Air Management Study Group
Quarterly Meeting Agenda

• Opening remarks & agenda review
• Hiring update
• Proposed guidance, rules and legislative update
• Act 369 update
• EDGE Pilot Project (Formerly known as Act 70)
• Permit Progress Bar
• Title V Operation Permit Review Procedures
• PFAS Plan
• Member updates
• Ozone updates
• Emissions inventory and confidentiality
• Work planning and digitization
• ACE Rule
Air Management Study Group
Quarterly Meeting

Madison
August 8, 2019
Hiring Update

Gail Good
Air Program Director
Proposed Guidance and Rules
Legislative Update

Kristin Hart
Permits and Stationary Source Modeling Section Chief

David Bizot
Air Quality Planning and Standards Section Chief
## Proposed DNR Guidance

<table>
<thead>
<tr>
<th>DNR Guidance in Drafting Phase</th>
<th>Description</th>
<th>Target Date</th>
</tr>
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<tbody>
<tr>
<td>None</td>
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<table>
<thead>
<tr>
<th>DNR Guidance in Public Comment</th>
<th>Description</th>
<th>Date Posted</th>
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<tbody>
<tr>
<td>None</td>
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<table>
<thead>
<tr>
<th>Finalized DNR Guidance</th>
<th>Location</th>
<th>Final Date</th>
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<tbody>
<tr>
<td>None</td>
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# Proposed DNR Rules

<table>
<thead>
<tr>
<th>Proposed DNR rule</th>
<th>Description</th>
<th>Phase</th>
</tr>
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<tbody>
<tr>
<td>AM-18-13 Lithographic Printing Rule</td>
<td>Changes to NR 422.142 and 422.143, to clarify and streamline the requirements for lithographic printing facilities.</td>
<td>Effective as-of July 1, 2019</td>
</tr>
<tr>
<td>AM-24-12b Air Permit Streamlining Rule Part 2</td>
<td>Changes to improve operational efficiency and to simplify the permitting processes administered under chs. NR 406 and 407, while remaining consistent with the federal Clean Air Act (CAA).</td>
<td>Preparing for adoption by NRB and Gov</td>
</tr>
<tr>
<td>AM-20-18 VOC RACT</td>
<td>Updates two RACT rules in ch. NR 422 to meet current EPA Guidelines for Miscellaneous Metal and Plastic Parts Coatings, and Miscellaneous Industrial Adhesives.</td>
<td>Rule drafting</td>
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</table>
# Proposed EPA Rules/Guidance

<table>
<thead>
<tr>
<th>Proposed EPA rule/guidance</th>
<th>Docket</th>
<th>Comments due</th>
</tr>
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<tbody>
<tr>
<td>Proposed Revision of the Photochemical Assessment Monitoring Station (PAMS) Requirement Start Date</td>
<td>EPA-HQ-OAR-2019-0137</td>
<td>July 1, 2019</td>
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<tr>
<td>Reclassification of Major Sources as Area Sources Under S. 112 of the Clean Air Act (Once in always in)</td>
<td>EPA-HQ-OAR-2019-0282</td>
<td>Sept 24, 2019</td>
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## Proposed EPA Rules/Guidance

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<thead>
<tr>
<th>Proposed EPA rule/guidance</th>
<th>Docket</th>
<th>Comments due</th>
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<tr>
<td>Agency Information Collection Activities on NESHAPs and NSPS</td>
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<td>Various</td>
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<tr>
<td>• Printing and publishing</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Primary copper, secondary copper, primary nonferrous metals</td>
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<td></td>
</tr>
<tr>
<td>• Prepared feeds</td>
<td></td>
<td></td>
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<tr>
<td>• Clay ceramics, glass manufacturing, secondary nonferrous metals area sources</td>
<td>Access EPA Docket</td>
<td></td>
</tr>
<tr>
<td>• Pressure sensitive tape and label surface coating</td>
<td></td>
<td></td>
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<tr>
<td>• Plastic parts and products</td>
<td></td>
<td></td>
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<tr>
<td>• Steel plants – Electric Arc Furnaces</td>
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## Finalized EPA Rules/Guidance

