

Air Management Study Group Quarterly Meeting

Madison
February 15, 2018

Brownfields Legislation

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Remediation and Redevelopment, Brownfields and Outreach Section Chief

Proposed Guidance and Rules

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Proposed DNR Guidance

DNR Guidance in Drafting Phase	Description	Target Date
1-hr NO ₂ NAAQS Implementation	New guidance on methods for evaluating NO _x emissions against the 1-hr NO ₂ standards in permit reviews	Final guidance available soon
Updates to Air Dispersion Modeling Guidelines	Update to Modeling Guidelines to incorporate changes approved by EPA in Appendix W	Final guidance available soon
DNR Guidance Available for Comment	Date Posted	Comments Due
Collaborative Permit Process – Guidance on submitting redline version of an existing permit with an application for a new permit	DATE	DATE

Proposed EPA Rules and Other Actions

Proposed EPA rule	Docket	Comments due
Responses to Certain State Designation Recommendations for the 2015 Ozone National Ambient Air Quality Standards	EPA-HQ-OAR-2017-0548	Feb. 5, 2018 (Feb. 28 for states)
State Guidelines for GHG Emissions from Existing EGUs (ANPR)	EPA-HQ-OAR-2017-0545	Feb. 26, 2018
Repeal of Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units	EPA-HQ-OAR-2017-0355	April 26, 2018

Other EPA Actions	Link	Final Date
Memorandum on Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act (Once-in-Always-in policy)	https://www.epa.gov/stationary-sources-air-pollution/reclassification-major-sources-area-sources-under-section-112-clean	Jan. 25, 2018

Final SO₂ Designations

David Bizot

Regional Pollutants and Mobile Sources Section Chief

2010 SO₂ NAAQS Implementation

- EPA is designating areas for this NAAQS in four rounds.
 - Round 1 (July 2013): EPA designated Oneida County (partial) as nonattainment. The state has submitted the required attainment SIP for this area to EPA.
 - Round 2 (July 2016): EPA designated Columbia County as attainment/unclassifiable.
- On December 20, 2017, EPA finalized its Round 3 designations. In this round, it designated the remainder of the state as attainment/unclassifiable, except for Outagamie County. This is a significant achievement and great news for the state and our sources!
- Outagamie County will be designated in Round 4.
 - Monitor will collect data from 2017-2019.
 - EPA will use this data to determine the area's initial designation no later than December 2020 (court ordered deadline).

E-signature Pilot

Sheri Stach

Business Support and IT Section Chief

E-signature Pilot

- Air Management is the first program in the agency to use the Digital Signature Service.
- A pilot e-signature project for the compliance certifications and monitoring reports for 15 facilities was launched 2/1/18.
- The pilot project and finalization of outreach materials will continue during the month of February.
- The goal is to have e-signature and all outreach materials available to all facilities statewide for compliance certifications and monitoring reports in the spring.
- DNR has a new e-signature webpage:
<http://dnr.wi.gov/topic/Switchboard/esignature.html>

Retention Disposition Authorization (RDA)

Sheri Stach

Business Support and IT Section Chief

Retention Disposition Authorization (RDA)

- Approved by Public Records Board
 - Asbestos
 - Permits
 - Monitoring
- Pending review by Records Review Committee & Public Records Board Approval
 - Compliance – May/June 2018
- Next RDAs to work on
 - Refrigerant Recovery Program
 - Asbestos – for desired updates

PM2.5 Network Changes

Katie Praedel
Air Monitoring Section Chief

PM2.5 Network Changes

- Adjustments to the PM2.5 monitoring network will be completed by April 1, 2018
- This effort was part of the DNR alignment initiative
- DNR will continue to support 20 PM2.5 monitoring sites
- Method change will result in 17 Federal Equivalent Method (FEM) and the minimum required (3) Federal Reference Method (FRM) samplers
- This change allows for more data at a reduced operating cost



Member Updates

Ozone Update

David Bizot

Regional Pollutants and Mobile Sources Section Chief

Kristin Hart

Permits and Stationary Source Modeling Section Chief



2015 ozone NAAQS designations process

- September 2016: Governor Walker recommended that the entire state of Wisconsin be designated as attainment of the 2015 ozone NAAQS.
- January – March 2017: AMMSG ozone implementation workgroup established to discuss what information state could consider providing to EPA to support/supplement this recommendation.
- April 2017: DNR provided supplemental information to EPA in support of the governor's recommendation showing, among other things, the maximum extent of any 70 ppb ozone areas based on the latest science and data.

