



Air Permit Streamlining Permit Efficiency Rule

Stakeholder Meeting

November 12, 2013

Wisconsin DNR

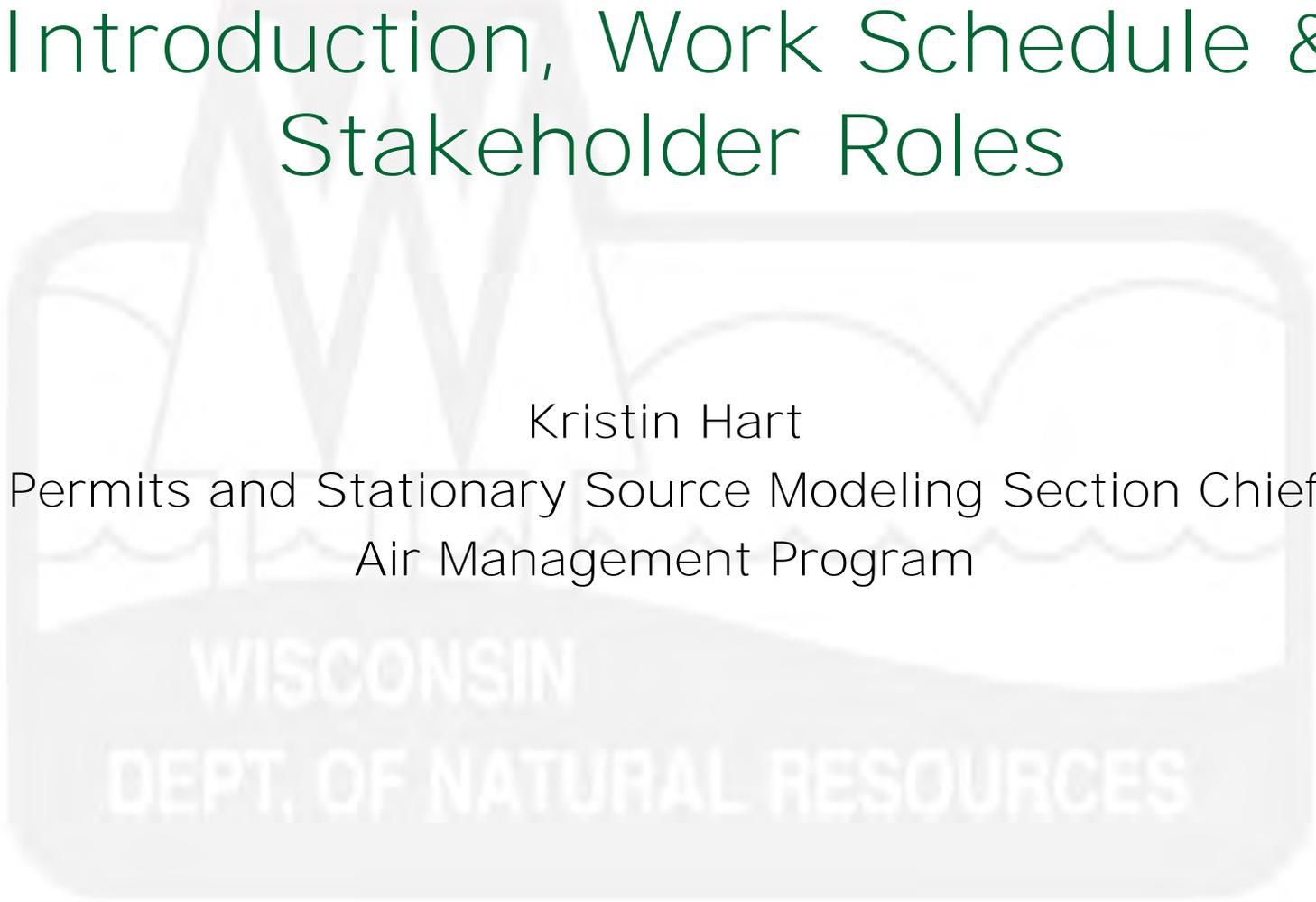
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Introduction, Work Schedule & Stakeholder Roles

