

# **Air Management Advisory Group Quarterly Meeting**

March 2, 2023

# Hybrid Meeting Guidelines

- Attendees in the room can raise their hand and will be called on. Members may also turn up their name card.
- 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, 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, unless called on by the host.

# Air Management Advisory Group Quarterly Meeting Agenda

- Opening remarks and introductions
- Agenda review
- Proposed guidance, rules and legislative update
- IRA Dockets
- Fall Unified Agenda
- Emissions Inventory Reporting Season
- Expanding E-Services
- Environmental Justice Update
- Member Updates
- Ozone Topics
- Clean Air Month Preview
- AMAG Membership

# Staffing Updates

- Secretary Adam Payne
- Jim Zellmer – EM Division Administrator
- Katie Grant – Communications Director
- Max Levins – EM/AM Attorney

# Proposed Guidance, Rules and Legislative Update

Kristin Hart, Permits and Stationary Source Modeling Section Chief

Jason Treutel, Air Quality Planning and Standards Section Chief

# Proposed/Final DNR Rules

Proposed DNR rule	Description	Phase
AM-05-21 NOx RACT Rule	Updates NOx RACT rules in NR 428 to address implementation issues that have been identified since previous NR 428 revisions in 2001 & 2007	Soliciting Comments on Environmental Impact
AM-05-22 Compliance Demonstration Rule	Updates to NR 439 testing, monitoring, recordkeeping, reporting requirements for compliance	Rule Drafting

# Proposed EPA Rules/Guidance

Proposed EPA rule/guidance	Docket	Comments due
Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NNSR): Reconsideration of Fugitive Emissions Rule	<a href="#">EPA-HQ-OAR-2004-0014</a>	02/14/2023
Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review	<a href="#">EPA-HQ-OAR-2021-0317</a>	02/13/2023
National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants 40 CFR Part 63, Subpart AAAAA	<a href="#">EPA-HQ-OAR-2017-0015-0066</a>	02/21/2023
Section 111(d) Implementing Regulations	<a href="#">EPA-HQ-OAR-2021-0527</a>	02/27/2023
Public Comment on EPA's National Enforcement and Compliance Initiatives for Fiscal Years 2024-2027	<a href="#">EPA-HQ-OECA-2022-0981</a>	03/13/2023
Reconsideration of the National Ambient Air Quality Standards for Particulate Matter	<a href="#">EPA-HQ-OAR-2015-0072</a>	03/28/2023
Findings of Substantial Inadequacy and SIP Calls to Amend Provisions Applying to Excess Emissions During Periods of Startup, Shutdown, and Malfunction	<a href="#">EPA-HQ-OAR-2022-0814</a>	04/25/2023

# Finalized EPA Rules/Guidance

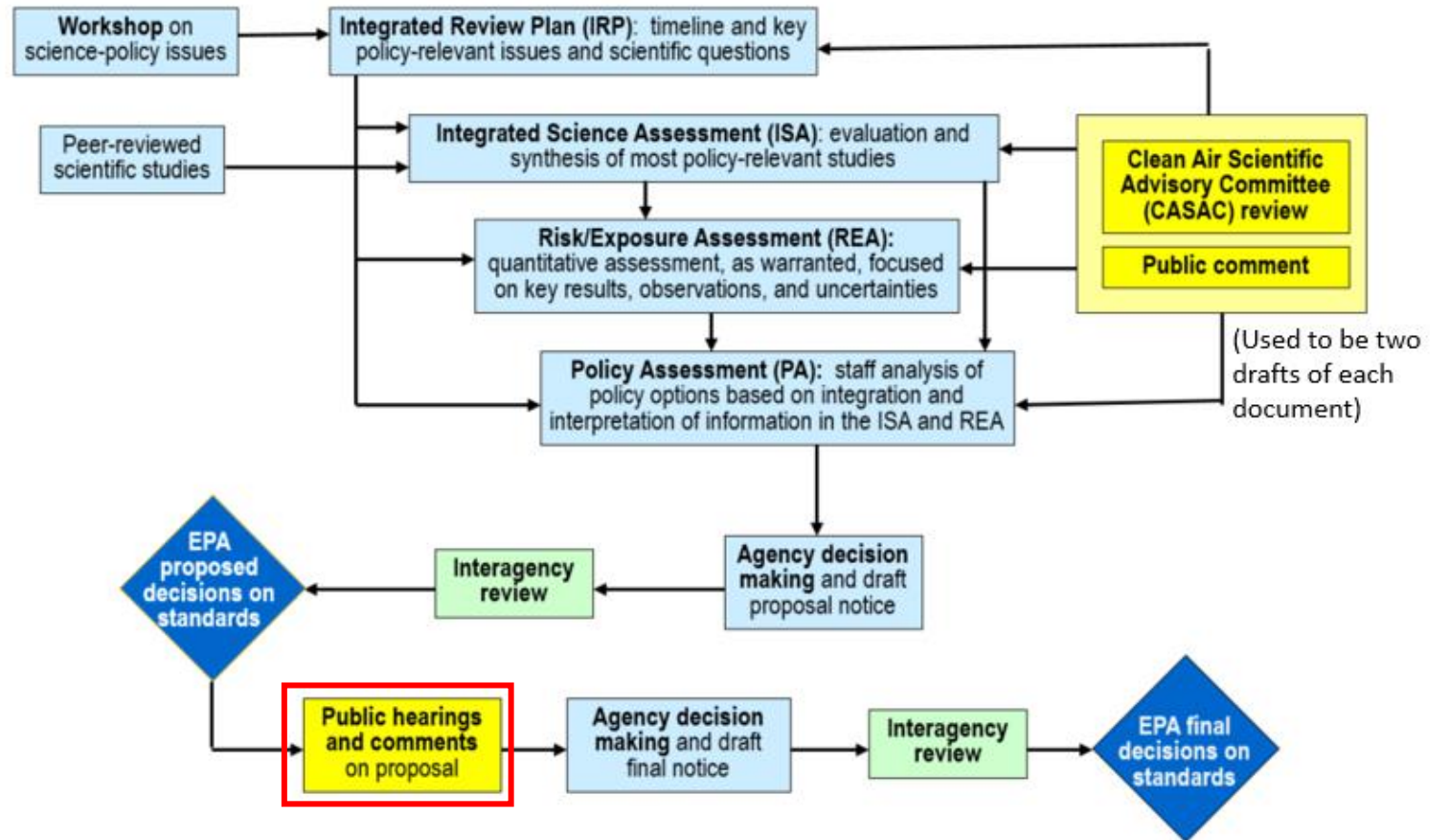
Finalized EPA rule/guidance	Link	Date finalized
National Emission Standards for Hazardous Air Pollutants: Site Remediation 40 CFR Part 63 Subpart GGGGG	<a href="#">EPA-HQ-OAR-2002-0021</a>	12/22/2022
Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards	<a href="#">EPA-HQ-OAR-2019-0055</a>	01/24/2023
Air Plan Disapprovals; Interstate Transport of Air Pollution for the 2015 8-Hour Ozone National Ambient Air Quality Standards	<a href="#">EPA-HQ-OAR-2021-0663-0020</a>	02/13/2023
Wisconsin; Definition of Chemical Process Plants Under State Prevention of Significant Deterioration and Operating Permit Program	<a href="#">EPA-R05-OAR-2008-0784</a>	02/21/2023



