Summary
Air Management Study Group Meeting

Wednesday, March 9, 2016

9:00 am

Room G09, State Natural Resources Building (GEF2)

101 S. Webster St., Madison, WI

Attendees

Gilberto Alvarez, EPA
Renee Bashel, DNR
Kendra Bondernd, Legislative Fiscal Bureau
David Bizot, DNR
Phillip Bower, WHD
Tyson Cook, Clean Wisconsin*
Sarah Geers, Midwest Environmental Advocates
Gail Good, DNR
Michael Hahn, SEWRPC
Andrew C. Hanson, Alliant Energy
Rob Harmon, Bemis Company, Inc.
Art Harrington, Godfrey & Kahn*
Kristin Hart, DNR
Joseph Hoch, Alliant Energy
Tracey Holloway, UW-Madison*
Jeff Jaeckels, MGE*
Joseph Ko, EPA
Jenny Liljegren, EPA
Amy Litscher, Saga Environmental & Engineering
Andrea Morgan, EPA
Todd Palmer, Michael Best*
Michelle Robinson, EPA
David Seitz, TRC Environmental
Jasmine Sodemann, Gannett Fleming
Andrea Simon, Trinity Consultants
Ryan Smith, Wisconsin Paper Council*
Kathleen Standen, WEC Energy Group
Andrew Stewart, DNR
Patti Stickney, SEH
Rob Thiboldeaux, DHS
Karen Walsh, DNR

* Air Management Study Group (AMSG) members

Action Items

- **Next meeting.** The next study group meeting will be held on **Thursday, June 2** at 9 a.m. at the State Natural Resources Building (GEF 2), Room G09, 101 S. Webster St., Madison.
- **SSM SIP workgroup.** The group had its first meeting in March (see p. 6), and the next meeting will be held in May. The group remains open to new members, and interested parties should contact Karen Walsh (karen.walsh@wisconsin.gov) or Kristin Hart (kristin.hart@wisconsin.gov).
- **Permit streamlining.** The Air Program would appreciate feedback from the study group on priorities for the second phase of the permit streamlining initiative (see p. 8). The program is looking for input on priority topics (ideally a prioritized list), timing and resources needed for the effort, and members' interest in participating. See slides 15 to 18 of the AMSG presentation for a list of ideas the program has collected to date. The presentation is available at http://dnr.wi.gov/topic/airquality/amstudygroup.html (refer to the March 9, 2016 meeting on the "Past meetings" tab). Send feedback to Karen Walsh at karen.walsh@wisconsin.gov.

- **$PM_{2.5}$ strategy.** The Air Program has posted the final $PM_{2.5}$ strategy and related documents at permanent locations on the program website:
    - **Guidance for Including $PM_{2.5}$ in Air Pollution Control Permit Applications:** http://dnr.wi.gov/topic/AirPermits/documents/EmissionsApplicantsGuidanceFinal.pdf (accessible from the "Other helpful materials" menu on the right-hand column of the Air permit options webpage)
    - **2016 Approach to Dispersion Modeling for Permits:** http://dnr.wi.gov/topic/AirPermits/documents/2016ModelingRequirementsPolicy.pdf (accessible from the "Policy and guidance" tab of the Air dispersion modeling webpage).
    - **Wisconsin Air Dispersion Modeling Guidelines:** http://dnr.wi.gov/files/PDF/pubs/am/AM528.pdf (accessible from the "Policy and guidance" tab of the Air dispersion modeling webpage).
    - **Variance Request Procedure for Industrial Sources Subject to Section NR 415.075(4), Wis. Adm. Code:** http://dnr.wi.gov/topic/AirPermits/documents/VarianceProceduresGuidanceFinal.pdf (accessible from the "Regulations" section of the Industrial Sand Mining webpage).

  The documents will also be posted to the Air Program guidance module at http://dnr.wi.gov/topic/AirPermits/Policy.html, which can be accessed from the Air Permits webpage.

