

**U.S. Environmental Protection Agency, Region 5
Air and Radiation Division**

**FY 2020 - 2021
Air Program Work Plan Elements
Annual Progress Report
for**

**Clean Air Act, Section 105
Assistance Agreements
or
Air Program Section of
Performance Partnership Agreement/Grant**

AIR PROGRAM WORK PLAN ELEMENTS

The following Air Program work plan has been negotiated between EPA and WDNR for the project period 10/01/2020 – 9/30/2021.

Input your State Specific Commitments/Activities that support the Outputs/Measures in the second column.

Strategic Goal 1: Core Mission¹

Objective 1.1: Improve Air Quality: Work with states to accurately measure air quality and ensure that more Americans are living and working in areas that meet high air quality standards.			
Air Toxics			
EPA Contact(s): John Mooney email: Mooney.John@epa.gov phone: (312) 886-6043			
State/Local Air Agency Contact(s): Gail Good email: Gail.Good@wisconsin.gov phone: (608) 264-8537			
Outputs/Measures (identified from EPA National Program Guidance, Regulations, or Policy) ²	State Specific Commitments/Activities	Progress Target Dates	Progress Made on Commitments (Annual or Final Performance Report)
State/Local Air Agency Specific Commitments			
Objective 1.1: Improve Air Quality: Work with states to accurately measure air quality and ensure that more Americans are living and working in areas that meet high air quality standards.			
Mobile Source Programs – Control Strategies			
EPA Contact(s): Pamela Blakley email: Blakley.Pamela@epa.gov phone: (312) 886-4447			
State/Local Air Agency Contact(s): Jason Treutel email: Jason.Treutel@wisconsin.gov phone: (608) 264-8596			
Outputs/Measures (identified from EPA National Program Guidance, Regulations, or Policy)	State Specific Commitments/Activities	Progress Target Dates	Progress Made on Commitments (Annual or Final Performance Report)
Implement mobile source control strategies on time and consistent with SIP commitments.		Project End Date	Ongoing. The WDNR continues to work with the Wisconsin Department of Transportation to implement the state I/M program in the required counties.
Work with EPA in preparing SIPs and developing, implementing, and transitioning mobile source control	WDNR will implement mechanisms to continue On-Board Diagnostics vehicle emissions testing in ozone nonattainment areas.	Per finalized implementation guidance dictates	Ongoing. Wisconsin continued to administer a contract to ensure OBD testing occurred in ozone nonattainment areas.

¹ EPA’s Strategic Goals are located at <http://www2.epa.gov/planandbudget/strategicplan>

² The Commitments/Activities are from the Office of Air and Radiation’s National Program Manager Guidance at <http://www2.epa.gov/planandbudget/fy-2014-npm-guidances>, regulations, laws, and/or EPA Policy

strategies such as I/M, OBD, and state fuel programs.			
Work with local Metropolitan Planning Organizations, EPA, and state and federal transportation agencies in future conformity determinations, as needed.		Per finalized implementation guidance dictates	Ongoing. The WDNR continues to collaborate with regional planning organizations (RPOs), EPA, the Wisconsin Department of Transportation and the Federal Highway Administration through quarterly transportation conformity meetings. WDNR is also participating with these organizations in RPO long-range transportation and land-use planning efforts.
Work with transportation agencies as appropriate to update mobile SIP budgets in response to changing needs such as updates to the mobile model MOVES or other changes.		Project End Date	Ongoing. WDNR participated in the MOVES3 model development process and has begun using the model for regulatory submittals since it was officially released.
Work with EPA to develop creditable mobile source programs.		Project End Date	Ongoing. The state continues to implement a vehicle I/M program in southeast Wisconsin.
Continue to support the Midwest Clean Diesel Initiative including the management of state clean diesel grants, active involvement in state clean diesel coalitions, Smartway, and the promotion, generation, and implementation of clean diesel funding, programs, projects, and policies. (Voluntary)	WDNR will continue to participate in these activities voluntarily, subject to program priorities.	Project End Date	The Wisconsin Clean Diesel Grant Program used EPA's Diesel Emissions Reduction Act (DERA) program to fund 39 projects in FY 2019, granting extensions as needed to help subrecipients respond to the impacts of the pandemic. Several projects will continue into FY 2020 as a result. Fourteen projects were funded in FY 2020. The WDNR is preparing to open an application period for FY 2021 awards in November 2021. Awards are posted on DNR web site: https://dnr.wi.gov/aid/cleandiesel.html
Implement mobile source control strategies on time and consistent with SIP commitments.		Project End Date	The state continues to implement mobile source control strategies (e.g., I/M programs, transportation conformity, RFG fuel) as required by approved SIPs.
State/Local Air Agency Specific Commitments			
Criteria and Toxics Pollutants - Ambient Air Monitoring			
EPA Contact(s): Marta Fouco email: Fuoco.Marta@epa.gov phone: (312) 886-6243			
State/Local Air Agency Contact(s): Katie Praedel email: katie.praedel@wisconsin.gov phone: (608) 259-6108			
Outputs/Measures	State Specific Commitments/Activities	Progress Target Dates	Progress Made on Commitments (Annual or Final Performance Report)

Commented [KR1]: Changed to Robin Katz in May 2021

(identified from EPA National Program Guidance, Regulations, or Policy)			
Operate and maintain the approved (annual network plan) monitoring network of NAAQS pollutants, NCORE, and Toxics according to 40 CFR Part 58, and complete the required data collection, analysis, laboratory and data reporting activities. The monitoring network and quality assurance should meet all applicable CFR minimum requirements.		Quarterly	WDNR operated NAAQS, NCore, NATTS, UATM, PM2.5 speciation and enhanced ozone monitors in accordance with 40 CFR Part 58 under the approved monitoring network plan. the Monitoring and Program QMPs underwent revisions based on EPA's 5 year cycle. Criteria pollutant QAPPS are complete and continue to be updated on a prioritized schedule.
Submit all ambient monitoring data (NAAQS pollutant data, NCore, Toxics, MET) and associated QA data to AQS according to the schedule in 40 CFR Part 58.		Quarterly	All criteria pollutant data submittals met the schedule and continued to meet the schedule through 2021. Toxics data was submitted as required.
Submit a state-wide annual network plan as required by 40 CFR 58.10		By July 1, each year	The 2022 annual network plan was released for 30 day public comment, submitted and approved by the Regional Administrator, as required in 40 CFR Part 58.10 prior to all applicable deadlines.
Report real time air quality data (O3, CO, SO2, NO2, and PM10) to AirNOW for cities required to report the AQL.		Daily	Real time reporting of O3, CO, SO2, NO2 and PM10 is being done. Real time PM2.5 is also being reported to AirNOW.
Participate in EPA's Technical System Audits and timely develop a corrective action plan, address findings, and provide documentation or verification or completed corrective actions.		Project End Date	Technical System A Past audits were resolved to meet deadlines. The 2021 TSA Final Report is expected on December 6, 2021. DNR is working with EPA on preliminary resolutions ahead of that deadline. The NATTS TSA was conducted in 2016, of 111 findings, WDNR submitted final responses for all. The NATTS TSA was concurred upon by EPA via a close-out letter on 6/14/19.
Submit 5-year network assessments required by 40 CFR 58.10(d)		July 1, 2020	The assessment was previously submitted in 2015. Wisconsin participated on a 5-year network assessment committee led by LADCO which kicked off on July 8, 2019. Work was completed in July 2020. In addition to providing review and state specific input, Wisconsin gathered input and provided a summary of current and planned sensor efforts throughout Region 5.
Establish and operate PM2.5 and CO monitors at near-road NO2 sites in CBSAs between 1M and 2.5M population.		July 1, 2015	WDNR continued to conduct near road (NO2, CO and PM2.5) monitoring at the Milwaukee College Avenue Near Road site as required. In addition, Wisconsin collects PM10 and black carbon at the near road site.

