

AIR MANAGEMENT - JOINT PRIORITIES AND PARTNERING

Program Leads

Region 5: Cheryl Newton

WDNR: John Melby

	WDNR and/or Region 5 Activity AIR MANAGEMENT	Performance Measures / Outcomes	Measures / Target Numbers	WDNR and/or Region 5 Evaluation Date
1	<p><b>Midwest Clean Diesel Initiative</b> EPA and WDNR will work together to reduce diesel emissions in the Midwest Region. EPA is leading a Regional Initiative focusing on (but not limited to) ports, agriculture, rail, and border communities. WDNR will participate in the Initiative.</p>	<p>In 2007 created the WI Diesel Workgroup to help achieve our goals under the MCDI. Will work collaboratively with stakeholders to identify, develop and implement strategies to voluntarily reduce diesel emissions in WI.</p>	<p>Goal is to impact 50,000 diesel engines in WI by 2010.</p>	
2	<p><b>Regional Pollutant Issues</b> EPA, WDNR and Other LADCO states will work together to implement Clean Air Act requirements for attainment of the ozone NAAQS, attainment of the PM2.5 NAAQS and meeting progress goals for regional haze. EPA will supply timely guidance to assist the multi-state process. WDNR will develop SIPs to attain the NAAQS for ozone and PM2.5 in Eastern Wisconsin and implement CAIR in Wisconsin.</p>	<p><b>Ozone</b> Submit nonattainment recommendations for a revised ozone standard by 12/10. If necessary, revise VOC RACT rules to make the rules consistent with the CTGs.</p> <p><b>Fine Particulate Matter</b> Develop base-year inventory for chemical transport modeling by 6/10.</p> <p><b>Haze</b> Submit SIP by 12/10.</p> <p><b>Interstate Transport</b> Implement CAIR</p>	<p><b>Ozone</b> EPA is scheduled to revise the ozone NAAQS by 8/10</p> <p><b>Fine Particulate Matter</b> 35 ug/m3 24 hr avg<sup>2</sup> and 15 ug/m3 annual arithmetic mean.<sup>3</sup></p> <p><b>Haze</b> No anthropogenic contribution to haze by 2064.</p> <p><b>Interstate Transport</b> No significant contribution to nonattainment in another state</p> <p>EPA is scheduled to propose a revision to the CAIR by spring 2010.</p>	

**A. AIR MANAGEMENT**

**Workplan**

**A.1. Air Management – Environmental Studies**

<b>WDNR and/or Region 5 Activity Air Management</b>	<b>Funding Source</b>	<b>Performance Measures or Outcomes</b>	<b>WDNR and/or Region 5 Evaluation</b>
<p><b>Community Air Toxics - Continued Expansion of RAIMI Efforts</b></p> <p>The next phase of activities will consist of data compilation and analysis, focusing specifically on foundries. These may be initiated in FY10; however, this will ultimately depend on progress made on the performance measures/outcomes associated with this item. Work during the next phase will include:</p> <ul style="list-style-type: none"> <li>• WDNR and Region 5 staff will evaluate data to identify facilities with unique emissions characteristics or for which emissions data may otherwise warrant further examination.</li> <li>• Based on the facilities/data identified, WDNR and Region 5 staff will work together to first define the criteria that will be used to prioritize the list, and then to develop a prioritized list of facilities.</li> <li>• WDNR and Region 5 staff will work together to develop preliminary proposals for actions or next steps at/related to the highest priority facilities, and to develop a broader plan for addressing all of the facilities identified on the list.</li> </ul> <p>Depending on progress, WDNR and Region 5 staff may agree to move forward with proposed actions or next steps at select facilities. This may include a collaboration to seek voluntary emissions reductions or, as appropriate, mandatory reductions to reduce public exposure to air toxics from these facilities.</p> <ul style="list-style-type: none"> <li>• Region 5 will arrange two conference calls during each year of the EnPPA to discuss progress on the project.</li> </ul> <p>In addition, the WDNR has partnered with the Wisconsin Department of Health to communicate public health impacts of air pollution to local health departments and the public through an Environmental Public Health Tracking Program. Associated with this, the WDNR is working with</p>	<p>105/State</p>	<ul style="list-style-type: none"> <li>• WDNR will work with EPA Region 5 staff to evaluate data to identify gaps or potential errors.</li> <li>• Based on the evaluation, WDNR and Region 5 staff will work to improve reporting and/or make necessary corrections to the emissions inventory.</li> <li>• Improvements or corrections will include standardizing emissions by calculating those either not captured or without emission factors at this time.</li> </ul>	

