AIR POLLUTION CONTROL CONSTRUCTION PERMIT REVISION

EI FACILITY NO: 744008100 CONSTRUCTION PERMIT NO.: 15-DMM-128-R1

TYPE: Revision of Construction Permit: 15-DMM-128

In compliance with the provisions of Chapter 285, Wis. Stats., and Chapters NR 400 to NR 499, Wis. Adm. Code,

Name of Source:	Ahlstrom-Munskjo Rhinelander LLC
Street Address:	515 W Davenport Street,
	Rhinelander, Oneida County, Wisconsin
Responsible Official, & Title:	Joseph Fierst, Plant Manager

is authorized to revise construction permit 15-DMM-128 in conformity with the plans and specifications dated January 13, 21 and 25, 2021 and the conditions herein. The authorization to construct, reconstruct, replace and/or modify any process covered by this construction permit revision expires upon issuance. The conditions established by a construction permit are permanent unless revised through a revision of the construction permit condition, revision of a construction permit, or through the issuance of a new construction permit. [s. 285.66(1), Wis. Stats.] The permit conditions revised by air pollution control construction permit revision 15-DMM-128-R1 are identified by the citation of 15-DMM-128-R1 in square brackets [] at the end of the permit condition.

Conditions of the permit marked with an asterisk (*) have been created outside of Wisconsin's federally approved State Implementation Plan (SIP) and are not federally enforceable.

This authorization requires compliance by the permit holder with the emission limitations, monitoring requirements and other terms and conditions set forth in all Parts hereof.

Dated at Eau Claire, Wisconsin March 25, 2021

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
For the Secretary

By /s/ Susan Lindem
Susan Lindem, Air Management Program Supervisor

Part I
Source Specific Permit Conditions

A. Boiler B26, Stack S09, Control Device C06 (Plant #7) 300 MMBtu/hour Cyclone Boiler Burning Bituminous Coal and Bituminous/Subbituminous Coal Blends with ESP collector, sorbent (hydrated lime; sodium bicarbonate; or Trona) injection for acid gases and activated carbon injection; Constructed 1958, modified under permit 15-DMM-128.		
1. Pollutant: Particulate Matter		
a. Limitations	**b.** Compliance Demonstration	**c.** Reference Test Methods, Recordkeeping and Monitoring Requirements
(1) Emissions of particulate matter may not exceed 0.10 pounds of particulate matter per million Btu heat input. [s. NR 415.06(2)(c), Wis. Adm. Code; 15-DMM-128]	(1) The permittee may burn only coal and fuel oil in this boiler. [s. 285.65(3), Wis. Stats.; 15-DMM-128] (2) The permittee shall perform compliance emission testing of particulate matter emissions from this boiler while firing coal to demonstrate compliance with the particulate matter emission limit in condition A.1.a.(1): (a) Testing shall be conducted every 24 months. (b) Each biennial test of particulate matter emissions shall be performed within 90 days of the anniversary date of the issuance of this permit or within 90 days of an alternate date specified by the department in writing. (c) The permittee may request and the department may approve a waiver from the required biennial testing provided the results of the most recently completed biennial test demonstrate that the particulate matter emissions are 50 percent or less of the applicable limitation in condition A.1.a.(1). The testing shall be conducted in accordance with the conditions in ZZZ.1.a.(1). (d) The first two emissions tests required under condition A.1.b.(2)(a) of this permit subsequent to issuance of permit no. 15-DMM-128 may not be waived.[1] [ss. NR 439.07, NR 439.075(2)(a)2., NR 439.075(3), and NR 439.075(4)(a)1.b., Wis. Adm. Code, s. 285.65(3), Wis. Stats.; 15-DMM-128] (3) The permittee shall use an electrostatic precipitator (ESP) to control emissions at all times the process is in operation. [s. 285.65(3), Wis. Stats.; 15-DMM-128] (4) The permittee shall monitor the following operational parameters for the electrostatic precipitator (ESP): (a) The primary voltage in volts; (b) The secondary voltage in volts; (c) The primary current in amps; (d) The secondary current in amps; and (e) The sparking rate in sparks per minute. [s. NR 439.055(1)(c), Wis. Adm. Code, s. 285.65(3), Wis. Stats.; 15-DMM-128]	(1) Reference Test Method for Particulate Matter Emissions: Whenever particulate matter emission testing is required, the permittee shall use US EPA Method 5 for filterable and US EPA Method 202 for condensible backhalf, or another method approved by the department in writing. [s. NR 439.06(1), Wis. Adm. Code; 15-DMM-128] (2) The permittee shall retain a copy of the results for each compliance emission test conducted pursuant to condition A.1.b.(2). [s. NR 439.04(1)(a), Wis. Adm. Code; 15-DMM-128] (3) The permittee shall monitor and record the following ESP operating parameters once for every eight (8) hours of source operation or once per day whichever yields the greater number of measurements: (a) Primary voltage; (b) Secondary voltage (c) Primary current; (d) Secondary current; and (e) Spark rate. [s. NR 439.055(2)(b), Wis. Adm. Code; 15-DMM-128] (4) The permittee shall keep records of: (a) The date and initials of the person performing the inspections required by Condition A.1.b.(5); (b) A list of the items inspected; (c) Any maintenance or repairs performed as a result of these inspections; and