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<tr>
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<tr>
<td>FY 20-21 Office of Air and Radiation National Program Guidance</td>
<td>FY20-21 OAR NMP</td>
<td>June 7, 2019</td>
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<tr>
<td>Repeal of the Clean Power Plan, Emission Guidelines for Greenhouse Gas Emissions From Existing Electric Utility Generating Units (Affordable Clean Energy rule), and Revisions to Emission Guidelines Implementing Regulations</td>
<td>EPA-HQ-OAR-2017-0355</td>
<td>July 8, 2019</td>
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# Draft and Final Legislation

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<th>Draft legislation</th>
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<td>PFAS Legislation</td>
<td>[LRB-2297/2]</td>
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<table>
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<th>Final legislation</th>
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<tbody>
<tr>
<td>None to report</td>
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Act 369 Update

Gail Good
Air Program Director
EDGE Pilot Project Update
(Formerly known as Act 70 Pilot)

Kristin Hart
Permits and Stationary Source Modeling Section Chief
EDGE Pilot Project Team is transitioning from formation to implementation

• Metrics Team
  – How do we define success?

• Communications Team
  – How do we get the word out and bring in participants?

• Discussed candidates for the EDGE Pilot
• Discussed structure moving forward
Progress Bar Update

Kristin Hart
Permits and Stationary Source Modeling Section Chief
Progress Bar Update

The permit search page has a new feature to track progress on an air permit review

https://dnr.wi.gov/topic/AirPermits/Search.html
Progress Bar Update

• Visual representation of the permit review process
• A symbol indicates that the department is waiting for additional information
• When the entire bar is filled in blue, the air permit has been issued
Title V Operation Permit Review Procedures

Kristin Hart
Permits and Stationary Source Modeling Section Chief
Title V Operation Permit Review Procedures

Several ongoing projects to improve the quality, consistency, and accuracy of Title V Operation Permit Permits

• Encouraging complete information in applications
  – Allowing submittal of emission calculations in spreadsheets
  – Assuring that up-to-date descriptions of activities and emission units are included in permits
  – Listing updated regulations, construction permits or permit exemptions
Title V Operation Permit Review Procedures

• Streamlined approach to including federal standards (NESHAP and NSPS requirements)
  – Assuring correct applicability
  – Assuring accurate and consistent inclusion in permit documents

• Encouraging attachment of a marked up permit to renewal applications

Collaborative Permit Process Guidance
PFAS Air Program Plan

Gail Good
Air Program Director
PFAS Plan

• FY20 chartered project
• Intended benefit: The air program will develop a plan to address and meet current PFAS needs, including development of an understanding of air fate and transport, sources that may be air emissions of PFAS, and strategies to address the issue, utilizing developing science.
PFAS Plan

• Deliverables:
  – List of potential air emissions sources of PFAS.
  – GIS layer of potential air emissions sources for AMDV.
  – Process to coordinate with WSLH to address monitoring questions and participate, where applicable, in study related to PFAS deposition activities.
  – Process to coordinate with EPA and other organizations on stack testing, emissions inventory, and monitoring goals.
  – Program understanding of incineration and other potential air control technologies relative to PFAS, developed in coordination with the WMM program and other relevant external partners.
  – Communication materials that describe the air program’s work, understanding, and approach to PFAS in Wisconsin.
Member Updates
Ozone Update

David Bizot
Air Quality Planning and Standards Section Chief

Kristin Hart
Permits and Stationary Source Modeling Section Chief

Katie Praedel
Air Monitoring Section Chief
2008 Ozone NAAQS: Sheboygan County split

• On July 15, EPA finalized a split of the Sheboygan County 2008 ozone nonattainment area into two areas:
  • “Inland Sheboygan County” – also made a clean data determination
  • “Shoreline Sheboygan County”

• These areas now are considered independent in terms of CAA planning purposes.

• DNR is currently working on a redesignation request for the Inland Sheboygan County NAA based on data from the Haven monitor showing the area has attained the 2008 ozone NAAQS.