Commented [KR2]: FYI: Reported to <https://airquality.wi.gov/home/map>

Commented [KR3]: Deadline has been modified. As of 1/10/2022, 2021 TSA Final Report is still under EPA R5 review, awaiting approval.

Develop a plan to characterize SO2 concentrations (modeling versus monitoring), and if required, establish and operate SO2 monitoring sites by the deadline published in the Final Data Requirements Rule (expected Summer, 2015)		January 1, 2017	As required by the Data Requirements Rule (DRR), Wisconsin notified EPA on July 1, 2016 of the air quality characterization option for each DRR-listed source. Per that notification, WDNR worked with one source to establish a SO2 monitoring site prior to the January 1, 2017 deadline. As required by Wis. Stat. 285.72(2) Wisconsin took over the operation and maintenance of the Kaukauna SO2 monitoring site in February 2020.
EPA will assess the implementation of the State's approved QMP.	WDNR will submit a certification letter to EPA Region 5 each year that: -Confirms that the QMP approved by EPA is still in effect; - Identifies any revisions needed and/or incorporated into the QMP during the preceding year; and -Identifies all QAPPs approved for environmental programs encompassed by the Air Agency's QMP.	January 1, each year (Required as a condition of EPA's QMP approval.)	WDNR did a full revision in the Jan 1, 2020 version as required. Review is underway for 2021.
Quality Assurance is in place to ensure the integrity of data quality.	WDNR will: -Operate sufficient collocated PM2.5, PM10 and Pb monitors to meet requirements in 40 CFR 58, Appendix A -Compose, review, and update SOPS for all air monitoring activities according to the schedule identified in your PQAO Quality Management Plan. -Develop a Quality Assurance Project Plan (QAPP) for projects not covered under current QAPP or QMP, pursuant to 40 CFR Part 58, Appendix A -Provide for (or participate in) adequate, independent quality assurance audits for the monitoring activities supported by this grant, including Pb Performance Evaluation Program (Pb-PEP) and National Performance Audit Program (NPAP). -Perform annual performance evaluations for single analyzers (gases) and semi-annual flow rate audits (particulates and Pb) -Perform 1-point quality control check on gaseous and particulate instruments per	Project End Date	<ul style="list-style-type: none"> - Continuing to meet collocation requirements for PM2.5 and PM10. WDNR is no longer required to operate Pb monitors. - Created and revised several QAPPs and SOPs to better document processes. Including the completion of all criteria pollutant QAPPs, Ozone and HAPS QAPPs - Revised all criteria and HAPs QAPPs. Additional work scheduled for revising criteria pollutant QAPPs is scheduled to occur on at least a five year basis or as needed. - Continuing to meet Quality Control requirements for NPAP, Internal audits, 1-point QC, flow rate verifications. - Continuing to work with laboratories to ensure quality data is produced. Developed a COOP plan with the Wisconsin State Lab of Hygiene - Continuing to quality assure data before submittal to AQS and annual certification. - Continuing to utilize standards that are certified and NIST traceable. - Continuing to have level 2 ozone standards certified against EPA Region 5 Standard Reference Photometer; and in turn certify our level 3 ozone standards to maintain traceability to EPA Region 5 Standard Reference Photometer.

	<p>requirements in 40 CFR Part 58, Appendix A</p> <ul style="list-style-type: none"> -Provide oversight of the analytical laboratories responsible for analyzing air quality samples to ensure quality assurance criteria are met. -Review field and laboratory quality assurance data and validate air quality data. -Maintain certification of all quality assurance equipment, standards, and gases -Verify ozone transfer standards through the Standard Reference Photometer Program. 		
<p>Commit funds sufficient to maintain an adequately supported monitoring program, to include upgrades of monitoring, laboratory and quality assurance equipment as necessary to maintain an appropriate inventory of monitoring assets.</p>	<p>WDNR will commit sufficient resources for:</p> <ul style="list-style-type: none"> -Federal Reference Methods (FRM) and Federal Equivalent Methods (FEMs) -Special purpose monitors -Meteorology measurements -Monitoring stations and shelters with adequate access and room to support air quality measurements supported under §105 (e.g., appropriate platform space to meet siting criteria and allow for independent audits). -Core measurements of PM_{10-2.5}, trace gas analyzers for carbon monoxide (CO), sulfur dioxide (SO₂), and nitrogen monoxide (NO)/nitrogen dioxide (NO₂/nitrogen oxides (NO_y), calibrators, zero gas generators, meteorology, or speciation -Data loggers supporting continuous data analyzers for real-time data reporting and telemetry systems -Laboratory space and equipment -Quality assurance equipment and supplies 	<p>Project End Date</p>	<p>WDNR budget managers and monitoring section chief work closely to maintain high quality monitoring and quality assurance equipment, data acquisition systems and laboratory equipment in accordance with the budget and the Equipment Replacement Plan. WDNR maintains a technologically advanced continuous FEM PM2.5 network and continues to allocate funding to support SPMs associated with enhanced ozone monitoring. WDNR maintains and bi-annually updates an air monitoring Equipment Replacement Plan to budget, maintain equipment and request EPA approval to dispose of or transfer equipment. The state also maintains a Wisconsin asset management system that includes monitoring equipment to meet financial and insurance requirements.</p>
<p>For any portion of this project (monitoring, laboratory analysis,</p>		<p>Project End Date</p>	<p>WDNR works with the Wisconsin State Lab of Hygiene (WSLH) in the analysis of discrete PM2.5, PM10, NATTS, and UATM samples. WLSH</p>

