

Air Management Advisory Group Quarterly Meeting

June 2, 2026



Hybrid Meeting Guidelines

- Please sign in if attending in person.
- Attendees in the room can raise their hand and will be called on.
- Online attendees should use the raise hand feature and will be called upon by the meeting host
- The host will attempt to respond to all messages received
- Participants will join the meeting with their video disabled. We ask that you keep your video disabled for the duration of the meeting, unless called on by the host.

Air Management Advisory Group Quarterly Meeting Agenda

- Operational Updates
- Proposed guidance, rules and legislative update
- Emissions Inventory
- Annual Network Plan
- Clean Air Month
- Member Updates
- Program Funding Update
- Ozone Updates
- Adjourn

Operational Updates

Gail Good, Air Management Program Director

Proposed Guidance, Rules and Legislative Update

Ron Binzley, Permits and Stationary Source Modeling Section Manager
Brianna Denk, Air Quality Planning and Standards Section Manager

Proposed/Final DNR Rules

Proposed DNR rule	Description	Phase
AM-10-23 NSR Fee Rule	Updates to construction permit fees to assure compliance with Clean Air Act requirements and to meet business needs of permitted sources. Construction Permit Fees Wisconsin DNR	Rule effective: 4/1
AM-15-25 VOC RACT Rule	Updates to VOC regulations in ch. NR 419 through NR 425 to ensure compliance with federal VOC RACT requirements are met.	Phase 2: Rule Drafting

VOC RACT Rulemaking

- The Clean Air Act requires states that are classified as Moderate nonattainment or above to implement Reasonably Available Control Technology (RACT) to limit emissions of VOCs.
- VOC RACT applies to two groups of emission sources.
 - Source categories for which the EPA issues Control Technique Guidelines (CTGs)
 - Other sources that emit VOCs at or above the major source threshold known as “non-CTG major sources”
- EPA has determined that collectively, VOC regulations in NR 419 through 425 are not meeting VOC RACT requirements and need to be updated.

Information Session – April 30, 2026

- The Air Management Program held an information session on April 30 to discuss VOC RACT and the purpose of this rulemaking.
- There were 35 members of the public in attendance
 - General VOC RACT Questions
 - One comment about NR 423.03 – the solvent metal cleaning rule.
- Additional stakeholder feedback sessions are being held this month.

Stakeholder Feedback Sessions

- Goals: (1) Share current status of analysis and rule writing, including draft rule text. (2) Hear from stakeholders on rule language that is confusing, difficult to interpret, or redundant.
- Non-CTG VOC RACT Session **June 17, 2026 at 10:00 am CT** (virtual)
 - Focus on NR 419 and NR 424 (non-CTG VOC RACT rules)
 - Impacts sources in nonattainment areas that emit VOCs over the major source threshold.
- CTG VOC RACT Session **June 30, 2026 at 9:30 am CT** (virtual)
 - Focus on NR 420, 421, 422, and 423 (CTG rules)
 - Specifically impacts sources that are regulated by new CTG rules.

Interested in a Stakeholder Session?

- Information on how to sign up for the first feedback session (non-CTG VOC RACT) will be sent out tomorrow.
- Questions or feedback can be directed to:
 - Brianna Denk
AQPS Section Manager
Briannaj.Denk@Wisconsin.gov
 - Emma Cleveland
State Implementation Plan and Administrative Rule Coordinator
Emma.Cleveland@Wisconsin.gov

EPA Rules/Guidance

EPA Action	Link	Status
Notice: Allocations of Cross-State Air Pollution Rule Allowances From New Unit Set-Asides for 2025 Control Periods	91 FR 20163	Allocations final 4/15/26
Proposed Rule: National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review Reconsideration	91 FR 12700	Comment period ended 6/1/26
Rule: National Emission Standards for Hazardous Air Pollutants: Polyether Polyols Production Industry Review	91 FR 13116	Rule effective 3/18/2026
Rule: National Emission Standards for Hazardous Air Pollutants: Chemical Manufacturing Area Sources Technology Review	91 FR 16502	Rule effective 4/1/26
Proposed Rule: Air Plan Approval; Wisconsin; Moderate Attainment Plan Elements for Wisconsin's 2015 Ozone Standard Areas	91 FR 16605	Comment period ends 5/1/26
Proposed Rule: National Emission Standards for Hazardous Air Pollutants: Crude Oil and Natural Gas Production Facilities and Natural Gas Transmission and Storage Facilities; Technology Review and Reconsideration	91 FR 21672	Comment period ends 6/22/26
Proposed Rule: Begin Actual Construction in the New Source Review (NSR) Preconstruction Permitting Program	91 FR 26958	Comment period ends 6/29/26
Proposed Rule: Revision of Tier 4 Criteria Pollutant Standards, Part 1: Amendments to Phase-In Schedule for Light-Duty and Medium-Duty Vehicles	91 FR 28463	Comment period ends 7/6/26

