



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

APR 09 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 comments on the Wisconsin Department of Natural Resources' (WDNR) draft revision to the Prevention of Significant Deterioration (PSD) permit for Waupaca Foundry, Inc (#15-JJW-024). The draft permit revises the current sulfur dioxide (SO₂) Best Available Control Technology (BACT) limit. 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 comments:

1. When WDNR first proposed revisions to the BACT limits of Waupaca Foundry Plant 1, it was determined that not enough information was available to determine a BACT limit. WDNR required Waupaca Foundry to adopt temporary BACT limits while conducting a BACT study to determine the ideal dry sorbent injection rate and determine the final BACT emission limit. The current draft permit authorizes Waupaca Foundry, Inc. Plant 1 to revise its temporary hourly SO₂ BACT limit from 34.83 pounds (lbs) of SO₂ in any hour (hr) to a limit of 150 lbs of SO₂ in any hour and create a limit of 34.83 lbs/hr averaged over any 24-hour period of time. WDNR justifies this change by explaining that unexpected peaks of SO₂ emissions occur during certain stages of cupola startup and shutdown. In its application, Waupaca states that it anticipates that the cupola will undergo startup and shutdown approximately once every two weeks. Since the SO₂ peaks seem to only occur during limited times in the infrequent periods of cupola startup and shutdown, EPA suggests that rather than revise the SO₂ limits for all periods of operation, WDNR create a separate limit for periods of startup and shutdown. This approach is consistent with EPA guidance and Environmental Appeals Board Decisions which state that if a BACT limit cannot be met during periods of startup and shutdown, a permitting authority can make an on the record determination that such compliance is infeasible and describe what measures will be undertaken to minimize emissions during startup and shutdown and create a secondary PSD limit for startup and shutdown events.¹

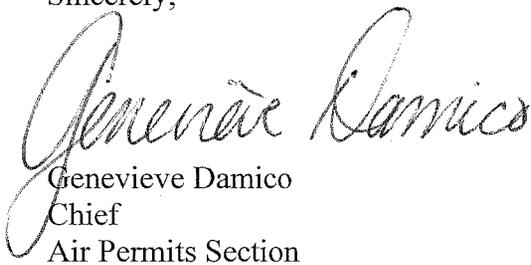
¹ See *In re*: Tallmadge Generating Station, PSD Appeal No. 02-12, (EAB, May 22, 2003) and *In re*: Rockgen Energy Center, PSD Appeal No. 99-1, (EAB, August 25, 1999).

Please either revise the permit and create a separate limit for startup and shutdown or justify why the higher hourly limit is necessary for all periods of operation.

2. The preliminary determination document provides no discussion regarding how the value of 150 lbs/hr was determined to be a reasonable hourly limit representing BACT. Please provide a discussion of the observed SO₂ peaks that occur during startup and shutdown and evaluate whether the 150 lbs/hr limit is reasonable and will minimize emissions for those periods, and revise the limit if it is found to not represent BACT.

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,



Genevieve Damico
Chief
Air Permits Section