# 2023 PM NAAQS Proposed Rule

- EPA published the proposed PM NAAQS update on January 27, 2023
- EPA comment period (60 day) closes March 28, 2023

## NAAQS Review Process\*



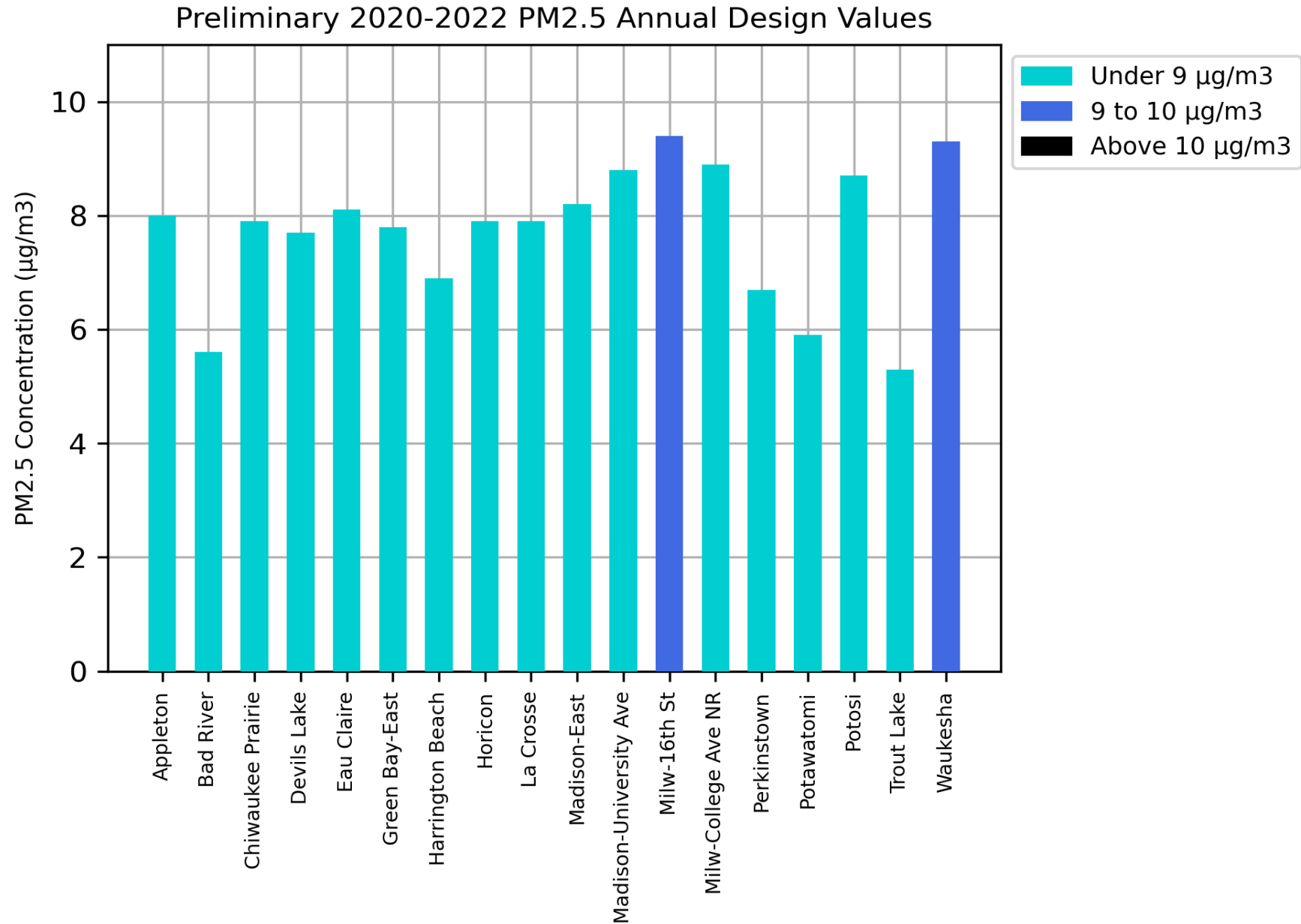
# PM NAAQS Proposed Standards

NAAQS	Current standard	New proposed range	Taking Comment
PM <sub>2.5</sub> annual standard	12 µg/m <sup>3</sup> (set in 2012)	9-10 µg/m <sup>3</sup>	8-11 µg/m <sup>3</sup>
PM <sub>2.5</sub> 24-hour standard	35 µg/m <sup>3</sup> (set in 2006)	No change	25-35 µg/m <sup>3</sup>
PM <sub>10</sub> 24-hour standard	150 µg/m <sup>3</sup> (set in 1987)	No change	No additional range identified

# PM<sub>2.5</sub> Annual Design Value Data

## Considerations

- Graph represents most recent preliminary design values data available
- 2022 data is not yet certified
- Designations for this NAAQS will utilize data from future years beyond 2022





# Ethanol SIP

## History

- July 2007- EPA finalized updates to definition of chemical processing plant which had the result of changing the major source threshold for PSD permitting of ethanol production facilities from 100 TPY to 250 TPY
- August 2008- DNR updated state rules to incorporate the exclusion of ethanol production from the definition of chemical processing plants
- September 2008 - DNR submitted updated rules to EPA for incorporation into the SIP
- 2007 and 2009 - NRDC petitioned EPA to reconsider and stay the ethanol rule. Petitions were consolidated and held in abeyance
- 2019 - EPA granted on the NRDC petition in part determining that anti-backsliding provisions had not been adequately addressed in nonattainment areas and denied the remainder of the petition

# Ethanol SIP

EPA proposed to approve Wisconsin's Ethanol rule into the SIP  
November 3, 2022

- Comment period closed January 3, 2023
- No comments were received
- Final approval published on February 21, 2023
- Effective date is March 23, 2023

Wisconsin has reviewed PSD permit applications for ethanol production facilities using the 250 tpy major source threshold since 2015.

