

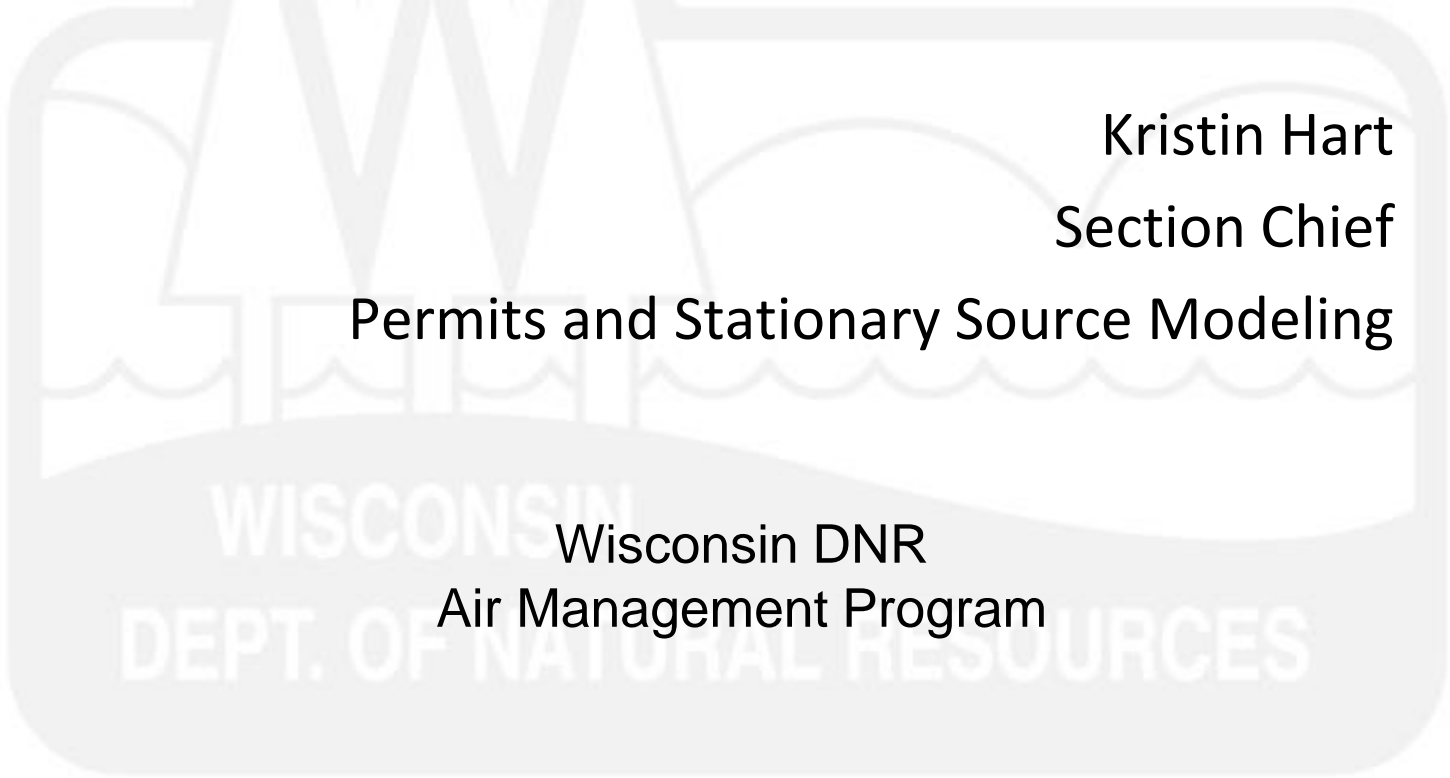


Air Pollution Control Permitting in Wisconsin

Kristin Hart
Section Chief

Permits and Stationary Source Modeling

Wisconsin DNR
Air Management Program





Topics

- Clean Air Act
- Air permitting
- Permit requirements for Foxconn
- Public process for permits
- Ozone