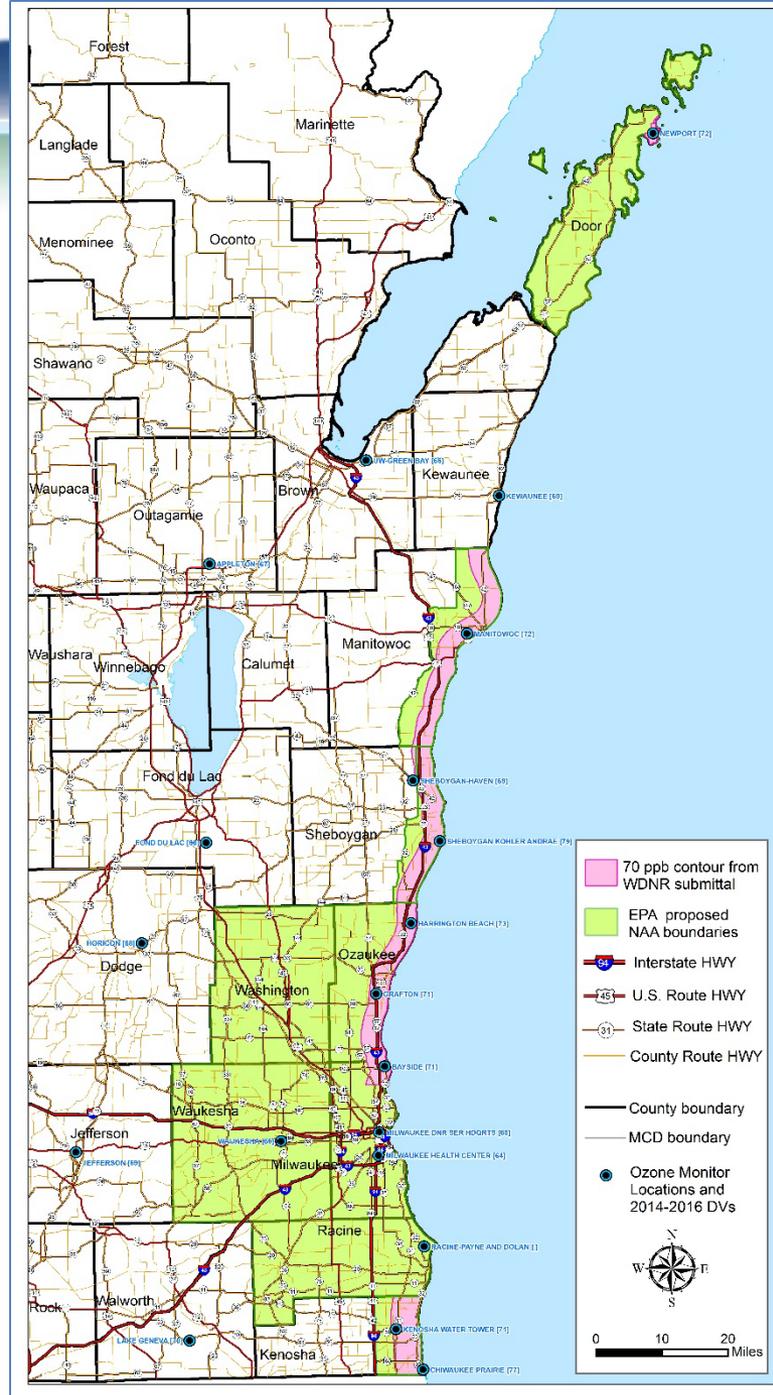


2015 ozone NAAQS designations process

- November 6, 2017: EPA made its initial designations for the 2015 ozone NAAQS. In its notice, EPA designated 56 counties in Wisconsin as attainment/unclassifiable and deferred action on the remaining 16 counties.
- December 20, 2017: EPA took action on the remaining 16 counties, proposing to designate them all as attainment/unclassifiable except for:
 - Kenosha County (partial)
 - Washington, Waukesha, Ozaukee, Milwaukee, and Racine counties
 - Sheboygan County (partial), Manitowoc County (partial), Door County (partial)