quality assurance, data reporting, and data validation) that is carried out by another organization (contract or other agreement), provide coordination and oversight to ensure all activities involved are accomplished according to 40 CFR 58.			has been included in the TSAs. All activities involved are accomplished according to 40 CFR 58. When issues have been identified WI has worked closely with EPA Region 5 and WSLH to mitigate data loss and perform corrective action planning. To allow for continuity of operations in the event the WSLH is unable to complete their obligations, DNR and WSLH have agreed to alternative methods of lab analysis outlined in a COOP. Additionally, WDNR works with the national contract laboratory (ERG) to perform analysis of canisters for TO-15a analysis.
Attend and participate in EPA's national and/or regional conferences and training pertinent to air quality monitoring, quality assurance, and data reporting (e.g. the National Ambient Air Monitoring Conference). Attend other meetings/conference calls, as necessary.		Project End Date	Wisconsin actively participates on SLT calls, as well as EPA – WI monthly calls. The monitoring Section Chief engages with EPA through attendance at NACAA monitoring steering committee meetings. Two monitoring personnel are planning to attend the 2022 conference.
State/Local Air Agency Specific Commitments			
NAAQS - Attainment Planning and Maintenance			
EPA Contact(s): Sarah Arra email: arra.sarah@epa.gov phone: (312) 353-6960			
State/Local Air Agency Contact(s): Jason Treutel email: Jason.Treutel@wisconsin.gov phone: (608) 264-8596			
Outputs/Measures (identified from EPA National Program Guidance, Regulations, or Policy)	State Specific Commitments/Activities	Progress Target Dates	Progress Made on Commitments (Annual or Final Performance Report)
Cooperatively undertake with EPA a “SIP binder” review and develop plan to address any elements requiring clarifying action on the part of EPA or the state.			EPA and WDNR continue to make progress on this work. A schedule has been established to complete work by June 30, 2022.
Continue to implement strategies to attain and maintain the NAAQS in all areas.		Project End Date	WDNR continued to take all Clean Air Act-required actions relative to the applicable NAAQS. WDNR also continued to collaborate with EPA on actions needed to fulfill outstanding SIP requirements and address backlogged SIPs.
Review air quality reports and take appropriate actions if attainment and/or		Project End Date	The Door County 2015 ozone NAAQS maintenance area showed a reviolation of the standard based on 2018-2020 data. WDNR is taking

maintenance areas are found to be violating the NAAQS.			actions as specified in the area maintenance plan to evaluate if additional control measures are necessary to bring the area back into attainment. Most recent data from 2019-2021 the area has moved back into attainment of the standard.
Prepare recommendations on designations for revised NAAQS.		One year after promulgation of revised NAAQS.	Analyzed and responded to EPA's revised nonattainment areas for five Wisconsin nonattainment areas resulting from the 2015 ozone Remand resulting from <i>Clean Wisconsin v. EPA</i> . EPA did not request recommendations nor did they provide an opportunity to comment, opting instead to go straight to final rule. DNR submitted a petition for reconsideration August 13, 2021 which EPA has acknowledged, but has provided no additional response.
Consult with EPA, as necessary, to finalize area designations for SO ₂ primary NAAQS.	WI has one remaining area (Outagamie County) to be designated in Round 4. All other areas of state have been designated.	December 2020.	A state recommendation of "nonattainment" for most of Outagamie County was made on May 1, 2020. EPA proposed to designate the area as nonattainment consistent with the state recommendation, with a final designation due by December 30, 2020. Due to the area meeting the NAAQS based on certified 2018-2020 data, EPA withdrew the initial nonattainment designation on April 8, 2021.
Submit redesignation requests including maintenance plans for areas with clean air quality data.		Project End Date	Redesignation requests and maintenance plans for the following nonattainment areas were submitted by WDNR in the reporting period: <ul style="list-style-type: none"> - 2015 ozone Door County area - 2008 ozone Shoreline and Inland Sheboygan County areas - 2008 ozone Kenosha County area - 2010 SO₂ Oneida County area <p>The Door and Sheboygan County requests were finalized by EPA. The Kenosha County request was not approved by EPA due to the violation of the NAAQS by an Illinois monitor in the Chicago nonattainment area. The Oneida County request was finalized by EPA.</p>
Develop and submit supplemental information needed to address remaining 2012 PM _{2.5} iSIP elements.		Project End Date	EPA approved most elements of Wisconsin's PM _{2.5} iSIP on 12/27/2019. WDNR is addressing the remaining element in a rulemaking currently underway (Board Order AM-31-19).
Implement strategies for controlling emissions from wood smoke where it is a significant contributor to air quality problems, including regulatory and non-regulatory measures. (Voluntary)			No update on this voluntary activity.

Commented [TA4]: The Rhenlander/Oneida County redesignation was finalized on 1/12/22

Develop and submit attainment demonstration SIPs for 2008 ozone NAAQS.		Project End Date	EPA approved most elements of the WDNR moderate-area attainment plan SIP for the partial Kenosha County 2008 ozone nonattainment area on Feb. 13, 2019. EPA further approved the NNSR requirements (May 3, 2019) and VOC RACT requirements (Sep. 16, 2020). Only the attainment demonstration remains to be approved. WDNR submitted the required serious-area attainment plan for the partial Kenosha County area on Dec. 1, 2020. EPA proposed approval on December 7, 2021.
At State's discretion, submit attainment date extension requests for qualifying nonattainment areas under the 2008 ozone NAAQS.		Project End Date	No action taken in the reporting period.
Facilitate implementation of NOx and SO2 Requirements under the Cross State Air Pollution Rule.		As required by CSAPR	WDNR continued to implement the Cross State Air Pollution Rule (and Cross State Air Pollution Rule Update, Close-out, and Revised), as finalized.
Convert, where desired, CSAPR FIP into a SIP. (Voluntary)		At state's discretion.	WDNR elected not to complete this activity in the reporting period.
Conduct public notification and education efforts, including reporting air quality forecasts and current conditions for ozone and particle pollution. (Voluntary)		As necessary on forecasted high pollution days	WDNR issued regular air quality forecasts and advisories for both ozone and PM2.5.
Conduct SO2 air quality planning, including the development and submittal of attainment demonstration SIPs as necessary, in accordance with EPA rules and guidance, including the final SO2 Data Requirements Rule.		Project End Date	WDNR submitted the required attainment SIP for the state's one Round 1 nonattainment area (partial Oneida County) on Jan. 22, 2016. EPA signed a notice to partially approve and partially disapprove that plan. EPA, WDNR, and the affected facility continued to work constructively to address the remaining approvability issues associated with that SIP. WDNR submitted a revised attainment plan on Mar. 29, 2021. EPA approved the required attainment SIP on October 22, 2021 with an effective date of Dec. 31, 2021.
For affected states, submit SIP revisions to revise startup, shutdown or malfunction (SSM) provisions per final SIP call.	WI not included in the SSM SIP call	Project End Date: 12/31/2020	There was no SIP call affecting Wisconsin for this issue in the reporting period.
Review and comment on the 2016 Modeling Platform, including future-year emissions projections.		Project End Date	WDNR is reviewing the 2016v.2 modeling platform internally and as part of a LADCO effort. WDNR will submit comments by the Dec. 17, 2021 deadline.