Kristin Hart

Permits and Stationary Source Modeling Section Chief
Air Management Program



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Permit Efficiency Rule

- Scope Objective
 - "...to improve operational efficiency and simplify the Air Pollution Permitting processes administered under chs. NR 406 and 407, Wis. Adm. Code, while remaining consistent with the Federal Clean Air Act."*
- Changes to NR 406 – Construction Permits
- Changes to NR 407 – Operation Permits
- Define "Cause or Exacerbate"

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Stakeholder Roles

- Ideas – diversity of view points
- Communication/Outreach
- Prioritizing ideas
 - Which rule changes should be included?
 - Which rule changes should we move ahead with now? (fast track)
 - Which rule changes need more discussion?
 - Of ideas that will need more discussion, where should we put our efforts?
- Dec. 3 Presentation to AMSG



Schedule

- December 3, 2013
 - AMMSG meeting report on progress
 - Close the gathering of streamlining ideas
 - Change focus to prioritizing ideas
- January 2014
 - Additional stakeholder meetings (NR 406 & 407)
 - Continue work on prioritizing
 - By end of Jan, make final recommendations on fast track rule content



Schedule

- February 2014
 - DNR finalizes prioritization plan for Streamlining rule.
 - Present final recommendations to full AMSG
- March/April
 - Additional Stakeholder meetings to discuss draft rule language.
 - Fast track rule in board order format.

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Contacts

Overall Rule Coordinator - Kristin Hart

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NR 407 - Operation Permit Team Leader – Barb

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“Cause or Exacerbate” – John Roth

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Air Permit Streamlining and Listening Session Update

By

JR Sims

and

Steve Dunn

Air Management Program

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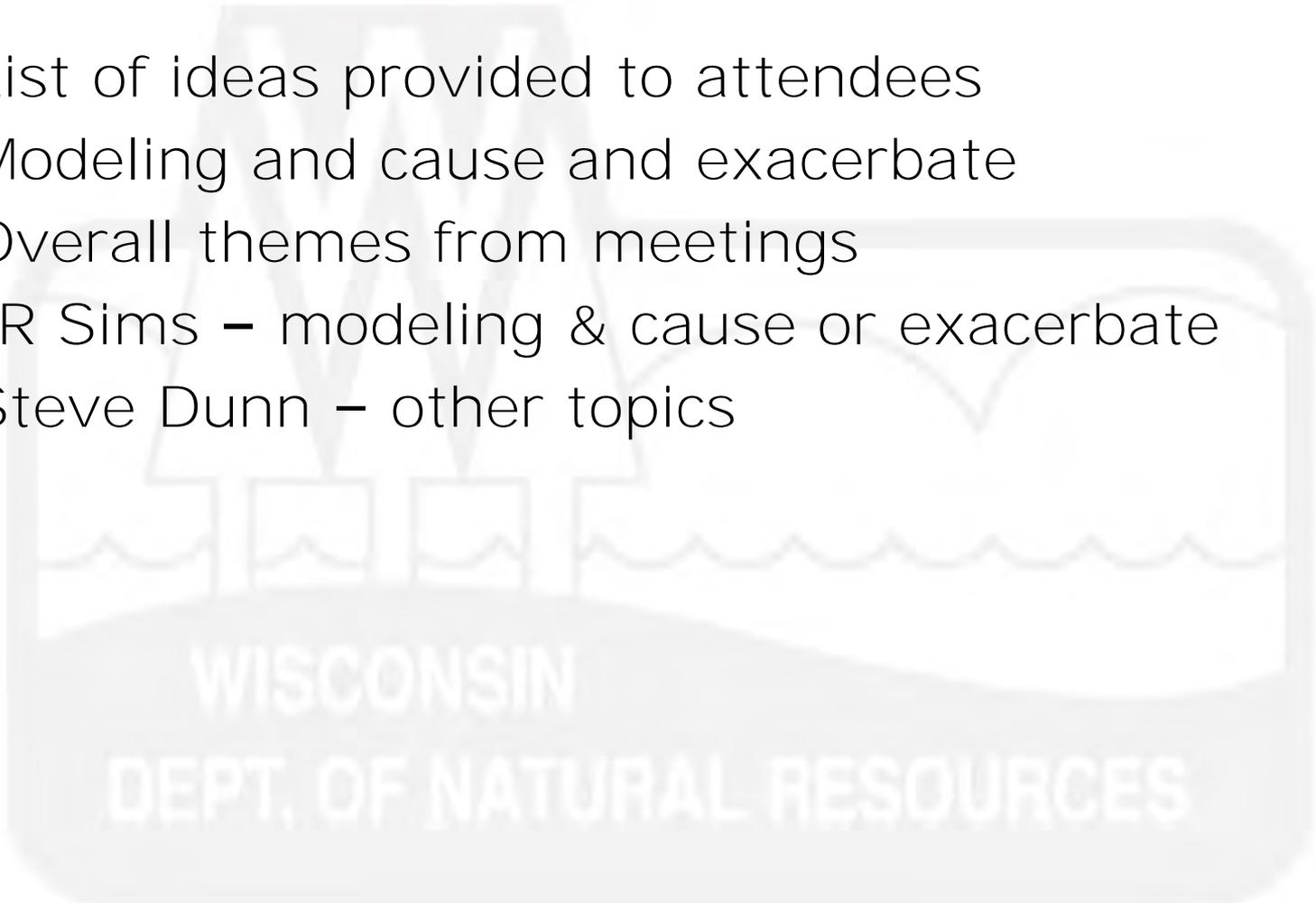
Listening Session Update