Meeting Summary

Opening remarks and agenda review

Gail Good, Air Program Director

Good opened the meeting and introduced some new members and visitors. Ryan Smith is the new representative from the Wisconsin Paper Council. Michael Hahn was present to represent the Southeastern Wisconsin Regional Planning Commission, standing in for Ken Yunker and Christopher Hiebert. Good announced that Tara Wetzel from the Wisconsin Transportation Builders Association and Tim Clay from Cooperative Network are stepping down from the study group, and that the Air Program is working on naming their replacements. She also welcomed new staff from EPA Region 5 in attendance. She introduced Grant Hetherington, the Air Program's acting monitoring section chief. Good asked all attendees introduce themselves and reviewed the agenda.

Program updates

New program guidance: DNR policy for regulating $PM_{2.5}$

Kristin Hart, Permits & Stationary Source Modeling Section Chief

Hart announced that the Air Program finalized its $PM_{2.5}$ strategy and related documents on February 22, 2016. The documents were posted to the DNR's public guidance website at http://dnr.wi.gov/news/input/guidance.html for 30 days. The program found permanent homes on the DNR website for the documents (seethe $PM_{2.5}$ strategy Action Item at the top of p. 2).

Good thanked the study group members that had provided feedback on the draft documents. Hart added that the finalized guidance includes a response to the comments received from the public. The Air Program is now using the findings developed through this process.

Cook asked whether the program has developed additional guidance to distinguish between high and low temperature sources. Hart responded that the program has not, but that the issue will probably be addressed as part of the preliminary determinations for individual permits.

Good added that as part of the $PM_{2.5}$ guidance package, the program finalized the variance process for industrial sand mines and ledge rock quarries that are subject to ch. NR 415, *Wisconsin Administrative Code*.

DNR comments on federal proposed rules

David Bizot, Regional Pollutants & Mobile Sources Section Chief

Bizot explained that the Air Program is committed to informing the study group and the public when the program comments on proposed rules. He described comments the program recently submitted on four proposed EPA rules. The rules and hyperlinks to DNR's comments are listed on slide 3 of the March 9, 2016 presentation available at http://dnr.wi.gov/topic/airquality/amstudygroup.html under the "Past meetings" tab.

Bizot explained that the program has been internally discussing strategies for informing stakeholders when the program submits comments. The program is making an effort to post these documents expeditiously on the DNR website. It is also considering options to notify interested parties that documents have been posted. Good added that the program is working on procedures to ensure that comments are posted on the website as soon as possible. She mentioned that one option for notifying the public when comments have been posted might be a subscription service. She requested feedback on approaches for notifications. She remarked that the program appreciates that several study group members provided input as the recent set of comments were developed. The program will continue to update the study group on its comments on federal rules as a standing agenda item for the quarterly meetings.

Harrington asked whether there are upcoming rules the Air Program plans to comment on. Good and Bizot responded that there are no comments the program is currently working on. In general, the program usually takes an active approach to proposed rules and submits comments.

Kenosha nonattainment area redesignation effort

David Bizot, Regional Pollutants & Mobile Sources Section Chief

Bizot stated that based on the last three years of data, the Kenosha 2008 ozone nonattainment area is eligible for redesignation to attainment. The most recent ozone season ended at the end of October, and in November the program started to coordinate with Indiana and Illinois to prepare documents for the resignation request. The effort is moving along well. At the end of January, Bizot, Good, and Bart Sponseller went to speak with officials from Kenosha County and the Southeastern Wisconsin Regional Planning Commission to give them an update.

Each of the three states is preparing an individual redesignation request. However, certain elements of the requests, such as inventories, must be consistent between the three submissions. The multistate coordination requires bit of time. The program is close to sharing a draft of Wisconsin's submission with the other two states. EPA informally let the states know that it would take about six months to act on the final submissions, which is much quicker than the 18 months usually required. Bizot said that the Air Program will continue to update the study group on this effort.

