

Meeting Summary

Air Management Study Group Meeting

Thursday, November 1, 2018

9:00 am

Room G09, State Natural Resources Building (GEF2)
101 S. Webster St., Madison, WI

Attendees

Gilberto Alvarez, EPA+	Jennifer Krzak, Trinity Consultants
Charlotte Ahrens, WI Dept of Health Services - Division of Public Health	Julius Lee, WI Dept of Health Services
Renee Bashel, DNR	Jeremy Luebke, Short Elliot Hendrickson
David Bizot, DNR	David Melum, Wisconsin Transportation Builders Association*
Scott Blankman, Clean Wisconsin*	Rita Neff, Manitowoc Public Utilities
Steve Dunn, Alliant Energy	Diane Sackmann, Silgan
Taylor Fritsch, Michael Best	David Seitz, TRC Environmental
Donald Gallo, Axley Brynerson+	Andrea Simon, interested party
Gail Good, DNR	Renee Smits, Spectrum Engineering
Ashley Gray, DNR	Jasmine Sodemann, Gannett Fleming
Kristin Hart, DNR	Sheri Stach, DNR
Grant Hetherington, DNR	Sean Stephenson, Wisconsin Transportation Builders Association*
Maria Hill, DNR	Andy Stewart, DNR
Joe Hoch, Alliant Energy*	Patti Stickney, Short Elliott Hendrickson
Christina Hogan, DNR	Scott Suder, Wisconsin Paper Council*
Tracey Holloway *+	Rob Thiboldeaux, WI Dept of Health Services
Erik Hoven, Dairyland Power Cooperative	Ken Yass, Hydrite
Jeff Jaeckels, MGE*	

* Air Management Study Group (AMSG) members
+Skype attendee

Action Items

- **Next AMSG Meeting.** The next study group meeting will be held on **Thursday, February 7, 2019** at 9 a.m. at the State Natural Resources Building (GEF 2), Room G09, 101 S. Webster St., Madison.

Meeting Summary

Opening remarks & agenda review

Gail Good, Air Program Director

Good opened the meeting with introductions and reviewed the agenda.

Program updates

Hiring update

Gail Good

Good mentioned that several people not new to the Air Program have taken on new roles. Grant Hetherington is in the Emissions Inventory Specialist role previously held by Ralph Patterson. He will be attending FET meetings in January. Additional staff in new roles include Ashley Gray, Compliance Policy Coordinator, Mary Oleson, Operation Permit Policy Coordinator, David Minkey, New Source Review Policy Coordinator, and Megan Corrado, Permit Metrics Coordinator. These coordinator positions are a little bit different than they have been in the past in that these coordinators will spend about half of their time continuing to do their regular work and spend half of their time on policy and program coordination. This keeps them connected to program work and staff, as well as sources around the state. Good mentioned that Public Information Specialist, Amanda Jutrzonka left the program in August and stated that the program is in the process of filling that position. The new Records Manager for the Air Program starts today. The program is continuously recruiting and hiring.

Jaeckels asked if there was an organization chart that lays out program staff and job duties. Good responded that the program does not have an externally available organization chart and is working on a reference for externals however the project is on hold now.

Proposed guidance and rules

Kristin Hart, Permits and Stationary Source Modeling Section Chief

David Bizot, Air Quality Planning and Standards Section Chief

Hart pointed out that the updates to the Air Dispersion Modeling Guidelines regarding Modeled Emission Rates for Precursors (MERPs) and Significant Impact Levels (SILs) that the program had been developing are on hold until EPA's guidance on these items is finalized. Hart mentioned that there is no DNR Guidance in public comment at this time and no new finalized DNR Guidance. Hart then listed proposed EPA rules and guidance including Adjacency Guidance for determining what is and is not considered "Adjacent" for source determinations.

Bizot mentioned that the deadline for comments on the Greenhouse Gas Emissions from Existing Electric Utility Generating Units (Affordable Clean Energy rule) was extended until October 31.

Hoch asked if the program submitted comments on the proposed Greenhouse Gas Emissions Guidance and Bizot stated that the program did submit comments.

Blankman asked about the timing of EPA's next steps with the Affordable Clean Energy rule. Bizot answered that the program is expecting a final rule in January and will work on next steps based on that.