[1] This non-waiver requirement is to ensure that emission data is collected during the 5 year period after issuance of permit no. 15-DMM-128. This will ensure that the emission increase from the project is verified using at least two data sets.

A. Boiler B26, Stack S09, Control Device C06 (Plant #7) – 300 MMBtu/hour Cyclone Boiler Burning Bituminous Coal and Bituminous/Subbituminous Coal Blends with ESP collector, sorbent (hydrated lime; sodium bicarbonate; or Trona) injection for acid gases and activated carbon injection; Constructed 1958, modified under permit 15-DMM-128.[2]		
3. Pollutant: Sulfur Dioxide (SO_2)		
a. Limitations	**b.** Compliance Demonstration	**c.** Reference Test Methods, Recordkeeping and Monitoring Requirements
(1) Stack Parameters – The height of Stack S09 shall be a minimum of 246 feet above ground level and the flue gas shall be discharged vertically and without obstruction. [ss. 285.63(1)(b) and 285.65(3), Wis. Stats.; 15-DMM-128-R1] (2) Emission Rate Limit - The operator shall not allow SO_2 emissions to exceed 2.38 pounds per million Btu (MMBtu) heat input on a 24-hour average basis.[3] Compliance with this emission limit shall be determined according to Condition A.3.b.(1). [s. NR 417.07(4), Wis. Adm. Code, ss. 285.63(1)(b) and 285.65(3), Wis. Stats.; 15-DMM-128-R1] (3) Boiler Utilization Limit - The operator shall not allow the heat input rate to boiler	(1) Continuous Emissions Monitoring (CEM) Emission Rate Limitation Compliance Demonstration. The operator shall demonstrate compliance with the SO_2 emission rate in Condition A.3.a.(2) by monitoring SO_2 emissions with a continuous emissions monitoring (CEM) system according to the following methods and procedures. (a) The operator shall install, certify, and operate a CEM system which continuously measures the concentration of SO_2 and O_2 in the exhaust gas and calculates and records the hourly average SO_2 emission rate in pounds per MMBtu heat input for each hour boiler B26 is operating. The CEM shall at a minimum include SO_2 and diluent (oxygen (O_2)) continuous emissions analyzers, a data recording system and, as applicable, a moisture analyzer. (b) The SO_2 and O_2 CEMs shall be calibrated, maintained, and operated according to the applicable methods and procedures of s. NR 439.09, Wis. Adm. Code, and 40 CFR 60.13, and the applicable performance, quality assurance, and data management and calculation procedures of Performance Specification 2 of 40 CFR Part 60, Appendix B for the SO_2 CEM and Performance Specification 3 of 40 CFR Part 60, Appendix B for the O_2 CEM and the quality assurance procedures in 40 CFR Part 60, Appendix F for the CEM systems. (c) The operator shall follow a department-approved CEM quality assurance/quality control plan in accordance with s. NR 439.095(6), Wis. Adm. Code. (d) The SO_2 emission rate in pounds per MMBtu heat input for each hour shall be determined using the F-factor method according to procedures in Method 19 of 40 CFR Part 60, Appendix A.	(1) Emissions Monitoring Plan. (a) The operator shall submit an updated emissions monitoring plan to the department for written approval within 60 days after issuance of permit 15-DMM-128-R1. The plan shall provide all information required under conditions A.3.b.(1) to (3). (b) The operator shall comply with the approved monitoring plan unless alternative monitoring requirements are approved under Condition A.3.c.(8). [s. 285.65(3), Wis. Stats., s. NR 439.03(1)(a), Wis. Adm. Code; 15-DMM-128-R1] (2) Solid Fuel Collection and Analysis Methods. All solid fuel sampling and analyses shall be performed according to the methods specified below: (a) The grab sampling of each as-fired solid fossil fuel sample shall be performed according to ASTM D2234-89, Collection of a Gross Sample of Coal or other method that results in data at least as reliable as classification I-B-1, defined in ASTM D2234-04 as automatic sampling --- full stream cut – systemic spacing. (b) The individual grab solid fossil fuel samples shall be prepared and composited according to ASTM D2013-86, Preparing Coal Samples for Analysis. (c) When required, the solid fossil fuel sample shall be analyzed for sulfur content according to ASTM D3177-89, Total Sulfur in the Analysis of Sample of Coal and Coke, or ASTM D4239-85, Sulfur in the Analysis Sample of Coal and Coke using High Temperature Tube Furnace Combustion Methods.

