

Attachment 2: Source-Specific Revisions to Wisconsin's State Implementation Plan

Introduction

Section XII of the Environmental Cooperative Agreement (Operational Flexibility and Variances) proposes to establish new requirements for Pleasant Prairie Power Plant that would replace or revise certain requirements that might otherwise apply to that source. Some of the requirements to be replaced or revised are currently embodied in Wisconsin's SIP for meeting air quality objectives. In such cases, the proposed flexibility in the Environmental Cooperative Agreement cannot be granted by WDNR unless the new requirements are first approved by USEPA as source-specific revisions to the SIP.

The remainder of this Attachment identifies all the portions of the proposed Environmental Cooperative Agreement that WDNR is submitting to USEPA as proposed source-specific revisions to Wisconsin's SIP.

Source-Specific Revisions to Wisconsin's SIP

The provisions of this SIP revision apply solely to the following source:

Pleasant Prairie Power Plant
8000 95th Street
Pleasant Prairie, WI 53158
Operation Permit #23006260-P01

The Pleasant Prairie Power Plant is the largest electric generating plant in Wisconsin. The facility occupies approximately 425 acres of land in the Town of Pleasant Prairie, five miles west of Lake Michigan in Kenosha County. Kenosha County has been designated a severe ozone non-attainment area. The plant consists of two 580 MW units, each consisting of a boiler, turbine and electric generator. It is Wisconsin Electric's main baseload plant, operating 24 hours per day throughout the year with the exception of maintenance outages that are typically scheduled once every 12 to 24 months.

The following portions of Section XII.B. of the Environmental Cooperative Agreement (verbatim excerpts) are submitted as source-specific SIP revisions:

Item	Previous Requirements Superseded by this Agreement <i>[source of requirement]</i>	New Requirements
Quarterly Excess Emission Reporting	Quarterly excess emission reports for visible emissions, sulfur dioxide, and nitrogen oxides from boilers B20 and B21 shall be	The Company shall: 1) notify WDNR by telephone within one business day of excess emissions, as

Item	Previous Requirements Superseded by this Agreement <i>[source of requirement]</i>	New Requirements
	submitted within 30 days following the end of each calendar quarter. <i>[Title V Permit #23006260-P01, Conditions I.A.2.c.(3), I.A.3.c.(3), I.A.4.c.(3), and I.G.1.a.(1) and (2)]</i>	defined in s. NR 439.09(10)(b), Wis. Adm. Code, followed by an electronic mail notification within five business days; and, 2) submit to WDNR semi-annual excess emission reports for visible emissions, sulfur dioxide, and nitrogen oxides from boilers B20 and B21. These reports shall cover the time periods January 1 to June 30 and July 1 to December 31 of each year and shall be submitted within 30 days after the end of each reporting period. These reports may be submitted by electronic mail at the Company's discretion as soon as WDNR and EPA develop procedures for authenticating electronic signatures.
Title V Semi-Annual and Annual Reports	<ol style="list-style-type: none"> 1) The permittee shall submit the results of monitoring, or a summary of monitoring results, required by this permit to the Department every 6 months. 2) The time periods to be addressed by the submittal are January 1 to June 30 and July 1 to December 31. 3) The report shall be submitted to Southeast Region within 30 days after the end of each reporting period. 4) All deviations from, and violations of, applicable requirements shall be clearly identified in the submittal. 5) Each submittal shall be certified by a responsible official as to the truth, accuracy and completeness of the report. <i>[Title V Permit #23006260-P01, Conditions I.G.4.b.a.(1) - (5)]</i>	<p>The Company shall submit to WDNR:</p> <ol style="list-style-type: none"> 1) A written semi-annual monitoring report covering the time period January 1 to June 30 of each year within 45 days after the end of each reporting period. This report may be submitted by electronic mail at the Company's discretion as soon as WDNR and EPA develop procedures for authenticating electronic signatures. This report shall be certified by a responsible official of the Company and shall describe any deviations from or violations of applicable requirements, including the dates of each event. 2) A written annual monitoring report that meets the requirements specified in conditions I.G.4.b.a.(3), (4), and (5) of the current Title V permit. This report shall include the results of all monitoring, or a summary of all monitoring results, required by the Title V permit.

The following portions of Section XII.C. of the Environmental Cooperative Agreement (verbatim excerpts) are also submitted as source-specific SIP revisions:

Item	Standard Requirements Replaced by this Agreement	New Requirements
Construction Permit Exemption for <u>Minor</u> Physical or Operational Changes	NR 406 Construction Permit Requirements and Application Procedures for Minor Sources/Minor Modifications	<p><u>A. General Construction Permit Exemption</u> The Company may construct, reconstruct, replace, relocate, or modify a stationary source at the Pleasant Prairie Power Plant <u>without</u> obtaining a construction permit, if the individual project meets <u>all</u> of the following conditions:</p> <ol style="list-style-type: none"> 1) The change is not subject to the permitting requirements of chs. NR 405 or 408, Wis. Adm. Code; 2) Maximum theoretical emissions from the project do not exceed <u>any</u> of the following thresholds: <ol style="list-style-type: none"> a. 9.0 pounds per hour each for sulfur dioxide, carbon monoxide, or nitrogen oxides; b. 5.7 pounds per hour each for particulate matter or volatile organic compounds; c. 3.4 pounds per hour for PM₁₀; d. 0.13 pounds per hour for lead; or, e. The emission rates contained in any table in s. NR 445.04, Wis. Adm. Code, for any air contaminant and the respective stack height. 3) The change will not cause or contribute to a violation of any standard, emission limit, or control requirements embodied in federal law, federal regulations, chs. NR 400-499, Wis. Stats., or any permit issued to the Company; 4) The change is not part of a larger project which, taken as a whole, would not qualify for this exemption; and, 5) The Notification Procedure and Documentation Requirements below are satisfied. <p><u>B. Other Construction Permit Exemptions</u> In addition to any General Construction Permit Exemptions, the Company is not required to obtain a construction permit for changes already exempted or excluded under ch. NR 406, Wis. Adm. Code.</p> <p>In the event the Company is granted a revised applicability test for New Source Review and/or Prevention of Significant</p>