Emission Reduction Credit (ERC) factsheet

Kristin Hart
David Bizot

Good introduced the ERC factsheet which can be found on the DNR website <https://dnr.wi.gov/files/PDF/pubs/am/AM567.pdf>. Hart described the factsheet as covering the permitting implications and emissions inventory reporting aspects of ERCs. Bizot asks that questions about specific situations involving ERCs be directed to himself and Hart. Good requests feedback regarding the factsheet and mentions that feedback should be directed to Hart.

Air monitoring update

Katie Praedel, Air Monitoring Section Chief

Praedel began with a summary of the Air Monitoring Annual Network Plan. EPA requires the submission of a document laying out the monitoring plan for the following year annually by July 1. The Annual Network Plan goes through a public comment period and is approved by EPA. Praedel stated that in early June the DNR submitted a plan to EPA that excluded the Sheboygan Kohler-Andrae air monitoring site, as required by Wisconsin 2017 Act 159. EPA did not approve the plan based on the omission of the Sheboygan Kohler-Andrae monitor. In September EPA approved a revised version of the plan that included the Sheboygan Kohler-Andrae site. The 2019 annual network plan process is concluded and DNR is operating under an approved plan.

Bizot mentioned that there is a SIP component and that, as part of Act 159 the department is required to ask for a waiver from any SIP requirements based on monitoring at the Sheboygan Kohler-Andrae site. The department requested that waiver, which EPA did not grant as it had no statutory authority to do so and the department had submitted, and EPA has approved, a revised network plan which included the Kohler-Andrae monitor.

Praedel continued with a discussion of the Air Monitoring 2018 Trends Report. This year's report included certified monitoring and emissions data through 2017. The report included emissions data based on a suggestion from the Air Management Study Group. The 2018 report included new graphs that exclude the monitoring site names and combine the whole state on one graph. This change makes it easier to see statewide trends. This report is very useful for explaining trends to the public and by including emissions the report can illustrate the trend of reductions in emissions. For example, ozone forming pollutants have decreased by 50% since 2002. The Trends Report is good news.

Praedel concluded with a presentation about Air Quality Sensors. As lower cost air quality sensors become increasingly available there is increased interest by the public to independently monitor air quality. This is good, but the data generated may not be suitable to compare to regulatory data. Praedel mentioned that monitors were of interest at the National Ambient Air Monitoring (NAAM) conference. The Purple Air PM_{2.5} sensor is the most popular sensor technology and features real-time worldwide mapping at <https://www.purpleair.com/map#1/25/-30>. The Purple Air data is known to be biased high.

Jaeckels ask if there were any Purple Air monitors in use in the state right now. Praedel answered that there are two sensor projects that DNR is aware of that are currently underway; one in Milwaukee and another in Madison.

Praedel went on to state that some of the reasons for the bias in the data are monitor siting and failure to account for variations in humidity. The bias can double the values reported by the monitors. There is a correction factor that can be applied to the data to enable it to be more comparable to regulatory monitors. The factor may vary by region, terrain or season. The slope of the regression line used to develop the correction factor may be biased 1-2%. The higher the concentration the greater the regression line slope.

The department is proposing collocating four Purple Air monitors with regulatory sensors in Madison, Milwaukee, La Crosse and Green Bay to gain familiarity with the sensors and develop a correction factor. Use of the correction factor will be encouraged by DNR and the correction factor will be made available to citizen-based monitoring groups to generate more representative data. The goal is to apply the correction factor to the data as it is uploaded to the Purple Air web map.

The group asked several questions about the locations of existing monitors and the department's coordination with monitoring groups. Praedel answered that the location of existing Purple Air monitors can be found on the Purple Air map and that the department is not currently working with any monitoring groups.

Hoch asked about how regionally variable the correction factors could be and how much they could vary over time. Praedel answered that while unsure of how much the factors vary in general there have been variations from .05 to 1.5 on a single site and that Wisconsin may need to have different correction factors for each season. The study being proposed will take that into consideration.

Good stated that a lot of the work on these air monitors has been done by a lab in South Coast, CA. Because California and Wisconsin have such different weather the department is not certain how long the monitors will need to be running before a correction factor can be reliably developed.

Jeff Jaekels mentioned that the Trends Report and charts are appreciated and have been useful in giving presentations.