WISCONSIN
DEPT. OF NATURAL RESOURCES



Clean Air Act

- Set National Ambient Air Quality Standards
- Requires ambient air monitoring
- Requires states to submit plans:
 - For areas attaining standards – plan to maintain attainment
 - For areas not attaining standards – plan to get area into attainment
- Set technology-based standards to reduce emissions of criteria pollutants and hazardous air pollutants
- Requires air permitting



Air Permitting

- Clean Air Act permitting in attainment areas:
 - Prevention of Significant Deterioration (PSD)
 - Best available control technology (BACT)
 - Effects on air quality analyzed
 - Air dispersion modeling analyses
 - For pollutants with regional effects such as ozone, qualitative assessment of the impact of precursor pollutants on potential concentrations of ozone

DEPT. OF NATURAL RESOURCES



Permit Requirements for Foxconn

- Four separate applications are being reviewed and four separate permits have been drafted
- These projects are all considered a single major source of air pollution
- PSD requirements apply
 - BACT level controls are required
 - Detailed air quality analysis is required



Permit Process

- Clean Air Act provides for public participation and opportunity for review of all air pollution control permits

http://dnr.wi.gov/cias/am/amexternal/public_notices.aspx

- Available for public review until April 16, 2018
 - Applications
 - Draft air permits
 - Analysis documents

