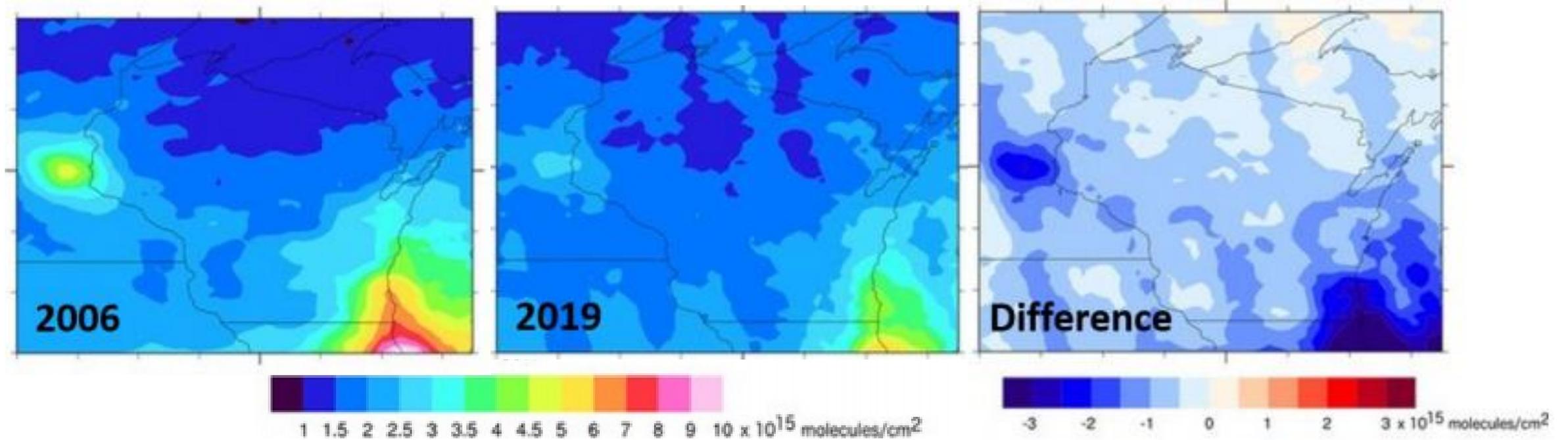


Wisconsin total VOC emissions



2020 Trends Report Highlights – Satellites

Satellite NO₂ column density over Wisconsin



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Trends Makes Headlines!

THE MORNING SHOW



Nick Humphries (CC-BY-NC-ND)

Air Quality In Wisconsin

Air Date: Thursday, November 5, 2020, 6:00am

SHARE:

Listen Download

The Wisconsin DNR recently released its 2020 Air Quality Trends report, which found that 95% of people live in an area that meets federal standards. Our guest details the latest pollutant data and breaks down what that looks like in different parts of the state.



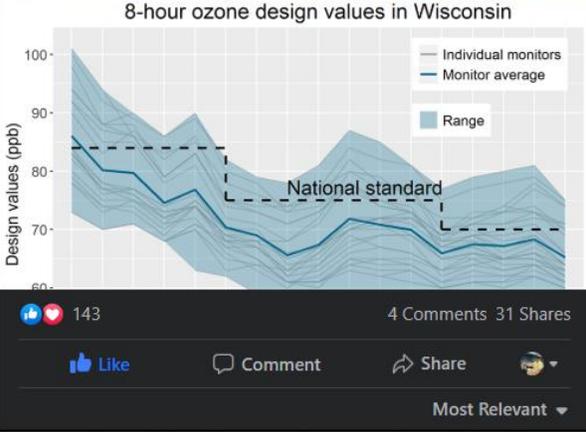
HOME NEWS CORONAVIRUS WEATHER SPORTS THINGS TO

DNR report: Wisconsin air quality improving



Wisconsin Department of Natural Resources
1d ·

Wisconsin is trending in the right direction!
Our annual Air Quality Trends Report shows Wisconsin's air quality continues improving.
The Trends Report shows decreases in ozone values across the state, but most noticeably in the lakeshore region, an area historically impacted by elevated ozone concentrations. ... [See More](#)



HOME NEWS CORONAVIRUS WEATHER SP

2020 CHEVROLET BLAZER
\$4,000 CASH ALLOWANCE* + \$750 CASH ALLOWANCE**
CURRENT OWNERS GET AN ADDITIONAL \$750 CASH ALLOWANCE**
BERGSTROM CHEVROLET IN MADISON, WI

DNR report: Wisconsin air quality improving

October 23, 2020 11:56 am Associated Press

TOP STORIES, WISCONSIN NEWS FROM THE ASSOCIATED PRESS

DNR report: Wisconsin air quality improving

by AP News — October 23, 2020 in AP WI News Feed



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Ozone Update

Katie Praedel
Air Monitoring Section Chief

David Bizot
Air Quality Planning and Standards Section Chief



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Ozone Monitoring Season 2020