<b>WDNR and/or Region 5 Activity</b> <b>Air Management</b>	<b>Funding Source</b>	<b>Performance Measures or Outcomes</b>	<b>WDNR and/or Region 5 Evaluation</b>
the University of Wisconsin to develop maps of air pollution using the RAIMI modeling. WDNR will provide updates on this work to Region 5 at the twice-annual conference calls for the foundries project.			
<p><b>Climate Change</b> Due to the number of initiatives relating to climate change still under development at the state and Federal levels, this agreement is focused on communication and coordination activities.</p> <p>Region 5:</p> <ul style="list-style-type: none"> <li>• Act as a convener with other Region 5 states, including arranging a regional face-to-face meeting in fall/winter 2009 and hosting regular conference calls.</li> <li>• Keep WDNR informed of regional/state briefings, webinars and other training and outreach initiatives planned by EPA HQ.</li> <li>• Provide access to EPA staff and/or analyses to assist with interpreting the ramifications of Federal rules and legislation.</li> <li>• Provide training and information or otherwise collaborate with WDNR on emissions inventories, including identification and/or development of emission factors for carbon equivalence.</li> <li>• Coordinate climate change activities with ongoing criteria and toxic pollution reduction activities to maximize air quality benefits.</li> </ul> <p>WDNR:</p> <ul style="list-style-type: none"> <li>• Participate in regional conference calls.</li> <li>• Attend the regional, face to face meeting, tentatively planned for fall/winter 2009.</li> <li>• Inform Region 5 of state/local initiatives and progress on related goals.</li> <li>• Assist Region 5 with marketing federal partnership programs related to climate change.</li> <li>• Participate with Region 5 on their Municipal Initiative.</li> </ul>	105/State		
<b>Atmospheric Deposition Monitoring</b>  WDNR:	105		

<b>WDNR and/or Region 5 Activity</b> <b>Air Management</b>	<b>Funding Source</b>	<b>Performance Measures or Outcomes</b>	<b>WDNR and/or Region 5 Evaluation</b>
<ul style="list-style-type: none"> <li>• Purchase and operate a Tekran continuous mercury monitoring system, in accordance with existing AmNet monitoring protocols, at the Horicon Marsh NCore monitoring site.</li> <li>• Measure progress resulting from the recently adopted mercury rule (with the multi-pollutant option) in Wisconsin and nearby states e.g., Minnesota and Illinois</li> </ul>			

B.2. Air Management – Regional Pollutant & Mobile Source Planning

<b>WDNR and/or Region 5 Activity Air Management</b>	<b>Funding Source</b>	<b>Performance Measures or Outcomes</b>	<b>WDNR and/or Region 5 Evaluation</b>
WDNR will develop and submit haze SIP including BART determinations and reasonable progress control programs as expeditiously as practicable.		BART determinations and reasonable progress haze SIP submittal	
EPA will rulemake on WDNR's Haze SIP, including BART, as expeditiously as possible once the SIP has been submitted			
EPA will rulemake on WDNR's 8-hour ozone attainment demonstration and redesignation requests as expeditiously as possible.			
The Governor of Wisconsin will submit nonattainment recommendations for the new 8-hour ozone standard 4 months after EPA promulgates the standard.		Letter with supporting documentation recommending ozone nonattainment areas in WI.	
EPA will evaluate the state's recommendations when making determinations of nonattainment areas and determining the size of the nonattainment areas			

B.3. Air Management – Permits

<b>WDNR and/or Region 5 Activity Air Management</b>	<b>Funding Source</b>	<b>Performance Measures or Outcomes</b>	<b>WDNR and/or Region 5 Evaluation (FY'08)</b>
<p><b>WDNR</b> Issue major source permits within statutory limitations and ensures each construction permit issued includes conditions for all applicable state and federal requirements and is processed according to state and federal laws and regulations. The construction permit program is funded by the program revenue it generates, separate and distinct from emissions fees.</p> <p><b>Region 5</b> Provide clarification on USEPA guidance and federal laws and regulations as requested.</p> <p><b>WDNR</b> Utilize the electronic permit file protocol for submitting permit documents to Region 5. Eliminate submittal of hard copies.</p>	<p>State</p>	<p>Number of permits issued vs. number of permit applications received.</p> <p>Number of days on average between date of complete application and date of permit issuance.</p> <p>Timely update of RACT/BACT/LAER Clearinghouse of major PSD/NSR permit issuance</p> <p>Consistency in permit requirements</p> <p>Ensure effective communications through bi-monthly conference calls between WDNR/Region 5 providing updates on PSD/NSR permit applications</p>	
<p><b>WDNR</b> Evaluate and propose revisions to major and minor NSR permit program as necessary Evaluate and propose revisions to Title V permit program Develop a Title V permit renewal policy</p>	<p>State</p>	<p>Submit proposed revisions to SIP for major sources of NSR and Title V program to incorporate federal revisions pertaining to PM2.5 by Jan. 2011.</p> <p>Develop renewal issuance strategy to eliminate backlog of Title V permit renewals by 2012</p> <p>Primary focus for FY10 is to issue renewals for sources of power generation</p>	