Commented [TA5]: EPA published a final rule approving Wisconsin's plan on Oct. 22, 2021.

Commented [MA6]: On January 12, 2022, EPA published a finding of failure to submit SSM SIP revisions in response to the 2015 SSM SIP call.

Respond to EPA comments on NEI data prior to publication, including submission revisions as needed.		Project End Date	WDNR actively participated in activities related to the 2017 NEI development, which has since been released, and is participating in the planning activities associated with the 2020 NEI.
Submit emissions data for the latest reporting year in accordance with the Air Emissions Reporting Requirements rule.		December 2018 December 2019 December 2020	WDNR submitted calendar year 2018, 2019 and 2020 point source data as required by the AERR. Area and mobile source data were reported following 2020 NEI deadlines and processes and will be reviewed as EPA completes the NEI.
Work with EPA and tribes, as necessary, to clarify air quality management authority for non-reservation tribal lands.		Project End Date	Ongoing
Develop and submit transport SIPs for the 2015 Ozone NAAQS.			WDNR submitted its required section 110(a)(2)(D) evaluation of transport relative to the 2015 ozone NAAQS as part of its 2015 iSIP on Sept. 14, 2018.
Develop and submit transport SIPs for the 2012 annual PM 2.5 NAAQS, if not yet submitted.			WDNR submitted its required section 110(a)(2)(D) evaluation of transport relative to the 2012 annual PM2.5 NAAQS on Nov. 26, 2018. EPA approved this SIP on Apr. 30, 2019.
Provide comments as necessary, regarding area designations and boundaries for Round 4 of the 2010 SO2 NAAQS.			A state recommendation of "nonattainment" for most of Outagamie County was made on May 1, 2020 based on 2017-2019 data. EPA proposed to designate the area as nonattainment consistent with the state recommendation, with a final designation due by December 30, 2020. EPA finalized a determination of attainment in April 14, 2021 based on 2018-2020 data which showed attainment with the standard.
State/Local Air Agency Specific Commitments			
Regional Haze - Attainment Planning and Maintenance			
EPA Contact(s): Sarah Arra email: Arra.sarah@epa.gov phone: (312) 886-9401			
State/Local Air Agency Contact(s): Jason Treutel email: Jason.Treutel@wisconsin.gov phone: (608) 264-8596			
Outputs/Measures (identified from EPA National Program Guidance, Regulations, or Policy)	State Specific Commitments/Activities	Progress Target Dates	Progress Made on Commitments (Annual or Final Performance Report)
Continue to work with EPA, Region 5 on issues related to submitted regional haze SIPs.		Project End Date	The WDNR worked with EPA on regional haze SIP requirements and was an active participant in regional and national regional haze

			discussions. WDNR submitted its round 2 regional haze SIP on July 30, 2021 meeting the EPA deadline.
Continue to implement BART and other SIP requirements.		Project End Date	Ongoing, per state rule and SIP requirements.
Submit any outstanding regional haze SIP elements, if identified by EPA.		Project End Date	No outstanding requirements in the reporting period.
As requested, provide input into EPA's re-review of regional haze rule and guidance revisions.		Project End Date	WDNR submitted comments in 2016 during EPA's last reviews. WDNR worked with LADCO states to submit feedback on the Regional Haze clarification memo.
Work on second planning period SIPs currently due in 2021.		Project End Date	WDNR participated in a LADCO-sponsored work group (including other LADCO states, EPA, and FLMs) to develop a consolidated list of updated source emissions (and other data) to help states develop their second planning period SIPs. WDNR held a public comment period on its draft Regional Haze SIP and incorporated feedback from EPA, FLMs and the public. WDNR submitted its round 2 regional haze SIP on July 30, 2021 meeting the EPA deadline.
State/Local Air Agency Specific Commitments			
Permitting			
EPA Contact(s): Genevieve Damico email: Damico.genevieve@epa.gov phone: (312) 353-4761			
State/Local Air Agency Contact(s): Kristin Hart email: Kristin.Hart@wisconsin.gov phone: (608) 266-6876			
Outputs/Measures (identified from EPA National Program Guidance, Regulations, or Policy)	State Specific Commitments/Activities	Progress Target Dates	Progress Made on Commitments (Annual or Final Performance Report)
(Commitments funded with state funding.)			
Issue major PSD/NSR permits within one year of receiving a complete permit application.		Project End Date	WDNR issued 100% of its major PSD/NSR permits within 1 year of a complete application*. *WDNR issued 7 PSD permits in FFY21, all were issued within a year of receiving a complete application (100%). WDNR did not issue any nonattainment area NSR permits during this time frame.
Issue major NSR permits consistent with CAA requirements and enter BACT/LAER determinations in the RACT/BACT/LAER Clearinghouse	Wisconsin to implement process to ensure timely entry of data into the RBLC.	Project End Date	WDNR issues permits consistent with CAA and BACT/LAER requirements. US EPA reviews and comments on all PSD/NSR draft permits.

(RBLC).			Plans to hire a summer intern in 2021 to enter BACT determinations into the Clearinghouse were halted due to the pandemic. No BACT determinations made in FFY 21 were entered into the RBLC. WDNR has begun the process to hire an intern this summer to enter all BACT determinations made in the last two FFYs.
Provide data in a timely manner on PSD issued for new major sources and major modifications by entering data including “the application accepted date” and “the permit issuance date” in to the RBLC national database.	Wisconsin to implement process to ensure timely entry of data into the RBLC.	Project End Date	WDNR has established a process to enter into the RBLC BACT determinations in a timely manner going forward. Plans were interrupted by the pandemic. Determinations will be entered next summer either by a summer intern or by existing staff.
PSD-delegated States (IL and MN) coordinate with EPA to ensure that Endangered Species Act consultations are handled in a timely manner.		Project End Date	Not applicable.
Provide PSD/NSR permit applications to EPA prior to the start of the public comment period.		Project End Date	All PSD Permit applications are made available to EPA upon receipt. PSD and NSR applications are scanned and uploaded to WDNR database and made available to the public. EPA staff is regularly notified of all permitting actions including PSD and NSR applications received. DNR and EPA meet monthly and discuss any PSD applications received or anticipated applications.
State/Local Air Agency Specific Commitments			
Program Implementation - Air Toxics			
EPA Contact(s): Alexis Cain email: cain.alexis@epa.gov phone: (312) 886-7018 State/Local Air Agency Contact(s): Maria Hill email: Maria.Hill@wisconsin.gov phone: (608) 267-7542 Jason Treutel email: Jason.Treutel@wisconsin.gov phone: (608) 264-8596 Gail Good email: Gail.Good@wisconsin.gov phone: (608) 264-8537			
Outputs/Measures (identified from EPA National Program Guidance, Regulations, or Policy)	State Specific Commitments/Activities	Progress Target Dates	Progress Made on Commitments (Annual or Final Performance Report)
Emissions Inventory: Prepare and submit Criteria and Hazardous Air Pollutant (HAP) data to the National Emissions Inventory (NEI) per EPA’s schedule. Quality assure and revise NEI data for the 2017 NEI due January 2018. Respond to EPA comments on	The State will continue to report toxics to NEI and respond to comments on the data per EPA schedule.	January 2020	The 2016, 2017, 2018, 2019 and 2020 Wisconsin data were submitted by the due dates. EPA comments on data were responded to and revisions were made as needed.