EPA's Intended 2015 Ozone NAAQS Nonattainment Area Designations

All areas of Wisconsin





Permitting implications of nonattainment

- Major sources of emissions in ozone nonattainment areas are subject to nonattainment new source review (NNSR) permitting requirements. The major source threshold is lowered from 250 to 100 tons per year each of VOC and NO_x.
 - Lowest Achievable Emission Rate (LAER), which by law does not consider cost, must be applied to each emission unit emitting VOC and or NO_x.
 - Major construction covered by NNSR also requires the permit applicant to offset the project's VOC and NO_x emissions with reductions found elsewhere in the nonattainment area according to a ratio that depends on the severity of nonattainment. Since these areas are likely to be classified as “marginal” nonattainment, the offset ratio in these areas is likely to be 1.1:1 (tons).
- In the existing 2008 ozone NAAQS nonattainment areas in Sheboygan County and Kenosha County (partial), the offset ratio will remain 1.15:1 since they remain in “moderate” nonattainment classification for the 2008 ozone NAAQS until EPA revokes the 2008 standard.



Next steps in designations process

- AMSG Ozone Implementation Workgroup met on January 17, 2018.
- EPA took public comment on the intended designations through February 5, 2018 (docket EPA-HQ-OAR-2017-0548-0065).
- EPA has asked states and tribes for any additional information by February 28, 2018. Wisconsin is currently developing a response.
- EPA has stated it intends to finalize designations prior to April 30, 2018. Per the Clean Air Act, EPA cannot finalize designations for at least 120 days after states were notified of any changes to the governor's recommendations (i.e., April 19, 2018).
- When finalizing designations, EPA will consider the public comments received and any additional information provided by states and tribes to determine if any changes should be made to its intended designations.



Resources

- EPA's letter and technical support document for Wisconsin regarding intended designations:
<https://www.epa.gov/ozone-designations/ozone-designations-2015-standards-wisconsin-state-recommendations-and-epa>
- DNR's submittals, maps, and fact sheet:
<https://dnr.wi.gov/topic/AirQuality/Ozone.html>



2008 ozone NAAQS update

- DNR has prepared a redesignation request for all of Sheboygan County based on data from the inland Sheboygan-Haven monitor, which shows attainment of the 2008 ozone NAAQS (75 ppb).
- Public hearing was held on Jan. 22 and comment period closed Feb. 1.
- Intention is to submit to EPA soon after the legislative review period concludes on Feb. 19.

Wisconsin Partners for Clean Air

Gail Good

Program Director

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Wisconsin Partners for Clean Air

Background Information

- Wisconsin Partners for Clean Air (WPCA) is an external stakeholder group supported by the Air Program
- Group was voluntarily formed in 1996 to support emissions reduction efforts like Ozone Action Days, and to recognize outstanding achievements by businesses in voluntarily reducing air emissions
- Active mostly in southeastern WI, but is a statewide group
- Currently about 250 partners

Wisconsin Partners for Clean Air

Outreach Activities

- Annual event typically held in May for awards ceremony
 - Attendance has ranged from 27 – 74 partners, with numbers averaging about 30 for the past 5 years; event is typically held at a partner's facility
 - Work includes soliciting nominations and coordinating event
- Quarterly newsletter, sent via email
- Steering committee meetings 2x per year, or more if needed
- Serve as main point of contact for questions from existing or new members

Wisconsin Partners for Clean Air

Current Situation

- DNR has limited staffing resources available to continue to support this group with coordination and outreach
- Questions for AMSG members:
 - Is there value in having a group like WPCA?
 - Should DNR continue to support WPCA's activities?
 - What should a group like WPCA be focusing on or doing?
 - Are there opportunities for partners or other organizations to help with or support WPCA's awards recognition/event?
 - Are there other events or meetings that the annual awards ceremony could be integrated into?