# **Inflation Reduction Act (IRA) Dockets**

Katie Praedel  
Monitoring Section Chief

# IRA Non-Regulatory Dockets for Public Input

- [Climate Pollution Reduction Grants \[60114\]](#)
- [Transportation Programs \[60101, 60102\]](#)
- [Methane Emissions Reduction Program \[60113\]](#)
- [Funding to Address Air Pollution \[60105, 60106\]](#)
- [Funding for Implementation of American Innovation and Manufacturing Act \[60109\]](#)
- [Low Emissions Electricity Program & GHG Corporate Reporting \[60107, 60111\]](#)

# IRA Non-Regulatory Dockets for Public Input

Theme	IRA Provisions	Exp. <sup>1</sup> Year	Use of Funds	Funding
<b>Climate Pollution Reduction Grants</b>	Climate Pollution Reduction Grants	2031 / 2026	\$250 million for Greenhouse Gas Air Pollution Planning Grants with at least one grant to an eligible entity in every state. \$4.75 billion for grants to implement select Planning Grants.	\$5B
<b>Funding to Address Community Air Pollution</b>	Air Monitoring & Screening	2031	Grants and other activities to support air monitoring and screening.	\$205.5M
	Clean Air Act Grants	2031	Funding for Clean Air Act's research, development, and grants program.	\$25M
	Funding to Address Air Pollution at Schools	2031	Grants and other activities to monitor and reduce air pollution and greenhouse gas emissions at schools.	\$50M
<b>Mobile Source Programs</b>	Grants to Reduce Air Pollution at Ports	2027	Competitive grants and rebates to reduce air pollution at ports.	\$3B
	Clean Heavy-Duty Vehicles	2031	Grants, rebates, and contract support to help cover costs of replacing dirty heavy-duty vehicles with clean zero emission vehicles.	\$1B
	Diesel Emissions Reductions	2031	Funding for Diesel Emissions Reduction Act program.	\$60M
	Mobile Source Grants	2031	Grants for States to adopt and implement zero-emission standards for mobile sources per Section 177 of the Clean Air Act (i.e., adopt / implement California's mobile source standards).	\$5M
<b>Methane Emissions Program</b>	Methane Emissions Reduction	2028	Financial (grants, rebates, contracts, loans, etc.) and technical assistance to reduce methane emissions and implement a methane fee.	\$1.55B

1. Year funding expires

Note: Table does not include: Low Emissions Electricity Program, GHG Corporate Reporting, Funding for section 211(o) of the Clean Air Act, and Funding for implementation of the American Innovation & Manufacturing Act.



# IRA Non-Regulatory Dockets for Public Input

- DNR commented on the design and implementation of IRA grant programs
- Comments were due January 18, 2023
- Program comments were developed on four dockets
- High level comments:
  - EPA should engage with state co-regulators on more specific aspects of programs throughout development process.
  - EPA should consider the specific needs of this region (nonattainment)
  - EPA should ensure that state agencies receive adequate funding to facilitate IRA programs

# Fall Unified Agenda

Jason Treutel  
Air Quality Planning and Standards Section Chief

Kristin Hart  
Air Permits and Modeling Section Chief

# EPA's Fall 2022 Unified Agenda – Ozone and PM2.5

Rule	Proposal Date	Final Date	Notes
2015 Ozone Transport Rule (FIP)	Apr 2022	Mar 2023	Program commented on proposal June 2022. Consent decree to finalize by March 15th.
PM2.5 NAAQS Review	Jan 2023	Aug 2023	EPA proposing to lower the annual PM <sub>2.5</sub> standard to a range of 9-10 µg/m <sup>3</sup> .
Ozone NAAQS Reconsideration	Apr 2023	TBD	EPA determining whether to retain or lower the existing standard.

# EPA's Fall 2022 Unified Agenda – Section 111

Rule	Proposal Date	Final Date	Notes
CAA Section 111(d) Implementing Regulations for State Plans	Jan 2023	Apr 2023	Implementing guidelines for 111 state plans included in the final ACE Rule were vacated.
Oil and Gas NSPS/Emissions Guidelines for Methane- 111(b) and 111(d)	Dec 2022	Aug 2023	Program commented on the original proposal and supplemental proposal.
Emission Guidelines for Existing Fossil Fuel Power Plants- 111(d)	Apr 2023	Jun 2024	Recent Supreme Court Decision will inform the scope of rule. Will require detailed review and likely development of a state plan and state rule.
NSPS for New Fossil Fuel Power Plants – 111(b)	Apr 2023	Jun 2024	

# EPA's Fall 2022 Unified Agenda - Mobile Sources

Rule	Proposal Date	Final Date	Notes
Removal of the Gasoline Volatility Waiver- Request from States	Dec 2022	Mar 2023	Governor's office was a signatory on this request.
NOx and GHG Standards for Light-Duty and Medium-Duty Engines (2027+)	Mar 2023	Mar 2024	
Light-Duty Fuel Efficiency Standard (DOT) (2026+)	Mar 2023	TBD	
GHG Emissions Standards for Heavy-Duty Engines and Vehicles- Phase 3	Mar 2023	Dec 2023	Originally part of 2022 NOx/GHG proposal, split before final in December 2022.
Fuel Efficiency and GHG Standards Heavy-Duty Vehicles (2030+) (DOT)	May 2023	TBD	