Commented [NP7]: Melissa Hulting email Hulting.Melissa@epa.gov Phone (312) 886-2265

Commented [NP8]: Yes this is correct. WDNR also participated in the review of the 2017-2019 inventory review for the air toxics data update.

data prior to publication, including submission revisions as needed.			
Conduct data analysis and assessment of air toxics monitoring and/or modeling data.	The State will not be reviewing 2017 RAIMI data due to limited resources, but rely on NATA instead.	Project End Date	WDNR provided refinements to 2014 Wisconsin NATA data. WDNR also participated in the NATA Lean process for 2014 NATA data.
Develop and implement delegated or approved section 112 (MACT and Residual Risk), 111(d) and 129 air toxic standards, as appropriate, for major sources residual risk, and area sources.	State taking responsibility for implementation. Where there is ambiguity, the State will confer with EPA.	Project End Date	WDNR continues to implement MACT by inclusion of appropriate requirements in permits. WDNR is reviewing and commenting on applicable Residual Risk proposals.
Participate in the quarterly State/Region 5 risk assessment conference calls. Participate in annual State/Region 5 air toxics meeting. (Voluntary)		Project End Date	WDNR air management staff participated in these quarterly calls. The State/Region 5 Air Toxics meeting was not held this year but three DNR staff attended the previous meeting in 2019
Participate in research projects, policy issues and task forces that address identification and reduction of persistent bio-accumulative air toxic pollutants. (Voluntary)		Project End Date	<p>Pen and ink changes were made by EPA to the NATTS workplan on 6/20/19 requiring the addition of Ethylene Oxide as a target compound at the Horicon monitoring site. WDNR worked with the WSLH, ERG and EPA to facilitate laboratory analysis of EtO by January 4, 2020. The monitored concentrations are shared on the DNR with the public and updated on a quarterly basis. Additionally, one facility was identified to have EtO concentrations above risk concern. A letter outlining the risk was provided to impacted residents and no follow-up was requested. EPA, DNR and local officials continue to work together to mitigate emissions of EtO from this source.</p> <p>In 2020, monitoring for PFAS was facilitated at seven sites in Wisconsin utilizing wet deposition (precipitation) samples already being collected throughout the state. Wisconsin is engaged with EPA ORD, EPA Region 5 and Region 5 State and Local partners in this study.</p> <p>Planning and implementation is underway for a 2021 PFAS in Air method development study in cooperation with the Wisconsin State Lab of Hygiene and EPA ORD.</p>
As resources allow, work with communities to develop and implement voluntary air toxics programs that address outdoor, indoor, and mobile sources with emphasis on areas with	The State will meet with public officials on an as needed basis.	Project End Date	<p>WDNR maintains membership in the technical advisory group for the Westlawn Community Partnership, and participates in meetings on an as needed basis.</p> <p>WDNR maintains UATM at the 16th street community health center environmental justice monitoring site.</p>

Commented [NP9]: Yes this is correct.

Commented [NP10R9]: WDNR also did the modeling for Evonik (Milton) facility .

Commented [NP11]: Yes this is correct.

Commented [NP12]: Yes this is correct. WDNR also attended the virtual State/Region 5 Air toxics meeting in 2020.

Commented [NP13]: Yes this is correct.

Commented [NP14]: Yes this is correct.

Commented [NP15]: Yes this is correct.

Commented [NP16R15]: yes this is correct.

Commented [NP17R15]: R5 worked with OAQPS to get the funding for this project.

Commented [NP18]: Correct.

Commented [NP19]: Correct.

potential environmental justice concerns. (Voluntary)			The air program has partnered with US EPA and local community groups to expand the usability of low-cost air quality sensors across Wisconsin and nationally. Air program staff conducted a study, created a website to share results and worked to create correction factors to better align low cost sensor data with regulatory monitors. Monitoring staff continue to work with and engage local health departments and community groups, specifically in the Milwaukee area, to identify and mitigate EJ issues.
Great Lakes Air Deposition (GLAD) Program: Address the deposition of persistent bioaccumulative toxics (PBTs) to the waterways of the Great Lakes Region. This effort includes, air monitoring, source characterization, source allocation, and PBT reduction efforts.	The WDNR Air Monitoring Program uses GLAD funds to monitor for elemental and other mercury species in the ambient air. The Air program operates three monitoring sites for mercury and also supports tribal efforts to monitor mercury in the ambient air. Funds are used to operate and maintain analyzers and support managing and evaluating the mercury data including uploading the data to the AQS database.	Annually	The WDNR Air program operated three monitoring sites for elemental mercury and also supported tribal efforts to monitor mercury in the ambient air. 105 funds were used to operate and maintain analyzers and support managing and evaluating the mercury data including uploading the data to the AQS database.
State/Local Air Agency Specific Commitments			

Commented [NP20]: Correct

Commented [NP21]: Correct.

Strategic Goal 3: Rule of Law and Process

Input your State Specific Commitments/Activities that support the Outputs/Measures in the second column.

<p>Objective 3.1: Compliance with the Law: Timely enforce environmental laws to increase compliance rates and promote cleanup of contaminated sites through the use of a ll EPA’s compliance assurance tools, especially enforcement actions to address environmental violations.</p>			
<p>Enforcement – Monitoring</p>			
<p>EPA Contact(s): Sarah Marshall email: marshall.sarah@epa.gov phone: (312) 886-6797 Mark Messersmith email: messersmith.mark@epa.gov phone: (312) 353-2154 State/Local Air Agency Contact(s): Maria Hill email: Maria.Hill@wisconsin.gov phone: (608) 267-7542</p>			
Outputs/Measures (identified from EPA National Program Guidance, Regulations, or Policy) ³	State Specific Commitments/Activities	Progress Target Dates	Progress Made on Commitments (Annual or Final Performance Report)
<p>Submit draft Compliance Monitoring Strategy (CMS) plan for review, negotiation and approval by EPA.</p> <p>Implementation of the final CMS plan will begin the upcoming federal fiscal year, as it pertains to non-Title V sources. CMS plan should meet EPA’s 2016 CAA Stationary Source CMS policy.</p> <p>CMS plan source category and frequency flags in ICIS-Air will be completed for the non-Title V source universe.</p> <p>When completing a FCE or PCE, agencies should, where appropriate and feasible, utilize advanced monitoring technologies to detect and document emissions and record ambient</p>	<p>State will submit the CMS plan and implement as approved by EPA.</p> <p>EPA has offered use of advanced monitoring equipment to the State (i.e. flare cameras). State has developed an electronic reporting option for all compliance documents. The agency is implementing digital signature for</p>	<p>September 1, 2020</p> <p>October 1, 2020</p> <p>December 1, 2020</p> <p>Project End Date</p>	<p>The WDNR air management final FFY22 CMS plan was submitted on September 20, 2021. The plan meets EPA 2016 CAA Stationary Source CMS policy except for four sources as part of an alternative plan for smoothing major source workload over the two year frequency period.</p> <p>The state FFY21 FCE commitments were completed by the September 30, 2021 due date. The state returned to on-site inspections beginning October 1, 2021. A new infrared camera is also in use as an addition to routine compliance monitoring efforts.</p>