Hahn asked when the final requests will be submitted. Bizot responded probably late spring. Once the drafts are prepared, they must be released for public comment before they are submitted to EPA.

Hahn asked whether the Air Program expects to continue using a 7.5 percent safety margin for the motor vehicle emission budgets in the redesignation request. Bizot confirmed.

Bender asked if the redesignation effort means the Air Program has QA'd data from the 2015 ozone season. Good responded that the program early-certified the data for eastern Kenosha in November, and is in the process of QA'ing the data for the rest of the state. The highest design value was for the Chiwaukee Prairie monitor in eastern Kenosha (75 ppb). Bender and Hahn asked about design values for western Kenosha County. Good responded that the program has only QA'd data for eastern Kenosha County to date.

Bender asked whether the Air Program has been discussing whether the 2015 design values for Kenosha would put the redesignated area back into nonattainment for the 2015 ozone standard. Bizot responded that the program has not started developing designations for the 2015 ozone standard. The conceptual framework for designating a Kenosha nonattainment area would most likely be similar to the framework used under the 2008 standard. Future nonattainment areas in Kenosha would probably be part of the Chicago MSA. The program will be engaging with EPA, Illinois, and Indiana on that issue. Hahn asked whether a partial designation would be possible, taking into account data from the Kenosha Water Tower monitor, which is a special purpose monitor. Bizot and Good confirmed that the Water Tower monitor would help inform the program's approach to designation recommendations. Now that there are three years of data from that monitor, it can be used to produce design values.

Bender asked about the factors contributing to lower ozone concentrations in Kenosha. Bizot responded that federal and state rules on the books for the last five to ten years led to permanent control measures that substantially reduced NO_x and VOC emissions in the Chicago area. These reductions are evident in the emissions inventories that will be released for public comment as part of the redesignation request.

Member updates

Good asked each member to provide an update to the group, and stated that she will make this a standing request for each meeting.

Jeff Jaeckels, MGE (representing the Wisconsin Utilities Association)

Jaeckels stated that environmental and regulatory staff members at utilities currently have a lot on their plate. The utilities have been working very collaboratively over the last couple years to identify a direction for the industry and compliance pathways for new federal rules, in particular the Cross State Air Pollution Rule (CSAPR) and the Clean Power Plan. In terms of CSAPR, the utilities share many of the concerns that were expressed by DNR regarding the required level of reductions and whether they are commensurate with modeled emissions. In terms of the Clean Power Plan, the utilities have been collaboratively examining compliance pathways, and believe they would have more flexibility under a state plan (compared to a federal plan). Because implementation of the rule has been stayed, the utilities are waiting for the outcome of challenges to the rule. They are interested in whether compliance dates will be adjusted because utility planning is long term.

Bizot thanked Jaeckels for acting as a conduit to the utilities community when DNR requests feedback on regulatory issues. He realizes there is a lot of behind the scenes work required when the DNR makes these requests, and Jaeckels delivers timely and good feedback. Jaeckels credited the utilities group for their effort in providing feedback, and said that the utilities appreciate being asked for input.

Hoch added that from the utilities' perspective, those that have been affected by the 2010 SO_2 NAAQS appreciate the DNR's implementation work.

Todd Palmer, Michael Best & Friedrich LLP

Palmer remarked that his practice represents industrial sources and some utilities who are generally concerned about compliance with the Clean Air Act. A specific issue they are currently struggling with is Boiler MACT implementation. Many sources have extensions, and are using this time to sort out compliance issues. Sources are also looking for cost effective strategies to address air standards. Industry is involved in challenging the transport rules (CAIR, CSAPR I, CSAPR II, and the NO_x SIP call), and is also concerned about carbon regulation. While the Clean Power Plan does not directly affect industrial sources, they are looking at new sources of power and alternatives such as energy efficiency. They are also concerned about the longer term potential for carbon regulations that would apply directly to industry. Good stated that if Palmer has ideas about how the study group can work on these concerns, if there is anything specific that could be addressed collaboratively by the group, he should let the group know.

