January 15, 2016

Susan Hedman
Regional Administrator
U.S. Environmental Protection Agency – Region V
77 West Jackson Boulevard
Mail Code: R-19J
Chicago, IL 60604-3507

Subject: Wisconsin sources subject to further air quality characterization under the Data
Requirements Rule for the 2010 1-hour Sulfur Dioxide (SO₂) Primary National
Ambient Air Quality Standard (NAAQS)

Dear Regional Administrator Hedman:

On August 21, 2015, the U.S. Environmental Protection Agency (EPA) published its final Data
Requirements Rule for the 2010 1-hour SO₂ NAAQS (80 Fed. Reg. 51052). This rule directs states to
provide data to EPA to characterize current air quality in areas with large sources of SO₂ emissions to
identify maximum 1-hour SO₂ concentrations in ambient air. The final rule also establishes minimum
criteria for identifying the emissions sources and associated areas for which air agencies are required
to characterize SO₂ air quality. Specifically, EPA’s final rule requires states to characterize ambient
SO₂ levels around sources that emitted more than 2,000 tons per year (tpy) of SO₂ in the most recent
year in which this data is available.

By January 15, 2016, the state is required to submit a list that identifies the SO₂ sources within its
jurisdiction around which air quality is to be characterized, including all sources that exceeded the
2,000 tpy threshold in the most recent year data is available, to the EPA Regional Administrator.

The following sources exceeded 2000 tpy in calendar year 2015 and may warrant further air quality
characterization under the final Data Requirements Rule:

<table>
<thead>
<tr>
<th>Facility</th>
<th>FID</th>
<th>County</th>
</tr>
</thead>
<tbody>
<tr>
<td>Georgia-Pacific Consumer Products LP</td>
<td>405032870</td>
<td>Brown</td>
</tr>
<tr>
<td>Expera Specialty Solutions, LLC - Kaukauna</td>
<td>445031180</td>
<td>Outagamie</td>
</tr>
<tr>
<td>Catalyst Paper - Biron Mill</td>
<td>772009480</td>
<td>Wood</td>
</tr>
<tr>
<td>Wisconsin Public Service Corporation - Weston Plant</td>
<td>737009020</td>
<td>Marathon</td>
</tr>
<tr>
<td>WPL - Edgewater Generating Station</td>
<td>460033090</td>
<td>Sheboygan</td>
</tr>
<tr>
<td>WPL - Nelson Dewey Generating Station</td>
<td>122014530</td>
<td>Grant</td>
</tr>
</tbody>
</table>
* This source was identified by EPA in March 2015 for potential “first round” designation on an accelerated timeframe. In a September 16, 2015 submittal to Region 5, WDNR noted that the source no longer met the criteria established by the court order and was not subject to the designations timeframe established in that order. WDNR further requested that EPA designate Columbia County as attaining the 1-hour SO\textsubscript{2} NAAQS based on modeling and application of the five factor analysis described in EPA’s SO\textsubscript{2} designations guidance. Therefore, no further air quality characterization for this source is necessary.

Some of the facilities that exceeded 2000 tpy in calendar year 2015 have indicated plans to comply with permanent and enforceable emission limits requiring emissions to be below 2,000 tpy, or shut down, by January 13, 2017. This will preclude the need for further characterization using dispersion modeling or ambient air quality monitoring. WDNR will continue to work with these sources on evaluating and addressing next steps.

If you have any questions or require additional information, please contact Mike Friedlander, at Michael.Friedlander@Wisconsin.gov or 608-267-0806.

Sincerely,

Gail Good
Director
Air Management Program

cc:
David Bizot, AM/7
Mike Friedlander, AM/7