USEPA has promulgated daily and annual National Ambient Air Quality Standards for particulate matter with aerodynamic diameter of 2.5 micrometers or less (PM$_{2.5}$), and one-hour standards for both sulfur dioxide (SO$_2$) and nitrogen dioxide (NO$_2$). As these standards are incorporated into the Wisconsin Administrative Code, and the Wisconsin State Implementation Plan, they will be addressed during dispersion modeling performed in support of air pollution control permits. During 2010 and 2011, Air Management staff and supervisors discussed options, and formulated the attached policy.

cc: AMT
Air attorneys – LS/8

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1 This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. This guidance does not establish or affect legal rights or obligations and is not finally determinative of any of the issues addressed. This guidance does not create any rights enforceable by any party in litigation with the State of Wisconsin or the Department of Natural Resources. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.
The procedures outlined in this document apply to TSP, PM\textsubscript{10}, direct emissions of PM\textsubscript{2.5}, NO\textsubscript{x}, SO\textsubscript{2}, CO, and Pb.

**Nonattainment Area (NAA) Sources:**

**Major Construction Projects that Require a Chapter NR 408 Permit (including After the Fact (ATF))**
For the pollutant considered nonattainment, the facility is required to obtain emission offsets for the construction project at the ratio specified in Ch. NR408, Wis. Adm. Code. Offsets may come from anywhere in the nonattainment area, including shutdowns at the facility itself. Modeling is not required at this time, but future USEPA guidance may recommend modeling to show that offsets benefit the area in question. For any other pollutants emitted at the facility, refer to the appropriate section below.

**Minor Construction Permit (including ATF, Portable Source Relocation, and Exemptions where modeling is requested)**
For the pollutant considered nonattainment, the facility may model project emissions to be below Significant Impact Level (SIL), obtain emission offsets, or provide a demonstration that the project meets s. 285.63(1)(b), Wisconsin Statutes. Offsets should be 1 ton increase to 1 ton decrease (1:1) and otherwise conform to nonattainment area guidance.

**Major/Minor Operation Permit**
Operation permits in the PM\textsubscript{2.5} NAA area cannot be modeled for the non-attainment area pollutant because the background concentration in this area has been shown to be over the standard. Dispersion modeling for all other pollutants should be performed per the Attainment Area policy. For PM\textsubscript{2.5} the facilities should be informed that further regulatory action may be necessary to bring the area back into attainment, and this may occur outside the usual permit schedules. If EPA promulgates NAA for SO\textsubscript{2} or NO\textsubscript{2}, this approach should be applied for those pollutants as well.

**Attainment Area Sources:**

**Major PSD Permit (including ATF)**
Project may model below the Significant Impact Level (SIL) for the pollutants that will have a significant net emissions increase from the proposed project. If SIL cannot be met, increment and NAAQS (traditional standards plus PM\textsubscript{2.5}, 1-hour SO\textsubscript{2}, and 1-hour NO\textsubscript{2}) for those reviewed pollutants for all nearby sources should be modeled. If a SIL has not been promulgated for a standard, the lowest SIL proposed or presumed by EPA will be used until promulgation. Increment will not be considered until baselines are set for the pollutant. If the SIL is not met in an analysis for PSD for a pollutant without an increment standard, the facility (and nearby sources) will have to model against the NAAQS.

**Minor Construction Permit, Baseline County (including ATF, Portable Source Relocation, and Requested Exemption modeling)**
Project may model below applicable SIL, otherwise all increment sources plus single facility NAAQS should be modeled for all pollutants that have an ambient air quality standard promulgated in the Wisconsin Administrative Code. Refer to sections on modeling Major PSD permits regarding SIL and increment. Portable sources are not modeled against the increment due to the temporary nature of the emissions. Minor construction permit applications at non PSD major Title V sources will be reviewed for PM\textsubscript{2.5} emissions if the application is received on or after April 15, 2011. Minor construction permit applications at Title V major sources will be reviewed for PM\textsubscript{2.5} emissions if the draft permit has not gone to public comment by April 15, 2011 regardless of permit application date. (Applicable for 1-hour NO\textsubscript{2} and 1-hour SO\textsubscript{2} upon effective date of the air quality standard within the Wisconsin Administrative Code)

**Minor Construction Permit, Non-baseline County (including ATF, Portable Source Relocation, and Requested Exemption)**
Project may model below SIL, otherwise single facility NAAQS should be modeled for all pollutants that have an ambient air quality standard promulgated in the Wisconsin Administrative Code. Refer to sections on modeling Major PSD permits regarding SIL. Minor construction permit applications at non PSD major Title V sources will be reviewed for PM\textsubscript{2.5} emissions if the application is received on or after April 15, 2011. Minor construction permit applications at Title V major sources will be reviewed for PM\textsubscript{2.5} emissions if the draft permit has not gone to public comment by April 15, 2011 regardless of permit application date. (Applicable for 1-hour NO\textsubscript{2} and 1-hour SO\textsubscript{2} upon effective date of the air quality standard within the Wisconsin Administrative Code)