- Four Listening sessions held in October
- Eau Claire, Mosinee, Milwaukee and Green Bay
- Upcoming: Madison today (11/12) at 3 PM
- Format:
 - Presentation by Department staff
 - Ideas on NR construction and operation **permits and “cause or exacerbate”**
 - Open proposals from attendees and discussion

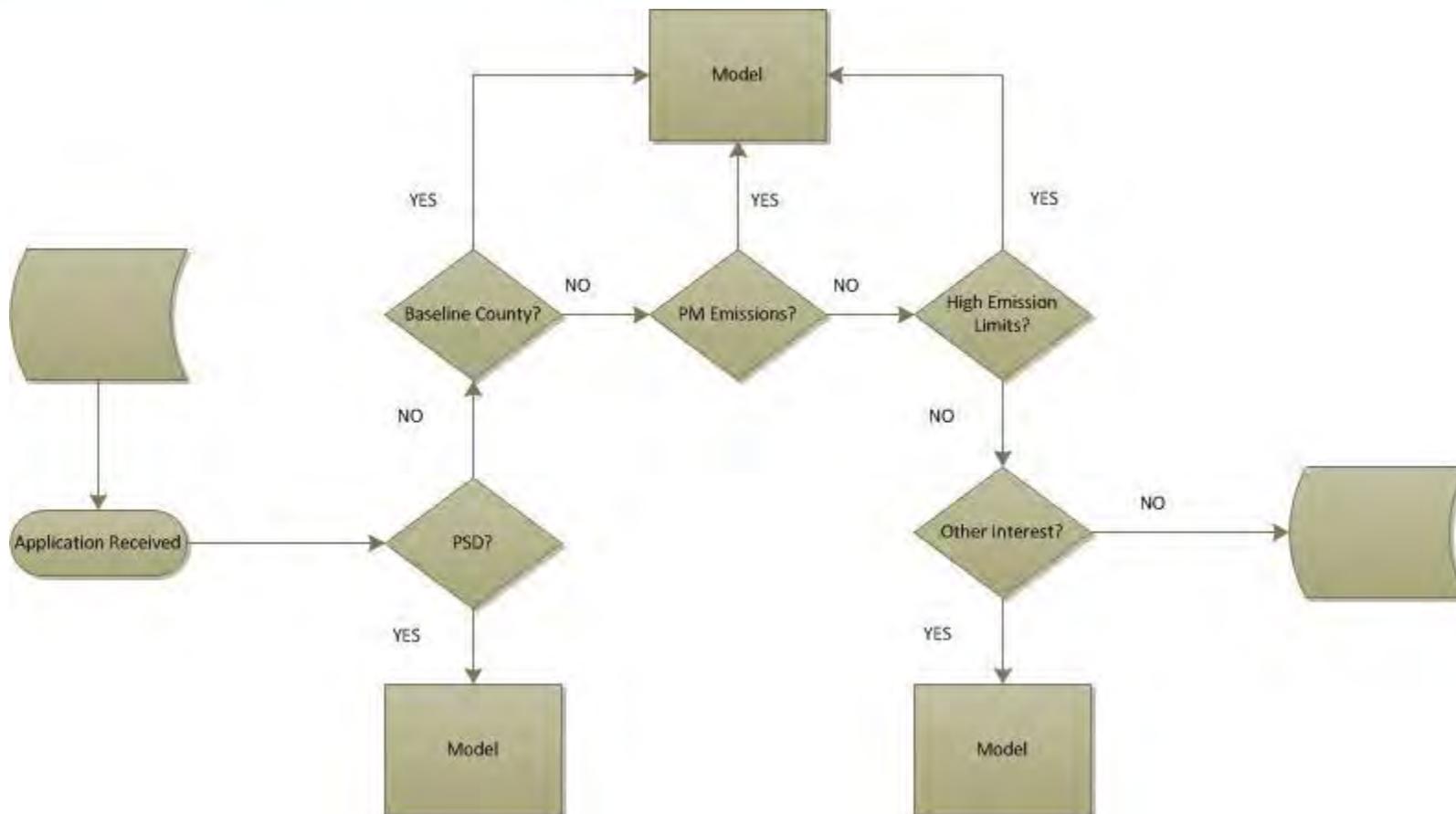


Listening Session Update

- List of ideas provided to attendees
- Modeling and cause and exacerbate
- Overall themes from meetings
- JR Sims – modeling & cause or exacerbate
- Steve Dunn – other topics



