

Air Management Study Group Quarterly Meeting

Madison
June 2, 2016



Air Program Staffing Update

Gail Good

Director, Air Management

WDNR



New Staff

- Kendra Fisher – Permits & Compliance Supervisor, Waukesha

Recent Departures

- Marvin Patton, Permit Writer
- Ted Cauwels, ROP Coordinator
- Steve Dunn, Construction Permit Team Leader
- Bob Eckdale, Rules Coordinator

Pending Recruitment

- Monitoring Section Chief – Central Office
- Two Construction Permit Writers – Central Office, Waukesha
- One Operation Permit Writer – Waukesha
- Four Compliance Inspectors – Eau Claire, Wausau (2), Waukesha
- State Implementation Plan (SIP) Coordinator – Central Office

Ozone Update

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Chief, Regional Pollutants and Mobile Sources Section

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Attainment Request for Kenosha County For the 2008 ozone NAAQS (75 ppb)

- The partial Kenosha County 2008 ozone NAAQS nonattainment area is eligible for redesignation to attainment based on 2013-15 certified monitoring data.
- The county is part of the 11-county Chicago IL-IN-WI 2008 ozone nonattainment area. The three states are coordinating with each other to develop their requests to EPA. LADCO is also providing technical support.
- Wisconsin has a draft redesignation request currently in public review.
- Once submitted to EPA, it is expected that EPA is expected to take about 6 months to review and approve the request.
- Note: EPA cannot approve the request if the area reviolates the 2008 ozone NAAQS (75 ppb) this summer.

Status of the 2016 Ozone Season

Top Four Ozone Concentrations – as of **May 24, 2016**

site	Concentrations (ppb)				2016 Critical values		Days at/above C.V.		Current 2014-2016 "design value"
	1st high	2nd high	3rd high	4th high	2008 std	2015 std	2008 std	2015 std	
NEWPORT PARK	82	73	72	64	89	74	0	1	67
CHIWAUKEE PRAIRIE STATELINE	79	76	69	68	77	62	1	4	73
MANITOWOC - WDLND DUNES	73	72	69	68	85	70	0	2	70
BAYSIDE	77	76	74	68	91	76	0	2	68
GRAFTON	72	71	69	67	84	69	0	3	70
HARRINGTON BEACH PARK	73	72	72	63	87	72	0	3	68
SHEBOYGAN - KOHLER ANDRAE	75	73	71	65	75	60	1	4	72
LAKE GENEVA	75	73	73	69	88	73	0	3	69

2008 NAAQS: 75 ppb
2015 NAAQS: 70 ppb

Exceeds the 2015 NAAQS critical value or design value

Exceeds the 2008 NAAQS critical value or design value

Note: 2016 monitoring data has not been QA'ed and is subject to change

2015 Ozone NAAQS (70 ppb) Area Designations

- The state is currently considering recommendations for nonattainment area designations for the 2015 (70 ppb) ozone NAAQS, due to EPA by October 1.
- These recommendations will be based on 2013-2015 air quality monitoring data. Final designations will be based on 2014-2016 data.

Milestone	Date
States submit area recommendations to EPA	No later than October 1, 2016
EPA notifies states concerning any intended modifications to their recommendations (“120-day letters”)	No later than June 2, 2017
EPA publishes final notice of designation recommendations and initiates 30-day public comment period	On/about June 9, 2017
States submit additional information, if any, to respond to EPA’s modification of a recommended designation	No later than August 7, 2017
EPA promulgates final nonattainment area designations	No later than October 1, 2017

Dates based on EPA’s draft implementation guidance of 1/27/2016

2015 Ozone NAAQS (70 ppb) Area Designations

Option 1

For October 1, 2016 submit initial area designation recommendations based on final 2013-15 data (or 2016 YTD/partial ozone season data)

Option 2

For October 1, 2016 submit recommendation of attainment for all counties

- Wait to see 2014-16 data
- Similar to what was done for 2008 ozone NAAQS designations

Option 2A: Submit updated recommendations following conclusion of 2016 ozone season but before EPA proposes area designations on June 2, 2017