EPA Title V Guidance

- In April, the EPA issued [guidance](#) on streamlining Title V renewals
- Reaffirms the EPA's position that with no changes to the permit terms or underlying applicable requirements, no new application needed (simply redate)
- Sources may cross-reference or incorporate by reference material submitted in previous applications
- Permitting authorities do not need to proactively explain the legal and technical basis for every permit term (focus on changes)
- During a renewal proceeding, all aspects of the permit are open for comment

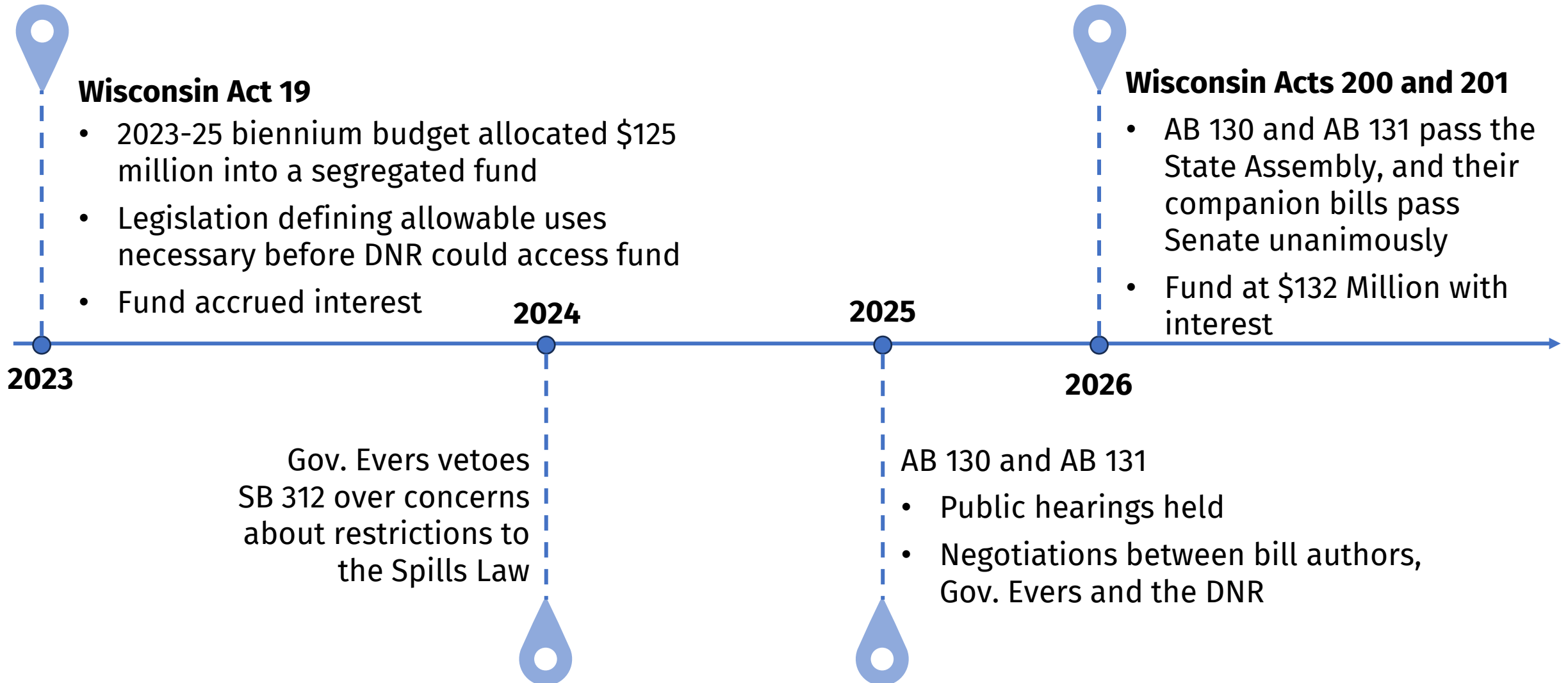
Begin Actual Construction Proposed Rule

- The [proposed rule](#) would broaden the scope of allowable pre-permitting activities by amending the regulatory text
- Rule revises definition of “begin actual construction” and adds a definition of “pollutant-emitting activities” to codify distinction between “emission units” that require a permit and elements of a project that do not
