

Summary

Air Management Study Group Meeting

Wednesday, May 14, 2014

9:00 am

Gathering Waters/Glacier's Edge Conference Room

DNR South Central Region Service Center, 3911 Fish Hatchery Rd, Fitchburg, WI

Attendees

Renee Bashel, SCS Engineers

David Bizot, DNR

Anne Bogar, DNR

Tim Clay, Cooperative Network*

Tyson Cook, Clean Wisconsin*

Kristin Hart, DNR

Tracey Holloway, UW-Madison*

Gail Good, DNR

Jeff Jaeckels, MGE*

Brenda Kubasik, MGE

Amy Litscher, Saga Environmental

David Molzahn, WPSC

Andrea Morgan, EPA

Todd Palmer, Michael Best*

Bart Sponseller, DNR

Andrew Stewart, DNR

Scott Suder, Wisconsin Paper Council*

Robert Thiboldeaux, DHS

Karen Walsh, DNR

Tara Wetzel, WTBA*

Ken Yass, NRT

* Air Management Study Group (AMSG) members

Action Items

SO₂ NAAQS implementation

The Air Program will be reaching out to stakeholders to address EPA's proposed data requirements rule for the 1-hour SO₂ standard, and EPA's guidance for nonattainment area SIP submissions.

Members should contact David Bizot (David.Bizot@Wisconsin.gov, 608-267-7543) or Bart Sponseller (Bart.Sponseller@Wisconsin.gov, 608-264-8537) if they would like to discuss the proposed rule and/or guidance. Please provide any feedback by **June 20** to ensure it can be considered as the Air Program develops comments for EPA.

Air permit streamlining

The Air Program would like stakeholder feedback about the following streamlining topics:

- Eliminating the waiting period for permit revocation at a facility's request (see p. 9).
- Regarding the 50% registration permit, treating PM_{2.5} as a regional pollutant that does not require modeling (see p. 9)

Please provide any comments to Kristin Hart (Kristin.Hart@Wisconsin.gov, 608-266-6876) by **June 13**.

In addition, the Air Program has posted two additional **checklists with draft rule language** to the [permit streamlining webpage](#):

- Term of non-part 70 operation permits (under the Workgroup 3 tab)
- Construction permit application cleanup (under the Workgroup 4 tab)

EPA Air, Climate and Energy Centers RFP

Tracey Holloway is leading development of a proposal for the University of Wisconsin-Madison to house an EPA-funded climate, energy, and air research center, and welcomes ideas for research needs (ideally within the next couple of weeks). EPA's funding announcement is available at <http://www.epa.gov/ncer/rfa/2014/2014-star-ace.html>. Tracey's contact information is below:

Prof. Tracey Holloway
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taholloway@wisc.edu

Air Quality Data

The Air Program is following up internally to address AMSG member suggestions to improve the presentation of information about state air quality on the department website. Suggestions included:

- Providing data (or contact information for obtaining data) on the [Air Quality Trends](#) webpage.
- Providing context for the [Current Air Quality](#) webpage by linking to the Trends webpage.

Meeting Summary

Opening remarks and agenda review

Bart Sponseller, Bureau Director

Sponseller opened the meeting and reviewed the agenda. He introduced David Bizot, the Air Program's new Regional Pollutants and Mobile Sources Section Chief.

Administrative items

Anne Bogar, AMSG coordinator

Updates & announcements

Air Program updates

Air quality trends report

Gail Good, Monitoring Section Chief

Good updated the group about the Air Program's recently completed 2014 Wisconsin Air Quality Trends report. The report is available on the DNR website at <http://dnr.wi.gov/topic/airquality/trends.asp>. The 2014 report incorporates the latest certified fine particle and ozone data from 2012 (each year the previous year's data is certified by May 1). This year's report includes some regional plots and draft data from 2013.

Good explained that the report shows an increase in ozone concentrations due to the hot summer in 2012. Draft 2013 ozone data indicates reduced ozone concentrations. The report also demonstrates significant reductions in PM_{2.5} concentrations over time. Plots available on the website allow users to view data for particular counties.

The Air Program is convening a group to make improvements to the report and plots, and include certified data for 2013. The program aims to provide updates to the report in the fall.

