

Attachment B – FE/EIA for AM-20-18

- Table 1 provides a breakdown of the annualized costs that may be incurred by facilities subject to the “Part II” rules under two cost scenarios (Scenario A and B). Note that facilities may already be complying with some or all of the revised requirements; the costs included in these tables assume they are not.
- Scenario A — Facilities that may be subject to the proposed rules upon finalization. This includes:
 - All facilities that undertake activities covered by the Control Techniques Guidelines (CTGs) and that emit above the applicability threshold in an ozone nonattainment area (NAA) that was classified as a moderate (or higher) at any time since July 20, 2012 (that is: Inland Sheboygan County, Shoreline Sheboygan County and Eastern Kenosha County).
 - The metal coating facilities that meet an applicability threshold in the three counties that were not included in the current metal coating rule (s. NR 422.15, Wis. Adm. Code).
- Scenario B — Facilities that may become subject to the proposed rules if their emissions and/or nonattainment area status changes in the future. This includes:
 - All Scenario A facilities.
 - Facilities in moderate (or higher) NAAs that currently emit below the applicability threshold, should they increase VOC emissions above the threshold in the future.
 - Facilities located in marginal ozone NAAs, should these areas all get reclassified to moderate nonattainment and these facilities emit VOCs above the applicability threshold.

Table 1. Annualized Cost/Facility

	Metal	Plastic	Adhesive
Scenario A	- Walworth, Kewaunee, and Manitowoc facilities that meet threshold - Moderate or higher nonattainment area facilities that meet threshold	- Moderate or higher nonattainment area facilities that meet threshold	- Moderate or higher nonattainment area facilities that meet threshold
Affected facilities under Scenario A	7	0	0
Cost/facility	\$13,440	\$13,440	\$4,277
Scenario A cost	\$94,080	\$0	\$0
Scenario A cost	\$94,080		
Scenario B	- Walworth, Kewaunee, and Manitowoc facilities that meet threshold - All moderate or higher nonattainment area facilities - All marginal nonattainment area facilities	- All moderate or higher nonattainment area facilities - All marginal nonattainment area facilities	- All moderate or higher nonattainment area facilities - All marginal nonattainment area facilities
Affected facilities under Scenario B	19	4	9

Cost/facility	\$13,440	\$13,440	\$4,277
Scenario B cost	\$255,360	\$53,760	\$38,493
Total Scenario B cost	\$347,613		

- Table 2 lists the Scenario A facilities that may become subject to the proposed rules if they meet the applicability requirements at the time of rule finalization.

Table 2. List of Impacted Facilities

Facility	Applicability	Permit
Broadwind Towers	Metal coating - Manitowoc (2015 marginal NAA)	436039670-P20
Tramontina US Cookware Inc.	Metal coating - Manitowoc (2015 marginal NAA)	436030210-P33
Federal Mogul Piston Ring Inc.	Metal coating - Manitowoc (2015 marginal NAA)	436039010-F21
GKN Sinter Metals-Manitowoc	Metal coating - Manitowoc	436123050-S14
CNH Industrial America LLC	Metal coating - Manitowoc	436105010-ROPB
Kewaunee Fabrications LLC	Metal coating - Kewaunee	431057110-F01
The Vollrath Company LLC	Metal coating - Kewaunee	NA (Natural minor)

- Note that three additional facilities (Kieffer & Co. and Kohler Power Systems in Shoreline Sheboygan and Insinkerator in Kenosha) would have been expected to be impacted by this rulemaking under Scenario A. However, these facilities are already complying with the requirements of the proposed rules through administrative orders and would therefore not be further economically impacted by this rulemaking.
- There is no DNR permit fee associated with a permit revision.