



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAY 14 2015

REPLY TO THE ATTENTION OF:

Ms. Kristin Hart  
Chief  
Permits and Stationary Source Modeling Section  
Bureau of Air Management  
Wisconsin Department of Natural Resources  
PO Box 7921  
Madison, Wisconsin 53707-7921

Dear Ms. Hart:

The U.S. Environmental Protection Agency has the following comment on the Wisconsin Department of Natural Resources' (WDNR) draft construction permit for Unlimited Renewables LLC, (#14-JJW-233). In order to ensure that the project meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis for the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comment:

The draft permit does not include requirements for the Volatile Organic Compounds (VOC) Process Lines limitation of NR 424.03(2) for the compost pile operations and no applicability discussion of this requirement is included in the Preliminary Determination. It seems that the compost pile operations should be considered part of a process line, which is defined in NR 400.02(128) as, "one or more actions or unit operations which must function simultaneously or in sequence in order to manufacture or modify a product." Unlimited Renewables produces organic fertilizer granules, bulk compost, fertilizer pellets, and fines. For all of these products, composting is an action that is an essential part of the production process which must occur in sequence. The composting operations have the potential to emit over 15 lbs. of VOC per day and do not appear to meet any of the exemptions provided in NR 424.03(1). Please determine if NR 424.03(2) is an applicable requirement and if necessary undertake a Latest Available Control Technology (LACT) review and incorporate the requirements determined to be LACT into the permit.

If a LACT determination is required, EPA suggests that WDNR review the "Final Draft Staff Report For Proposed Rule 4566 (Organic Material Composting Operations)" from San Joaquin Valley Unified Air Pollution Control District.<sup>1</sup> In particular pages 12-15 provide discussion of control technologies available, including add on technologies such as biofilters and best practices such as covering windrows with a finished compost which acts a passive biofilter.

<sup>1</sup> <http://www.valleyair.org/workshops/postings/2011/8-18-11-rule4566/rule%204566%202%20final%20draft%20staff%20reportfinal.pdf>

We look forward to working with you to address all of our comments. If you have any further questions, please feel free to contact Andrea Morgan, of my staff, at (312) 353-6058.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in dark ink and is positioned above the printed name.

Genevieve Damico  
Chief  
Air Permits Section