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Listening Session Update

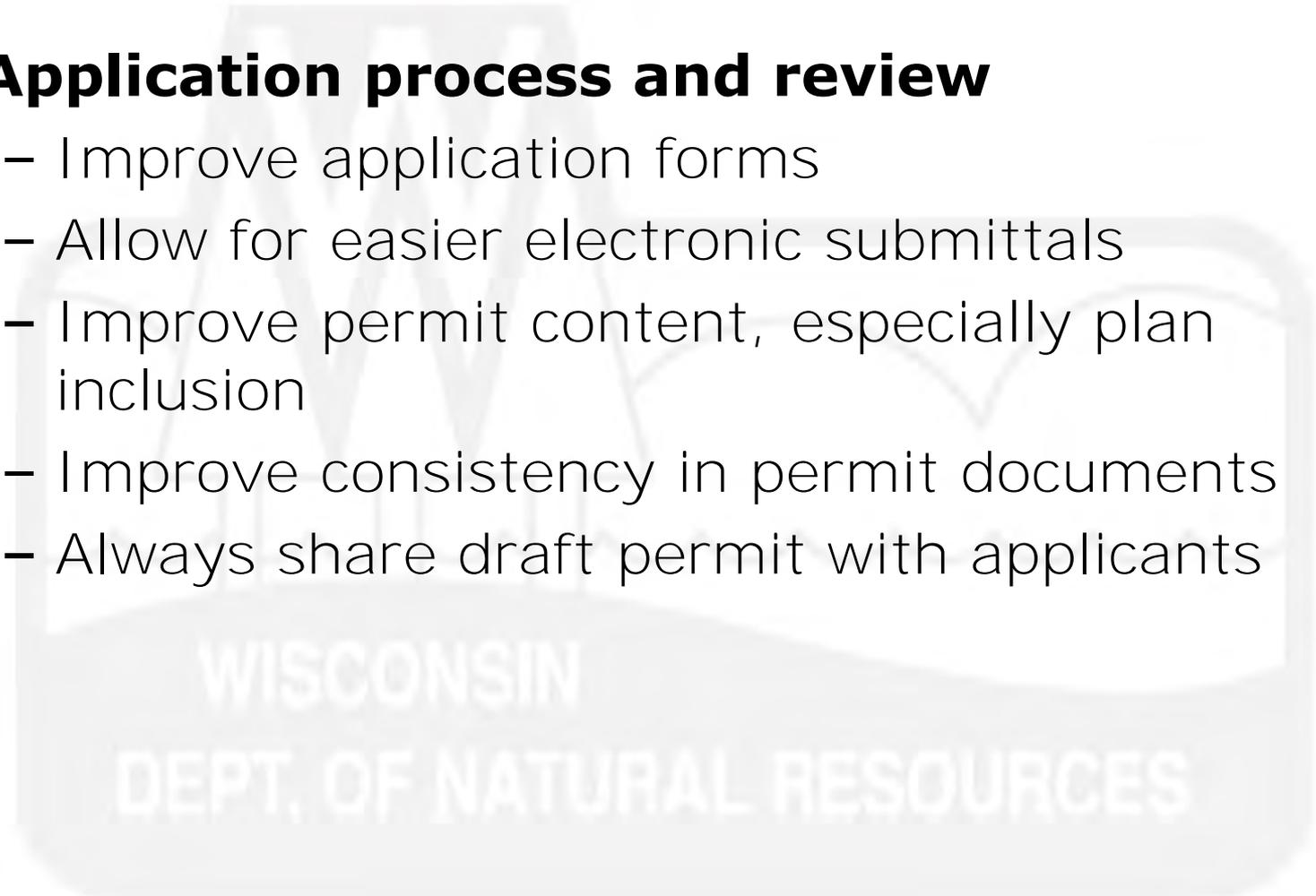
- Public Information
 - Provide better information on public comment and hearing process
 - Provide better outreach to smaller communities and potentially impacted neighbors
 - Concern over where streamlining may be heading

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Listening Session Update

- **Application process and review**
 - Improve application forms
 - Allow for easier electronic submittals
 - Improve permit content, especially plan inclusion
 - Improve consistency in permit documents
 - Always share draft permit with applicants



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Listening Session Update

- **Pre-permit activities and permit content**
 - Allow more construction prior to permit issuance
 - Allow for better incorporation of plans in permits
 - Allow for easier changes to parametric monitoring parameter ranges in permits
 - Make requirements clear and concise