- If adopted as proposed, a state rulemaking would be necessary to make the final rule operative in Wisconsin

Title V Emergency Affirmative Defense

- The EPA has [rescinded](#) the 2023 final rule that removed emergency-related affirmative defense provisions from the Title V regulations
- The restored provisions have never been in Wisconsin's statutes or administrative code and are not part of the state's approved Title V program

PFAS Legislation Timeline



What's In The PFAS Laws



Exemptions to the Spills Law



Codification of Interim Biosolids Strategy



Airport and Industrial Possessor Grant Program



Municipal and Private Well Grant Programs



Other Provisions



Staffing

Implementation Input and Updates

- Submit questions and feedback
 - <https://www.surveymonkey.com/r/LDL9DXY>
- DNR.WI.GOV/Topic/PFAS
 - Updates on implementation
 - Sign up for GovDelivery updates



Submit questions and feedback

Emission Inventory

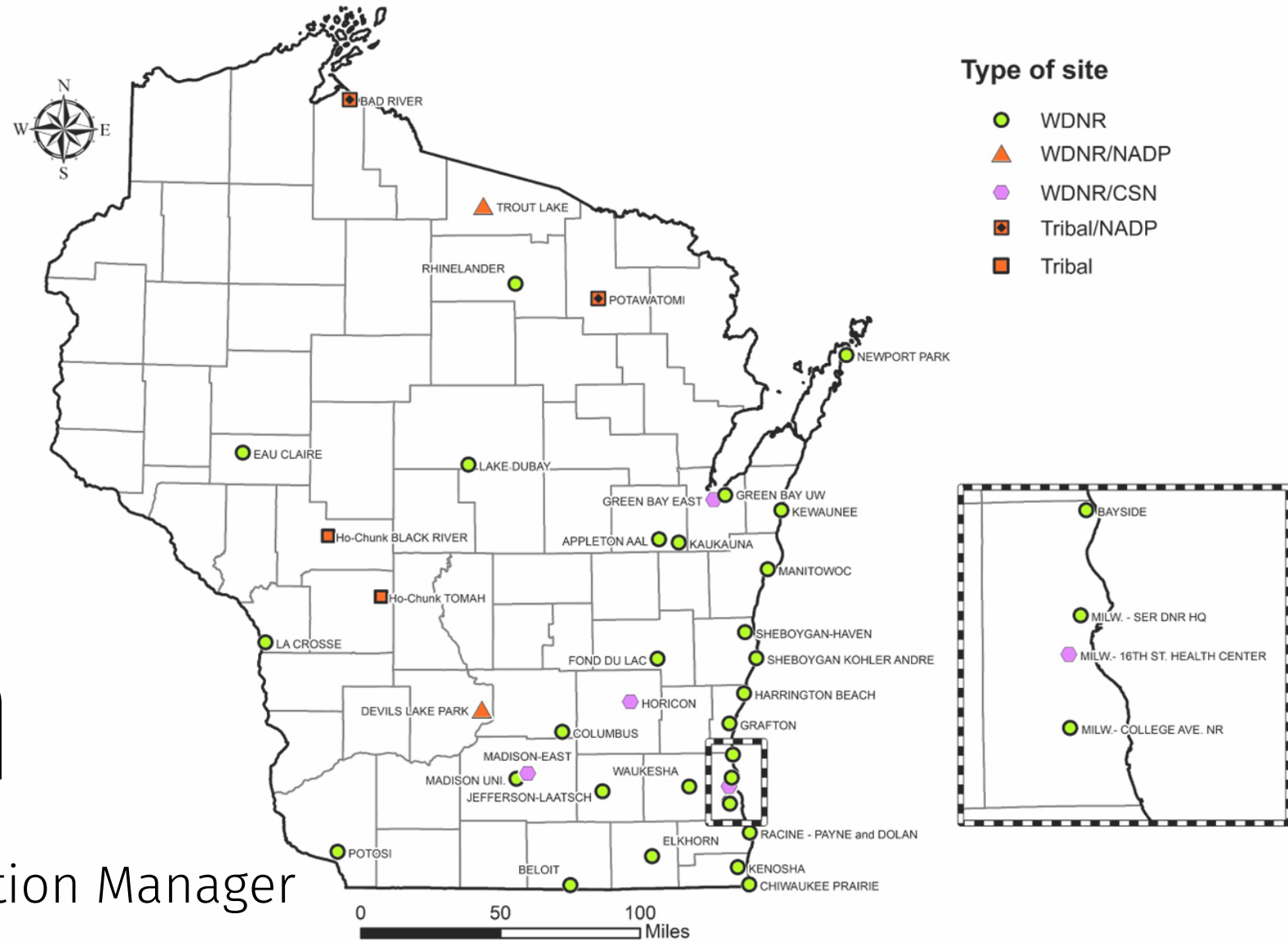
Ashley Gray, Compliance, Enforcement and Emission Inventory Section Manager