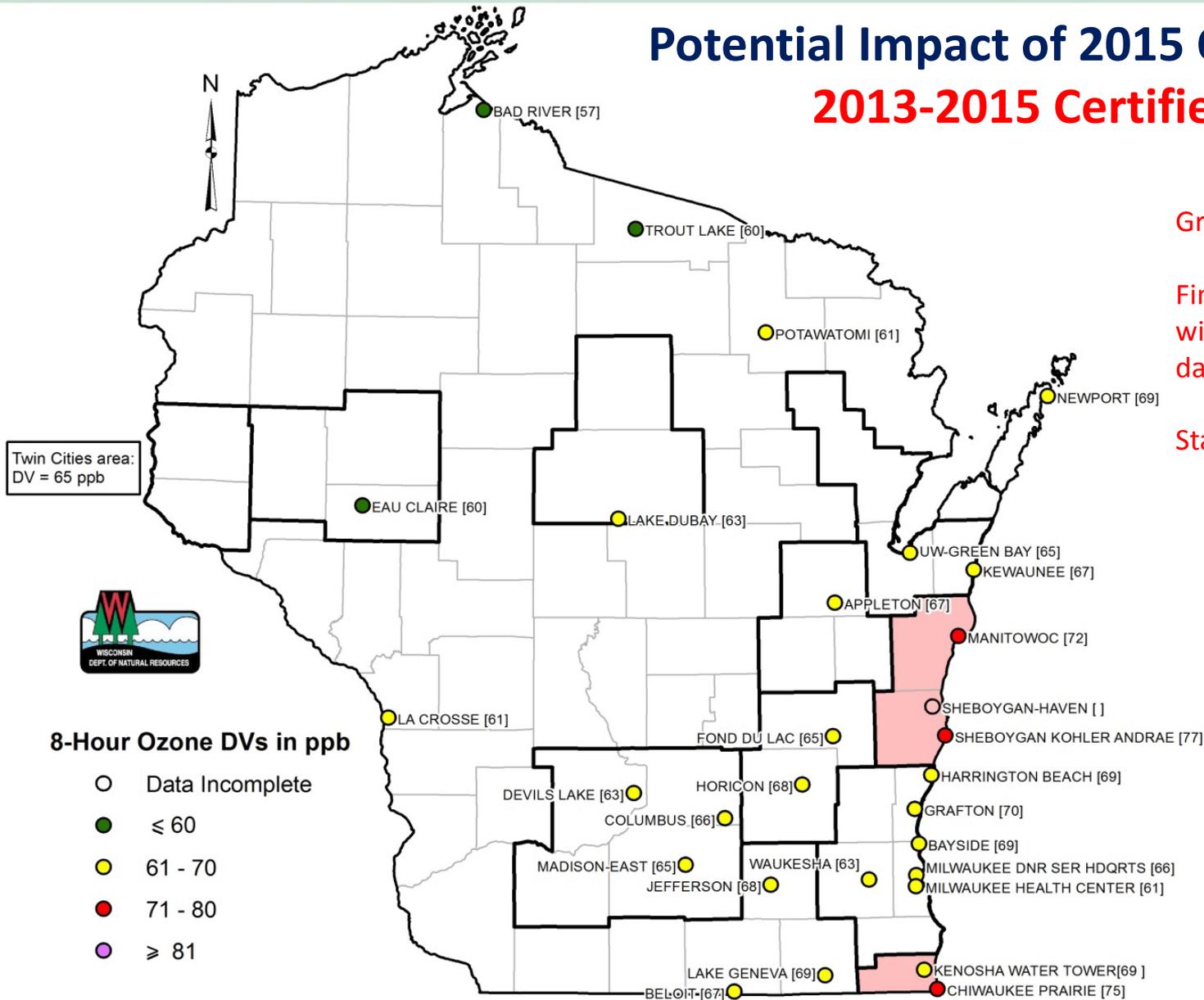
Option 2B: Submit updated recommendations after EPA proposes designations on June 2, 2017

Potential Impact of 2015 Ozone NAAQS: 2013-2015 Certified Data

Graphic is illustrative only.