Cook asked whether the data behind the charts is also available on the website. Good explained that the data is available from EPA's [AQS website](#), and can also be obtained directly from DNR. Members can contact Good (Gail.Good@Wisconsin.gov, 608-266-1058) for information about accessing the data.

Holloway noted that it might be nice to provide a link or phone number for accessing the data directly on the website. She pointed out that obtaining some data from the AQS site requires logging into the site. Good responded that she will check to see if that information is available on the website, and that the data manager's contact information could be posted.

Clay commented that it might be helpful to provide data in a simple format (e.g., an Excel file) for members of the public that want more information, but may not want a complex set of data from the AQS site.

Clay thanked DNR for providing this information about air quality improvements to the public, since showing these improvements is a topic that members discussed in past meetings.

1-hour SO₂ NAAQS proposed data requirements rule & guidance

David Bizot, Regional Pollutants and Mobile Sources Section Chief

Bizot discussed EPA's proposed rule addressing data collection requirements for the area designations for the 1-hour SO₂ NAAQs, which was published May 13, 2014. He explained that Air Program staff members are currently reviewing the proposal, as well as EPA's guidance for SO₂ nonattainment area SIP submissions. The program will be determining whether to provide comments, and developing them in the next month or month and a half. Any members that have comments or would like to discuss the documents are welcome to contact Bizot (David.Bizot@Wisconsin.gov, 608-267-7543) or Sponseller (Bart.Sponseller@Wisconsin.gov, 608-264-8537).

The proposed rule represents a significant shift from an initial EPA proposal to set a 100 ton emissions threshold. EPA is proposing tiers of annual emissions thresholds that differ depending on whether the source is located in an urban or rural area. The proposed rule also addresses clusters of sources.

Nonattainment designations will take place in 2017 and 2020. The 2017 designations will be based on modelling, and the 2020 designations based on monitoring data (allowing time to set up monitors and

collect three years of needed data). Sources could avoid nonattainment status if they take action to reduce emissions before 2017.

Palmer asked what kind of outreach the Air Program is planning to make to regulated sources. Bizot responded that the study group update is part of their outreach efforts, and that the program has also started to speak with some relevant organizations (WMC and the Wisconsin Paper Council). Sponseller added that members should view this update as an invitation to discuss the rule with the Air Program. The program will also reach out to utilities, since the affected sources are large coal boilers.

Holloway asked how many monitors DNR would set up around the state if the department was going to monitor SO₂. Bizot responded that it will depend on the emissions thresholds finalized by EPA and the Air Program's review. The Air Program's initial estimate is that 15 to 25 sources may be affected. Sponseller noted that EPA did not address funding for a monitoring network. DNR does not have the funding and EPA probably would not provide it, so the department would have to work with sources to arrange something. However, monitoring would not be required if sources reduced emissions below the thresholds by 2017.

PM_{2.5} redesignation

David Bizot, Regional Pollutants and Mobile Sources Section Chief

Bizot explained that EPA finalized their redesignation of Wisconsin's nonattainment areas for the 24-hour PM_{2.5} standard to attainment status. The affected counties are Milwaukee, Racine, and Waukesha. The redesignation is a success story for Wisconsin, and good news for industry in the southeastern part of the state, because it lightens their regulatory burden.

PM_{2.5} levels have been dropping across the state due to rules such as the NO_x SIP Call and the Clean Air Interstate Rule. The emissions trend can be seen on the department's [Air Quality Trends](#) website. Sponseller added that Wisconsin has also benefitted from emissions reductions in upwind states such as Illinois and Indiana, and that improvements are being seen across the upper Midwest.

Bizot pointed out that the only remaining nonattainment areas in Wisconsin are one and a half counties that are nonattainment for ozone (Sheboygan and Kenosha), and a small area that is nonattainment for SO₂ (around Rhineland).

Cross-State Air Pollution Rule Supreme Court decision

David Bizot, Regional Pollutants and Mobile Sources Section Chief

Bizot discussed the U.S. Supreme Court's May 1 decision to uphold the Cross State Air Pollution Rule (CSAPR). He provided some background on interstate air pollution regulations, explaining that a provision in the Clean Air Act requires upwind states to take action on air pollution contributions to downwind states. Wisconsin is both a recipient of pollution from other states, and also a contributor to some extent. The Clean Air Interstate Rule was EPA's first rule addressing this issue, and CSAPR was the second. CSAPR was designed to address the 1997 ozone standard, and EPA has since finalized 2008 ozone standards. EPA is looking at developing another transport rule to address the 2008 standard.