[2] The permit conditions in A.3.a.(1), (2), (3), A.3.b.(1), (2) and (3), and A.3.c.(1), (2), (3), (4), (5), (7), (8) and (9) will be incorporated into Wisconsin's state implementation plan (SIP). These conditions cannot be changed without a source-specific SIP revision.

[3] The emission limitation for complying on a 24-hour basis was determined by multiplying the 1-hour modeled emission rate of 2.56 by a factor of 0.93. This factor reflects the national average, among coal-fired boilers without advanced SO_2 controls, determined according to EPA guidance, for applying to a candidate 1-hour limit to determine a presumptively comparably stringent 24-hour limit. The U.S. EPA presented this factor in Appendix D of the Memorandum "Guidance for 1-Hour SO2 Nonattainment Area SIP Submissions" from Stephen D. Page, Director to Regional Air Division Directors, Regions 1 – 10, April 23, 2014. In absence of adequate data for determining a site-specific adjustment factor, the department believes that this adjustment factor is the best estimate of the appropriate degree of adjustment for determining a 24-hour average limit at this facility.

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3. Pollutant: Sulfur Dioxide (SO_2)		
a. Limitations	**b.** Compliance Demonstration	**c.** Reference Test Methods, Recordkeeping and Monitoring Requirements
B26 to exceed 260 MMBtu heat input per hour. Compliance with this emission utilization limit shall be determined according to Condition A.3.b.(3). [s. NR 417.07(4), Wis. Adm. Code, ss. 285.63(1)(b) and 285.65(3), Wis. Stats.; 15-DMM-128-R1] ~~(4) The sulfur content of the fuel oil fired in the boiler may not exceed 0.05% by weight. [s. 285.65(7), Wis. Stats.; 15-DMM-128]~~	(e) To demonstrate compliance with the 24-hour average emission limitation in A.3.a.(2): i. The permittee shall calculate the daily average SO_2 emission rate, in pounds per million Btu, for each operating day by summing the hourly SO_2 pounds per million Btu emission rates for each boiler operating hour as calculated in A.3.b.(1)(d) for each calendar day and dividing by the number of hours the boiler operated during the calendar day. ii. The daily average SO_2 emission rate shall be determined on the basis of valid readings representing a minimum of 18 hours. If an operating day has less than 18 hours of valid readings, compliance shall be determined on the basis of a pooled data set consisting of data for the applicable calendar day and all data from the most recent preceding operating day with at least 18 hours of valid readings. Notwithstanding the use of the data from a preceding operating day in determining compliance for the initial day, a separate compliance determination shall be made for each operating day. (f) If the SO_2 and/or O_2 CEM system is not operating for a continuous period of 48 hours of boiler operation, the facility operator shall comply with the requirements in Condition A.3.b.(2). The operator shall notify the department of a CEM outage lasting longer than 48 hours and shall return the CEM system to operation as expeditiously as practical. (g) The operator shall submit an emissions monitoring plan to the department for written approval which incorporates and meets the requirements of condition A.3.b.(1) and (2), and shall follow the plan. [s. 285.65(3), Wis. Stats., ss. NR 439.06(2), NR 439.09(2) and (3), and NR 439.096(5), Wis. Adm. Code; 15-DMM-128-R1] (2) Emission Rate Limitation Alternative Compliance Demonstration if CEM System is Not Operational. If the SO_2 and/or O_2 CEM is not operating for a continuous period of 48 hours of boiler operation, the permittee shall: (a) Fire only the same type of coal or mixture of coal that was being fired in boiler B26 immediately prior to the CEM becoming inoperable until the CEM becomes operational; and (b) Operate the sorbent injection system as necessary to comply with the hydrogen chloride (HCl) limit in condition A.4.a.(2) as demonstrated through the use of a HCl CEMs operated in accordance with 40 CFR 63, Subpart DDDDD. [s. 285.65(3), Wis. Stats.; 15-DMM-128-R1]	(d) The solid fossil fuel sample shall be analyzed for heat content according to ASTM D2015-85, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter. (e) Alternative methods may be used if approved, in writing, by the department and U.S. EPA. [s. NR 439.08, Wis. Adm. Code; 15-DMM-128-R1] (3) Sampling and Analysis of Liquid Fossil Fuel: (a) *Liquid fossil fuel sampling:* Liquid fossil fuel sampling shall be performed according to ASTM D4057-95, Standard Practice for Manual Sampling of Petroleum and Petroleum Products, or ASTM D4177-95, Standard Practice for Automatic Sampling of Petroleum and Petroleum Products, incorporated by reference in s. NR 484.10(51) and (52), Wis. Adm. Code. (b) *Sulfur content in liquid fossil fuel:* The sulfur content of a liquid fossil fuel sample shall be determined according to ASTM D129-00, Standard Test Method for Sulfur in Petroleum Products (General Bomb Method), ASTM D1552-03, Standard Test Method for Sulfur in Petroleum Products (High-Temperature Method), or ASTM D4294-03, Standard Test Method for Sulfur in Petroleum Products by Energy-Dispersive X-ray Fluorescence Spectroscopy, incorporated by reference in s. NR 484.10 (3), (25) and (54), Wis. Adm. Code. (c) *Heat content in liquid fossil fuel:* The heat content of a liquid fossil fuel sample shall be determined according to ASTM D240-02, Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by a Bomb Calorimeter, incorporated by reference in s. NR 484.10(4), Wis. Adm. Code. (d) Alternative methods may be used if approved, in writing, by the department and U.S. EPA. [ss. NR 439.08 and NR 439.08(2), Wis. Adm. Code; 15-DMM-128-R1] (4) Recordkeeping. The operator shall maintain the following records on site for a period of five years: (a) The compliance reports as required under condition A.3.c.(5). (b) The steam load for each hour of operation, in Klbs/hr;

