



July 1, 2016

Acting Regional Administrator Robert Kaplan  
 U.S. Environmental Agency - Region V  
 77 West Jackson Boulevard  
 Mail Code: R-19J  
 Chicago IL 60604-3507

**Subject: Wisconsin Source Air Quality Characterization for the 2010 1-Hour Sulfur Dioxide (SO<sub>2</sub>) National Ambient Air Quality Standard (NAAQS) Data Requirements Rule**

Dear Acting Regional Administrator Kaplan:

The final Data Requirements Rule (DRR) for the 2010 1-Hour Sulfur Dioxide NAAQS required states to submit to the U.S. Environmental Protection Agency (EPA), by January 15, 2016, a list of sources that emitted greater than 2,000 tons per year (tpy) of SO<sub>2</sub> in the most recent year data was available. The Wisconsin Department of Natural Resources (WDNR) submitted this information to EPA on January 15, 2016. This list was subsequently modified by EPA on April 12, 2016 to include one additional source (USG Interiors, Walworth County).

The DRR requires states to further indicate, by July 1, 2016, the approach they will use for each listed source to characterize air quality in the respective area: air quality characterization through air quality modeling or ambient monitoring, or establishment of a federally enforceable emission limit (or facility shut down). Table 1 identifies the approach WDNR intends to use to characterize each listed source.

**Table 1. Summary of Sulfur Dioxide Source Air Quality Characterization Options**

<b>Facility</b>	<b>FID</b>	<b>County</b>	<b>Characterization Option</b>
Georgia-Pacific Consumer Products LP	405032870	Brown	Emission limit
Expera Specialty Solutions, LLC – Kaukauna	445031180	Outagamie	Ambient monitoring
Catalyst Paper – Biron Mill	772009480	Wood	Emission limit
Wisconsin Public Service Corporation – Weston Plant	737009020	Marathon	Air quality modeling
WPL – Edgewater Generating Station	460033090	Sheboygan	Air quality modeling
WPL – Nelson Dewey Generating Station	122014530	Grant	Facility shutdown
WPL – Columbia Energy Center	111003090	Columbia	Addressed in previous round (see below)
USG Interiors, LLC	265006830	Walworth	Air quality modeling

Draft air quality dispersion modeling protocols and monitoring plans are attached for the sources that will be characterized using those options. WDNR is providing the following supplemental information for the remaining sources. Facilities taking a federally-enforceable emissions limit will comply with that limit by January 13, 2017.

Georgia-Pacific Consumer Products LP

The Georgia-Pacific facility will be taking an enforceable SO<sub>2</sub> emission limit of not greater than 1981 tpy. This limit will be taken via issuance of a construction permit.

Catalyst Paper – Biron Mill

The Biron Mill facility will be taking an enforceable SO<sub>2</sub> emission limit of not greater than 1819 tpy. This limit will be taken via issuance of a construction permit.

WPL – Nelson Dewey Generating Station

The Nelson Dewey plant consists of two coal-fired electric utility steam generating units (Units 1 and 2) with a rated capacity of 100 MW each. Per an April 22, 2013 consent decree, Units 1 and 2 were retired on December 31, 2015. Construction permit 122014530-P13 requiring these retirements (see condition I.Z.3.a.(1)(b)), as well as confirmation of their retirement by WPL, are attached.

WPL – Columbia Energy Center

On September 16, 2015, WDNR requested that EPA designate Columbia County as attaining the 1-hour SO<sub>2</sub> NAAQS based on air quality modeling of the Columbia Energy Center and application of the five factor analysis described in EPA's SO<sub>2</sub> designations guidance. On February 16, 2016, EPA notified the state of EPA's preliminary intention to designate Columbia County as unclassifiable/attainment for the 2010 1-hour SO<sub>2</sub> NAAQS. Therefore, no further air quality characterization for this source is necessary to comply with the DRR.

If you have any questions or require additional information, please contact David Bizot at [David.Bizot@wisconsin.gov](mailto:David.Bizot@wisconsin.gov) or (608) 267-7543.

Sincerely,



Gail Good  
Director  
Air Management Program

cc: David Bizot, AM/7

Attachments