# EPA's Fall 2022 Unified Agenda - Permitting and Compliance

Rule	Proposal Date	Final Date	Notes
Reconsideration of Fugitive Emissions Rule: PSD and NNSR	Oct 2022	Nov 2023	DNR provided comments
Reclassification of Major Sources to Area Sources- Section 112	Apr 2023	Feb 2024	
Project Emissions Accounting- PSD and NNSR	Sep 2023	TBD	
Revisions to Minor NSR Program Req for SIPs	Oct 2023	Jul 2024	May require SIP revision in the future.
State Implementation Plans: SSM Revisions	Apr 2023	Mar 2024	Proposed rule published in February

# EPA's Fall 2022 Unified Agenda - Permitting and Compliance

Rule	Proposal Date	Final Date	Multiple Sections?	Notes
NESHAP Coal and Oil-Fired Electric Utility Steam Generating Units	Feb 2022	Mar 2023	No	
NESHAP Ethylene Oxide Sterilization	Mar 2023	Oct 2023	No	
Revisions to Part 75 - Acid Rain Requirements for Power Plants	Mar 2023	Nov 2023	No	

# Start up, Shut Down, Malfunction



## Background on SSM

- *Sierra Club v. Johnson* (2008) finds that the inclusion of startup, shutdown, and malfunction (SSM) exemptions in section 112 standards is not allowed under the Clean Air Act (CAA) and vacates affirmative defense provisions in EPA's regulations.
- June 30, 2011, Sierra Club files petition for rulemaking with EPA. Issues in the petition center on compatibility of existing SSM exemptions in state implementation plans (SIPs) with CAA requirements.



## Background on SSM

- February 23, 2013, EPA agrees with Sierra Club petition and makes a preliminary finding that provision in SIPs of 36 states are substantially inadequate to meet CAA requirements.
- December 11, 2014, EPA Region 5 informs DNR that Wisconsin was inadvertently omitted from the list of 36.
- On June 12, 2015, EPA publishes its 2015 SSM SIP Action notice (80 FR 33840-33985) in which EPA restates and revises its SSM guidance. In this notice, EPA also finalizes its finding that certain SIP provisions in 36 states are substantially inadequate to meet CAA requirements.

## Background on SSM

- During 2020, EPA Regions 5, 6 and 7 withdraw SIP calls previously issued to North Carolina (for automatic exemptions), Texas (for affirmative defense) and Iowa (for discretionary exemptions).
- October 9, 2020 - Administrator Wheeler issues a new SSM guidance memorandum that asserts SSM exemptions and affirmative defense provisions may be allowable under the CAA. The memo also considers withdrawal the remaining 33 SIP calls issued in 2015.
- September 30, 2021 - Administrator McCabe issues SSM guidance memorandum withdrawing the October 9, 2020 guidance memorandum and reinstating EPA's prior policy positions and legal interpretations. EPA's memo has the affect of reinstating its previous SIP calls.

# Where we are today

- On February 23, 2023, EPA published its latest SIP call which proposes to reinstate previous SIP calls for North Carolina, Texas and Iowa and made a new finding for 8 state and local air pollution control agencies including Wisconsin.
- Affected Wis. Adm. Codes:
- **S. NR 431.05** - exceptions for opacity limits
  - **Section NR 431.05 (1):** allows up to 80% opacity for 6 minutes in any one hour s. Combustion equipment may not be cleaned nor a fire started more than 3 times per day
  - **Section NR 431.05 (2):** Emissions may exceed number 1 of the Ringlemann chart or 20% opacity for stated periods of time, as permitted by the department, for such purpose as an operating test, use of emergency equipment, or other good cause, provided no hazard or unsafe condition arises.

# Where we are today

- Affected Wis. Adm. Codes:
- **S. NR 436.03 (2)** - Emissions in excess of the emission limitations set in chs. NR 400 to 499 may be allowed in the following circumstances
  - **Section NR 436.03 (2) (a):** When an approved program or plan with a time schedule for correction has been undertaken and correction is being pursued with diligence
  - **Section NR 436.03 (2) (b):** When emissions in excess of the limits are temporary and due to scheduled maintenance, startup or shutdown of operations carried out in accord with a plan and schedule approved by the department.
  - **Section NR 436.03 (2) (c):** The use of emergency or reserve equipment needed for meeting of high peak loads, testing of the equipment or other uses approved by the department. Such equipment must be specified in writing as emergency or reserve equipment by the department. Upon startup of this equipment notification must be given to the department which may or may not give approval for continued equipment use.

# EPA's 7 Criteria for Setting Alternative Emission Limits (AEL) During SSM Events

1. Revision is limited to **specific, narrowly defined source categories using specific control strategies** (e.g., cogeneration facilities burning natural gas and using selective catalytic reduction).
2. Use of the control strategy for this source category is **technically infeasible during startup or shutdown periods**.
3. The alternative emission limitation requires that the **frequency and duration of operation in startup or shutdown mode are minimized** to the greatest extent practicable.
4. As part of its justification of the SIP revision, the **state analyzes the potential worst-case emissions** that could occur during startup and shutdown based on the applicable AEL.
5. The AEL requires that all possible steps are taken to **minimize the impact of emissions during startup and shutdown** on ambient air quality.
6. The AEL requires that, at all times, the facility is operated in a manner consistent with good practice for minimizing emissions and the source uses **best efforts regarding planning, design, and operating procedures**.
7. The AEL requires that the owner or operator's actions during **startup and shutdown periods are documented** by properly signed, contemporaneous operating logs or other relevant evidence.

# Next Steps - Review other States' Actions to Remedy SSM SIP Calls and EPA Response

- Revised rules and requested approval of revision into SIP. ([IN](#), [SC](#), [MS](#))
- Repealed rules at state-level and requested removal of rules from SIP. ([MN](#), [DE](#), [SC](#), [MS](#))
- Requested removal of rules from SIP and retained rules as state-only. ([KY](#), [LA](#))
- Requested removal of rules from SIP then revised and retained rules as a state-only. ([MI](#), [MS](#), [NM](#))
- Promulgated new rules and submitted as a revision into the SIP. ([GA](#), [WV](#)) - Both states received disapprovals of these SIP submittals.