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3. Pollutant: Sulfur Dioxide (SO_2)		
a. Limitations	**b.** Compliance Demonstration	**c.** Reference Test Methods, Recordkeeping and Monitoring Requirements
	(3) Boiler Utilization Compliance Demonstration. The operator shall demonstrate compliance with the Boiler B26 utilization limit in Condition A.3.a.(3) according to the following methods and procedures. (a) The operator shall operate and maintain a steam load monitoring and data recorder system capable of determining the hourly steam load generated by boiler B26. i. The operator shall utilize two redundant steam flow monitors that provide an average value for determining steam load. ii. In the event that one steam flow monitor is not operational, the steam flow measured by the operational monitor shall be utilized to determine steam load until the non-operational monitor is returned to service and the operator shall return the non-operational monitor to operation as expeditiously as practical. (b) The operator shall continuously monitor and record the hourly steam load generated by Boiler B26 in thousand pounds of steam per hour (Klbs per hour). The steam load for each operating hour shall be converted to an hourly boiler utilization rate in MMBtu heat input per hour according to the following equation: Equation 1: $BU = HSL \times BE$ Where: *BU* is the Boiler Utilization, in MMBtu/hr; *HSL* is the Hourly Steam Load, in Klbs/hr; and *BE* is the Boiler Efficiency, in MMBtu/Klbs. (c) The boiler efficiency factor applied in Equation 1 shall be determined for each calendar year compliance period. This boiler efficiency factor shall be updated for each subsequent calendar year compliance period that spans January 1st to December 31st. (d) The boiler efficiency factor for each calendar year compliance period shall be determined using the total heat input and steam load for the twelve month period ending on September 30th of the year preceding the applicable compliance period. The operator may use an alternative period of heat input and steam load data with written approval by the department. The request for an alternative period must be due to changes in boiler operation or fuel which	(c) The heat input rate for each hour of operation, in MMBtu/hr, as calculated in A.3.b.(3)(b); (d) The calculated boiler efficiency for each calendar year compliance period, including the monthly and annual heat input to the boiler and annual steam load, and any other supporting information used in determining the boiler efficiency. (d) The results of all fuel heat content analyses. (e) The monthly usage of each fuel fired in the boiler. (f) During periods when complying with CEM monitoring according to condition A.3.b.(1), each daily average SO_2 emission rate in pounds per MMBtu. (g) During periods when complying with the alternate emission rate compliance demonstration in Condition A.3.b.(2), records of the source and identity of the coal consumed in boiler B26 immediately prior to the CEM becoming inoperable and the source and identity of coal consumed in boiler B26 during the period when the CEM was not operational. These records may include daily operating logs and bills of lading, coal specifications, or equivalent documents which indicate the coal supplier and the supplier's characterization of the coal. These records shall be sufficient to determine the sulfur content, or maximum sulfur content, of the fuel consumed. (h) Records of any additional analysis or performance testing required by the department for purposes of determining compliance with the requirements of this section A.3. [s. NR 439.04(1)(d), Wis. Adm. Code; 15-DMM-128-R1] (5) Reporting. The operator shall submit to the department a quarterly report no later than 60 days after the end of each calendar quarter. The report shall provide the following: (a) The date and the maximum monitored SO_2 ambient air concentration value for days during which the Rhinelander Tower monitor registered an ambient air quality concentration equal of 75 ppb or greater on an hourly basis. (b) The SO_2 emission rate in pounds per MMBtu and maximum boiler utilization in MMBtu per hour determined during days when the Rhinelander Tower monitor registers an SO_2 ambient air concentration of 75 ppb or greater on an hourly basis.