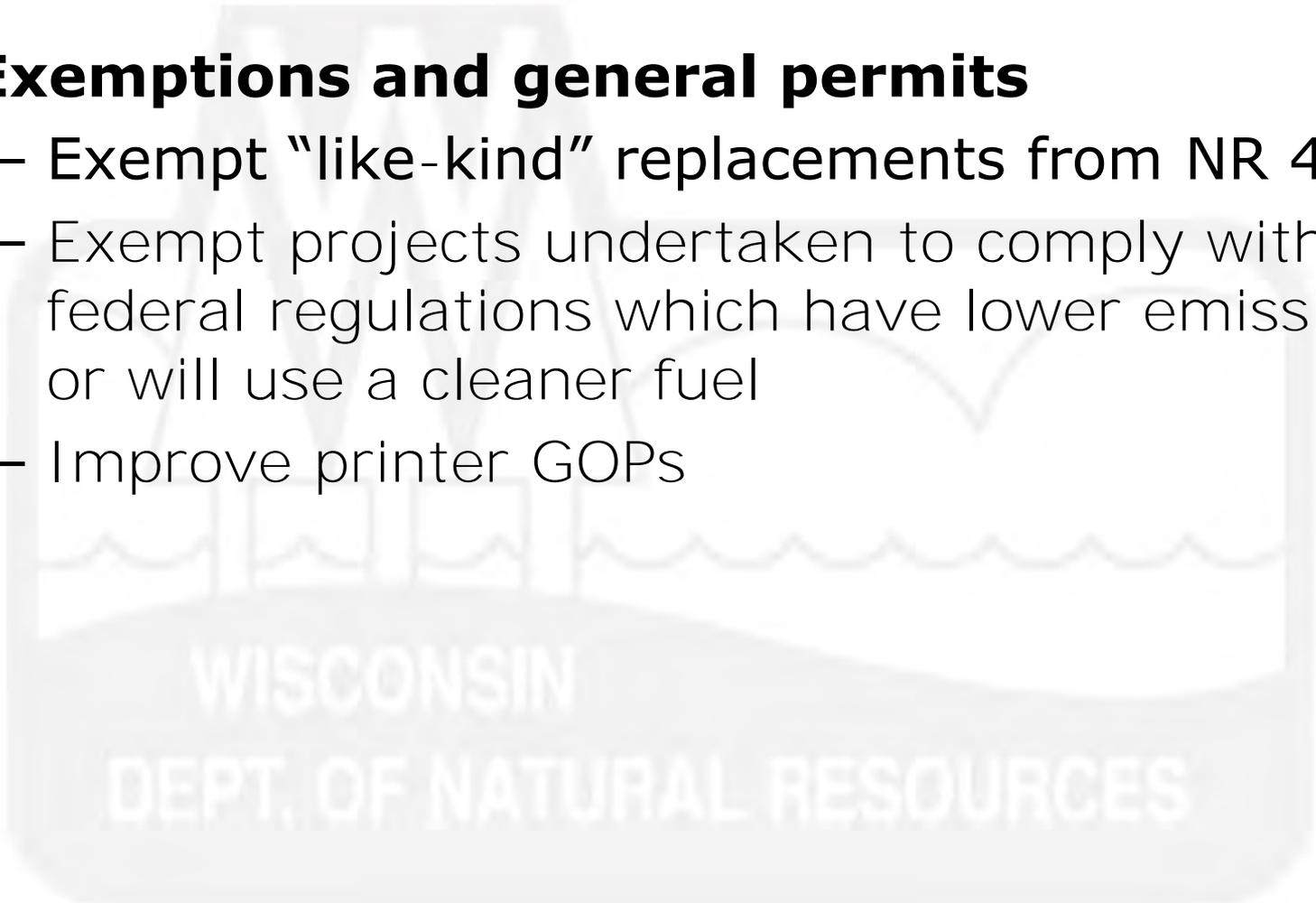
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Listening Session Update

- **Exemptions and general permits**

- Exempt “like-kind” replacements from NR 406
- Exempt projects undertaken to comply with federal regulations which have lower emissions or will use a cleaner fuel
- Improve printer GOPs