• DNR will also have to submit an attainment plan for the Shoreline Sheboygan area.
## Status of the 2019 Ozone Season

### Top Four 8-Hour Average Ozone Concentrations – as of July 29, 2019

<table>
<thead>
<tr>
<th>Site</th>
<th>Concentrations (ppb)</th>
<th>2018 Critical values</th>
<th>Days at/above C.V.</th>
<th>Current 2016-2018 &quot;design value&quot;</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1st high</td>
<td>2nd high</td>
<td>3rd high</td>
<td>4th high</td>
</tr>
<tr>
<td>Newport</td>
<td>74</td>
<td>68</td>
<td>68</td>
<td>66</td>
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<tr>
<td>Chiwaukee Prairie</td>
<td>76</td>
<td>72</td>
<td>70</td>
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<tr>
<td>Kenosha WT</td>
<td>73</td>
<td>69</td>
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<td>63</td>
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<td>Manitowoc</td>
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<tr>
<td>Bayside</td>
<td>71</td>
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<tr>
<td>Grafton</td>
<td>73</td>
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<td>64</td>
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<td>Harrington Beach</td>
<td>71</td>
<td>69</td>
<td>67</td>
<td>66</td>
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<tr>
<td>Racine Payne &amp; Dolan</td>
<td>75</td>
<td>69</td>
<td>68</td>
<td>66</td>
</tr>
<tr>
<td>Sheboygan Kohler Andrae</td>
<td>73</td>
<td>73</td>
<td>68</td>
<td>67</td>
</tr>
</tbody>
</table>

**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.

---

2008 NAAQS: 75 ppb  
2015 NAAQS: 70 ppb  
Exceeds the 2015 NAAQS critical value or standard  
Exceeds the 2008 NAAQS critical value or standard
2020 Air Monitoring Network Plan Submitted

• On June 24, 2019 the air program submitted the final “2020 Annual Air Monitoring Network Plan”

• Process included 30 day public comment period

• Act 159 required exclusion of the Sheboygan Kohler Andrae monitor from the submitted network plan. Due to official comment from EPA, final version included both Sheboygan Haven and Sheboygan Kohler Andrae monitoring sites

• All information including final version, comments and response to comments can be found on the DNR webpage
  – https://dnr.wi.gov/topic/AirQuality/Monitor.html
PAMS/Enhanced Ozone Monitoring in WI

• Non-attainment areas classified at moderate and above for the 2008 ozone NAAQS are required to submit an Enhanced Ozone Monitoring Plan by Oct 2019.

• The 2015 Ozone NAAQS rule which took effect on December 28, 2015:
  – Included a new PAMS requirements that removed the requirement for a PAMS site in Milwaukee. Consequently, the Milwaukee SER DNR Hdqrs PAMS site shut down in 2017.
  – Required other states with urban NCORE sites to install PAMS monitoring, including Auto GCs.
To implement additional monitoring of ozone and ozone precursor compounds to better understand the impacts of ozone precursors on ozone concentrations in Wisconsin.

1. Determine how out-of-state emissions are impacting WI ozone values, and inform strategies that could potentially be used to address those emissions
2. Provide data that can be used to update and improve the regulatory meteorological and photochemical models that are used to estimate future ozone values
3. Ground truth VOC and NOx inventories and determine what elements of the regional emissions inventory require improvement
WI – 2019 Enhanced Ozone Monitoring

Enhancements for 2019

- The Mobile Air Monitoring Lab (MAML) being placed at predetermined sites along the lakeshore.
  - Parameters measured in the MAML: PM2.5, Ozone, NOx, CO, VOCs

8-Hour Ozone Design Values (DVs)
2016-2018 *

8-Hour Ozone DVs in ppb
- Data Incomplete
- ≤ 65
- 66 - 70
- 71 - 75
- ≥ 76

* 2018 values have been certified by the state, and EPA has concurred with our certification.
More on Manually Triggered VOC samples
• Ozone Air Quality Forecast to inform remote, manually triggered samples for PAMS suite
• Specifically hone resources to gather critical precursor data

The Details
• 9 Carbonyl and 9 Canister Ports (1 blank)
• Timing to optimize sample investment
  – 3hr, 3hr, 9hr, 9hr
• Number of events expected 10-30

<table>
<thead>
<tr>
<th></th>
<th>70 ppbv</th>
<th>75 ppbv</th>
<th>80 ppbv</th>
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</thead>
<tbody>
<tr>
<td>Grafton</td>
<td>62 hours (over 15 days)</td>
<td>34 hours (over 9 days)</td>
<td>17 hours (over 4 days)</td>
</tr>
<tr>
<td>Chiwaukee</td>
<td>134 hours (over 27 days)</td>
<td>77 hours (over 19 days)</td>
<td>38 hours (over 10 days)</td>
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</table>
## Wisconsin Enhanced Ozone Monitoring Strategy