# Stakeholder Feedback

- AMAG members
- Regulated sources
- Communities impacted by SSM emissions



# Emissions Inventory Updates

Maria Hill, Compliance and Emissions Inventory Section Chief



# EI Update

- [Historical Air Emissions Information | | Wisconsin DNR](#)
- [Air Emissions Inventory \(EI\) Updates, Tutorials, FAQ and Help | | Wisconsin DNR](#)

Annual Summaries **Statewide** CO NOx PM PM10 PM2.5 ROG SO2 Lead GHG

### ANNUAL SUMMARIES

Air emission inventory summary information is available from data year 1995 to the present in DNR's [air permit search tool](#).

### DETAILED INSTRUCTIONS

1. Go to the [Air Management Program permit search tool](#).
2. Enter your search information and then click on the "Search" button. The search results will appear on the bottom of the screen.
3. Click the "Go" link located to the left of a FID number. You will see the facility information, facility contacts, etc.
4. Use the slider bar located on the right of the computer screen to scroll to the bottom of the screen. You will see the available emission inventory reports.
  - If a number of emission inventory reports exist, you will see a slider bar located to the right of the Emission Inventory Reports area.

### GRAPHS AND MAPS

The [Air Management Data Viewer \(AMDV\)](#) is DNR's web-based mapping application that provides information about air permitted facilities, facility emissions and air quality monitoring sites in Wisconsin. The viewer also identifies federally-designated nonattainment and Class I areas.

The Department of Health Services offers a web-based mapping application that provides information about Air Emissions in Wisconsin: [Wisconsin EPH Tracker](#).

### HEALTH EFFECTS

Visit [Air Toxics and Mercury | | Wisconsin DNR](#) for information on air toxics.

**Toxic Air Emissions - Formaldehyde - Total Reportable Emissions**  
2021 ~ Pounds

[EXPORT DATA \(.CSV\)](#) [+ ADD TO](#)

[Choose primary category by topic](#)

Primary Secondary Places of Interest

Choose a Category  
Toxic Air Emissions

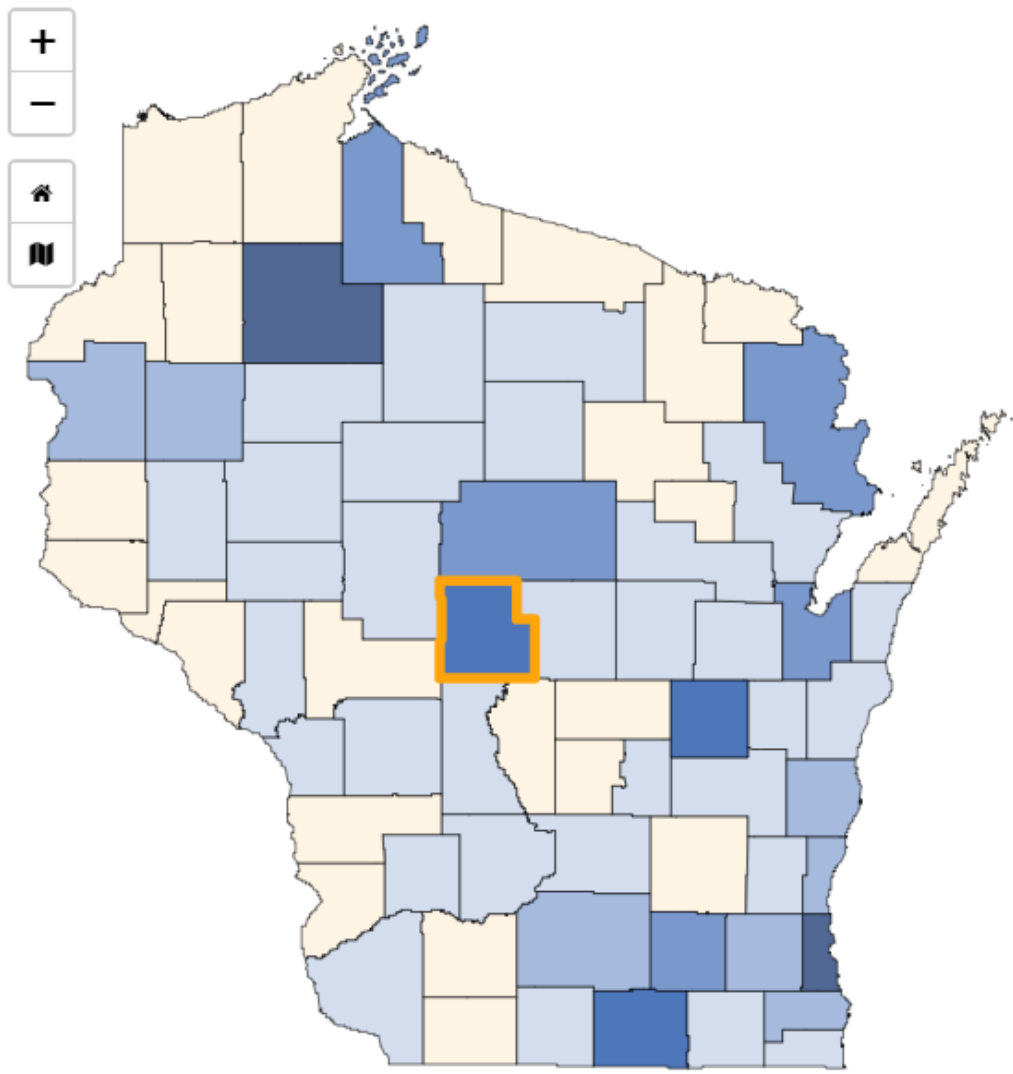
Choose a Geography  
 By Census Tract  
 By County  
 Statewide (No Map)

Choose a Topic  
Formaldehyde

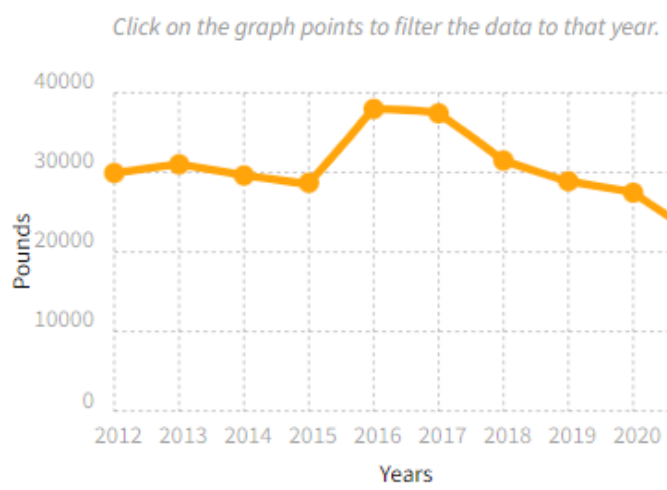
Choose a Sub Topic  
 Facilities Reported  
 Total Reportable Emissions