Holly Bender, Sierra Club

Bender updated the group on Sierra Club's work relevant to the study group, which mainly involves rule implementation. Sierra Club is heavily involved in Clean Power Plan litigation, and involved in implementation of the rule in almost every state. Bender is interested in the Air Program's SO_2 NAAQS implementation work and recent area designation activity. Sierra Club has also been working on the Mercury and Air Toxics Standards (MATS), which has an upcoming compliance deadline.

Robert Thiboldeaux, Wisconsin Department of Health Services (DHS)

Thiboldeaux remarked that the study group addresses topics different from those he usually works on at DHS, making the AMSG meetings especially educational. He usually addresses local air pollution issues rather than regional ones. These include outdoor wood smoke and hazardous waste issues. As one of his current projects, he is working with WE Energies and the neighborhood around the Oak Creek power plant to address concerns about air quality. The plant is considered compliant with existing air regulations, which presents challenges for addressing residents' concerns. Alvarez asked if DHS is doing health monitoring, for example collecting neighborhood data on hospital visits. Thiboldeaux responded that they are working with a health questionnaire and relying on air monitoring data.

Gilberto Alvarez, EPA Region 5

Alvarez updated the group on Region 5's recent air planning work. They have been involved with SO_2 NAAQS implementation, and recently sent 120-day letters to states notifying them of intended designations under the second round of area designations. Region 5 is not directly involved with the Clean Power Plan pending the current legal challenges, because the region focuses more on work related to State Implementation Plans. The region is working on regional haze issues, specifically new guidance extending the 2018 deadline for regional haze progress reports. The guidance is under internal review.

Andrea Morgan, EPA Region 5

Morgan updated the group on Region 5's recent permitting work. They are continuing to review permits as they come up, and are currently reviewing a permitting SIP submittal from Wisconsin. Another priority for the group is to promote the use of optional compliance measures that could save facilities time and money in meeting air, water, and other requirements. For example, they are promoting IR cameras, which have been approved at the national level for use at chemical plants and refineries in lieu of method 21, and bag leak detection systems in lieu of pressure drop monitoring in baghouses. Region 5 is conducting outreach on these technologies, mainly for facilities in Illinois.

Tyson Cook, Clean Wisconsin

Cook reported that Clean Wisconsin has been working with the Midcontinent Power Sector Collaborative on the Clean Power Plan. The group has been commenting on the Clean Power Plan proposed rules. During the current stay on rule implementation, the group is continuing to meet and assess what analyses may be needed for the region.

Lucas Vebber, Wisconsin Manufacturers and Commerce (WMC)

Vebber stated that WMC shares many of the concerns that have already been mentioned, including concern about federal rules such as the CSAPR update and the new ozone standard. The national Chamber of Commerce is a litigant in the Clean Power Plan challenge, and WMC will continue to monitor the status of the challenge. Vebber mentioned that at the state level, the recently released Institute for Wisconsin's Health report on industrial sand mining is worth reading.

Tracey Holloway, UW-Madison

Holloway explained that she has been working with NASA to integrate satellite data into air management at multiple levels, down to the local level. Wisconsin is well represented in this effort. The initiative is led by Harvard, and Holloway is the deputy leader. Satellite data can identify trends NO_2 where there are no monitors. Holloway welcomed anyone interested in satellite data to use her as a resource. She also mentioned that she teaches a class on advanced air quality monitoring and another that addresses real air quality issues. For example, the class has been working with Joe Hoch at Alliant Energy on a project related to the Clean Power Plan.

Michael Hahn, Southeastern Wisconsin Regional Planning Commission (SEWRPC)

Hahn stated that SEWRPC has been working on its Regional Land Use and Transportation Plan.