### Deliverables Timeline

<table>
<thead>
<tr>
<th>Deliverables</th>
<th>Timeline</th>
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</thead>
<tbody>
<tr>
<td>Aetheometer to HB</td>
<td>March</td>
</tr>
<tr>
<td>Install NOx in MAML</td>
<td>March</td>
</tr>
<tr>
<td>Install loaner pandora on site paired with MAML (Mobile Air Monitoring Lab)</td>
<td>April - October</td>
</tr>
<tr>
<td>MAML at Grafton</td>
<td>April - May</td>
</tr>
<tr>
<td>MAML at Chiwaukee</td>
<td>June - July</td>
</tr>
<tr>
<td>MAML at School of Freshwater Sciences</td>
<td>Aug - Sept</td>
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<tr>
<td>Ozone AQ forecast - manually triggered carb/VOC (PAMS suite) in MAML</td>
<td>March - May</td>
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### Ozone Seasons 2020 & 2021 (AMT Charter)

<table>
<thead>
<tr>
<th>Deliverables</th>
<th>Timeline</th>
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</thead>
<tbody>
<tr>
<td>Add Equipment to Grafton (NOx, CO)</td>
<td>April - May</td>
</tr>
<tr>
<td>Add Ceilometer at Grafton</td>
<td>April - May</td>
</tr>
<tr>
<td>Add Pandora at Grafton (if 2019 is useful)</td>
<td>April - May</td>
</tr>
<tr>
<td>Add additional mobile ozone trailer</td>
<td>April-Oct</td>
</tr>
<tr>
<td>Add PANDORA at Chiwaukee to pair with Chiwaukee NSF O3 study using a Purdue UAS</td>
<td>Summer 2020</td>
</tr>
<tr>
<td>Relocate SERHQ site to a new EOM site location</td>
<td>FY21</td>
</tr>
<tr>
<td>Kenosha Water Tower - second ozone analyzer, inlet on water tower</td>
<td>FY20</td>
</tr>
</tbody>
</table>

### Future Ozone Season Considerations (3-8 years)

<table>
<thead>
<tr>
<th>Deliverables</th>
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<tbody>
<tr>
<td>Ozone AQ forecast - manually triggered carb/VOC (PAMS suite) in MAML</td>
</tr>
<tr>
<td>Continuous Formaldehyde</td>
</tr>
<tr>
<td>Continuous total Hydrocarbon</td>
</tr>
<tr>
<td>Determining Biogenic emissions</td>
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<tr>
<td>Ozone analyzers in light houses</td>
</tr>
<tr>
<td>Ozone on Lake Guardian Research Vessel</td>
</tr>
<tr>
<td>Additional Mobile Ozone Monitoring site</td>
</tr>
<tr>
<td>Drones over Lake Michigan - Cleary project</td>
</tr>
<tr>
<td>Sensors</td>
</tr>
</tbody>
</table>
AirNow changes to AQI Ozone Calculations

• 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 AQI in real time.

• EPA anticipates that the revised algorithm will improve the accuracy ozone predictions at the local level.

• New algorithm will be coded into DNR web map within 30 days.
Emissions Inventory

PM$_{2.5}$ and Confidentiality

Maria Hill
Compliance Enforcement and Emissions Inventory Section Chief
Emissions Inventory and PM$_{2.5}$

Reporting of 2018 PM$_{2.5}$ emissions to satisfy Section 110(a)(2)(F) and Air Emissions Reporting Rule (AERR)

- PM$_{2.5}$ emission factors were added to the state air reporting system (ARS)
- PM$_{2.5}$ emissions will be uploaded to National Emissions Inventory per the normal process and deadlines
Emissions Inventory and Confidentiality

Reporting of emission data for confidential sources to meet 40 CFR 51.15(b)(1) and AERR

- All data submitted is used to build the National Emission Inventory and is public domain
- EPA approval that “supporting information” for confidential point sources can be omitted
- Throughput data and emission factors will be omitted for all sources with explicit NR 2.19 confidentiality approvals as well as those facilities awaiting approval
Work Planning and Digitization