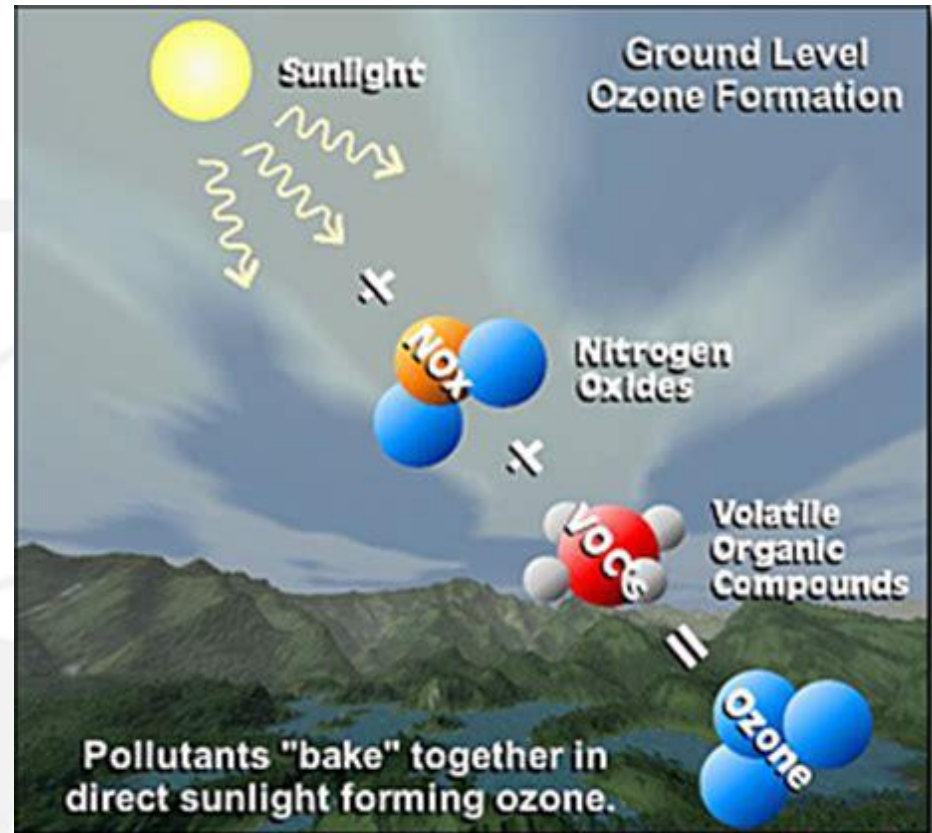


Permit Process

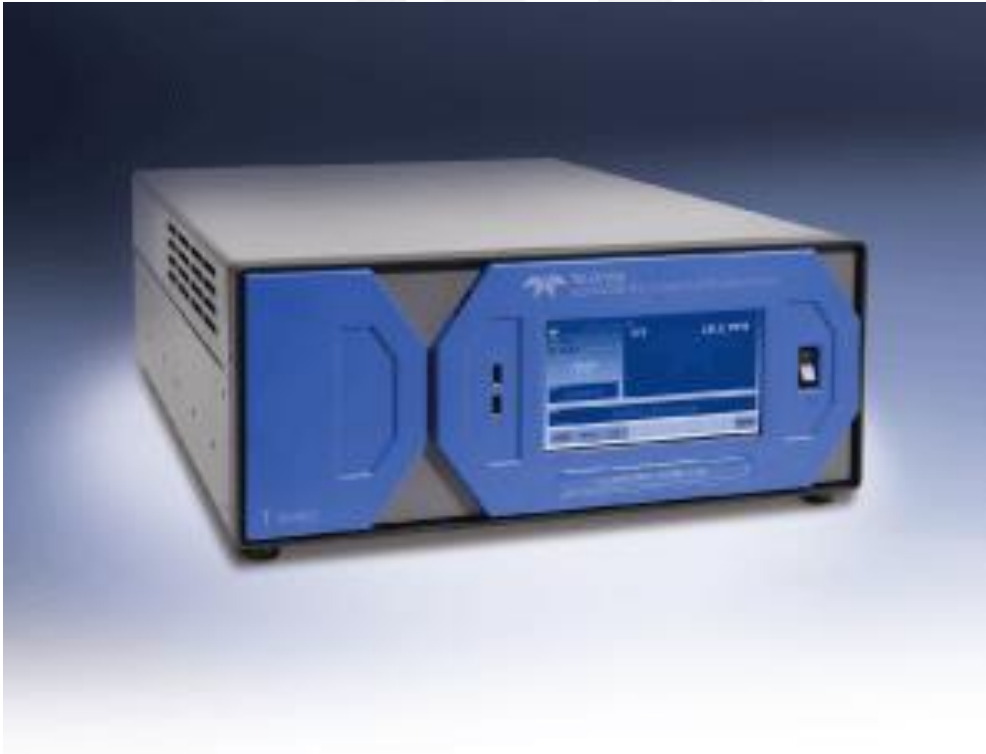
- The DNR *must* issue a permit if the source, considering the draft permit requirements, meets the criteria for permit approval
- Public comments:
 - Adequacy of technical review
 - Accuracy of emission calculations
 - Appropriateness of controls
 - Adequacy of compliance requirements

Ozone

- Ground level ozone is formed when volatile organic compounds (VOC) and nitrogen oxides react in the presence of sunlight
- Precursor pollutants can travel long distances from their emission points before conditions will be right to form ozone