CSAPR was litigated because some parties, including the State of Wisconsin, were unhappy with the way the rule determined culpability for upwind states by taking compliance costs into consideration. Specifically, Wisconsin was listed as the state with the 19th highest emissions contributions, but was assigned the third highest level of emissions reductions because the state can reduce emissions more cost effectively than other states. There were also concerns about EPA implementing the rule at the federal level before states had enough time to develop State Implementation Plans (SIPs). While the Court upheld the structure of CSAPR, it also left open opportunities for states to pursue litigation if they believe they have

been forced to regulate emissions below the one-percent significance threshold in CSAPR, or required emission reductions are greater than necessary to bring all downwind states into attainment.

It may take up to a couple years before the implications of the decision for Wisconsin are clear, but the Air Program will be staying up-to-date with any developments. The decision will affect other pending litigation, including Wisconsin's challenge to the NO_x SIP Call, and Sierra Club's challenge to Wisconsin's BART SIP (which was stayed for the CSAPR decision). EPA may revisit the NO_x SIP Call and Wisconsin's inclusion in light of the CSAPR decision.

Palmer commented that he could add perspective from industry's standpoint. They have been involved in the CSAPR challenge, and are still figuring out what the decision means for sources and other related lawsuits. He explained that he is participating in a call that week to determine what sources will do, and offered to update the group.

Landfill gas guidance update

Andy Stewart, Deputy Bureau Director

Stewart explained that the Air Program is finishing up the guidance development process for establishing presumptive BACT for formaldehyde emissions at landfills regulated by the state air toxics rule. The goal of the guidance is to facilitate efficient permitting and compliance. The guidance provides certainty to sources, and its development is a good example of successful collaboration between the Air Program and regulated sources.

The guidance was posted for the 21-day public review and comment period. DNR received four comments from three individuals. Two of these individuals supported the guidance, though one also questioned the need for the requirement to test every five years. After internal review with the technical group, the Air Program decided to maintain the testing requirement as a cost-effective method for sources to demonstrate compliance. With enough data, DNR could review that decision five or 10 years down the line. Another informative comment suggested that instead of burning the landfill gas, it could be converted into liquid propane. While this approach is not the process that underwent BACT evaluation, the Air Program appreciates the information.

Stewart stated that he has started developing a document responding to the public comments. The document will be posted on the department website with the guidance. The guidance will not be changing as a result of the comments, and some sources have already started to implement it.

Member updates

Greenhouse gas standards for power plants

Cook asked for an update from the Air Program on EPA's carbon rules. Bizot responded that the program had just provided comments on EPA's proposed greenhouse gas (GHG) New Source Performance Standards (NSPS) for power plants, which were developed under Section 111(b) of the Clean Air Act. The Air Program had reached out to the same stakeholders that were contacted when the program was developing comments on EPA's pre-proposal request for feedback regarding GHG standards for existing power plants (to be developed under Section 111(d) of the Clean Air Act). The program did not receive much additional feedback.

The Air Program's comments on the proposed NSPS addressed the department's concerns about the standards requiring carbon capture and sequestration (CCS), when Wisconsin is one of the few states that does not have the geologic features necessary for sequestering carbon. The NSPS would put Wisconsin at

an economic disadvantage. The program conducted a BACT analysis to determine the cost of running a pipeline from Milwaukee to Illinois, and found that it would be twice as expensive as the CCS technology itself.

The Air Program's comments on the GHG standards for existing power plants (submitted in December) stated that the proposal should consider Wisconsin's Renewable Portfolio Standard and other existing programs, giving the state credit for work done to date. EPA intends to propose the standards around June 1 to stay on track with the timeline presented by the president. The proposal is currently being reviewed by the federal Office of Management and Budget. The Air Program does not know what the proposal will look like, but expects that it will provide a menu of options for ways EPA could proceed with a final rule. The final rule is expected the following summer, and SIPs would be due 13 months after the final rule is promulgated. It takes the department over two years to get a rule through the rulemaking process, so the timeline is a significant concern that was included in the comments to EPA.

Sponseller added that the Air Program worked closely with the Public Service Commission on the proposals, and will continue to do so. The program reached out to 13 stakeholder groups last fall, and will work with these stakeholders and others to comment on the proposed rule for existing sources.