Art Harrington, Godfrey & Kahn S.C.

Harrington provided information about two upcoming events members might be interested in attending. On March 17, Harrington is providing an update on the Clean Power Plan for the Midwest Energy Research Consortium in Milwaukee. The event is focusing on technology deployment under the Clean Power Plan and includes a technology-focused industry panel.

The second event is a conference on June 14, 2016 in Chicago sponsored by the American Board Association's Section of Environment, Energy, and Resources. The event is titled "Key Environmental Issues in Region 5 of the U.S. Environmental Protection Agency." Harrington is co-chairing the meeting with Gary Steinbauer from EPA Region 5. There will be a panel on the Clean Power Plan led by Kate Konschnik from the Harvard Environmental Policy Initiative. The speakers are Valerie Brader, Michigan Agency for Energy; Delanie Breuer, Wisconsin Department of Justice; and Doug Scott, Great Plains Institute.

SSM workgroup update

Kristin Hart, Permits & Stationary Source Modeling Section Chief

Hart provided an update following the first meeting of the SSM workgroup on March 3, 2016. She explained that a section of the Wisconsin Administrative Code (s. 436.03 (2)) allows sources to avoid emission limits during startup, shutdown, and malfunction. EPA has informed other states via a SIP call that this type of provision is contrary to the Clean Air Act and State Implementation Plans (SIPs) must be revised. Wisconsin DNR received a letter about a year ago stating that it had been omitted from the original SIP call and would receive one in the future. The Air Program has been planning for the expected SIP call, because the state rule development process takes three years, which is longer than the time frame allowed for addressing a SIP call. The program formed a work group to provide input on Wisconsin's approach to the issue.

Hart stated that the SSM workgroup has started by examining other states' approaches to the SIP call. Georgia and North Carolina have released straw proposals. These states are considering some creative approaches to revising their rules, such as developing alternative SSM limits or other types of enforcement discretion. Georgia is proposing that if an alternative limit is approved in federal rule then it would be approvable for the SIP revisions. Hart stated that the next step for the workgroup is to look more closely at these other states' approaches. The group is also going to look at whether states are planning to revise their rules or litigate their SIP call. In addition, the group is planning to look at the existing rules of the nine states that did not receive SIP calls. For example, one of Michigan's two relevant rules was excluded from the SIP call.

Hart explained that the SSM workgroup discussed the scope of the group's effort, because the topic involves a number of issues. For example, during start up and shutdown it may not always be possible to comply with the emission limits. The group agreed to narrow its scope to working specifically on the language in ch. NR 436, which is still a big task.

Hart also mentioned that the group agreed that it would be helpful to get better indication from EPA about when the SIP call will be coming. The Air Program wants to maintain forward movement on the effort before receiving the SIP call, but the official notice will help make the issue a priority.

Hart stated that the next SSM workgroup meeting will be held in May, and will be open to the public. An agenda will be posted ahead of time on the study group webpage (http://dnr.wi.gov/topic/airquality/amstudygroup.html). The group remains open to new members, and interested parties should contact Walsh (karen.walsh@wisconsin.gov or Hart (kristin.hart@wisconsin.gov).

SO_2 NAAQS implementation

David Bizot, Regional Pollutants & Mobile Sources Section Chief

Bizot updated the group on ongoing implementation of the SO_2 NAAQS. The presentation slides are available on the AMSG website under the March 9, 2016 meeting at http://dnr.wi.gov/topic/airquality/amstudygroup.html (starting on slide 4).

Bizot explained that area designations under the SO_2 NAAQS are being completed in multiple phases. The first phase based nonattainment designations on data from existing monitors. In Wisconsin, a portion of Oneida County was designated nonattainment. DNR submitted a State Implementation Plan (SIP) for this area in January.

