



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

(AR-18J)

JUL 16 1996

Mr. Dale Ziege
Bureau of Air Management
Department of Natural Resources
101 South Webster Street
Box 7921
Madison, WI 53707

Dear Mr. Ziege:

This letter is in regards to the construction permit for Western Lime Corporation-Green Bay, #95-POY-118. This is a Prevention of Significant Deterioration (PSD) modification to an existing PSD major source. The modification involves increasing the capacity of lime kiln #2 and adding some screening operations to debottleneck the rest of the process in order to increase production capacity of kiln #2 from 375 tons per day (tpd) to 500 tpd.

The kiln was originally constructed in 1990 and was given a Best Available Control Technology (BACT) limit for sulfur dioxide (SO₂) of 68.1 lbs/hr and a 1% SO₂ content in the coal. The Preamble to the New Source Review Rule Changes in the August 7, 1980 Federal Register, page 52718, states that "The presumption that federally enforceable source-specific requirements correctly reflect actual operating conditions should be rejected by EPA or a state, if reliable evidence is available which shows that actual emissions differ from the level established in the SIP or the permit." Western Lime did a stack test on this kiln in 1993, which gave an SO₂ emission rate of .1 lb/hr. This value is more than 600 times less than the BACT limit. Therefore, the kiln should not be allowed to continue the original BACT for SO₂ as the BACT for the modification.

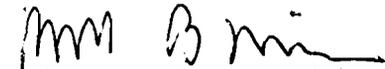
In light of this, the United States Environmental Protection Agency (EPA) has some concerns with the new BACT determination. First, the State in the netting process is not permitted to use the old BACT limit for SO₂ as actual emissions. Second, the BACT limits cannot be separated between the existing and modified portions of the kiln because the emissions from both go through the same stack. Also, the new stream BACT limit must always be identifiable for testing, and since the two streams are mixed the only way to demonstrate the modification is at BACT is to subject the total stream to the new BACT. In addition, the source has requested that the kiln modification retain the 68.1 lb/hr limit,

but increase the percent sulfur to 1.5% in the coal. This part of the old BACT limit cannot be relaxed.

In light of these complexities, we suggest that, in order to raise the sulfur content, the source could exempt itself from PSD by either taking a synthetic minor restriction to reduce total SO2 emissions from the kiln to below 40 tons per year, or redoing BACT for the whole kiln including the modification. This increase of the percent sulfur content does not generate any more tons of SO2 emissions because the source is taking a much lower emission limit, which can be done by taking an emission limit and a percent sulfur limit in coal. A synthetic minor restriction would not trigger a PSD review and the kiln would no longer be subject to the previous poor BACT.

If you have any further questions regarding this letter or would like to discuss the matter further, please contact Laura Gire Dods at (312) 886-5031 or Ron Van Mersbergen at (312)886-6056.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Robert Miller', with a stylized flourish at the end.

Robert Miller, Chief
Permits and Grants Section

cc: Paul Yeung
Wisconsin Department of
Natural Resources
Permits Section