AQAST update

Holloway stated that the NASA Air Quality Applied Sciences Team (AQAST) kicked off a project that will be examining interstate transport of air pollution using satellite data. The idea for the project was hatched with help from Sponseller and his staff, including Angie Dickens. The first call included representatives from Missouri, New Hampshire, New Jersey, Texas, Maryland, New York, and some others. The group is looking at air quality episodes in 2012 where interstate transport of pollution may have played a role. These episodes will be analyzed by researchers at the Naval Research Lab, University of Wisconsin, Harvard, NASA, and others.

EPA funding for climate, energy, and air research centers

Holloway reported that EPA has announced funding for three research centers that would address climate, energy, and air issues. The grants are 10 million dollars each. Holloway is leading development of a proposal for Wisconsin to house one of the centers. The center would involve the University of Wisconsin-Madison and other universities, and researchers from a range of areas including health, social science, energy modeling, air transport, etc. The proposal is due at the beginning of September, and she thinks it would be stronger if it identifies real research needs in the state. She welcomes suggestions from study group members about research needs. Comments provided in the next couple of weeks would be the most helpful (see the action item on p. 2 for Holloway's contact information).

Air permitting trends, 2004-2013

Andy Stewart, Deputy Bureau Director

Stewart explained that in response to member questions at the previous study group meeting, he put together a chart outlining construction air permitting trends over the last 10 years. The chart is available on the AMSG website at <http://dnr.wi.gov/topic/AirQuality/AMStudyGroup.html> under the May 14 meeting (the chart is titled "Permitting trends handout").

Stewart clarified that the white numbers on the chart represent the blue bars; there are no numbers associated with either line chart, though the scale on the left side of the chart applies to both the bar and line charts.

The chart shows that the need for construction permit actions have decreased as the number of sources covered under registration operation permits (ROPs) have increased. More than 500 ROPs have been issued since 2005. The number of construction permit applications have decreased steadily and flattened out in the last few years. The downturn in the economy and applications related to the sand mining industry have affected both ROPs and normal New Source Review (NSR) construction permit applications. Facilities were still submitting applications during the downturn; there was a gradual rather than steep drop in applications.

Stewart stated that for all but two years, more construction permit applications were received than issued. He clarified that this is not due to a growing backlog of NSR permit applications. Some reasons for the trend are that the application process may span multiple calendar years or facilities may put projects on hold, in which case no permits are issued (this is rare, but does happen). More importantly, however, over the last five years permit writers have been able to direct applicants to an available exemption or get facilities covered under ROPs instead. For this reason, some construction permit applications lead to ROP issuance.

NSR applications are assigned as soon as they come in the door. As a result of a Lean 6 project undertaken a year/year-and-a-half ago, a nightly report tells managers how long it takes to assign applications to a staff member. Most are assigned within three days.

Stewart also pointed out that the Air Program tracks the amount of time it takes to issue a construction permit from the date a complete application was submitted. In 2007, the average time was 157 days. The 12-month average at the end of 2013 was 61 days, showing that the program has shaved almost 100 days off of the construction permitting process. This is a direct result of keeping permit writers focused on a smaller number of more complex permits. The less complex permits that would improve the average are now covered by the ROP program, so there comes a point where it is not possible to improve the average much further. The 61-day average includes a 30-day public comment period, so it really reflects a 31-day review period. The Air Program considers this a significant accomplishment.

Cook asked whether DNR has a sense of the relative percentage of sources that would be eligible for exemptions versus ROPs or construction permits, and whether the numbers for 2013 are likely to be the trend going forward. Stewart responded that the program thought that ROP issuance would plateau or start to decline, with the expectation that eligible facilities would apply for them relatively quickly. The uptick in ROPs is due to sand mining. Hart added that the NSPS for small engines also made previously exempt facilities non-exempt.

Stewart stated that the Air Program conducted a survey to see if the ROP market had been saturated. The results of the survey suggest that twice as many sources could qualify for the ROP, potentially 1,200. The program wants to follow up to better understand why more facilities are not applying for them. One reason is that facilities may not want to commit to an emissions cap of 25 percent of the major source threshold, because if business picked up the facilities would have to go through the construction permitting process.

