



January 13, 2017

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

SUBJECT: Implementation of the 2010 1-hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS) Data Requirements Rule

Dear Acting Regional Administrator Kaplan:

This letter is to provide the U.S. Environmental Protection Agency (EPA) with the status of Wisconsin's implementation of the final Data Requirements Rule (DRR).

As required by the DRR, on July 1, 2016, the Wisconsin Department of Natural Resources (WDNR) identified to EPA the approach it intended to use to characterize the air quality in each of the eight areas identified under the DRR. Specifically, WDNR identified three areas to be addressed through air quality modeling, two areas that would be addressed by sources taking a federally-enforceable emission limit, one area where the source has been shut down, one area that has been designated unclassifiable/attainment by EPA, and a final area the department would be characterizing using ambient monitoring.

Air quality modeling

Attached are the completed analyses for the three sources identified by WDNR as completing this characterization through air quality modeling.<sup>1</sup> These modeling analyses, which were conducted in accordance with EPA's SO<sub>2</sub> NAAQS Designations Modeling Technical Assistance Document, show that 2010 SO<sub>2</sub> NAAQS will be attained in the areas in which these sources are located.

Facility	FID	County
Wisconsin Public Service Corporation – Weston Plant	737009020	Marathon
WPL – Edgewater Generating Station	460033090	Sheboygan
USG Interiors, LLC*	265006830	Walworth

\*The modeling analysis for USG Interiors, LLC is based on Administrative Order AM-16-01, which establishes new permanent and enforceable SO<sub>2</sub> limitations on this source. Wisconsin will be submitting this order into the State Implementation Plan (SIP) to make these limits federally-enforceable.

<sup>1</sup> The data files associated with these analyses will be sent to Region 5 separately via electronic mail.

### Federally-enforceable emission limits

WDNR's July 1, 2016 letter also identified two sources that would be taking a federally-enforceable emissions limit to meet DRR requirements. Both sources have currently taken, and are complying with, the following permanent and enforceable limits established in recently-issued construction permits (attached):

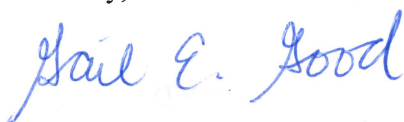
Facility	FID	County	SO <sub>2</sub> Limit (tons per year)	Permit
Georgia-Pacific Consumer Products LP	405032870	Brown	1981	Construction Permit 13-JJW-073-R1
Catalyst Paper – Biron Mill	772009480	Wood	1819	Construction Permit 16-POY-131

The status of the remaining three Wisconsin DRR sources are as follows:

- WPL–Nelson Dewey Generating Station (Grant County). As previously reported to EPA, this source permanently shut down on December 31, 2015. No further characterization of this source for DRR purposes is necessary.
- Columbia Energy Center (Columbia County). On July 12, 2016, EPA designated Columbia County as “unclassifiable/attainment” for the 2010 SO<sub>2</sub> NAAQS. No further characterization of this source for DRR purposes is necessary.
- Expera Specialty Solutions, LLC–Kaukauna (Outagamie County). On July 1, 2016, WDNR notified EPA that the department would be characterizing the air quality around this source using ambient monitoring. Based on modeling conducted in accordance with EPA’s SO<sub>2</sub> NAAQS Monitoring Technical Assistance Document, and in consultation with EPA, a monitor site was selected to meet this requirement. EPA concurred with this siting recommendation on October 19, 2016. As required by the DRR, this monitor was installed and operating by January 1, 2017. A letter confirming the monitor’s operation is attached.

If you have any questions about this update 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: Pat Stevens, AD/8  
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Attachments