Gail mentioned that the report has evolved over the years and that Praedel and Bizot have added a lot to the report and tried to incorporate feedback from last year into this year's report.

Melum asked about EPA use of gaseous sensors when used on an ongoing basis. Hill answered that EPA is using those sensors but that the department has not.

LON recoding update

Maria Hill, Compliance, Enforcement and Emission Inventory Section Chief

Hill mentioned that EPA has asked states to hold off on making any changes to recoding violation letters in ICIS while EPA reviews the LON issue with the regions. EPA is considering additional coding options

and providing more guidance on what type of letter equates to what type of violation. Wisconsin is using the LOI step more frequently during the interim.

A question was asked as to whether any changes to how LONs are coded in ICIS would be retroactive, Hill responded no. Any changes would only be going forward from the time of EPA approval.

Dave Seitz mentioned EPA is now making inspection reports available to the public. Hill confirmed, stating EPA will post inspection reports within 60 days to the web.

Act 70 Update

Kristin Hart

Hart summarized the Act 70 Pilot Project as a collaboration between the Brownfields, Green Tier and Air Management programs. The goal of the project is to provide incentives for manufacturing facilities to locate in urban areas on brownfields. The Act 70 Advisory Group met October 31, 2018 and discussed ways to engage municipalities. The next steps are to continue refining the outreach materials and Green Tier model charter and contract materials, provide the Type G Registration Permit for public comment and develop a Registration Permit outreach plan. Hart noted that the next meeting of the group is January 18, 2019.

Member updates

Gilberto Alvarez, EPA – Announced that he is retiring at the end of the year and expressed respect and admiration for this group.

Jeff Jaeckels, MGE – Mentioned in general, on behalf of utilities, that the ACE Rule comments were due yesterday and that a clean power plant conceptualized ACE Rule is direction that MGE is going.

Scott Blankman, Clean Wisconsin – stated that Clean Wisconsin also commented on the ACE Rule and will work with utilities as the rule comes out.

Rob Thiboldeaux, DHS – Mentioned that there have been a lot of opportunities for working with DNR lately including working on Madison Kipp Corporation with the Remediation and Redevelopment Program, working with the Waste Program on mercury monitoring and working with the Spills Program.

Scott Suder, Wisconsin Paper Council – explained that the WPC is going through restructuring and will be having a much larger presence on a regulatory front going forward.

Good thanked the group for their updates and set up the next topic, Work Plan.

Work Plan

Andy Stewart, Field Operations Director

Stewart explained that the Air Program must plan carefully to ensure it uses its resources appropriately. The program has many standing commitments that are the program's core work and looks for continuous improvement.

Stewart explained that work planning starts at the beginning of the calendar year and is aligned with DNR priorities. The focus is on using staff and funds appropriately and efficiently and making sure that the fees collected from regulated sources are used appropriately. The program also considers suggestions from externals, reacts to developments on the federal level and acts to improve business processes. The work plan is finalized by the end of June so that work can start at the beginning of the fiscal year. The work plan is based on the goals that the program is trying to meet and considers whether program staff has the skills and competencies necessary to meet those goals. The work plan guides continuous recruitment and provides the opportunity to retain existing staff by presenting them with new opportunities and experiences.

Stewart stated that the work planning process uses a charter approach to define the scope of each project and the resources needed. Each charter focuses on a project for the fiscal year so if the project is something that will span multiple years a piece of the project is identified to accomplish during a single fiscal year. The Air Management Team started using a Work Plan Narrative a few years ago to communicate with staff what the program is working on. The program has replaced 30-40% of its staff over the last few years. The work planning process includes performance measures for the five primary core work areas. The performance measures are shared with staff and the department. One performance measure, the construction permit metric, is on the Governor's dashboard.

Ozone Update

David Bizot

Katie Praedel

Praedel stated that the ozone season began on March 1, 2018 and is officially over (as of October 31). There were some monitoring sites that recorded above the standard.

Bizot explained that the 2018 critical values are the values that, if ozone is recorded at or above those values four times or more in year three, the map will show an exceedance of the NAAQS. There were several early ozone exceedances. Bizot pointed out that the 2018 data has not been quality assured yet.