Final nonattainment areas will be based on 2014-16 data.

Statistical areas outlined
Red areas = marginal



Contact Information

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Air Permit Program Update

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Streamlining Rule Implementation

- Natural Minor Operation Permit Exemption
- New Type B Registration Permit
- Non-Title V Expiration Changes
- New Emergency Engine Exemption
- Changes to “Commence Construction”



Natural Minor Exemption

- Exempts a “natural minor” source from the need for an operation permit
- Natural Minor source is defined as:
 - Not a Part 70 source
 - Not a major source
 - Not a synthetic minor source
- Streamlining Target: Sources with State Operation Permit applications that have no plans for new construction
- Issues: Construction permitting still applies
- Numbers: Exemptions requested and approved for 4 facilities
- Resources available at:
<http://dnr.wi.gov/topic/SmallBusiness/Exemptions.html>



Type B Registration Permit

- Form of General Permit where the source category is “low emitting” facilities.
- Caps emissions to 50% of the major source thresholds (generally 50 tons/yr of criteria pollutants and 5 tons/yr each and 12.5 tons/yr total federal hazardous air pollutant)
- Permit is written for the source category, undergoes notice and public comment and is issued.
- Eligible sources apply for and coverage under the permit determined in 15 days of complete application.



Type B Registration Permit

- Streamlining Target : Facilities emitting less than 50% of the major source threshold
- Issues
 - Case by case limits (BACT under major new source review or BACT for state hazardous air pollutant rule)
 - Limits taken to avoid major new source review
- Numbers: 10 Type B Registration Permit applications; coverage granted for 6 facilities
- Resources available at:
<http://dnr.wi.gov/topic/AirPermits/Options.html>



Changes to Non-Part 70 Permit Expiration

- Rules changed so that an expiration date is no longer required to be included in a non-Part 70 source permit
- Existing Non-Part 70 source permits still expire, sources must apply for renewal.
- New Non-Part 70 source permits do not have an expiration date.
- DNR can set an expiration date for “cause”
 - DNR plans to renew 2-4 non-Part 70 permits each year
- Revisions are main tool for keeping permits up to date



Changes to Non-Part 70 Permit Expiration

- Streamlining Target: Non-Part 70 source permit holders including natural minor and synthetic minor sources
- Issues
 - Communication about what permit covers and how that doesn't change over time
 - Process for removing expiration date from existing non-Part 70 source permits
- Numbers: 30 non-Part 70 source operation permits have been issued under new rules
- Resources available at:
<http://dnr.wi.gov/topic/SmallBusiness/PermitTypes.html>



Change to Definition of “emergency generator”

- New rule written to define a “restricted use engine”
- Relies on definitions in RICE rules for black start, emergency, and limited use engines
- Streamlining Targets:
 - Facilities installing fire pumps, and other engines used infrequently and under exceptional conditions
 - Facilities subject to both state and federal rules
- Issues: Rules still complex
- Numbers: Facilities are not required to request exemption
- Resources:
<http://dnr.wi.gov/topic/SmallBusiness/Exemptions.html>