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Listening Session Update

- **Permit renewals and guidance**

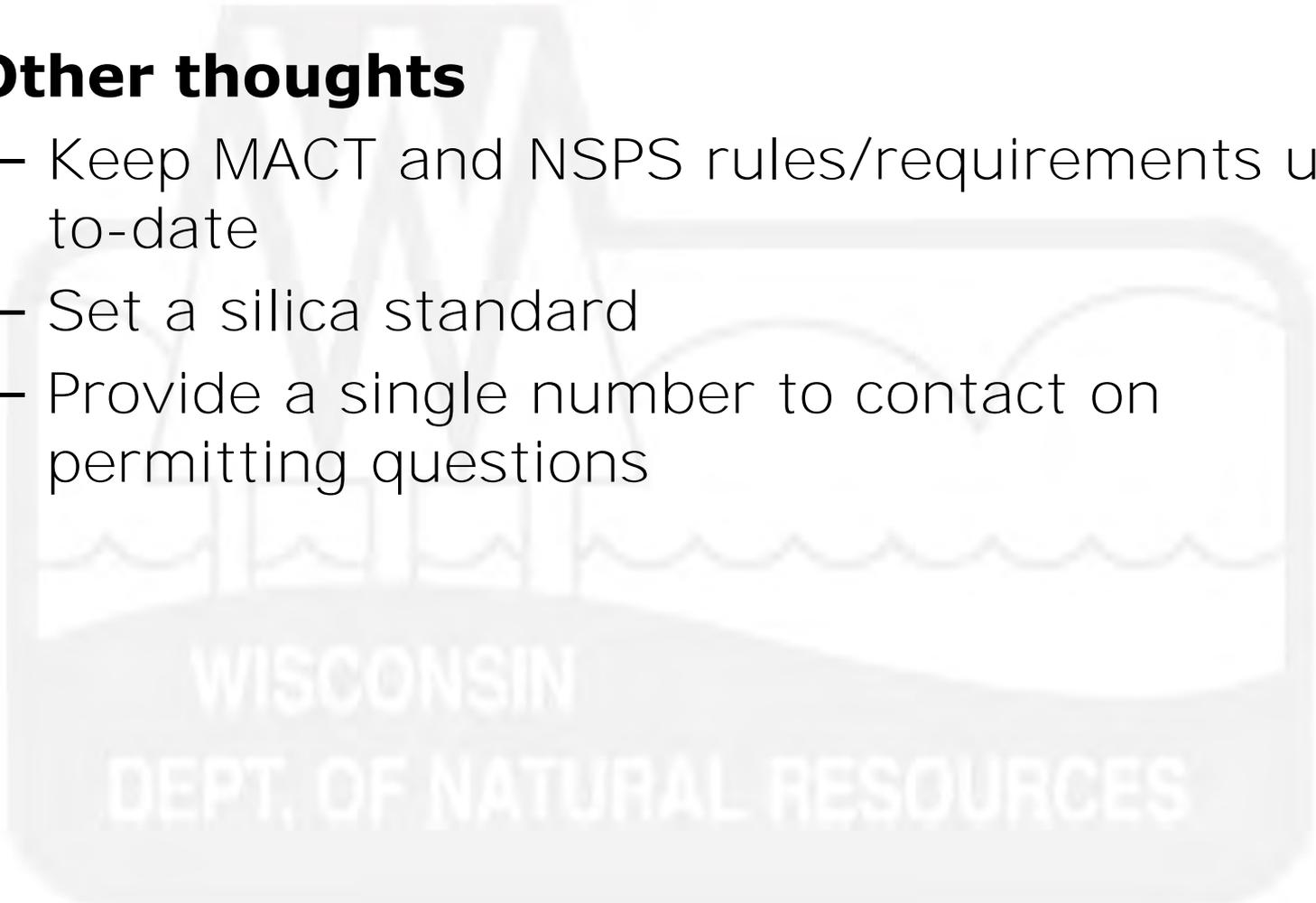
- Simplify renewal process
- Make more permits permanent or have longer (10 year) renewal periods
- Prioritize renewal based on emissions or compliance status
- Provide guidance on converting from ROP to traditional permit
- Improve availability and notice procedures for guidance updates



Listening Session Update

- **Other thoughts**

- Keep MACT and NSPS rules/requirements up-to-date
- Set a silica standard
- Provide a single number to contact on permitting questions



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