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3. Pollutant: Sulfur Dioxide (SO_2)

a. Limitations	**b.** Compliance Demonstration	**c.** Reference Test Methods, Recordkeeping and Monitoring Requirements
	have affected the boiler efficiency. The boiler efficiency is calculated as follows: Equation 2: $BE = AHI \div ASL$ Where: *BE* is the Boiler Efficiency, in MMBtu/Klbs, for a calendar year compliance period; *AHI* is the total heat input for the twelve month period ending on September 30th of the year preceding the applicable calendar year compliance period, in MMBtu/yr; and *ASL* is the total steam load for the twelve month period ending on September 30th of the year preceding the applicable calendar year compliance period, in Klbs/yr. (e) The operator shall determine total annual heat input by summing the heat input determined on a monthly basis. The heat input for each month is determined by applying the monthly fuel heat content of each fuel to the monthly fuel consumption using the following equation: Equation 3: $MHI = \sum_{i=1}^{n} MFC \times MFHC$ Where: *MHI* is the Monthly Heat Input, in MMBtu/month; *MFC* is the Monthly Fuel Consumption of an individual fuel, in tons/month; *MFHC* is the Monthly Fuel Heat Content of an individual fuel, in MMBtu/ton; *i* is an individual fuel type used in boiler B26 in a given month; and *n* is the number of fuel types used in boiler B26 in a given month.	(c) Any daily average SO_2 emission rate value, in pounds per MMBtu, or boiler utilization value, in MMBtu per hour, determined for compliance purposes under this section A.3. which exceeds the emission rate limit or boiler utilization limit, respectively. (d) The identification of any periods when fuel samples could not be obtained or the applicable monitoring systems were not operating and the reasons why. (e) The period of use and value of alternative data used in determining compliance when fuel samples could not be obtained or the required monitoring systems were not operating. [s. NR 439.03(1)(a), Wis. Adm. Code; 15-DMM-128-R1] ~~(6) The permittee shall keep and maintain fuel supplier certifications for each shipment of fuel oil that include the following information:~~ ~~(a) The date received;~~ ~~(b) The name of the fuel oil supplier; and~~ ~~(c) The sulfur content or maximum sulfur content of the fuel oil, in percent by weight.~~ ~~[s. NR 439.04(1)(d),Wis. Adm. Code; 15-DMM-128]~~ (7) CEM Emission Reports. The permittee shall submit quarterly excess emission reports to the department within 30 days following the end of each calendar quarter. (a) The excess emission report shall contain the following information: i. The date and starting and ending times or duration of each period of excess emissions and the magnitude of the emissions. ii. The periods of excess emissions that occur during startups, shutdowns, sootblowing, control equipment malfunction, process malfunction, fuel problems, other known causes or for unknown causes. The report shall identify the cause of any malfunction and the measures taken to reduce excess emissions. iii. The date and starting and ending time of any period during which the monitoring system was inoperative for any

