



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

AUG 13 2015

REPLY TO THE ATTENTION OF:

Kristin Hart, Chief
Permits and Stationary Source Modeling Section
Bureau of Air Management
Wisconsin Department of Natural Resources
P.O. 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 permit for Wisconsin Electric Power Company D/B/A We Energies – Oak Creek Station (We Energies), permit #14-SDD-205. The permit is a Prevention of Significant Deterioration permit authorizing the addition of a new outdoor coal storage pile. 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. The Best Available Control Technology (BACT) discussion in the staff report notes that wind barriers, either trees or wind fences, are an available control technology; however, nothing further is noted for why the permit does not include a wind barrier as BACT. On a conference call with WDNR and We Energies on August 4, 2015, We Energies indicated that they intended to use trees as a wind barrier for the new storage area, and agreed to include this as a component of BACT in the permit. EPA believes that a wind barrier should be include as a component of BACT for this project.
2. A review of the RACT/BACT/LAER Clearinghouse shows some projects that have included a requirement for zero visible emissions at the property boundary as BACT for coal storage piles. EPA suggests that WDNR consider including an additional requirement of zero visible emissions at the property boundary as a component of BACT for this project.
3. The fugitive dust emission control plan required by 40 CFR 60.254(c) is an integral part of We Energies' ability to comply with the 10% opacity limit established as BACT under this permit. EPA would normally defer review of such plans to WDNR as the delegated authority for the New Source Performance Standards (NSPS); however, due to the

relationship with BACT in this case, EPA intends to request a copy of the initial plan directly from We Energies when it is submitted to WDNR in accordance with the NSPS and the requirements of this permit. EPA is not requesting any changes to permit language regarding where submittals are sent. We may seek to coordinate our review with WDNR when the plan is submitted.

We look forward to working with you to address our comments. If you have any questions regarding these comments please contact Rachel Rineheart, of my staff, at (312) 886-7017.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Genevieve Damico
Chief
Air Permits Section