Stewart noted that the question about exemptions is more difficult to answer. The number of exemptions has not shifted significantly, but many exemptions do not need to be approved by the department. A source can often evaluate for itself whether it is exempt, so it is difficult to define the universe of eligibility. If the department develops more flexible exemptions, the numbers could change.

Sponseller pointed out that the reason the data from the chart is available is due to the Air Program's WARP database, which was developed by Stewart and other staff members. The database has improved the efficiency of the permitting process, and is probably one of the best in the country. Stewart added the program used NSR funding to build WARP. The IT platform was developed in 2008, and the program has barely scratched the surface of potential capabilities. The department is working on a Lean 6 project to

develop a process for electronic submission of compliance information. This process will make it easier and more cost-effective for sources to submit forms.

Outcome of ROP and permit exemption notifications

Kristin Hart, Permits and Stationary Source Modeling Section Chief

Hart explained that state statute directs the Air Program to annually notify facilities of registration operation permit (ROP) or exemption eligibility. Using inventory data, the program identified facilities and notified them of their potential eligibility last October. See slide 4 of the presentation available on the AMMSG website at <http://dnr.wi.gov/topic/AirQuality/AMStudyGroup.html> (under the May 14 meeting) for more information. Hart noted that the number of facilities that selected to operate under an exemption may be higher than indicated because they are not required to notify the department.

Hart commented that the response rate to the notifications was lower than expected and surmised that this was due to the way emails were sent out. For facilities with multiple sites, the email did not specify which site was potentially eligible. When the Air Program notifies potentially eligible facilities this year, the email will be triggered when a facility certifies its emissions, so the email will be associated with a specific site. The timing of notifications may also improve responses this year, because the emails will arrive directly after inventory reporting efforts have been completed (during a potential lull in facility's workloads).

Sponseller added that the upcoming year is the first year the legislation requires the Air Program to notify facilities. The program started the notification process last year to try it out. This year the process will be automated.

Air permit streamlining

Kristin Hart, Permits and Stationary Source Modeling Section Chief

Hart reported on workgroup progress on the permit streamlining initiative. The presentation slides are available on the AMMSG website at <http://dnr.wi.gov/topic/AirQuality/AMStudyGroup.html> under the May 14 meeting (see slide 5). In addition to meeting with the streamlining workgroup, the permit streamlining staff members have been working with the Air Program rules coordinator and EPA representatives to get feedback on the streamlining proposals. Based on legal discussions, the program is taking some topics off the table for the first set of rule revisions. Slide 7 lists the topics that are currently being addressed in the initial revisions. Hart's discussion of each topic is summarized below.

Commence construction/waiver issues

Hart explained that the Air Program is pursuing specifying some preconstruction activities in the rule. She pointed out that EPA is currently concerned about preconstruction activities at the national level, so the Air Program needs to be cautious about their approach. The program may avoid revising the waiver rule because EPA Region 5 staff members have indicated that opening the waiver language would put the rule at risk of not being approved in the SIP. Instead, the Air Program is considering developing guidance that interprets the existing waiver language. Some workgroup members are interested in pursuing rule revisions, so the Air Program is currently having internal conversations about potential strategies.

Palmer noted that industry would like to see the department move forward on the commence construction and waiver issues, despite concerns expressed by EPA. He said he would be happy to discuss this perspective with interested parties.

Restricted use generator exemption

Hart stated that the Air Program is now referring to “restricted use” rather than “emergency use” to include emergency fire pumps in this proposal. The current proposed rule language, which exempts restricted use generators in both chs. NR 406 and 407, refers to the emergency generator definitions in the NSPS and NESHAP. The current language includes a 3,000 kW threshold. The workgroup discussed whether it would be better to exclude the 200-hour operating limit currently in the proposed rule language in order to be consistent with the RICE rule. Hart’s perspective is that the limit is necessary to keep the Air Program from having to limit potential-to-emit in a permit. The 200-hour limit is also used as part of the justification for the department’s intermittent source modeling policy. She noted that ch. NR 436 also allows generator use during emergencies, so the program still has a mechanism for approving use of emergency generators beyond 200 hours. The Air Program is considering a suggestion to include black start and limited use generators in the rule, which are both defined in the NSPS and NESHAP.