Gail Good  
Air Program Director

Andy Stewart  
Air Program Field Operations Director

Sheri Stach  
Business Support and IT Section Chief
Work Planning

• Work planning is part of an approach that directs program activities over the course of the fiscal year.
  – aligns with agency & program priorities
  – focuses on understanding anticipated staff hours
  – adheres to budgets for the upcoming fiscal year
• In addition:
  – work planning identifies specific improvement projects
  – work plan outlines responsibilities & expectations of staff and supervisors
Work Planning

• Air Management Team
  – Assess projects to continue into next FY
  – Identifies potential new projects/areas of focus
  – Identifies training & recruitment needs
  – Drafts & approves charters
  – Identifies & quantifies resources
  – Develops timelines
  – Gathers & assesses feedback
  – Finalizes projects, goals & expectations
Work Planning

• Highlights for FY20
  – WARP 2.0
  – Expansion of e-docs and e-signature
  – Further innovation and automation in monitoring
Digitization

- Paper
- Digitization
- Scan/Upload (Paper Sorting)
- Fileshare Conversion
- Determine needs of Monitoring & AQPS
- Document Management System – Guidance Module Replacement
- ARDN Improvements
- RDAs
- Metadata/Naming Conventions
- Policy/Workflow for new documents for a digitized source
Digitization

Equipment
• Others’ experience
• Determined specifications (required vs optional)
• Purchasing guidelines to obtain bids
• Space allocation and preparation

Datasheet
FUJITSU Image Scanner fi-7700

Flatbed scanner for professional use enables heavy-duty & flexible scanning
Digitization

Metadata
• Descriptive
• Administrative
• Structural

Naming Conventions
• Uploader tool
PROCESS
Affordable Clean Energy Rule

David Bizot
Air Quality Planning and Standards Section Chief
ACE Rule

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

• This action was finalized in conjunction with two related, but separate and distinct rulemakings:
  – The repeal of the Clean Power Plan (CPP)
  – Revised implementing regulations for ACE, ongoing emission guidelines, and all future emission guidelines for existing sources issued under the authority of Clean Air Act (CAA) section 111(d)
ACE Rule

• ACE establishes heat rate improvement (HRI), or efficiency improvement, as the best system of emissions reduction (BSER) for CO₂ from coal-fired EGUs.

• ACE lists six HRI “candidate technologies,” as well as additional operating and maintenance practices. The six candidate technologies are:
  – Neural Network/Intelligent Sootblowers
  – Boiler Feed Pumps
  – Air Heater and Duct Leakage Control
  – Variable Frequency Drives
  – Blade Path Upgrade (Steam Turbine)
  – Redesign/Replace Economizer
ACE Rule

• 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 will submit plans to EPA that establish standards of performance and include measures that provide for the implementation and enforcement of such standards.

• States have three years (September 2022) to submit plans to EPA
In the final ACE rule, EPA finalized that designated facilities subject to this regulation as “any coal-fired electric utility steam generating unit that:

• is not an integrated gasification combined cycle (IGCC) unit…;
• was in operation or had commenced construction on or before January 8, 2014;
• serves a generator capable of selling greater than 25 megawatts (MW) to a utility power distribution system; and
• has a base load rating greater than ...250 MMBtu/h heat input of coal fuel (either alone or in combination with any other fuel).”

Source: page 52 of pre-publication version of rule
## ACE Rule – Affected facilities

<table>
<thead>
<tr>
<th>Plant Name</th>
<th>FID</th>
<th>WI Unit ID</th>
<th>Owner</th>
<th>Operator</th>
<th>Capacity (MW)</th>
<th>Capacity (MMBtu/hr)</th>
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</thead>
<tbody>
<tr>
<td>Columbia</td>
<td>111009030</td>
<td>B21</td>
<td>MG&amp;E,WPL,WPSC</td>
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<td>Genoa</td>
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<td>DPC,GRE</td>
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<td>DPC,WPSC</td>
<td>WPSC</td>
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</tr>
</tbody>
</table>
ACE Rule

• Air program has invited affected utilities to discuss rule at meeting on September 26.

• Additional information: https://www.epa.gov/stationary-sources-air-pollution/affordable-clean-energy-rule
2019 Meeting Dates

• Thursday, November 7, 2019