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

JUN 0 3 2013

REPLY TO THE ATTENTION OF:

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 of the Prevention of Significant Deterioration (PSD) permit for the Green Bay Packaging Inc. –Mill Division. The draft permit is being proposed as a construction permit (#13-JJW-040). The facility manufactures recycled linerboard and medium. The proposed project is to install one 253 million British thermal units per hour natural gas-fired boiler with low Nitrogen Oxides (NO_x) burners. The project is a major modification under PSD for greenhouse gases (GHGs).

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 11 of the Preliminary Determination document states that the GHG Best Available Control Technology (BACT) limit will be 160 lbs of Carbon Dioxide Equivalent (CO_2e) per 1,000 lbs of steam, but on page 6 of the draft permit the GHG BACT emission limit is 160 lbs of Carbon Dioxide (CO_2) per 1,000 pounds of steam. Since the regulated NSR pollutant is defined as GHG, the GHG emission limit(s) should account for not only CO_2, but for all of the GHGs that are emitted.

2) Page 6 of the draft permit identifies nitrous oxide (N_2O) as a GHG emitted from the proposed modification. When determining GHG BACT, WDNR assumes that limiting NO_x formation will in turn limit the formation of N_2O, and the BACT limit is set such that NO_x is used as a surrogate for N_2O. However, no justification as to why it is appropriate to use NO_x as a surrogate for N_2O is provided. Please explain why the relationship between NO_x and N_2O makes it appropriate to use NO_x as a surrogate.

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

Genevieve Damico
Chief
Air Permits Section