Year  
2021

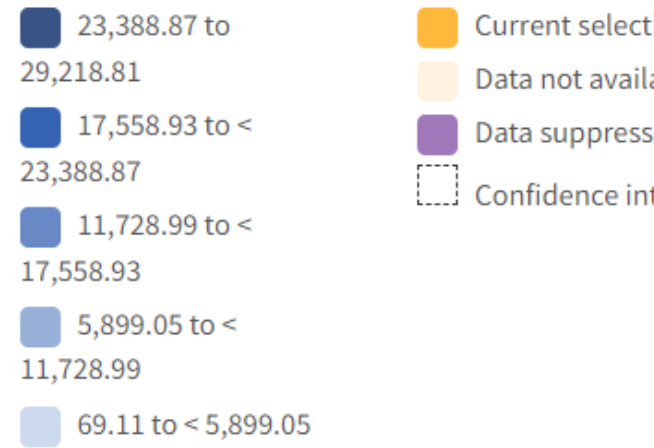
What would you like to see?  
 Pounds  
 Tons



Wood County - Pounds



Legend - Pounds **i**



[Find out more information on the dataset.](#)

# Expanding E-Services

Maria Hill

Compliance and Emissions Inventory Section Chief

# Expanding E-Services

New E-payment option for Refrigerant Recovery Program – registration can be renewed and paid online through the Environmental Licensing and Certification Renewal Portal

E-payment option for Asbestos Notification Program – notification and fees for demolition and/or renovation can be submitted and paid online

# Environmental Justice Update

Gail Good  
Air Management Program Director

Kristin Hart  
Air Permits and Modeling Section Chief

# New EPA Guidance on EJ for Air Permitting

On December 22, 2022, EPA released “[Principles for Addressing Environmental Justice in Air Permitting](#)”

- These 8 principles are described by EPA as an interim operating framework for identifying, analyzing, and addressing EJ concerns in the context of Clean Air Act permitting.
- The Principles supplement other EJ tools provided by EPA:
  - [EPA Legal Tools to Advance Environmental Justice](#) - May 2022
  - [Interim Environmental Justice and Civil Rights in Permitting Frequently Asked Questions](#) - August 2022

# EPA's 8 Principles for addressing EJ

1. Identify communities with potential environmental justice concerns
2. Engage early in the permitting process to promote meaningful participation and fair treatment
3. Enhance public involvement throughout the permitting process
4. Conduct a “fit for purpose” environmental justice analysis

# EPA's 8 Principles for addressing EJ cont.

5. Minimize and mitigate disproportionately high and adverse effects associated with the permit action to promote fair treatment
6. Provide federal support throughout the air permitting process
7. Enhance transparency throughout the air permitting process
8. Build capacity to enhance the consideration of environmental justice in the air permitting process



# Cumulative Impacts

“Cumulative impacts” refers to the total burden – positive, neutral, or negative – from chemical and non-chemical stressors and their interactions that affect the health, well-being, and quality of life of an individual, community, or population at a given point in time or over a period of time.

Cumulative impacts include:

- Contemporary and past exposures
- Direct and indirect health effects

Cumulative Impacts provide a measure of a community’s ability to withstand or recover from additional exposures under consideration

# DNR Air Program and EJ

The Air Management Program is working to address EJ in air permitting

- High level efforts include
  - Working with DNR's new Environmental Justice policy advisor
  - Assuring consistency within the Environmental Division and Agency
  - Collaborating with DNR's Office of Communication for website updates, development of materials in other formats and languages, and translation services for documents and hearings
- Technical efforts include
  - Developing processes and procedures necessary to address EJ in air permits

# Member Updates

# Ozone Topics

Katie Praedel  
Air Monitoring Section Chief

Jason Treutel  
Air Quality Planning and Standards Section Chief

# Ozone Monitoring – Key Dates

- Ozone Monitoring begins
  - March 1 at Kenosha County monitors
  - April 1 statewide
- Enhanced Ozone Monitoring
  - Is a requirement of the Ozone Non-Attainment classification of Moderate in Sheboygan and the Milwaukee area
  - The plan is state directed and approved by EPA in the annual monitoring network plan
  - Begins May 1

# Enhanced Ozone Monitoring - Key Decisions

- Annual decisions made about EOM take policy implications and resources into account
- Some EOM data has already been utilized in models that inform policy development



# Preliminary Critical Values for 2023 Ozone Season

Site	Site ID	4th high (ppb)		2023 C.V.s	
		2021	2022 (preliminary)	2008 std	2015 std
Bayside	550790085	72	74	82	67
<b>Chiwaukee</b>	<b>550590019</b>	<b>79</b>	<b>70</b>	<b>79</b>	<b>64</b>
Grafton	550890008	72	72	84	69
Harrington Beach	550890009	73	71	84	69
Kenosha WT	550590025	72	71	85	70
Milw 16th St	550790010	66	65	97	82
Milwaukee-UPark	550790068	71	70	87	72
<b>Racine</b>	<b>551010020</b>	<b>78</b>	<b>70</b>	<b>80</b>	<b>65</b>
Sheboygan-Haven	551170009	66	71	91	76
<b>Sheboygan-KA</b>	<b>551170006</b>	<b>73</b>	<b>77</b>	<b>78</b>	<b>63</b>
Waukesha	551330027	70	69	89	74

2008 NAAQS: 75 ppb  
2015 NAAQS: 70 ppb

2015 NAAQS: Reached critical value or exceeded standard  
2008 NAAQS: Reached critical value or exceeded standard

*Note: Data have not yet been QA'ed or certified and are subject to change. Values are only shown for monitors in current nonattainment area counties.*

# Transport SIP/FIP Background

- The Clean Air Act requires states that significantly contribute to ozone nonattainment or maintenance in another state address these contributions by reducing emissions (the “good neighbor” provision).
- February 28, 2022 – EPA proposed a “transport rule” to address good neighbor obligations for the 2015 ozone NAAQS for 26 states, including Wisconsin.
- January 31, 2023 – EPA took final action on 19 state transport SIPs for the 2015 Ozone NAAQS, including Wisconsin's SIP. EPA finalized a partial approval and partial disapproval of Wisconsin's SIP.
- March 15, 2023 – EPA is under court ordered consent decree to finalize the Transport FIP.