Changes to Commence Construction

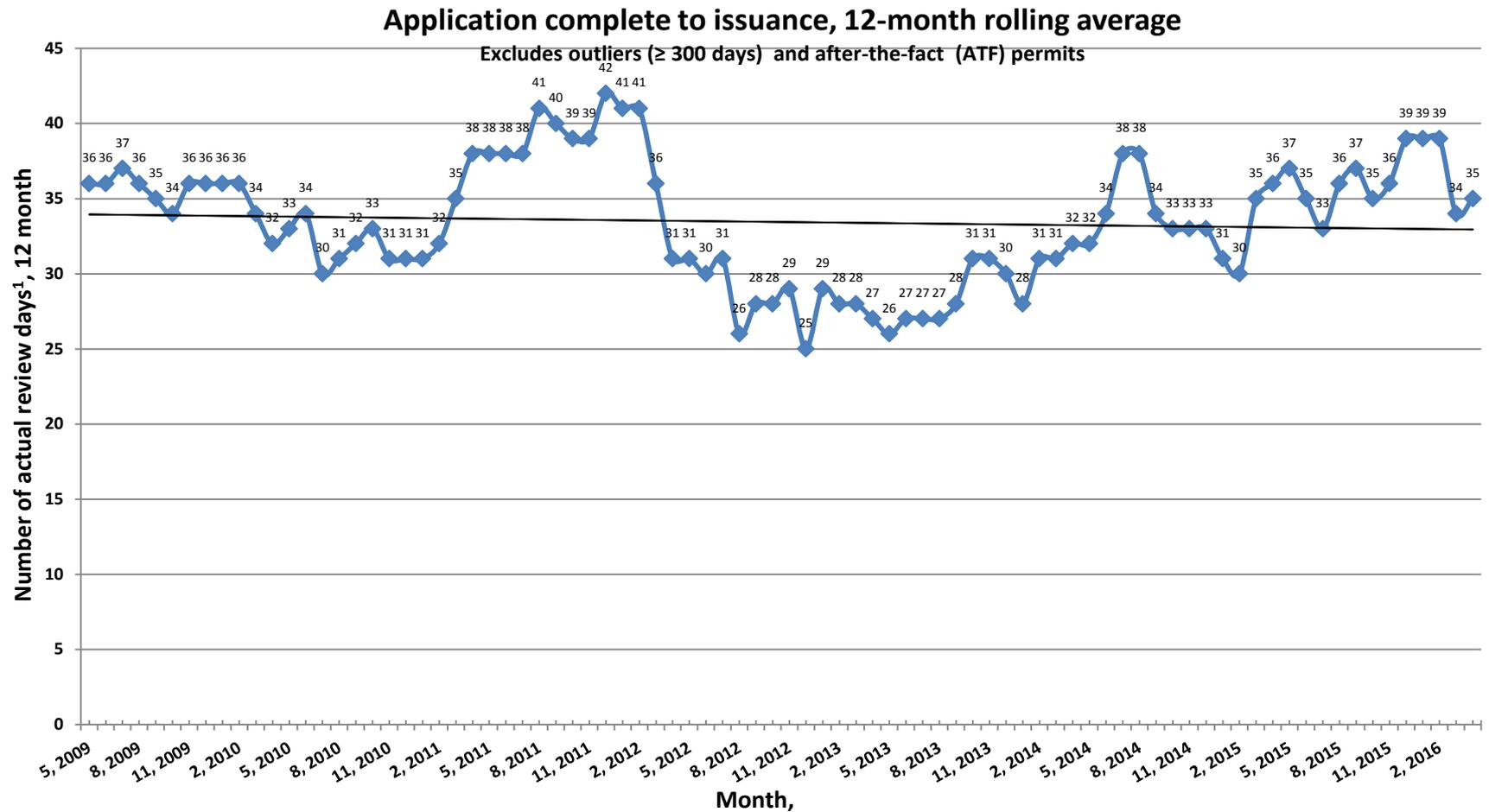
- Exclusion added in minor source construction permit regulations such that certain activities would not constitute commence construction
- *[...] has commenced:*
 - (a) *Installation of building supports or foundations.*
 - (b) *Laying underground piping or conduit.*
 - (c) *Erecting storage structures.*
 - (d) *Dismantling existing equipment or structures.*
 - (e) *Ordering equipment or control devices.*
 - (f) *Temporary storage of equipment on site.*
 - (g) *Site clearing.*
 - (h) *Programs undertaken to locate underground utilities.*
 - (i) *Installation of erosion control measures.*
 - (j) *Paving.*



