



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

DEC 03 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 Title V renewal for WPL Columbia Energy Center (#111003090-P30). 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 permit contains over 40 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 7 on page 9 states, "The requirements and limitations outlined in this section apply at all times regardless of the fuel being fired". Similarly, it appears that the following footnotes should be permit conditions: footnotes 10-13; footnote 16, footnote 17, footnotes 19-25; footnotes 27-31 and footnote 37. Please review all 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.
2. On draft permit page 6, footnote 1 seems to indicate that the applicable limit of NR 415.06(1) was not incorporated into the permit because a more stringent limit was required to ensure protection of the National Ambient Air Quality Standards. 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 consider moving the language from footnote 1 into the permit and clarifying that when the facility is in compliance with the more restrictive limit, they are in compliance with NR 415.06(1). Additionally, please add clarifying language to permit conditions I.M.1.a.(1) and I.N.1.a(1) to ensure that the less stringent applicable State Implementation Plan requirement is clearly identified in the permit.

3. On page 10 of the draft permit, conditions I.B.b.(1)(a) and I.B.c.(2) reference condition I.B.1.b.(2), however, condition I.B.1.b.(2) does not exist. Please ensure that all applicable requirements were included in the permit, and correct the citations as necessary.
4. Conditions I.BA.c.(1) and I.BB.c.(1) require use of US EPA Method 5, including condensables, to demonstrate compliance with Particulate Matter emissions for the Lime Silo Vents, however there are also limits for particulate matter of less than 10 micrometers (PM<sub>10</sub>) and particulate matter of less than 2.5 micrometers (PM<sub>2.5</sub>) that do not have a test method indicated. Method 5 only measures filterable particulate matter and is unable to differentiate PM<sub>10</sub> and PM<sub>2.5</sub>. Please explain why Method 201 and 202 are not listed as the Reference Test Method for PM<sub>10</sub> and PM<sub>2.5</sub> emissions or revise the permit as necessary.
5. It appears that it may be more appropriate for the origin and authority of condition I.Q.4.(a)(1) to be 285.65(7) or 285.63(1)(a). If appropriate please consider revising.
6. It appears that the most recent version of 40 CFR 63 Subpart UUUUU may not have been incorporated into the permit part III. Revisions to 40 CFR 63 Subpart UUUUU were finalized on November 19, 2014 with additional revisions finalized on March 24, 2015. Please ensure that the version of the 40 CFR 63 Subpart UUUUU that is currently effective is incorporated into the final permit.

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