# Transport impacts to Wisconsin

- Wisconsin has multiple 2015 ozone NAAQS nonattainment areas:
  - Parts of Kenosha and Sheboygan counties.
  - Much of the 5-county Milwaukee area.
- Based on EPA's proposed FIP modeling, other states contribute between 42-48 % to the ozone in Wisconsin's nonattainment areas.
- Wisconsin cannot meet upcoming 2015 ozone NAAQS attainment dates without additional, significant emissions reductions in upwind states.

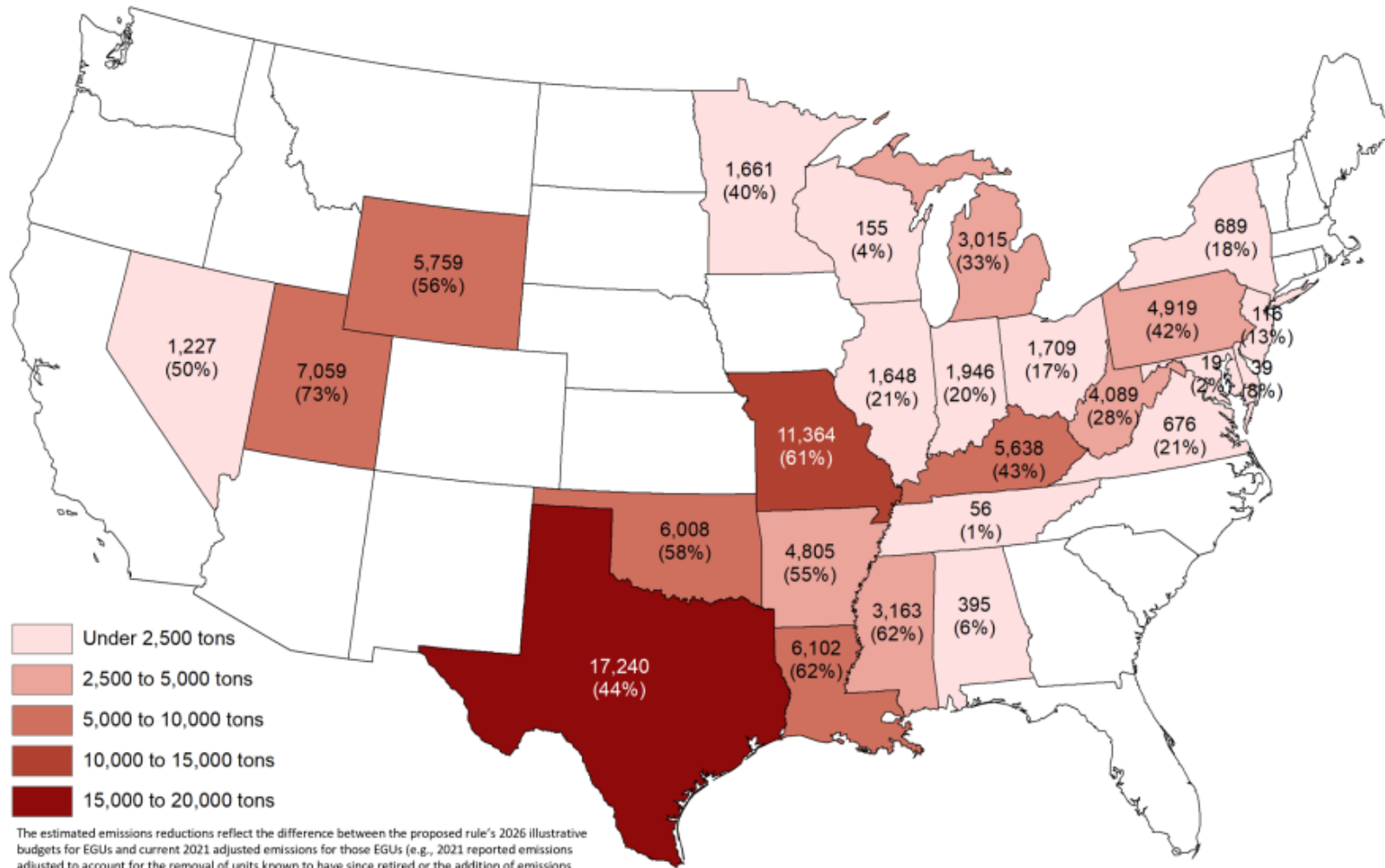
# Updated EPA Modeling

- Updated modeling indicates Chiwaukee and Racine monitors now categorized as maintenance-only monitors
- Sheboygan Kohler-Andrae monitor now fully analyzed and categorized as a nonattainment receptor
  - Monitor meets criteria for analysis in the updated modeling
- Introduction of use of recent monitoring data to identify “violating monitor” receptors
  - Identification based on recent 2021 and preliminary 2022 data
  - Uncertain how this will be used in the FIP; may be considered equivalent to maintenance-only monitors

# Updated EPA Emissions Platform

- Uses more recent 2019 industrial point source inventory as starting point
- Reflects delayed retirement plans for Columbia, Edgewater and South Oak Creek power plants
- Mostly reflects corrections recommended for industrial point sources

# Impacts of EGU emissions reductions (proposal)



The estimated emissions reductions reflect the difference between the proposed rule's 2026 illustrative budgets for EGUs and current 2021 adjusted emissions for those EGUs (e.g., 2021 reported emissions adjusted to account for the removal of units known to have since retired or the addition of emissions from under-construction new fossil plants). In other words, the estimated reductions reflect changes known to have happened and be happening in the power sector, as well as the impact of the proposed rule. Because these estimated reductions reflect the overall change from current levels of operation, they are higher, on average, than the values reflected in the regulatory impact analysis (emissions reductions relative to projected future levels of operation) and other communications materials for the proposal.