Item	Standard Requirements Replaced by this Agreement	New Requirements
		<p>Deterioration rules within a Project XL agreement with EPA and WDNR, the requirements for a General Construction Permit Exemption shall not limit the right of the Company to make operational or physical changes at Pleasant Prairie Power Plant.</p> <p><u>C. Notification Procedure</u> The Company shall notify WDNR and EPA each time it intends to exercise the General Construction Permit Exemption portion of this agreement. To do so, the Company shall submit a written pre-construction notification to WDNR and EPA including the following information, at a minimum:</p> <ol style="list-style-type: none"> 1) A description of the proposed changes, including the purpose and schedule; 2) A summary of the expected effect of the changes on potential and actual air emissions; 3) A summary of ambient air quality modeling results for the proposed changes; 4) A certification by a responsible official of the Company that the changes will not cause or contribute to a violation of any standard, emission limit, or control requirement embodied in federal law, federal regulations, chs. NR 400-499, Wis. Stats., or in any permit issued to the Company; and, 5) An explanation of how WDNR may obtain more detailed documentation of all appropriate technology reviews and analyses, and design information, if necessary. <p>Notifications shall be mailed to WDNR Air Management Construction Permit Team Leader (AM/7) at P.O. Box 7921, Madison, WI 53707-7921, and to Chief of Permits and Grants Section MI/MN/WI (mailcode AR-18J), EPA Region V, 77 W. Jackson Blvd., Chicago, IL 60604.</p> <p><u>D. Documentation Requirements</u> For each change made under the General Construction Permit Exemption provisions.</p>

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		the Company shall maintain documentation of all appropriate technology reviews and analyses, and design information. This information shall be made available to WDNR on request. Also, the Company shall summarize all such changes in its annual report to interested persons.
Operation Permit Revisions	This agreement modifies the application and issuance procedures for NR 407 operation permit revisions.	<p>WDNR shall review any information submitted by the Company under the General Construction Permit Exemption terms of this agreement and determine if the proposed changes require revisions to the Company's operation permit. If revisions to the operation permit are required:</p> <ol style="list-style-type: none"> 1) WDNR shall notify the Company within 15 days of the need to revise the permit; 2) The Company may not <u>operate</u> the new or modified source until the revised operation permit has been issued; 3) The information submitted by the Company under the General Construction Permit Exemption shall serve as an application for an operation permit revision; 4) Following normal rules and procedures defined in ch. NR 407, Wis. Adm. Code, WDNR shall review the application and propose revisions to the operation permit within 60 days of receiving a complete application; and, 5) EPA review of the proposed revisions to the operation permit shall be limited to 30 days and shall be <u>concurrent</u> with WDNR's normal 30-day public comment period. EPA may extend the review period an additional 15 days if necessary to resolve concerns with the proposed changes. Details of this EPA review will be contained in a separate agreement between WDNR and EPA.
Testing or Research of New Technologies	Equipment used or to be used for the purpose of testing or research may be eligible for an exemption from construction permit requirements in ch. NR 406, Wis. Adm. Code, provided both of the	The Company may conduct testing or research of new technologies without obtaining a <u>minor</u> source construction exemption under ch. NR 406, Wis. Adm. Code, if all of the following conditions are met:

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	<p>following conditions are met:</p> <ol style="list-style-type: none"> 1) The Company submits a complete application for exemption that describes the proposed testing or research and includes an operating schedule and the types and quantities of emissions anticipated. 2) WDNR determines that the equipment to be used and the anticipated emissions from the testing or research will not present a significant hazard to public health, safety, or welfare or to the environment. <p>WDNR shall approve or deny an application in writing within 45 days of receiving a complete application for exemption.</p>	<ol style="list-style-type: none"> 1) The Company (or its consultants) conducts a thorough engineering analysis and determines that the equipment to be used and the anticipated emissions from the testing or research will not present a significant hazard to public health, safety, or welfare or to the environment; 2) The Company provides written notification to WDNR at least 30 days prior to commencing research or testing that describes the proposed testing or research and includes an operating schedule and the types and quantities of emissions anticipated; 3) WDNR does not object in writing within 21 days of receiving notification; 4) Members of the interested persons group are informed and given at least 7 days to comment; and, 5) The Company responds in writing to any significant comments received from a member of the interested persons group prior to commencing research or testing. <p>The Company shall remain responsible for the performance of any new technologies and for compliance with all applicable emission limits and control requirements, including those in the Title V permit. In addition, the Company shall maintain documentation of all appropriate technology reviews and analyses, design, construction, and operational information, making it available for examination by WDNR upon request. The Company shall describe the environmental and energy efficiency benefits of any technology tested or researched in its annual report to WDNR.</p>