Natural minor exemption

Hart stated that the Air Program is definitely moving forward with this exemption because of a directive from the legislature. She noted that she has gotten feedback on draft rule language from Clean Wisconsin and in workgroup meetings. The Air Program is currently considering a request to include safe harbor provisions that are in the registration permit rule. The program is looking into why these provisions of the registration permit are not being used and whether they are included in the state SIP. The program is also considering a request to require that records be submitted annually rather than kept on site at all times.

Term of a non-Title V permit

Hart explained that state statute permits the department to set a term for permits that is greater than five years or non-expiring if the permits are not required by the Clean Air Act. EPA recently clarified that a federally enforceable state operating permit (FESOP) is not a permit required under the Clean Air Act, which allows the department to move forward with rulemaking that would make non-part 70 (non-Title V) permits non-expiring. The proposed rule would allow the department to reopen permits for revision or set expiration dates when specific criteria are met (e.g., ongoing compliance issues at a facility) or at a facility’s request. This would allow the Air Program to focus efforts on permits with the greatest public health or environmental impact, while reducing the permit renewal backlog. Terms for any permit would not be shorter than five years.

Streamlining revocation procedures

Hart stated that facilities that request permit revocation currently have to wait 21 days. The waiting period was required for notification of intent to revoke a permit, because the revocation might be a punitive measure initiated by the department. The Air Program is evaluating the possibility of eliminating the waiting period, and would like feedback from study group members. Hart noted that potential complications include a facility requesting revocation because it plans to shut down, when it ultimately does not (which has happened twice in about five years). In addition, not all facilities understand that a permit transfers if the facility is sold; if the permit was revoked, the new owners would have to obtain a new permit.

Hart noted that facilities would be able to appeal revocation decisions. Stewart suggested that the proposed rule could include a 30-day period after revocation that provides time for a facility to appeal the decision on the back end.

Application clean-up procedures

Hart explained that because the Air Program's permit database contains 20 years of data, it includes hundreds of outdated permit applications. The program needs to clear out these applications to allow the system to send automatic notifications to permit writers or applicants. Under normal circumstances, a facility would have to withdraw the application. However, in many cases the facility no longer exists. The Air Program does not have the authority to remove applications from the database, so the program is proposing a streamlined procedure for denying applications. The procedure would also give a facility the opportunity to withdraw an application after notification that the application will be denied.

50% registration permit

Hart explained that the Air Program presented a draft 50% registration permit (ROP) at the last workgroup meeting, and reviewed some of the differences between the existing 25% registration permit (which caps emissions at 25 percent of the major source threshold). The Clean Air Act allows issuance of a general permit for a specific category of sources, and a registration permit is a source category based on size. The State of Minnesota first developed the registration permit. A registration permit can act as a federally enforceable permit that keeps a source from being subject to part 70 requirements.

The Air Program was initially considering a rule change to ensure the federal enforceability of the 50% ROP, but is now trying to ensure federal enforceability in the permit itself using the following approaches:

- Capping emissions based on a 12-month rolling average to prevent emissions from approaching the major source threshold. The 25% ROP has a calendar year cap on emissions, which for the 50% ROP could allow emissions to approach the major source threshold.
- Including emissions calculation and recordkeeping methods borrowed from Minnesota's registration permit program.
- Including additional modeling requirements. The 25% ROP has a 5 ton per year modelling threshold for PM. The 50% ROP maintains this threshold and adds modeling thresholds for NO_x and SO₂. Modeling would be done using the maximum controlled emission rate based on the control efficiencies allowed in the permit, etc.

Hart also commented that the Air Program is considering treating PM_{2.5} as a regional pollutant in the 50% ROP (because PM_{2.5} is primarily formed in the atmosphere from precursor pollutants such as sulfur dioxide, oxides of nitrogen, and ammonia), which means it would not be modeled. The program would need to consider direct emitters such as engines, but expects that carbon monoxide emissions would keep these emitters from qualifying for the permit. The Air Program is looking for comments from stakeholders regarding the proposal to not require modeling for PM_{2.5}.

Hart ended the permit streamlining discussion by explaining that the goal is to have the rule revisions in board order format by the end of June, and then move through other parts of the rule process, including developing an Economic Impact Analysis and rule analysis. The proposed rule would then be presented to the Natural Resources Board in December.

Adjourn

Sponseller closed the meeting by recognizing that AMMSG members represent the best in their fields. He appreciates their participation in the collaborative process of the study group and their participation in the technical workgroups. He thanked members for their continued engagement.