<b>WDNR and/or Region 5 Activity Air Management</b>	<b>Funding Source</b>	<b>Performance Measures or Outcomes</b>	<b>WDNR and/or Region 5 Evaluation (FY'08)</b>
		Ensure effective communications through bi-monthly conference calls between WDNR/Region 5 providing updates on Title V renewals & revisions	
<p><b>WDNR</b> Evaluate the need for changes to the NSR and Title V permit programs in order to respond to issues raised through the Title V petition process.</p> <p><b>Region 5</b> Work with WDNR to help clarify issues and expectations raised through the petition process. Provide assistance when requested</p>	State	Submit proposed revisions to SIP for major sources of NSR and Title V program to incorporate changes as necessary to implement program changes.	
<p><b>DNR</b></p> <p><b>Region 5</b></p>	State	Notify Region 5 and include Region 5 on all agendas for air management monthly permit conference calls.	
<p><b>WDNR</b> Evaluate program implementation in the Regions and Central Office to determine what additional tools are desirable to help permit writers issue operation permits. As part of this task, review and evaluate existing tools and procedures and recommend changes to improve efficiency.</p> <p><b>Region 5</b> Provide federal permit guidance when issued, provide specific assistance when requested, participate in monthly WDNR permit calls and quarterly regional permit calls.</p> <p>Assist WDNR in their efforts for permit streamlining initiatives such as: IT Improvements Source modeling Concurrent Title V permit review</p>	State	Continued improvement.	
<p><b>WDNR</b> Provide stationary source/permit tracking database updates on a weekly basis</p>	State	Electronic submittal of tracking information	

<b>WDNR and/or Region 5 Activity</b> <b>Air Management</b>	<b>Funding Source</b>	<b>Performance Measures or Outcomes</b>	<b>WDNR and/or Region 5 Evaluation (FY'08)</b>
Provide TOPs information on a semi-annual basis  <b>Region 5</b> Evaluate and review EPA proposals with regard to TOPs and any other data entry and management for operation permit issuance.		Electronic submittal of tracking information	
<b>WDNR</b> Evaluate and respond to EPA program review inquiries and efforts.	State	DNR participates in conference calls. DNR responds to written drafts with written comments within at least 6 weeks of receipt.	
<b>WDNR</b> Participate in regional meetings and communication with states and Region V on collaborative evaluation and discussion of issues facing Part 70 or NSR permit issuance or the programs.  <b>Region 5</b> Organize meetings including meetings, conference calls and agendas.	State	DNR and Region 5 participate in conference calls. Participate in meetings as time and resources allow.	
<b>WDNR</b> Participate in training with states and Region V on issues facing Part 70 permit issuance. WDNR contribute to training.  <b>Region 5</b> Organize meetings including meetings, conference calls and agendas for training on issues facing NSR and Part 70 permit issuance.	State		