Emission Inventory Summary

- Overall
 - 2,266 sources reported for 2025
 - Transitioned from WAMS to MyWisconsinID
- Schedule
 - Environmental Fee Statements have been issued (due within 30 days)
 - Certifications due by June 30th
- Air Environmental Fees
 - Billing \$4,186,979 for 2025
 - Comparable to billing in the past 3 years
- Upcoming
 - Planning another Webinar in 2026

2027 Annual Network Plan

Ben Wolf, Air Monitoring Section Manager



Annual Monitoring Network Plan/Review

Consists of a main document and seven appendices

Includes monitoring requirements, monitor classifications, waivers and approvals, memorandums of agreement (MOAs), site descriptions, enhanced ozone monitoring (EOM) plan, monitoring network changes and sulfur dioxide (SO₂) emissions assessment

May 13 – June 12, 2026 - Public Comment Period
June 8, 2026 at 10am (CST) - Public Meeting via Zoom
June 30, 2026 - Submit final to EPA
120 days to approve

Completed Network Changes

May 1, 2024 – December 31, 2025

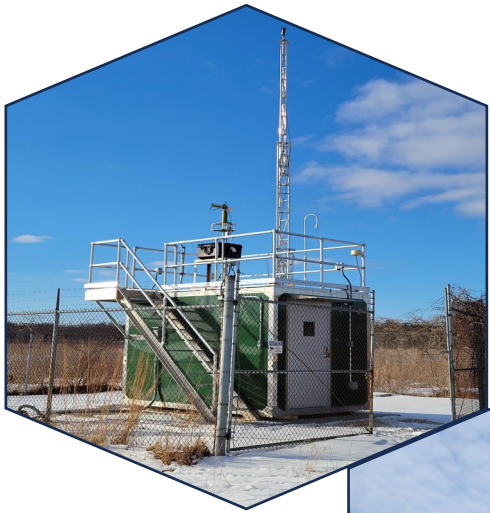
- Shutdown of ammonia monitoring at Bad River Tribal School-Odanah site
- Shutdown meteorological parameters at Waukesha site
- Replacement of aging monitoring shelters at Chiwaukee, Grafton, Lake Dubay and Potosi
- Start-up and shutdown of industrial monitors and SPM monitors associated with Enhanced Ozone Monitoring
 - The industrial sand mine monitor was shutdown at AMI Silica following approval of air monitoring variance request
 - Chiwaukee Carbon Monoxide monitoring will no longer occur as part of the EOM plan