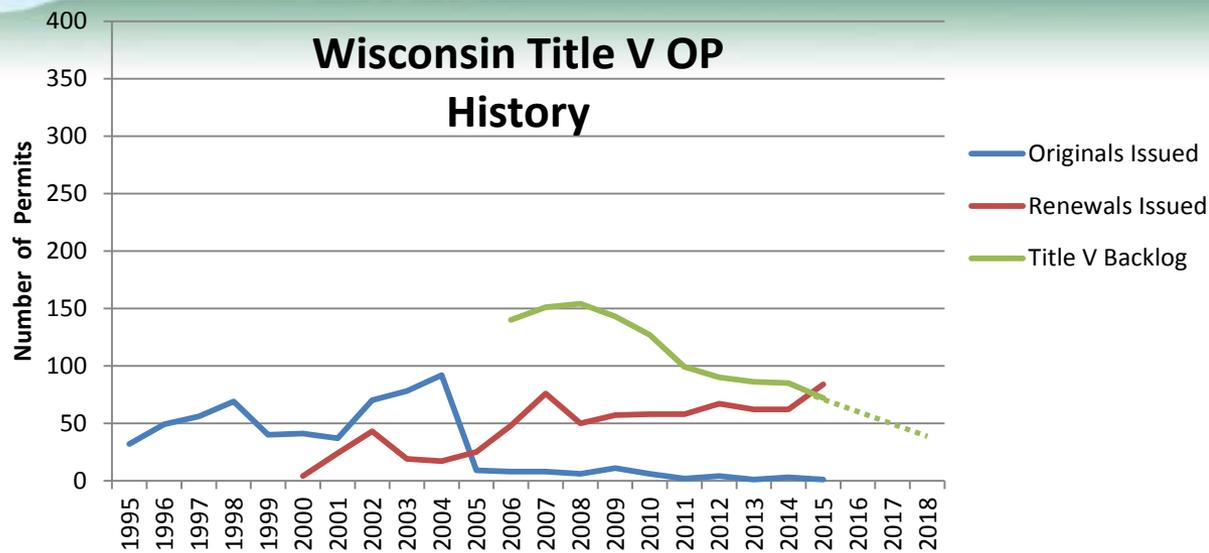
Changes to Commence Construction

- Streamlining Target: Facilities presently utilizing construction waiver allow site preparation prior to ground freezing
- Issues
 - Source subject to major new source review must meet definition of “commence construction/modification” in chs. NR 405 or NR 408
 - No guarantee of permit approval, so commencing construction should be done cautiously
 - Rule change not yet SIP approved; Submitted for EPA approval in April
- Numbers: Not yet being used; awaiting SIP approval by EPA

Construction Permit Metrics



¹ Note: each construction permit requires a mandatory 30-day public comment period. The numbers shown in the chart are after subtracting 30 days to show actual



1995 - Title V OP program began.

2000 - First issuance of Renewals (five years after 1995).