³ The Commitments/Activities are from the Office of Enforcement and Compliance Assurance Manager Guidance at <http://www2.epa.gov/planandbudget/national-program-manager-guidances>, regulations, laws, and/or EPA Policy.

conditions, as it pertains to non-Title V sources.	compliance certification and monitoring reports in March 2018 through CROMERR.		
Respond to citizen complaints, including those referred by EPA, as it pertains to non-Title V sources. Inspect as necessary.		Project End Date	WDNR investigates complaints received and tracks related information in the air management database WARP. WDNR notifies EPA of state activities related to complaints forwarded by EPA.
Facilities subject to the asbestos NESHAP regulations will be inspected in accordance with the Guidelines for Asbestos NESHAP Demolition and Renovation Inspection Procedures, Revised November 1990, as it pertains to non-Title V sources.		Project End Date	WDNR air management staff conduct inspections and follow up on complaints received regarding asbestos renovation and demolition projects. A summary of state activity is provided to EPA Region annually. A new mobile app was developed and placed in use for asbestos inspections. Onsite data is entered directly into the mobile device by the inspector and stored in the asbestos data system without the need for additional paper steps.
Track and update recommendations made during the State Review Framework until completion. This reporting effort includes the verification of data used by the State Review Framework that is made available to the public as it pertains to non-Title V sources.		Quarterly	No significant issues were identified during the last iteration of the State Review Framework. WDNR staff worked with EPA staff to clarify and resolve issues as the review was underway.
State/Local Air Agency Specific Commitments			
Enforcement – Reporting			
EPA Contact(s): Sarah Marshall email: marshall.sarah@epa.gov phone: (312) 886-6797 Mark Messersmith email: messersmith.mark@epa.gov phone: (312) 353-2154 State/Local Air Agency Contact(s): Maria Hill email: Maria.Hill@wisconsin.gov phone: (608) 267-7542			
Outputs/Measures (identified from EPA National Program Guidance, Regulations, or Policy)	State Specific Commitments/Activities	Progress Target Dates	Progress Made on Commitments (Annual or Final Performance Report)
Submit compliance and enforcement information to meet EPA’s Minimum Data Requirements (MDRs) for the current Integrated Compliance Information System – Air (ICIS-Air)	The State will submit to meet MDRs for the current ICIS-Air ICR, HPV and FRV policies.	60 day reporting as required by ICR	Data is currently not complete in ICIS, due to communicated data transfer issues. Progress has been made on transfer errors and missing data. The state will continue in order to to meet the end of the year verification deadline.

Information Collection Request (ICR), revised Timely and Appropriate Enforcement Response to High Priority Violations (HPVs) policy, revised Guidance on Federal Reportable Violations (FRVs) for Stationary Sources, CAA National Stack Testing Guidance as it pertains to non-Title V sources. Ensure data is complete, accurate and timely consistent with EPA policies and ICR. Such language should also be included in the written agreement between the State and EPA.			
State will provide and report asbestos demolitions/renovation notification information, compliance evaluations and enforcement activities, including penalties assessed, as it pertains to non-Title V sources.		Annually – October 1 st	WDNR asbestos program activities are summarized and provided to EPA annually after the close of the federal fiscal year.
State/Local Air Agency Specific Commitments			
Enforcement			
EPA Contact(s): Sarah Marshall email: marshall.sarah@epa.gov phone: (312) 886-6797 Mark Messersmith email: messersmith.mark@epa.gov phone: (312) 353-2154 State/Local Air Agency Contact(s): Maria Hill email: Maria.Hill@wisconsin.gov phone: (608) 267-7542			
Outputs/Measures (identified from EPA National Program Guidance, Regulations, or Policy)	State Specific Commitments/Activities	Progress Target Dates	Progress Made on Commitments (Annual or Final Performance Report)
Conduct bimonthly conference calls to discuss efforts made by the State to resolve known violators. During the conference calls, newly discovered violators will be identified, case lead, evidence, timeline for resolution, status of case, data management and reporting. For State lead HPV cases unaddressed over 180 day timeframe, a discussion will be held between the agencies and determination made on	WDNR and EPA agreed to move to a bi-monthly combined enforcement and data management and reporting call beginning January 2018.	Bi- Monthly	WDNR continues to conduct bimonthly conference calls to discuss efforts made by the state to resolve known violators.

what will be the best method of returning the source back into compliance, as it pertains to non-Title V sources.			
Conduct enforcement activities in accordance with EPA's revised Timely and Appropriate Enforcement Response to High Priority Violations (HPVs) policy, the Clean Air Act Stationary Source Civil Penalty policy and the Revised Asbestos NESHAP Strategy, as it pertains to non-Title V sources.		Project End Date	WDNR air management utilizes a violation evaluation form to identify high priority violations (HPV) and track enforcement progress in the state database WARP to assure EPA timelines are being met. Individual enforcement cases are discussed on bimonthly conference calls with EPA to assure that the case resolution is consistent with EPA policies.
Initiate civil enforcement actions, as appropriate, and whenever necessary to protect communities. Negotiate settlements and track compliance with consent decrees and administrative orders taking all necessary actions to ensure compliance with the terms of the enforcement action, as it pertains to non-Title V sources.		Project End Date	It should be noted that WDNR does not negotiate settlements directly; however, WDNR will provide technical support as requested by the Wisconsin Department of Justice.
State/Local Air Agency Specific Commitments			

Grant Administrative Requirements

EPA Contact(s): Michelle Becker email: Becker.Michelle@epa.gov phone: (312) 886-3901
 Camden Ogletree email: Ogletree.Camden@epa.gov phone: (312) 886-0250
 State/Local Air Agency Contact(s): Gail Good email: Gail.Good@wisconsin.gov phone: (608) 264-8537
 Sheri Stach email: Sheralynn.Stach@wisconsin.gov phone: (608) 264-6292