2027 Proposed Network Changes

May 1, 2026 – December 31, 2027

- Relocation of Milwaukee 16th Street site due to uncertainty surrounding site access
- Adding meteorological parameters to Ho-Chunk tribal sites located in Black River Falls and Tomah
- Replacing aging monitoring shelters at Elkhorn, Eau Claire, Fond du Lac, Madison East, Rhinelander and Racine sites
- Start-up and shutdown of industrial monitors and SPM monitors associated with Enhanced Ozone Monitoring (EOM)

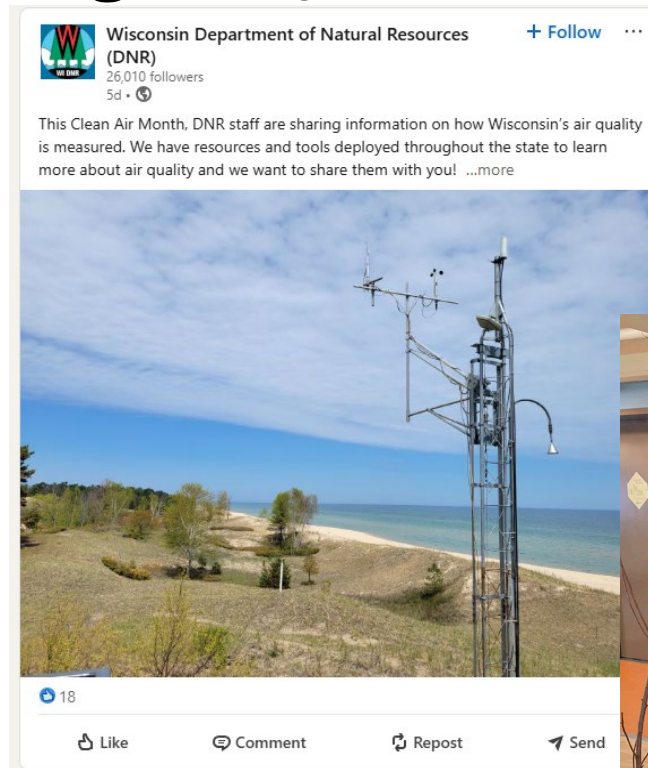


Clean Air Month

Craig Czarnecki, Air Management Outreach Coordinator

Clean Air Month

- [News Release](#)
- NextDoor/LinkedIn and Instagram Quiz
- [Intranet/Internet](#) Updates
- Huegel School Visit
- [Poetry Contest Winner](#)



Member Updates

Program Funding Update

Gail Good, Air Management Program Director

Ron Binzley, Air Permits and Stationary Source Modeling Section Manager

Title V and Non-Title V Funding Overview and Deficit Progression

- Title V and Non-Title V fees were last addressed in 2013-15 biennial budget and increases were predicated on the need to revise fees by the end of FY19
- Because the current fee structure is overly reliant on emissions fees, revenues have steadily declined even as inflation and the increased complexity of regulations have raised program costs
- The Air Management Program submitted proposals to revise Title V fees in the 2021-23, 2023-25 and 2025-27 budget cycles
- The Air Management Program contracted with MGT to assess program funding and develop a fee model
- The Air Management Program recently submitted issue papers to the agency regarding our TV and NTV fees

Matching Title V and Non-Title V Effort to Available Resources

- To lessen expenses and stretch available funding, Title V and Non-Title V vacancies have been allowed to increase
- Understaffing has resulted in less compliance assistance and a suspension of site-specific permitting
- Title V Renewal backlog is over 50% and expected to approach 70% in FY27
- Sources are unable to obtain permit updates critical to operational flexibility and compliance assurance
- The Program has only 2 Non-Title V compliance inspectors, each covering nearly 1,500 sources

- No Title V Renewals
- No Non-Title V site-specific permits
- Limited compliance assistance

Current Title V fee schedule

Base and Emissions Fees		
Total Emissions	Base fee	Emissions per ton fee
1 – 10 tons	\$900	\$35.71
11 – 25 tons	\$1,300	\$35.71
26 – 50 tons	\$1,600	\$35.71
51 – 80 tons	\$2,300	\$35.71
>80 tons	\$3,000	\$35.71

Category Fees (federal program applicability)	
MACT	\$960
NSPS	\$960
PSD/NAA NSR	\$1,500
Private Coal EGU	\$46,980