B.4. Air Management – Compliance

WDNR and/or Region 5 Activity Air Management	Funding Source	Performance Measures or Outputs	WDNR and/or Region 5 Evaluation
WDNR will support the AFS and electronic HPV databases in accordance with the WDNR – EPA Region 5 compliance and enforcement MOU.	WDNR: 235 & 236 funds	Outcome: accurate presentation of Wisconsin data in AFS; completion of data uploads in accordance with the MOU.	
Implementation of the EPA CMS policy in accordance with the WDNR – EPA Region 5 compliance and enforcement MOU.	WDNR: 235 & 236 funds EPA: pending FY10/11 enforcement budget.	Outcome: Full implementation of the CMS policy by the end of state FY '10.	
Implementation of the EPA HPV policy in Wisconsin in accordance with the WDNR – EPA Region 5 compliance and enforcement MOU.	WDNR: 235 & 236 funds, other funding source EPA: pending FY10/11 enforcement budget.	Absence of HPV policy issues identified via the SRF process that are appropriate for resolution as part of EnPPA	
Assure Air Program violations in Wisconsin are accurately characterized as HPV or non-HPV.	WDNR: 235 & 236 funds EPA: pending FY10/11 enforcement budget.	WDNR HPV evaluation forms are completed, compiled, and available for review for all LON's and NOV's issued (excludes asbestos, late AEMS submittals, open burning, and NR 445 violations, per the WDNR – EPA Region 5 compliance and enforcement MOU).	
WDNR and EPA will implement the State Review Framework (SRF) process steps for the Air Program during federal fiscal year '10.	WDNR: 235 & 236 funds EPA: pending FY 10/11 enforcement budget.	Completion of the Air Program portion of the final SRF report by July 9, 2010.	
EPA will support the Region 5 States Autobody ERP project by conducting up to 140 post-certification inspections in the Region 5 States during the second half of federal fiscal year '11.	EPA: pending FY 10/11 enforcement budget.	Completion of the post-certification inspections by September 30, 2011.	

B.5. Air Management – Monitoring

<b>WDNR and/or Region 5 Activity</b> <b>Air Management</b>	<b>Funding Source</b>	<b>Performance Measures or Outputs</b>	<b>WDNR and/or Region 5 Evaluation (FY'08)</b>
<p>WDNR</p> <p>Establish, operate and maintain a comprehensive air quality monitoring network in accordance with the regulations specified in Title 40 Code of Federal Regulations Part 58, as well as U.S. EPA guidelines to identify and assess local air quality problems.</p>	<p>105/State</p>	<p>Trends in ambient air quality for the criteria pollutants.</p> <p>Emission reductions since 1990 for the criteria pollutants, as discussed in each annual edition of EPA's <i>National Air Pollution Emission Trends Report</i>.</p> <p>Establish PSD database for prevention of future air quality deterioration (Indian Tribes). Timely, quality –assured, submittal of criteria and toxics monitoring data to AQS database. Efforts will be made to submit end of ozone season data to AQS within 45 days of end of ozone season for final ozone data submittal.</p> <p>Maximization of resources to enhance performance and capabilities to meet changing monitoring needs.</p>	
<p>WDNR</p> <p>Submit quality assured air-monitoring data to AQS in accordance with USEPA deadlines. Annually certify the AQS data.</p>	<p>105/State</p>		
<p>WDNR</p> <p>Forecast air pollution health advisories and episodes and keep the public Informed of health advisories and Ozone Action Days.</p> <p>Realign the Air Quality Index (AQI) with the new 24-hour PM2.5 standard (35ug/m3) and the new 8-hour O3 standards.</p>	<p>105/State</p>		

<b>WDNR and/or Region 5 Activity Air Management</b>	<b>Funding Source</b>	<b>Performance Measures or Outputs</b>	<b>WDNR and/or Region 5 Evaluation (FY'08)</b>
Cooperate with Indian Tribes and industrial sources; advise them and assist them with ambient air monitoring needs including siting, QA, and submittal of data to AQS. Specifically continue to provide assistance to the Bad River Tribe with PM2.5, ozone and meteorological monitoring efforts and the Forest County Potawatomi Tribe with PM2.5, ozone, sulfur dioxide, elemental mercury (Tekran), meteorological and atmospheric deposition monitoring efforts.	105/State		
<p>WDNR</p> <p>Monitor for hazardous air pollutants and atmospheric deposition of sulfates, strong acids, mercury, other metals and air toxics including establishment, operation and maintenance of a National Air Toxics Trends (NATT) station near Horicon, WI to measure rural background toxics.</p> <p>Measurement of roadway air toxics at numerous sites in Milwaukee and Madison as required by a new 103 Community Assessment Air Toxics (CAAT) Monitoring Grant beginning late in 2008.</p> <p>Includes performing periodic updates to QAPP for toxics air monitoring program.</p>	105/State		
<p>EPA</p> <p>Review all monitoring networks from a regional perspective, annually and submit network changes to USEPA for approval.</p> <p>WDNR</p> <p>Conduct critical assessment of ongoing needs for individual monitoring sites during network review process.</p> <p>Prepare an annual network plan, provide 30-day public inspection and comment period, and submit the plan to Region 5 in accordance with 40 CFR part 58.</p> <p>Participate with other states and LADCO in the Region V 5-Year Network Review process.</p>	105/State	<p>WDNR</p> <p>Submit 5-Year Network Review in July 2010.</p>	
<p>WDNR</p> <p>Lead Monitoring -</p>			