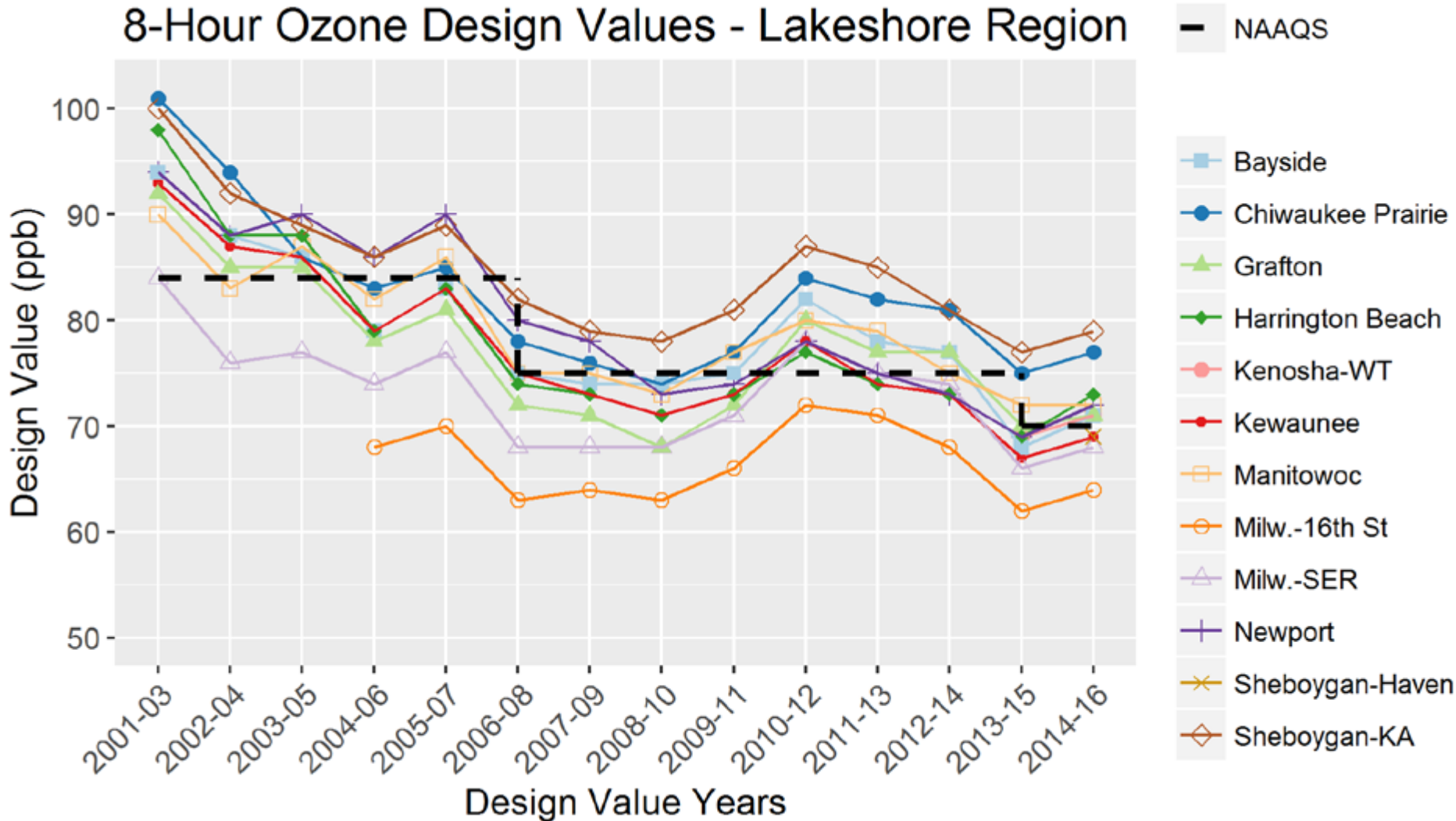
Ozone Monitoring



- UV light is passed through the sample cell, where it is absorbed proportionally to the amount of ozone present
- Switching valve alternates measurement between the sample stream and a sample that has been scrubbed of ozone