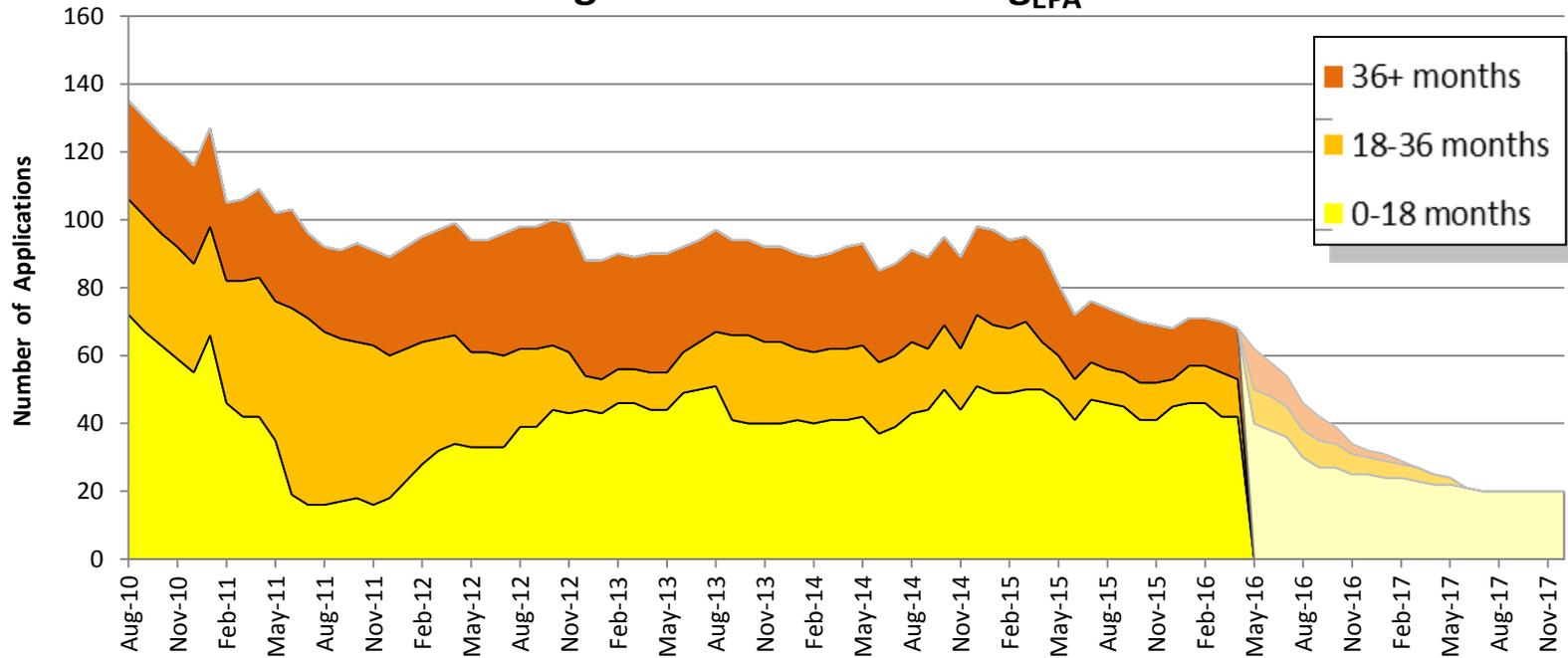
2004 - All Originals issued due to "Governor's 148" effort.

2006 - Started tracking our backlog of Title V Renewals. Since 2008, this improved monitoring of backlog progress has resulted in improved performance.

As more old applications have been removed from the Title V Backlog, the ease with which newer Renewal applications are addressed has significantly improved.



'Age' of Renewal Backlog_{EPA}



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Next Steps

- SIP approval as appropriate for elements in current streamlining rule
- Streamlining Rule Part 2
 - Define “cause or exacerbate”
 - Administrative revision process for construction permits
 - Examine definitions of “reconstruction” and “shutdown” in the context of major sources
- Implement tools for efficient, accurate, consistent permit issuance
 - Setting realistic timelines with permittees
 - Improved application forms
 - Standard language for permit conditions

Contact Information

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2017 Monitoring Network Plan

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Air Monitoring 2017 Network Plan Highlights

- Requesting waiver from extended ozone season
- Meteorological monitoring evaluation
 - Shutdown of meteorological monitors at six sites
 - Adjustment of sensor heights at five sites
- Potential shutdown of PAMS site at Milwaukee HQ office
- Move Kohler Pb site to accommodate work at facility
- Potential administration of new source-oriented SO₂ monitors
- Shutdown of Potawatomi NO_x monitor



Air Monitoring 2017 Network Plan Highlights

- Transition to new data acquisition system (WAMDAS)
- Broadband/Remote Operations
 - 3G to 4G transition
- Conversion of PM2.5 FRMs method code
- Conversion of PM2.5 BAMS to Federal Equivalent Method configuration
- Continued evaluation of performance of PM2.5 FRMs/FEMs
- Evaluation of industrial sand variance requests
- SOP and QAPP development



Air Monitoring 2017 Network Plan Next Steps

- May 20, 2016 – Annual Network Plan posted on DNR webpage and comment period begins
 - <http://dnr.wi.gov/topic/AirQuality/Monitor.html>
- June 2, 2016 – Public meeting
- June 20, 2016 – Comment period ends
- By July 1, 2016 – Submit annual network plan to EPA

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