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

JUN 1 7 2016

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) Title V renewal for Wisconsin Rapids Mill, permit number #772010030-P10. In order to ensure that the project meets federal Clean Air Act (CAA) 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 recommends that the following points be addressed:

1) 40 CFR 70.5(c)(3) requires the source to provide emission-related information as part of the permit application, including all emissions of pollutants for which the source is major and emissions of all regulated air pollutants. Pursuant to 40 CFR 70.2, "regulated air pollutant" includes "Any pollutant for which a national ambient air quality standard (NAAQS) has been promulgated" and thus includes particulate matter of less than 2.5 micrometers ($PM_{2.5}$). Further, 40 CFR 70.3(d) requires that fugitive emissions from a Part 70 source must "be included in the permit application and Part 70 permit in the same way as stack emissions, regardless of whether the source category in question is included in the list of sources contained in the definition of major source." WDNR's February 2016 report entitled "Air Quality Review of Industrial $PM_{2.5}$ from Stationary Sources in Wisconsin", states that mechanical units are not likely to "cause or contribute to a violation of the NAAQS". A determination that an emission unit does not cause or contribute to a violation of the NAAQS does not necessarily equate to no emissions from the unit. As frequently seen in ambient air impact analyses, an emission unit can emit significant quantities of a pollutant and still not cause, by itself, a violation of the NAAQS. WDNR's statement that mechanical units are unlikely to "cause or contribute to a violation of the NAAQS" does not address the explicit Part 70 requirements to quantify emissions rates. WDNR's failure to consider $PM_{2.5}$ emissions from mechanical sources, including fugitive emissions, is not allowable under Title V of the CAA and the permit record is currently deficient. Compliance with Title V requires WDNR to quantify the $PM_{2.5}$ emissions from the mechanical sources at the facility. EPA urges WDNR to include $PM_{2.5}$ emissions calculations for the mechanical units at Wisconsin Rapids Mill using the best available information.

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2) The draft permit contains over 100 footnotes. In some cases where the footnote is purely informational, the use of a footnote may be appropriate. However, many of the footnotes included in the permit seem to contain language that is intended to be federally enforceable and should be contained in the body of the permit as an applicable requirement- for example footnote 15. Additionally, some of the footnotes, such as footnote 51, seem unnecessary as the information they contain is redundant to language in the permit conditions. Please review the footnotes in the permit and ensure that any footnote that contains requirements that are intended to be enforceable are included in the permit as permit conditions and remove unnecessary footnotes as appropriate.

3) Condition I.A.(1)(c)(6) on page 10 of the draft permit requires that the facility "keep records of the amount of used oil sorbents burned... during the hours that used oil sorbents are burned", it appears that this recordkeeping is required to demonstrate compliance with condition I.A.(1)(a)(4) which limits the amount of used oil sorbents the facility may burn in the boiler per hour. To improve clarity and practical enforceability of the permit condition, EPA suggests that it may be more appropriate to require the facility to record the amount of used oil sorbents burned per hour.

4) EPA identified several instances where the Permittee is required to establish parameters to be monitored and acceptable parameter ranges to indicate if a control device is operating properly. Specifically, EPA noted this language in Condition I.A.(1)(b)(8) on page 11, Condition I.D.(1)(b)(10) on page 24, Condition I.E.(1)(b)(5) on page 45, Condition I.F.(5)(b)(5) on page 59, I.G.(1)(b)(9) on page 65, Condition I.I.(1)(b)(4) on page 100, and Condition I.I.(3)(b)(5) on page 103. Since the permit relies upon operation of the control devices to demonstrate compliance with the particulate matter limits, EPA believes that the parameters and acceptable ranges should be included in the permit.[1] To improve clarity, practical enforceability and transparency for the public, please revise the permit to include the parameters monitored to ensure proper operation of the control devices and the acceptable ranges.

5) Condition I.AE.(1)(c)(2) on page 191 requires the facility to monitor the pressure drop across the mechanical collector once every 8 hours, but does not include a range that the pressure drop should be maintained between. As discussed in comment 4 above, EPA believes that inclusion of this range is necessary as the control device is being relied upon to demonstrate compliance with applicable limitations. Please incorporate the acceptable pressure drop range into the permit.

6) Footnote 5, 17, and 124 are confusing- please consider revising to improve clarity.

7) Permit Condition I.G.4.c.(4) on page 69 and Condition I.E.(3)(c)(3) on page 47 require that the permittee keep records of the annual heat input from fossil fuel, residual fuel oil, wood or wood waste to determine if the source is exempt from the requirement for process sources under NR 417.07(2)(e). The exemption applies to sources which derive more than 50% of its annual heat input from solid fossil fuel, residual fuel oil, wood, or wood waste. EPA believes that in order to determine if this exemption applies the Permittee must also be required to

[1] *See* JP Pulliam Title V petition response Order, No. V-2009-01, June 21, 2010, at 10 https://www.epa.gov/sites/production/files/2015-08/documents/jp_pulliam_decision2009.pdf

maintain the total annual heat input to a unit. Please revise the permit to include the requirement to maintain records of the total annual heat input to the unit.

8) Condition I.H.(7)(b)(1) on page 90 requires that the facility maintain a good combustion practices document for the #3 kraft chemical recovery unit. As this is a compliance demonstration for both a Carbon Monoxide (CO) and volatile organic carbon Best Available Control Technology (BACT) limit, to improve clarity and enforceability of the condition EPA suggests that key elements of the good combustion practices document be incorporated into the body of the permit.

9) Footnote 91 on page 120 of the draft permit seems to indicate that the applicable requirements of NR 440.19(4)(a)1. and NR 440.205(3)(a) were not incorporated into the permit because a more stringent limit was required as BACT. While it may be appropriate to streamline similar requirements, EPA White Paper #2 for Improved Implementation of The Part 70 Operating Permits Program, recommends that when such streamlining is utilized the permit should contain language indicating that when the facility is in compliance with the more restrictive limit, they are in compliance with the less restrictive limit. Please at a minimum add the citations to NR 440.19(4)(a)1. and NR 440.205(3)(a) to the origin and authority for Condition I.L.(3)(a)(1) and consider moving the language from footnote 91 into the permit and clarifying that when the facility is in compliance with the more restrictive limit, they are in compliance with NR 440.19(4)(a)1 and NR 440.205(3)(a).

10) Draft permit Condition I.L.(6)(a)(1) on page 127 establishes a CO BACT limit for Boiler B24. However, the only compliance demonstration required is a stack test as required by the Department. Infrequent stack tests are not sufficient to demonstrate continuous compliance with an emission limitation. EPA suggests that it may be appropriate to cite to the Boiler Maximum Achievable Control Technology (MACT) requirements in Condition I.L.(8) as a compliance demonstration for the CO BACT limit.

11) Condition I.N.(3)(a)(6) contains requirements from 40 CFR 63.446(d), however the citation to the MACT is not included in the citation to the origin and authority of the conditions. Similarly, the citation to the federal MACT requirements are missing from conditions I.N.(3)(c)(8)-(14), I.N.(3)(b)(6)-(10), I.Z.(1)(a)(1), I.Z.(1)(b)(1)-(9) and I.Z.(1)(c)(3)-(4). Please add the MACT to the citation of origin and authority.

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,

FOR

Genevieve Damico
Chief
Air Permits Section