- April 1, 2020 – Oct 15, 2020 (Kenosha County Monitors through Oct 31, 2020)
- Enhanced Ozone Monitoring – June through September 2020
 - Focused on precursor monitoring in Sheboygan and Kenosha counties
 - DNR will evaluate 2021 priorities in the ozone offseason



Ozone Monitoring Season 2020

- Challenges
 - COVID-19 Safer at Home essential work
 - Weather – wind, sun and heat
- Innovative improvements out of necessity
 - Raspberry Pi deployment with new remote operations process
 - Training videos and video conferencing



Ozone – draft 2020 ozone data

**Top Four 8-Hour
Average Ozone
Concentrations – as
of **November 2, 2020****

site	Concentrations (ppb)				2020 Critical values		Days at/above C.V.		Current 2018-2020 "design value"
	1st high	2nd high	3rd high	4th high	2008 std	2015 std	2008 std	2015 std	
Newport	85	79	76	75	87	72	0	4	72
Chiwaukee Prairie	104	81	79	78	82	67	1	18	74
Kenosha WT	84	79	78	78	82	67	1	12	74
Manitowoc	81	79	73	69	86	71	0	3	70
Milw SER	93	82	78	75	99	84	0	1	68
Bayside	93	82	81	74	91	76	1	3	70
Grafton	91	81	81	73	87	72	1	4	71
Harrington Beach	88	81	76	71	89	74	0	3	70
Racine Payne & Dolan	94	84	80	77	84	69	2	8	73
Sheboygan Kohler Andrae	89	86	78	76	77	62	3	18	75
Elkhorn	81	77	76	74	96	81	0	1	68

Exceeds the 2015 NAAQS critical value or standard

Exceeds the 2008 NAAQS critical value or standard

Note: Data have not yet been QA'ed or certified and are subject to change. Values are only shown for monitors that exceeded their critical value at least once.



Implications of draft 2018-2020 ozone values

- 2008 ozone NAAQS – 3-state Chicago area, including Kenosha County (partial)
 - Currently “serious” classification with attainment date of July 2021. Attainment plan was out for comment through November 9; submittal to EPA next.
 - Area will not attain, due to re-violation of an Illinois monitor.
 - Bump-up to “severe” anticipated in late 2021.
- 2015 ozone NAAQS
 - Eligible for attainment: Manitowoc County NAA
 - Kenosha County, Sheboygan County, and Northern Milwaukee/Ozaukee Shoreline NAAs will not attain by the attainment date of August 2021. Bump-up to “moderate” anticipated in late 2021.
 - Door County area re-violation – prompts maintenance plan



Regional haze

- SIP for second planning period (through 2028) is due July 31, 2021.
- The Class I federal areas in this region appear to be on track to meet their 2064 visibility goals.
- DNR has been working with Region 5 states, LADCO and federal land managers (FLMs) to ensure the latest information about source emissions, controls, and impacts in the region are documented.
- LADCO is currently completing the modeling needed to support state SIPs.
- DNR's draft SIP is expected to be ready for formal review by the FLMs in early 2021, followed by the public comment period.



AMSG Charter

Gail Good
Air Program Director



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Air Management Study Group Charter and Membership

- The AMSG Charter has not been revised since 2015. This may be a good time to review the charter and bring it up to date.
- One area the program has identified for updating is AMSG organization and membership.
- The program has developed some potential changes but would like to form an AMSG ad hoc working group to review these and offer input before anything is finalized.



Air Management Study Group Charter and Membership

- Questions for the sub-group to consider include:
 - Is the AMSG fully representative of air management stakeholders and interests? If not, who is not represented?
 - Should AMSG include at-large representatives in addition to the stakeholders that have historically been on the group? If so, how would those seats intersect with the current membership?
 - Could the charter do more to encourage fresh perspectives and new voices on the group?
 - What additional clarity should the charter provide in terms of member selection, expectations on members, and the role of the AMSG co-chair?



Air Management Study Group Charter and Membership

- Open discussion and questions on this topic.
- Call for members interested in being part of the membership working group.



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2021 Priority Topics

Gail Good
Air Program Director



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2021 Priority Topics

- **Emerging federal regulation**

- Emerging contaminants (PFAS)
- New source review reform
- Long term planning at the federal level
- ACE Rule

- **Ongoing efforts**

- 2008/2015 ozone NAAQS implementation
- SIP submittals and re-designation requests
- Regional haze
- Permit streamlining and other rulemaking

- **Opportunities**

- Transparency in information (data, digitization)
- Goals and vision of DNR
- Working with other states organizations



2021 Meeting Dates

- Thursday, February 4
- Thursday, May 6
- Thursday, August 5
- Thursday, November 4



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