The second phase of designations took place early as a result of a consent decree. Nonattainment designations in this phase are based on specific large emitters and existing monitors indicating new violations. One source in Wisconsin met the nonattainment criteria for this phase: the Columbia power plant. DNR submitted modeling in the fall demonstrating that the source meets the standard. In February, EPA sent out a 120-day letter indicating that EPA plans to designate Columbia as attaining the standard. This recommendation is currently open to public comment.

Designations for remaining sources involve a number of different deadlines. DNR responded to a January 15 deadline for submitting a list of sources that require characterization of SO_2 air quality under the Data Requirements Rule (DRR; slide 5). The Columbia power plant is included on this list, but, as discussed, its designation is being addressed under the second phase.

Slide 6 shows the three available options for characterizing the air quality of the listed sources. The three options are described in greater detail on slides 7 to 9. Because Option 1 involves installing new monitors and collecting three years of data, its timeline is longer. Decisions about selecting this option must be made relatively quickly, in order to include any new monitors in the state monitoring plan by July 1, 2016.

Bizot emphasized that the Air Program has been discussing implementation of the standard with sources since last fall, and so the listed sources have been aware of their status. The program is pursuing a collaborative approach to select the appropriate implementation option for each source (slide 10).

Bizot explained that the Green Bay area presents a unique issue (slide 11). The DRR does not address situations where there is an existing monitor and there are also sources subject to the rule (i.e.., sources included on the January 15 list). One source in Green Bay – Georgia Pacific – exceeds the 2,000 tons per year emissions threshold. However, the 2013-2015 data from the monitor a couple miles away shows attainment of the standard. The Air Program early-certified data from this monitor and submitted a request that EPA designate Brown County as attaining the standard, using EPA's designation guidance and an internal technical analysis. EPA indicated that it will probably not designate the area until the 2017 deadline.

A member of the public asked about the Air Program's confidence that the listed sources subject to further air quality characterization are only those emitting more than 2,000 tons of SO_2 per year (they had heard that Region 5 may require modeling of additional sources). Good responded that the DRR asks for air quality characterization of certain areas. The 2,000 tons threshold was finalized as part of the rule process. However, the rule does leave an opening for characterization of other areas of concern. The DNR list specifically includes sources exceeding the

2,000 ton threshold. The Air Program is aware that EPA may be looking at additional sources, and is sharing its concerns with EPA about ensuring the rule is implemented consistently.

Bender asked which additional sources EPA might be looking at. Good responded that while Georgia Pacific exceeds the 2,000 ton threshold (and was therefore one of the listed sources), there are other power plants and paper mills in the Green Bay area that fall under the threshold but are large emitters. Bender asked how EPA is reconciling potential-to-emit in terms of allowable versus actual emissions. She pointed out that the Green Bay monitor was not showing attainment as of the last study group meeting. She assumes the Air Program is looking at enforceable limitations to keep the monitor in attainment. Good confirmed, and added that the monitor has been showing attainment since 2010, with the exception of the 2012-2014 period. The attainment request shows large reductions in emissions over the last five years (over 30 percent), as a result of permanent enforceable limits at stationary sources. Seven to eight sources make up the majority of emissions in the area. Good remarked that the monitor has not shown a congruent drop in SO_2 concentrations. Bender asked whether the Air Program has modeled large sources in the area. Good responded that the program has in the permitting context, but not with respect to the DRR.

Hoch asked where the monitor is located relative to the maximum SO_2 concentrations in the county. Bizot responded that the Air Program has demonstrated that it believes the location of the current monitor is representative. EPA's 120-day letters for other states show that there are various ways to make this kind of demonstration. Good added that the Green Bay area demonstration is more qualitative at this point, and the Air Program is working with EPA Region 5 to consider strategies to adjust the analysis. Bizot stated that to his knowledge, EPA staff has not yet reviewed the current analysis.