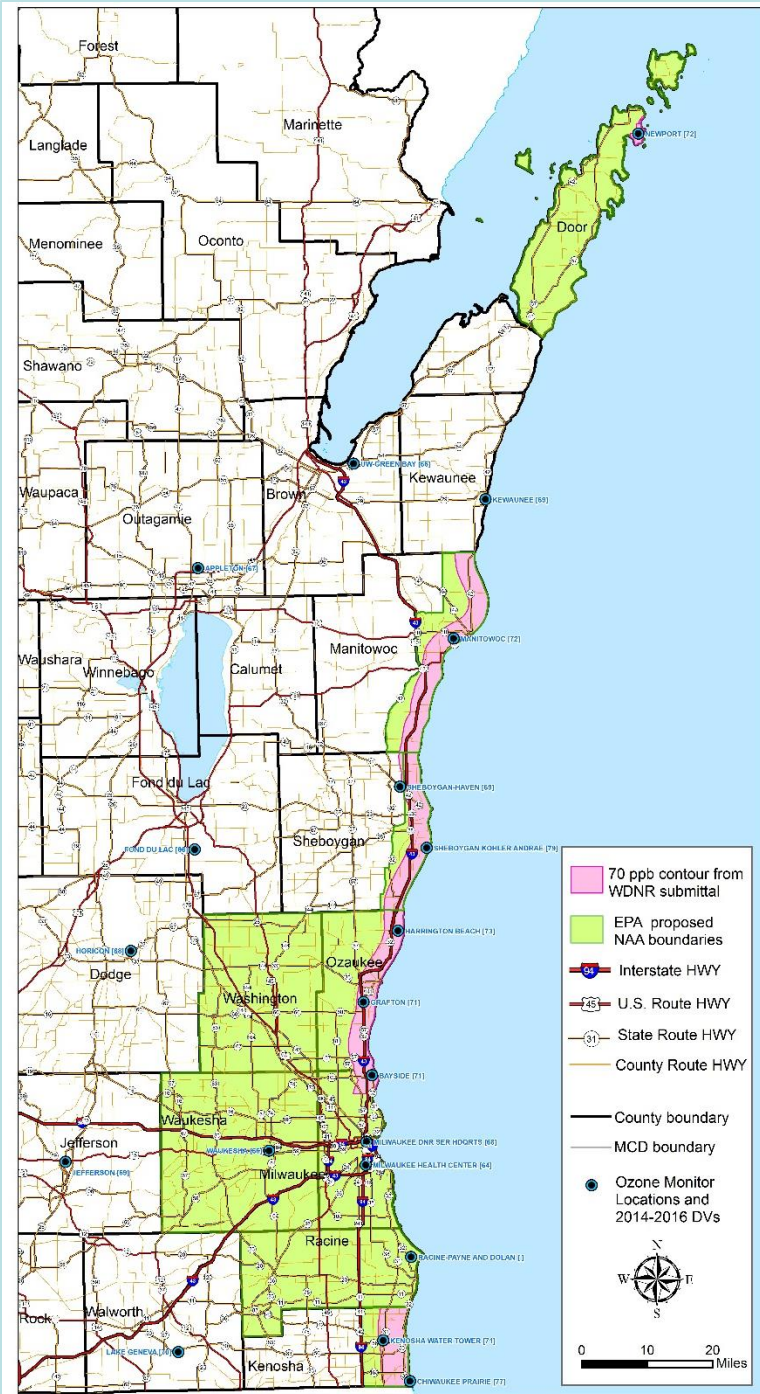


8-Hour Ozone Design Values - Lakeshore Region



EPA's Intended 2015 Ozone NAAQS Nonattainment Area Designations

All areas of Wisconsin



WISCONSIN
DEPT. OF NATURAL RESOURCES

Data from EPA's 120-day letter of 12/20/17 and DNR submittal to EPA of 4/20/17



Permitting impact of Non-Attainment

- Clean Air Act permitting in nonattainment areas:
 - Nonattainment area new source review (NNSR)
 - Lower Major Source Threshold
 - Application of Lowest achievable emission rate (LAER)
 - Offset emissions of VOCs and NO_x by a ratio of 1:1.1

WISCONSIN
DEPT. OF NATURAL RESOURCES



Permit Process

- Clean Air Act provides for public participation and opportunity for review of all air pollution control permits

http://dnr.wi.gov/cias/am/amexternal/public_notices.aspx

- Available for public review until April 16, 2018
 - Applications
 - Draft air permits
 - Analysis documents



Thank you

Public comments can be submitted through
April 16, 2018. Send comments to:

By email: jonathan.wright@wisconsin.gov

By mail:

Wisconsin Department of Natural Resources
Northeast Region Air Program
Oshkosh Service Center
625 E. County Road Y, Suite 700,
Oshkosh, WI 54901-9731. Attn.: Jonathan Wright.