Outputs/Measures (identified from EPA National Program Guidance, Regulations, or Policy)	State Specific Commitments/Activities	Progress Target Dates	Progress Made on Commitments (Annual or Final Performance Report)	EPA Approval (Initial/Date)	DNR Approval (Initial/Date)
Reporting Requirements. Within 90 days after the project period has ended, a final report shall be submitted to the EPA Air Project Officer, the administrative closing documents shall be submitted to EPA's Assistance Section, and the final financial federal report shall be submitted to the EPA Las Vegas Finance Center.		Within 90 days after project period ends	N/A – Annual Progress Report		
End-of-Year Progress Report for Multi-Year Grants. Within 90 days after one-year of the project start date, a comprehensive end-of-the-year progress report shall be submitted to the EPA Air Project Officer.		Within 90 days after one-year of the project period start date	Submitted 12/22/2021		
Performance Evaluation Process and Reporting Schedule. The work plan will include a performance evaluation process and reporting schedule in accordance with Section 35.115, 40 CFR 35.107.		Annual	Completed		
Annual Meeting. The air agency will participate with EPA in an annual meeting to discuss Air Program progress, resolution of issues and collaboration opportunities to improve air quality.		Annual	Completed as part of EnPPA process.		
Management System. The air agency has in place policies and standard operating procedures in order to manage the grant funds associated with completing the work plan components outlined in the work plan.		Annual	Confirmed as part of EnPPA process		

Areas for Disinvestment (if applicable). The air agency should identify any areas for air program disinvestment and develop a strategy for disinvestments.		Annual	Completed
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BUDGET DETAIL

10/01/2019 – 09/30/2020

Final Air Federal Fiscal Year 2020 Air Program 105 Allocation; \$3,127,899 (Year 1 of 4)

Final Air Federal Fiscal Year 2021 Air Program 105 Allocation; \$3,125,505 (Year 2 of 4)

Final Air Federal Fiscal Year 2022 Air Program 105 Allocation; \$3,081,429 (Year 3 of 4)

Final Air Federal Fiscal Year 2023 Air Program 105 Allocation; To Be Announced (Year 4 of 4)

WDNR anticipates completing a re-budget during a future year of the award per EPA recommendation to align with final Federal Air Program Allocations.

Budget Category	Federal (10/01/2020 – 09/30/2021)	State (10/01/2020 – 09/30/2021)	Total (10/01/2019 – 09/30/2020)
1. Personnel Indicate personnel/FTE that will be working on work plan elements.	\$ 1,440,857	\$ 1,356,218	\$ 2,797,075
2. Fringe Benefits Indicate the mandated and voluntary benefits to be supplemented with these funds.	\$ 692,019	\$ 651,367	\$ 1,343,386
3. Supplies Indicate any items to be purchased that will be used in support of air project work plan objectives. EPA policy defines supplies as a unit item that cost less than \$5,000.	\$ 39,896	\$ 37,553	\$ 77,449
4. Equipment Identify items to be purchased such as air quality related instruments used in support of work plan objectives. Provide estimated cost for each item. EPA policy defines equipment as items costing \$5,000 or greater.	\$ 80,217	\$ 75,505	\$ 155,722
5. Contractual Indicate any proposed contractual items that are reasonable and necessary to carry out the work plan objectives.	\$ 264,187	\$ 248,668	\$ 512,855
6. Travel Indicate number of individuals traveling, destination, number of trips, and reason for travel.	\$ 25,200	\$ 23,719	\$ 48,919

7. Other Indicate general (miscellaneous) expenses necessary to carry out objectives stated in the work plan.	\$ 181,798	\$ 171,118	\$ 352,916
8. Total Direct Charges Summary of all costs associated with each object-class category.	\$ 2,724,174	\$ 2,564,148	\$ 5,288,322
9. Total Indirect Costs Organization must provide documentation of a federally approved indirect cost rate (percentage) reflective of proposed project/grant period.	\$ 357,255	\$ 336,272	\$ 693,526
Total Cost Indicate overall figure of all direct and indirect costs.	\$ 3,081,429	\$ 2,900,420	\$ 5,981,849

APPENDIX A – Title V Program

EPA encourages States to include Title V Program commitments as a component of their work plan or in the air component of the ir PPA to articulate the agreement between the State and EPA with regard to the Title V Program. Title V activities are not funded with Clean Air Act, Section 105 air pollution control program appropriations.

Strategic Goal 1: Core Mission ⁴

Objective 1.1: Improve Air Quality: Work with states to accurately measure air quality and ensure that more Americans are living and working in areas that meet high air quality standards.			
Permitting			
EPA Contact(s): Genevieve Damico email: Damico.genevieve@epa.gov phone: (312) 353-4761			
State/Local Air Agency Contact(s): Kristin Hart email: Kristin.Hart@wisconsin.gov phone: (608) 266-6876			
(Commitments funded with EPA Clean Air Act funding.)			
Outputs/Measures (identified from EPA National Program Guidance, Regulations, or Policy)	State Specific Commitments/Activities	Progress Target Dates	Progress Made on Commitments (Annual or Final Performance Report)
Provide data in a timely manner on Title V permits to EPA for entry into TOPS.		Project End Date	Ongoing. All data for FFY 21 was provided on time.
Issue initial permits, significant modifications and renewal Title V permits and reduce backlog of renewal permits.		Project End Date	In the course of FFY21, WDNR completed the following number of Title V permit actions: Initial Permits: 0 Significant Mods: 32 Renewals: 62 By the end of FFY21, the backlog of Title V renewal applications increased to 60. Backlog reduction continues to be a focus in FY22. DNR has made improvements to training, templates and checklists, application materials, and communications and expects to see positive impacts to backlog reduction once staffing levels recover from FY21.
Participate with EPA in Title V permit program evaluations, set target to respond to EPA’s evaluation report and implement recommendations.		Project End Date	The EPA’s evaluation of WDNR’s progress in implementing the NSR and Title V programs occurred on June 24, 2020. There were no significant recommendations in the final report.

⁴ EPA Measures are from National Program Guidance at <http://www2.epa.gov/planandbudget/national-program-manager-guidances>, 40 CFR 35 at <https://www.gpo.gov/fdsys/search/submitcitation.action?publication=CFR> , and EPA Regional Priorities.

