



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

MAR 14 2013

REPLY TO THE ATTENTION OF:

Andrew Stewart
Acting Chief
Permits and Stationary Source Modeling Section
Bureau of Air Management
Wisconsin Department of Natural Resources
PO Box 7921
Madison, Wisconsin 53707-7921

Dear Mr. Stewart:

The U.S. Environmental Protection Agency has the following comments on the Wisconsin Department of Natural Resources' (WDNR) draft revision of the Prevention of Significant Deterioration (PSD) permit for the We Energies Biomass-Fueled Cogeneration Facility in Rothschild, Wisconsin. The draft permit is being proposed as a construction permit (#10-SDD-058-R1). In 2011, We Energies was issued a permit to construct a 50 megawatt, biomass fueled cogeneration facility. This permit revision covers changes to material handling processes and the proposed cooling tower. The project will exceed the PSD threshold for several pollutants and will require Best Available Control Technology (BACT) limits for Particulate Matter (PM), Particulate Matter less than 10 micrometers (PM₁₀), and Particulate Matter less than 2.5 micrometers (PM_{2.5}).

In order to ensure that the project meets 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) Page 10 of the Preliminary Determination document states that the impact of the modified source will exceed the Significant Monitoring Concentrations (SMCs) for PM₁₀, sulfur dioxide, and nitrogen oxides. WDNR explains that it is not necessary to conduct preconstruction monitoring because, "The WDNR has monitored for these pollutants in the area historically, and this data can serve to estimate the pre-construction air quality". It also appears that WDNR relied on historical monitoring data for PM_{2.5} to estimate the pre-construction air quality. Please provide further justification in the permit record that the existing monitoring data is representative including the location of monitors and the completeness of the data set. In addition, the May 1987 EPA document titled, "Ambient

Monitoring Guidelines for PSD”¹ includes information on factors that we recommend you consider when determining if existing data may be considered representative for purposes of this permit.

- 2) Page 8 of the Preliminary Determination document indicates that the North Transfer Tower (F126) BACT for PM, PM₁₀, and PM_{2.5} is proposed as use of a total enclosure, an emission rate of 0.04 pound per hour, and a 5% opacity requirement. However, it appears that these limits are not included in the draft permit. Please ensure that the BACT requirements are included in the final permit.
- 3) Please correct the typographical error in condition I.A.4.c.(2)(a). Current language reads, “The calculated emission rates required under condition A.1.4.b.(6) of this permit.” It appears that the condition should reference permit condition I.A.4.b.(6). If appropriate please correct the reference.

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

¹ Ambient Monitoring Guidelines for Prevention of Significant Deterioration -May 1987 available at <http://www.epa.gov/ttnamtl1/archive/files/ambient/criteria/reldocs/4-87-007.pdf>