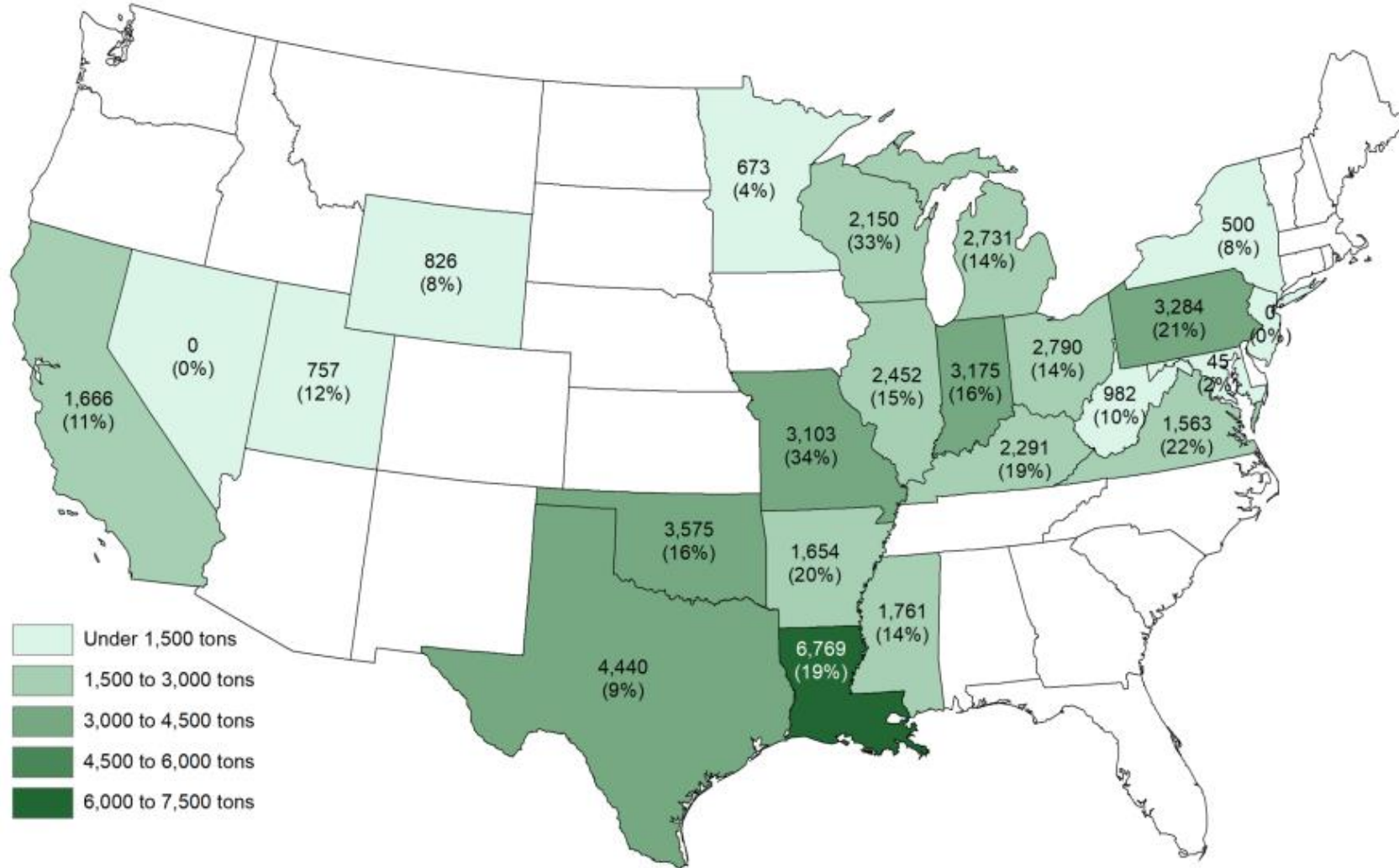
- Significant reductions in upwind state EGU emissions.
- Very little anticipated impact on Wisconsin EGUs. EPA anticipates a 4% reduction in emissions over baseline in 2026 (155 tons) – among the smallest of any state in rule.

# Non-EGU emissions reduction approach

- Sets NO<sub>x</sub> emissions standards starting in 2026 for certain emissions units in identified industries:
  - Reciprocating internal combustion engines (>1,000 hp) in *Pipeline Transportation of Natural Gas*.
  - Kilns (>100 tpy PTE) in *Cement and Cement Product Manufacturing*
  - Boilers, furnaces and preheaters (>100 tpy PTE) in *Iron and Steel Mills and Ferroalloy Manufacturing*
  - Furnaces (>100 tpy PTE) in *Glass and Glass Product Manufacturing*
  - High-emitting, large boilers (>100 mmBtu/hr) in *Basic Chemical Manufacturing, Petroleum and Coal Products Manufacturing, and Pulp, Paper, and Paperboard Mills*

→ *Not included in the NO<sub>x</sub> budget/trading program.*

# Impacts of Non-EGU emissions reductions (proposal)



- Most reductions to be in LA, TX, OK, PA, MO, IN
- EPA anticipates a 33% reduction in Wisconsin emissions over baseline in 2026 (2,150 tons) – about mid-pack.

# Clean Air Month Preview

Craig Czarnecki  
Air Management Outreach Coordinator



# Clean Air Month Highlights

- Milwaukee Air Walk – May 6
- [OutWiGo Green](#) - May 13
- Wisconsin Natural Resources Magazine – Spring 2023 Issue
- News Release
- Social Media



# Annual Air, Air Everywhere Poetry Contest

- Open to 3-5<sup>th</sup> Grade students
- March 14 – May 5
- Send submissions to: [DNRAirEducation@wisconsin.gov](mailto:DNRAirEducation@wisconsin.gov)
- Winners will be announced at the end of May



# **AMAG Membership**

Gail Good  
Air Management Program Director

# CONNECT WITH US

## Next Meeting

June 1, 2023



/WIDNR



@WIDNR



@WI\_DNR



/WIDNRTV



"WILD WISCONSIN:  
OFF THE RECORD"