Bizot mentioned that the attainment date for the partial Kenosha and Sheboygan counties of the 2008 Ozone NAAQS was July 20, 2018 and, based on this data, neither area attained. Sheboygan County is eligible for an extension (based on its 2018 fourth highest value), but based on 2016-2018 data, the area still will not attain even if granted an extension. These areas will be bumped up to "serious" classification nonattainment areas. The department expects to receive notice of the partial Kenosha county area's reclassification to "serious" very soon in a national-level EPA rulemaking.

Bizot explained that the implications of this bump-up to "serious" classification are an increase in the offset ratio to 1.2:1 and a decrease in the major source threshold to 50 tpy. This may affect sources currently permitted as synthetic minor sources.

Hart mentioned that the department will reach out to sources to determine if they want to maintain synthetic minor source status. Sources wishing to remain synthetic minor sources may need permit revisions.

Bizot mentioned that Sheboygan County is likely to likewise be bumped up to serious sometime late next year.

Hart explained that there will be an outreach effort for sources with Registration Permits.

Bizot stated that department will need to produce an attainment plan for the new “serious” areas demonstrating how the areas will be in attainment by July 2021.

Melum asked if the department has considered aligning the 2008 and 2015 Ozone standards and pointed out that there are areas that are in attainment for the 2015 Ozone NAAQS but not for the 2008 Ozone NAAQS. Good explained that such an alignment would take a process with EPA and was unsure if there was precedent for such a proposal.

Hoch asked about a potential redesignation request Bizot responded that a redesignation request for all of Sheboygan county is pending with EPA at this time.

Melum asked if the program was working with LADCO on modeling for the ozone attainment and Bizot confirmed that it was.

Melum mentioned that along with reductions in NO_x there have been lower ozone levels in urban areas. Bizot confirmed this pattern using metro Milwaukee as an example and stated that it is a result of what is happening chemically in the atmosphere based on the ratio of VOC and NO_x emissions. A similar pattern of lower ozone concentrations can be seen in the greater Chicago area.

Emission inventory update

Maria Hill

Hill stated that the emission inventory process is based on a calendar year. All the 2017 data has been quality assured, and the program is in the process of uploading the data to the national database. The data reflects a continued decrease in emissions. Grant Hetherington, the new Emission Inventory Specialist, has been in the role permanently for five weeks. He will attend the January 2019 FET seminars and will be available to provide one-on-one assistance. Assistance will also be available via Skype session. Hill mentioned that the PM_{2.5} reporting strategy will match the permitting strategy developed in 2017. Questions on emission inventory should be directed to Grant Hetherington.

2019 Meeting Dates and Priority Topics

Gail Good

Good said that the 2019 meeting dates for the study group are as follows.

- February 7, 2019
- May 23, 2019
- August 8, 2019
- November 7, 2019

Good asked that study group members please let the program know if there are concerns about these dates. Due to the gap between this meeting and the February 2019 meeting, member should reach out to the program if anything comes up.

The list of 2017 priority topics includes:

- Permit streamlining
 - Rule making process
 - Improvements to other regulatory programs
- Ozone
 - 2008 and 2015 ozone NAAQS implementation
 - SIP submittals and redesignation requests
 - Maintenance areas in southeast Wisconsin
- PM2.5 strategy implementation
- NO2 NAAQS implementation
- Opportunities to provide more information and data to the public
 - Use of data viewer
 - Accessibility of details on permitted amounts, emissions levels, NOV's and LON's
- Long-term planning under the new federal administration
- Additional time-sensitive topics as relevant

Good noted that the study group has made significant progress on permit streamlining and suggested that this topic remain on the list. Study group members requested that New Source Review, Ozone, NAAQS Implementation, sharing information with the public and long-term planning under the federal administration remain on the list. The long-term planning item should be expanded to include the state administration. Members also requested specific topics on the ACE Rule and regional haze and that more time be spent discussing potential future regulatory topics. In response to a request to highlight things that are going on in other states and to share collaborations, Good explained that DNR is part of NACAA and LADCO and the program can share items of interest from those groups along with items from FET and at the state, regional and national levels.

Study group members are encouraged to submit additional topic items and this list will be posted to the AMMSG website. Good mentioned that members should look forward to an announcement about the new Public Information Specialist when that position is filled.