<b>WDNR and/or Region 5 Activity Air Management</b>	<b>Funding Source</b>	<b>Performance Measures or Outputs</b>	<b>WDNR and/or Region 5 Evaluation (FY'08)</b>
<ul style="list-style-type: none"> <li>- With EPA's support, identify an appropriate lead monitoring site at Kohler.</li> <li>- Install and have operable collocated TSP lead samplers at Kohler site by January 1, 2010.</li> </ul>			
<p>EPA</p> <p>Work with WDNR to approve a Federal Equivalent Method for lead filter analysis.</p>			
<p>WDNR</p> <p>WDNR's Information Technical Team will evaluate the costs and benefits of moving to a digital data collection system, including the use of broadband.</p>	103/105		
<p>WDNR</p> <p>Continue operation and maintenance of a fine particulate monitoring network consisting of the following components:</p> <ul style="list-style-type: none"> <li>- 19 FRM PM2.5 monitoring stations</li> <li>- 13 Continuous PM2.5 monitoring stations (includes move of Milwaukee FAA to Milwaukee College Avenue site and move of rural Mayville to Horicon NCore location)</li> <li>- 4 PM2.5 Manual Speciation monitoring stations</li> <li>- 1 Continuous PM2.5 Speciation monitoring station</li> <li>- 1 Hazecam Site in Milwaukee</li> <li>- Recommence operation of 1 Hazecam Site in Horicon, funding permitting</li> </ul> <p>Annually, perform review of 3 complete years of quality assured PM2.5 data to determine compliance with NAAQS for PM2.5</p>	103/105	<p>Establish Attainment/Non-attainment designations.</p> <p>Reallocation of PM2.5 resources to perform PM2.5 monitoring at other locations, upgrade existing continuous PM2.5 samplers with new hardware to enhance correlation of PM2.5 FRM and continuous measurements and to establish additional continuous PM2.5 stations.</p>	
<p>WDNR</p> <p>Continue to evaluate operation of continuous PM2.5 monitors (TEOMS) through retrofitting of upgrade hardware and an annual maintenance program of TEOM drier replacement on existing continuous PM2.5 samplers (TEOMS) to enhance correlation of FRM and continuous PM2.5 measurements.</p> <p>Continue to coordinate operation of fine particulate (mass and speciation) monitors at Horicon and Perkinstown to support the regional haze program.</p>	103/105	<p>Reduction of FRM sampling frequency at collocated FRM/continuous PM2.5 monitoring sites following collection of sufficient data to assure acceptable correlation of FRM and continuous measurements. FRM frequency will be reduced when approval for reduction is granted by Region 5 USEPA.</p>	

<b>WDNR and/or Region 5 Activity Air Management</b>	<b>Funding Source</b>	<b>Performance Measures or Outputs</b>	<b>WDNR and/or Region 5 Evaluation (FY'08)</b>
<p>WDNR</p> <p>Continue to report FRM and continuous fine particulate data to USEPA.</p> <p>Continue to report continuous fine particulate data to AIRNOW.</p>	103/105	FRM and continuous PM2.5 data will be submitted to AQS database meeting USEPA requirements for timely submittal.	
<p>WDNR</p> <p>Continue programming effort to improve WISARDs data acquisition system.</p>	103/105		
<p>WDNR</p> <p>Establish, operate and maintain RADNET monitoring station at Milwaukee and possibly in Madison at a later date.</p>	105	Submit collected RADNET samples to lab for analysis. Submit required documentation for samples.	
<p>WDNR</p> <p>Perform all required quality assurance activities</p>	103/105	<p>Participate in all audit programs, including the National Performance Audit Program (NPAP), Performance Evaluation Program (PEP), and interlaboratory audits</p> <p>Certify the primary ozone photometer on an annual basis with U.S. EPA</p> <p>Conduct performance audits and checks at all monitoring sites as per 40 CFR part 58, Appendix A</p> <p>Operate according to a Quality Assurance Project Plan (QAPP) approved by Region 5</p>	
<p>WDNR</p> <p>Develop a Quality Management Plan (QMP) and periodically review and update the QMP.</p>	103/105		