**Part 70 Operation Initial Permit Issuance**
Increment consumption and full facility NAAQS modeling should be performed for applicable pollutants and averaging periods. This includes the traditional standards (TSP 24-hour; PM\textsubscript{10} 24-hour and annual; SO\textsubscript{2} 3-hour, 24-hour, and annual; NO\textsubscript{2} annual; CO 1-hour and 8-hour). If the draft permit is public noticed on or after April 15, 2011 PM\textsubscript{2.5} emissions are analyzed as well. (Applicable for 1-hour NO\textsubscript{2} and 1-hour SO\textsubscript{2} upon effective date of the air quality standard within the Wisconsin Administrative Code)
Part 70 Operation Permit Revision Affecting Dispersion or Increasing Emissions
Increment consumption and full facility NAAQS modeling should be performed for applicable pollutants and averaging periods. This includes the traditional standards (TSP 24-hour; PM_{10} 24-hour and annual; SO_{2} 3-hour, 24-hour, and annual; NO_{2} annual; CO 1-hour and 8-hour). If the draft permit is public noticed on or after April 15, 2011 PM_{2.5} emissions should be considered. If the particulate matter rates have increased, the facility should be modeled for PM_{2.5}. (Applicable for 1-hour NO_{2} and 1-hour SO_{2} upon effective date of the air quality standard within the Wisconsin Administrative Code)

Part 70 Operation Permit Renewal, Previously Modeled
If permit conditions, emission rates, stack parameters, and ambient air quality standards are unchanged from previous issuance, or have changed such that ambient air impacts could decrease, modeling is not required. Where any of these have changed such that ambient air quality impacts could increase, applicable pollutants and averaging periods should be modeled, including increment consumption and full facility NAAQS. This includes the traditional standards (TSP 24-hour; PM_{10} 24-hour and annual; SO_{2} 3-hour, 24-hour, and annual; NO_{2} annual; CO 1-hour and 8-hour). If the draft permit is public noticed on or after April 15, 2011 PM_{2.5} emissions should be considered. If the particulate matter rates have increased, the facility should be modeled for PM_{2.5}. (Applicable for 1-hour NO_{2} and 1-hour SO_{2} upon effective date of the air quality standard within the Wisconsin Administrative Code)

Non-Part 70 (FESOP, SOP) Operation Initial Permit Issuance
Increment consumption and full facility NAAQS modeling performed. This includes the traditional standards (TSP 24-hour; PM_{10} 24-hour and annual; SO_{2} 3-hour, 24-hour, and annual; NO_{2} annual; CO 1-hour and 8-hour). If the draft permit is public noticed on or after April 15, 2011 PM_{2.5} emissions are analyzed as well. (Applicable for 1-hour NO_{2} and 1-hour SO_{2} upon effective date of the air quality standard within the Wisconsin Administrative Code)

Non-Part 70 (FESOP, SOP) Operation Permit Revision Affecting Dispersion or Increasing Emissions
Increment consumption and full facility NAAQS modeling performed. This includes the traditional standards (TSP 24-hour; PM_{10} 24-hour and annual; SO_{2} 3-hour, 24-hour, and annual; NO_{2} annual; CO 1-hour and 8-hour). If the draft permit is public noticed on or after April 15, 2011 PM_{2.5} emissions should be considered. If the particulate matter rates have increased, the facility should be modeled for PM_{2.5}. (Applicable for 1-hour NO_{2} and 1-hour SO_{2} upon effective date of the air quality standard within the Wisconsin Administrative Code)

Non-Part 70 (FESOP, SOP) Operation Permit Renewal, Previously Modeled
If permit conditions, emission rates, stack parameters, and ambient air quality standards are unchanged from previous issuance, or have changes such that ambient air impacts could decrease, modeling is not required. Where any of these have changed such that ambient air quality impacts could increase, applicable pollutants and averaging periods should be modeled, including increment consumption and full facility NAAQS. This includes the traditional standards (TSP 24-hour; PM_{10} 24-hour and annual; SO_{2} 3-hour, 24-hour, and annual; NO_{2} annual; CO 1-hour and 8-hour). If the draft permit is public noticed on or after April 15, 2011 PM_{2.5} emissions should be considered. If the particulate matter rates have increased, the facility should be modeled for PM_{2.5}. (Applicable for 1-hour NO_{2} and 1-hour SO_{2} upon effective date of the air quality standard within the Wisconsin Administrative Code)

Type A Registration Permits
Perform NAAQS modeling when company does not submit results in accordance with ROP/RCP guidance already in place. This includes the traditional standards plus PM_{2.5}. ROP/RCP considerations for 1-hour NO_{2} and 1-hour SO_{2} standards will be applicable upon effective date of the air quality standards within the Wisconsin Administrative Code.

General Permits
Upon development of a general permit or re-issuance, modeling to address applicable NAAQS will be performed. For determining case-by-case coverage, only pollutants directly addressed by the permit are considered. Decisions regarding the schedule for updating existing or developing new general permits will be made through work planning according to program priorities and available resources.

Note on Integrated Permits
For integrated permits issued together, modeling should be assessed based on the most restrictive policy relevant to either portion.