Current Non-Title V fee schedule

Permit Type Fees	
FESOP SM80	\$4,100
FESOP SM	\$400
SOP	\$400
ROP	\$400
GOP	\$400

The core purpose of these programs

- For each facility with a Title V permit, compliance with an up-to-date permit is deemed compliance with the act (CAA Section 504(f))
- For the department and the public, up-to-date permits provide assurance that air pollution emissions are properly accounted for and controlled
- An adequately funded and functioning program reduces the legal risk of federal intervention and sanctions

Funding needs for the Title V and Non-Title V Programs

Current		
	Revenue	FTE Supported
Title V	\$2,993,887	20.0
Non-Title V	\$1,183,200	8.0

Future Need			
	FY28	FY34	FTE Supported
Title V	\$9.1 million	\$10.2 million	54.0
Non-Title V	\$3.4 million	\$3.8 million	20.0

Annual Base Fees

- Most states use annual base fees to cover a portion of program costs
- Some vary base fees to reflect complexity or emissions level of the source, others use a single universal base fee for all sources

Recommendation

Apply universal base fee to all Title V and SM80 sources

Annual Complexity Fees

- Category fees in the current Title V schedule use major NSR and federal standard applicability as markers for complexity.
- Complexity approaches other agencies employ include tracking staff hours or facility size

Recommendation

Retain category fees, while adjusting fee amounts and the frequency with which NSPS and MACT fees are charged

Fees for Service

- Ch. NR 410 contains additional fees for construction permits

Additional fees in NR 410	Amount
Analysis of multiple basic emission units	\$1,200
Air quality modeling analysis	\$1,800
Toxic emission limitation established under NR 446-449 or 445.07	\$1,200
Public hearing is held	\$2,000
LACT determination under s. NR 424.03(2) – per basic emissions unit	\$1,200
BACT or LAER under ch. NR 445	\$2,400
Limit on PTE to make the source a minor source	\$4,200

Recommendation

- Add application fees to the Title V and Non-Title V fee schedules
- Include application base fee as well as “additional” fees from NR 410
- Fees for service billed at time of service

Summary of Budget Proposal

- Increase the base fee
- Increase the MACT/NSPS fees and charge per applicable standard
- Increase the PSD/NAA NSR fee
- Eliminate the private coal EGU fee
- Incorporate a renewal and revision fee to be charged at time of service
- Increase the emissions fee to match EPA's annual per ton fee
- Include fees for service commensurate with those found in construction permitting
- Adjustments for all fees

2027-29 Biennial Budget Process

Timeline of budget process

- DNR budget proposal
 - March - August 2026: Development of DNR budget proposals
 - Mid-May: Initial program proposal due to agency
 - September 2026: Final DNR budget submission
- Governor's budget proposal January / February 2027
- Final biennial budget adopted June 2027

Objective of AMAG Subgroup on Program Revenue Funding

- Assist the department in developing a revised fee schedule for Title V and Non-Title programs