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3. Pollutant: Sulfur Dioxide (SO_2)		
a. Limitations	**b.** Compliance Demonstration	**c.** Reference Test Methods, Recordkeeping and Monitoring Requirements
	i. The monthly fuel heat content for solid fossil fuels shall be determined by obtaining one fuel sample each week which is composited into a monthly fuel sample and analyzed for heat content. All solid fuel sampling shall be conducted in accordance with applicable methods and procedures under condition A.3.c.(2). ii. If solid non-fossil fuels are fired, the operator shall determine fuel heat content according to a sampling plan approved in writing by the department. iii. The heat content for fuel oil shall be determined by obtaining one fuel sample during each calendar year that is analyzed for heat content using the method specified in condition A.3.c.(3). The heat content to be used shall be the result from the most recent analysis. (f) The operator shall determine the annual total steam load in thousand pounds by summing the measured hourly average steam load over the applicable twelve month period. (g) The operator shall prepare and follow a department approved emissions monitoring plan which includes the requirements of conditions A.3.b.(3)(a) through (f). The plan shall describe the steam load monitoring and data recording system, identify any steam loss points between the boiler and steam load monitor and any additional monitoring needed at these points to determine boiler efficiency, a method for determining periods of time when the steam monitoring and recording system are unavailable, provide a method for substituting data for determining compliance in the event that the steam monitoring system is not available, and establish the fuel sampling and consumption monitoring plan used in determining total heat input. (h) The department may require the operator to update the boiler efficiency value at any time based on information indicating a change may have occurred in actual boiler operating efficiency. The update may require use of heat input and steam load data from a time period other than that required under Condition A.3.b.(3)(d). The department may also require additional analysis of fuel samples in determining fuel heat input as necessary to characterize the representative boiler efficiency. [s. 285.65(3), Wis. Stats.; 15-DMM-128-R1]	reason or causes, including monitor malfunction or calibration, except for zero and span checks. The report shall identify the repairs or adjustments made to the system. iv. The date and starting and ending time of any period during which the process being monitored was inoperative. v. When no period of excess emissions occurred during the quarter and the monitoring system had no period of downtime, an excess emissions report shall be filed stating such information. (b) For purposes of the excess emission reports, periods of excess emissions shall be reported as any calendar day during which the average sulfur dioxide emissions as determined in I.A.3.b.(1)(e) exceed the limitation in A.3.a.(2). [ss. NR 439.09(10), (10)(a), and (10)(b)2., Wis. Adm. Code; 15-DMM-128-R1] (8) Alternative Monitoring, Compliance Determination, Recordkeeping, or Reporting. The operator may use alternative methods and procedures to any monitoring, compliance demonstration, recordkeeping, or reporting requirement in Conditions A.3.b.(1), (2), or (3), or A.3.c.(2), (3), (4) or (5) with written approval from the department and U.S. EPA. [s. 285.65(3), Wis. Stats.; 15-DMM-128-R1] (9) The permittee shall keep and maintain on-site technical drawings, blueprints or equivalent records of the physical stack parameters for stack S09. [s. NR 439.04(1)(d), Wis. Adm. Code; 15-DMM-128-R1]

YYY. Construction Permit 15-DMM-128-R1 Requirements	
Condition Type	a. Requirements
1. Effective Date for Conditions in permit 15-DMM-128-R1	(1) The permittee shall comply with the conditions of permit 15-DMM-128-R1 beginning no later than December 31, 2021. [ss. 285.65(1) and (3), Wis. Stats., 15-DMM-128-R1]