A member of the public asked whether the Air Program would need to model all seven or eight major sources in the Green Bay area, or even more, if it elects to model concentrations to meet DRR requirements,. Good responded that the program will follow EPA's technical support documents for modeling and monitoring. They include processes for determining how facilities impact other facilities. Bizot stated that the Air Program is currently reaching out to all significant sources in the area to keep them updated of implementation status, even though to date only Georgia Pacific has been identified as requiring air quality characterization.

Cook asked whether the Air Program anticipates adding any monitors to the state network. Good responded that some sources are considering that option, but that final decisions have not been made yet. New monitors would be included in the state monitoring network plan, which must be submitted annually to EPA. The draft plan will be released for public comment, and a public meeting is tentatively scheduled for May 20. The program will let the study group know when the draft plan is available for public comment, and invites members' feedback.

Permit streamlining initiative – Phase 2

Kristin Hart, Permits & Stationary Source Modeling Section Chief

Hart introduced the second phase of the DNR's air permit streamlining initiative. The presentation slides are available on the AMSG website under the March 9, 2016 meeting at http://dnr.wi.gov/topic/airquality/amstudygroup.html (starting on slide 13). Hart explained that the Air Program is looking to the study group to inform the priorities for the second phase.

Hart listed the topics that were addressed in the first phase of the streamlining effort, effective December 1, 2015 (slide 14). The initiative was separated into two phases because the Air Program was facing a deadline to develop the natural minor source exemption, which was addressed under the first phase. Slides 15 to 18 list potential items to address under the second phase, including deferred items that were listed on the initial rule scoping statement (slide 15), and deferred items that were suggested in public listening sessions. Hart also listed other rules and initiatives the Air Program is pursuing and prioritizing outside of the streamlining effort (slide 19).

Cook asked which potential phase 2 items are legislatively required. Hart responded that defining "cause or exacerbate" is required. Morgan asked whether the monitoring requirements topic (AM-32-13) listed on slide 19 is

also required by the legislature. Hart said that she believes so; the Air Program was asked to develop a scope statement for rulemaking.

Jaeckels asked which topics would be the likely priorities. Hart stated that priorities may be a result of external factors. For example, the SSM issue is being addressed due to the expected SIP call. On the other hand, the Air Program has more flexibility in addressing reporting, monitoring and recordkeeping requirements (AM-32-13). The existing rule has not kept up with new technology, and there are many revisions people may be interested in pursuing, for example next generation compliance.

Good said that the DNR strategic alignment is driving some priorities, particularly in the areas of permitting and policy development. The Air Program has done a good job over the years of working within its resources and implementing process improvements. However, there is also room for additional improvements. The department is taking the alignment seriously, and it may influence the timing of the Air Program's efforts.

Cook commented that the department and Air Program have done a good job of increasing clarity and efficiency for industry over the last couple of years. However, there have not been similar improvements regarding the Air Program's communication with the public. Cook encourages the program to focus on transparent and efficient public outreach as well. Hart responded that slide 18 addresses permit streamlining ideas that are citizen focused. She also welcomes additional ideas.

Good asked whether the study group felt it would be appropriate to develop a workgroup for the second phase. Hart mentioned that it would need to be run differently than the first phase workgroups. During the first phase, participants were frustrated by the Air Program's approach to sharing information. What worked in the end was sharing documents during meetings and collecting them at the end of the meetings. Posting documents on the internet required too much time and was not a useful approach to sharing information and ideas.

Hart asked study group members to consider the requested areas of input on slide 20 and provide feedback to the program. Good added that she encourages members to review the listed streamlining ideas, consider additional ideas, and submit a priority list to Walsh (karen.walsh@wisconsin.gov) or Hart (kristin.hart@wisconsin.gov).

DNR strategic alignment roundtable

Gail Good, Air Program Director

Andy Stewart, Air Program Director

Good provided an overview of the DNR's proposed priorities for the ongoing strategic alignment effort. These priorities were identified during the department's Core Work Analysis. Good and Stewart collected feedback from attendees on the priorities relevant to the Air Program.