Issue new Title V permits and significant permit modifications within 18 months of application completeness determined by permitting authority.		Project End Date	<p>Of the permit actions completed in the course FFY21 by WDNR, the count of how many Title V permits were done within and without the 18 month timeframe are:</p> <table data-bbox="972 386 1251 480"> <tr> <td></td> <td><18</td> <td>>18</td> </tr> <tr> <td>Initial Permits:</td> <td>0</td> <td>0</td> </tr> <tr> <td>Renewals:</td> <td>51</td> <td>11</td> </tr> <tr> <td>Significant Mods:</td> <td>32</td> <td>0</td> </tr> </table>		<18	>18	Initial Permits:	0	0	Renewals:	51	11	Significant Mods:	32	0
	<18	>18													
Initial Permits:	0	0													
Renewals:	51	11													
Significant Mods:	32	0													
State/Local Air Agency Specific Commitments															

Strategic Goal 3: Rule of Law and Process:

<p>Objective 3.1: Compliance with the Law: Timely enforce environmental laws to increase compliance rates and promote cleanup of contaminated sites through the use of all EPA's compliance assurance tools, especially enforcement actions to address environmental violations.</p>			
<p>Enforcement – Monitoring</p>			
<p>EPA Contact(s): Sarah Marshall email: marshall.sarah@epa.gov phone: (312) 886-6797 Rochelle Marceillars email: Marceillars.rochelle@epa.gov phone: (312) 353-4370 State/Local Air Agency Contact(s): Maria Hill email: Maria.Hill@wisconsin.gov phone: (608) 267-7542</p>			
Outputs/Measures (identified from EPA National Program Guidance, Regulations, or Policy)	State Specific Commitments/Activities	Progress Target Dates	Progress Made on Commitments (Annual or Final Performance Report)
Submit draft Compliance Monitoring Strategy (CMS) plan for review, negotiation and approval by EPA.	State will submit the CMS plan and implement as approved by EPA.	September 1, 2020	The WDNR CMS plans and FCE lists were submitted to EPA Region by the due dates.
Implementation of the final CMS plan will begin the upcoming federal fiscal year. CMS plan should meet EPA's 2016 CAA Stationary Source CMS policy.		October 1, 2020	The WDNR air management FFY21 CMS plan was submitted by the due date. Region 5 has requested details on off-site inspections. The state will be providing the information by the end of CY20. The state FFY20 FCE commitments were completed prior to the September due date
CMS plan source category and frequency flags in the Integrated Compliance Information System – Air (ICIS-Air) will be completed for the Title V source universe.		December 1, 2020	Data was set up in ICIS-Air to reflect the CMS plan prior to the required due date.
When completing a FCE or PCE, agencies should, where appropriate and feasible, utilize advanced monitoring technologies to detect and document emissions and record ambient conditions.	EPA has offered use of advanced monitoring equipment to the State (i.e. flare cameras). State has developed an electronic reporting option for all compliance documents. The agency is implementing digital signature for compliance certification and monitoring reports in March 2018 through CROMERR.	Project End Date	Permit required compliance demonstration methods are utilized to assess facility compliance. Additional information (e.g., ambient monitoring data, citizen complaints) are utilized as available.
Respond to citizen complaints, including those referred by EPA. Inspect as necessary.		Project End Date	WDNR investigates complaints received and tracks related information in the air management database WARP. WDNR notifies EPA of state activities related to complaints forwarded by EPA.
Track and update recommendations made during the State Review Framework (SRF) until completion. This reporting effort includes the		Quarterly	No significant issues were identified during the last iteration of the State Review Framework. WDNR staff worked with EPA staff to clarify and resolve issues as the review was underway.

verification of data used by the SRF that is made available to the public.			
State/Local Air Agency Specific Commitments			
Enforcement – Reporting			
EPA Contact(s): Sarah Marshall email: marshall.sarah@epa.gov phone: (312) 886-6797 Mark Messersmith email: messersmith.mark@epa.gov phone: (312) 353-2154			
State/Local Air Agency Contact(s): Maria Hill email: Maria.Hill@wisconsin.gov phone: (608) 267-7542			
Outputs/Measures (identified from EPA National Program Guidance, Regulations, or Policy)	State Specific Commitments/Activities	Progress Target Dates	Progress Made on Commitments (Annual or Final Performance Report)
Submit compliance and enforcement information to meet EPA's Minimum Data Requirements (MDRs) within the sixty (60) day standard required for reporting by the current Integrated Compliance Information System – Air (ICIS-Air) Information Collection Request (ICR), Revised Timely and Appropriate Enforcement Response to High Priority Violations (HPVs) policy, Revised Guidance on Federal Reportable Violations (FRVs) for Stationary Sources, CAA National Stack Testing Guidance. Ensure data is complete, accurate and timely consistent with EPA policies and ICR. Such language should also be included in the written agreement between the State and EPA.	The State will submit to meet MDRs for the current ICIS-Air ICR, HPV and FRV policies.	60 day reporting as required by ICR	Wisconsin has communicated to EPA compliance data transfer issues and the data is currently not complete in ICIS. Progress has been made on transfer errors and missing data. The state will continue in order to meet the end of the year verification deadline.
Provide asbestos demolitions/renovation notification information, compliance evaluations and enforcement activities, including penalties assessed.		Annually – October 1 st	This data is tracked by WDNR and submitted to EPA at the end of each federal fiscal year (October).
		Quarterly	
State/Local Air Agency Specific Commitments			

Enforcement

**EPA Contact(s): Sarah Marshall email: marshall.sarah@epa.gov phone: (312) 886-6797
Mark Messersmith email: messersmith.mark@epa.gov phone: (312) 353-2154**

State/Local Air Agency Contact(s): Maria Hill email: Maria.Hill@wisconsin.gov phone: (608) 267-7542

Outputs/Measures (identified from EPA National Program Guidance, Regulations, or Policy)	State Specific Commitments/Activities	Progress Target Dates	Progress Made on Commitments (Annual or Final Performance Report)
Conduct bimonthly conference calls to discuss efforts to resolve known violators. During these conference calls, newly discovered violators will be identified and discussions on case lead, evidence, timeline for resolution case status, data management and reporting will be discussed. For State lead HPV cases unaddressed over the 180 day timeframe, a discussion will be held between the agencies and determination made on what will be the best method of returning the source back into compliance.	WDNR and EPA agreed to move to a bi-monthly combined enforcement and datarmanagement and reporting all beginning January 2018.	Bi-Monthly	WDNR, in agreement with EPA, has moved to bimonthly calls. Newly discovered violations and updates on open violations are included on each agenda. Data management is now discussed on these same bimonthly calls while all supervisors involved are present.
State will conduct its enforcement activities in accordance with EPA’s revised Timely and Appropriate Enforcement Response to High Priority Violations (HPVs) policy, the Clean Air Act Stationary Source Civil Penalty policy and the Revised Asbestos NESHAP Strategy.		Project End Date	WDNR air management utilizes a violation evaluation form to identify HPV’s, and tracks enforcement progress in the state database WARP to assure EPA timelines are being met. Individual enforcement cases are discussed on bi-monthly conference calls with EPA to assure that the case resolution is consistent with EPA policies.
Initiate civil enforcement actions, as appropriate, and whenever necessary to protect communities. Negotiate settlements and track compliance with consent decrees and administrative orders taking all necessary actions to ensure compliance with the terms of the enforcement action.		Project End Date	It should be noted that WDNR does not negotiate settlements directly; however, WDNR will provide technical support as requested by the Wisconsin Department of Justice.