Ozone Updates

Ben Wolf, Air Management Program Director

Brianna Denk, Air Quality Planning and Standards Section Manager

Ozone Season – as of May 27, 2026

Monitor Name	Monitor ID	1st high		2nd high		3rd high		4th high		4th high values		2026 Critical values		Days at/above C.V.		Current 2024-2026 "Design Value"
		conc (ppb)	date	conc (ppb)	date	conc (ppb)	date	conc (ppb)	date	2024	2025	2008 std	2015 std	2008 std	2015 std	
Appleton	550870009	63	5/18	61	5/26	59	5/25	59	5/15	61	63	104	89	0	0	61
Bad River	550030010	64	5/25	57	5/15	55	5/3	53	4/21	53	65	110	95	0	0	57
Bayside	550790085	69	5/25	67	5/26	65	5/16	60	5/4	73	75	80	65	0	3	69
Beloit	551050030	76	5/16	75	5/26	67	4/22	67	5/25	63	65	100	85	0	0	65
Chiwaukee	550590019	79	5/25	78	5/16	63	5/4	62	5/26	80	75	73	58	2	5	72
Columbus	550210015	66	5/26	61	4/22	60	5/16	58	5/4	62	66	100	85	0	0	62
Devils Lake	551110007	66	4/22	63	5/26	60	5/4	60	5/8	59	63	106	91	0	0	60
Eau Claire	550350014	70	5/26	63	5/15	63	5/25	60	5/24	58	57	113	98	0	0	58
Elkhorn	551270006	73	5/26	71	5/16	69	5/25	64	4/22	66	69	93	78	0	0	66
Fond Du Lac	550390006	67	5/26	63	5/16	61	4/21	59	5/4	61	61	106	91	0	0	60
Grafton	550890008	71	5/26	70	5/25	67	5/16	59	5/4	73	71	84	69	0	2	67
Green Bay-UW	550090026	64	5/26	61	5/25	61	5/18	59	5/16	62	61	105	90	0	0	60
Harrington Beach	550890009	73	5/25	69	5/26	68	5/16	62	5/4	75	72	81	66	0	3	69
Horicon	550270001	69	5/26	66	5/16	61	5/25	61	5/4	63	64	101	86	0	0	62
Jefferson	550550009	68	5/26	65	4/22	64	5/16	60	5/25	66	63	99	84	0	0	63
Kenosha-WT	550590025	74	5/16	73	5/25	70	5/26	60	5/4	73	77	78	63	0	3	70
Kewaunee	550610002	67	5/26	66	5/25	59	5/16	59	5/15	67	67	94	79	0	0	64
La Crosse	550630012	63	5/15	62	5/26	62	5/16	61	5/24	59	62	107	92	0	0	60
Lake Dubay	550730012	61	5/26	59	5/18	58	5/25	58	5/15	59	61	108	93	0	0	59
Madison East	550250041	67	5/26	66	5/16	65	4/22	60	5/4	63	65	100	85	0	0	62
Manitowoc	550710007	70	5/25	66	5/26	59	5/16	57	5/15	71	64	93	78	0	0	64
Milwaukee-16th	550790010	62	5/26	59	5/16	59	5/25	56	5/4	60	63	105	90	0	0	59
Milwaukee-UPark	550790068	69	5/26	69	5/25	68	5/16	62	5/18	66	72	90	75	0	0	66
Newport	550290004	67	5/25	65	5/26	59	4/23	56	5/4	67	70	91	76	0	0	64
Potawatomi	550410007	66	5/25	62	5/26	59	5/18	58	5/15	58	58	112	97	0	0	58
Racine	551010020	75	5/25	74	5/16	64	5/26	62	5/4	78	75	75	60	1	4	71
Sheboygan-Haven	551170009	70	5/26	66	5/25	63	5/16	59	5/4	67	69	92	77	0	0	65
Sheboygan-KA	551170006	78	5/25	71	5/16	64	5/26	61	5/4	76	74	78	63	1	3	70
Trout Lake	551250001	59	5/25	54	5/15	53	4/21	53	5/3	56	61	111	96	0	0	56
Waukesha	551330027	71	5/26	67	5/25	67	5/16	61	5/4	66	69	93	78	0	0	65
Highlighted values are above the 2015 NAAQS level (70 ppb).														color-coded by #		71- 75 ppb
																>75 ppb

Ozone Season – as of May 27, 2026

Wisconsin Sites	Concentrations (ppb)				2026 Critical Values (2008 NAAQS)	Days at/above Critical Values (2008 NAAQS)	2026 Critical Values (2015 NAAQS)	Days at/above Critical Values (2015 NAAQS)	Preliminary 2024-2026 “Design Value” (2015 NAAQS)
	1st high	2nd high	3rd high	4th high					
Bayside	69	67	65	60	80	0	65	3	68
Chiwaukee	79	78	63	62	73	2	58	5	72
Harrington Beach	73	69	68	62	84	0	66	3	69
Grafton	71	70	67	59	81	0	69	2	67
Kenosha-WT	74	73	70	60	78	0	63	3	70
Racine	75	74	64	62	75	1	60	4	71
Sheboygan-KA	78	71	64	61	78	1	63	3	70

2015 NAAQS: 70 ppb	Non-Attainment for 2015 NAAQS	Reached 2015 Critical Value	Exceeded 2015 Standard
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Note: 2026 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.

Final 2026 Program Meeting Date

- Thu. Sept. 17, 2026

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Next Meeting AMAG Meeting

September 2026



/WIDNR



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OFF THE RECORD"