

January 9, 2016

Mr. Mark B. Vandenbusch  
Designated Representative  
Wisconsin Public Service Corporation  
700 North Adams Street  
P.O Box 19001  
Green Bay, WI 54307-9001

Re: Petition for a Waiver of the Requirement to Provide Operating Data to Qualify as  
“Gas-Fired” for Unit 2 at the Weston Power Plant (Facility ID (ORISPL) 4078).

Dear Mr. Vandenbusch:

The United States Environmental Protection Agency (EPA) has reviewed the April 24, 2015 petition submitted under 40 CFR 75.66 by Wisconsin Public Service Corporation (WPS) requesting a waiver of the requirement to provide operating data that would otherwise be required to allow Weston Power Plant Unit 2 to qualify as “gas-fired” under 40 CFR 72.2. EPA approves the petition, with conditions, as discussed below.

#### Background

WPS owns and operates the Weston Power Plant (Weston), which is located near Wausau, Wisconsin. Weston Unit 2 has historically been operated as a coal-fired boiler. The unit has a design heat input capacity of 1319 million Btu per hour (mmBtu/hr) and serves a generator with a nameplate capacity of 75 megawatts. According to WPS, the unit is subject to the Acid Rain Program, the Cross-State Air Pollution Rule (CSAPR) annual trading programs for sulfur dioxide (SO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>), and the CSAPR ozone season trading program for NO<sub>x</sub>. WPS is therefore required to continuously monitor and report NO<sub>x</sub>, SO<sub>2</sub>, and carbon dioxide (CO<sub>2</sub>) mass emissions, NO<sub>x</sub> emission rate, and heat input for this unit in accordance with 40 CFR part 75. To meet these monitoring requirements, WPS has installed and certified a NO<sub>x</sub>-diluent continuous emission monitoring system (CEMS), an SO<sub>2</sub> CEMS, a CO<sub>2</sub> CEMS, a stack gas flow rate CEMS, and a continuous opacity monitoring system (COMS) on the unit’s exhaust stack.

WPS is also a party to a consent decree in *United States v. Wisconsin Public Service Corp.*, No. 1:13-cv-00010-WCG (E.D. Wis. filed Jan. 4, 2013). The consent decree prohibits WPS from combusting coal at Unit 2 after May 31, 2015 and also includes certain emissions monitoring requirements.

In the April 24, 2015 petition, WPS states that it plans to permanently convert Unit 2 from a coal-firing unit to a natural gas-firing unit. According to the petition, by June 1, 2015 WPS will turn off the power supply to the coal belt and by June 30, 2015, WPS will weld a cover over the feeder hopper for the coal belt and will cut and remove the tripper deck belt to provide a physical barrier to prevent coal from being combusted in Unit 2. In addition, the title V operating permit for the Weston plant has been modified to prohibit the combustion of fuel other than natural gas in Unit 2 as of June 1, 2015.

Under part 75, units that meet the definition of “gas-fired” units in 40 CFR 72.2 have monitoring options that are not available to coal-fired units, including the option to quantify the units’ SO<sub>2</sub> mass emissions and heat input rate using the methodology in appendix D to part 75, which relies on measurements of the quantity and quality of fuel combusted, as an alternative to using SO<sub>2</sub> and stack gas flow rate CEMS. Gas-fired units also have options for quantifying CO<sub>2</sub> mass emissions under appendix G to part 75 that are not available to coal-fired units. In addition, part 75 does not require opacity monitoring for gas-fired units.

WPS’s petition requests a waiver of an otherwise applicable condition for Weston Unit 2 to be considered “gas-fired” units for purposes of 40 CFR part 75 following the conversion to natural gas combustion. The definition of the term “gas-fired” in 40 CFR 72.2 includes provisions under which a unit that previously has not qualified as gas-fired can qualify as gas-fired based upon the submission of operating data for three calendar years or 720 operating hours, whichever is less, demonstrating that the unit has combusted natural gas for specified minimum percentages of its overall fuel usage and only fuel oil for its remaining fuel usage. In the petition, WPS requests that Unit 2 be considered a gas-fired unit for purposes of part 75 without the submission of such operating data.

#### EPA’s Determination

Absent the waiver requested in WPS’s petition, following conversion of Weston Unit 2 to natural gas combustion WPS would be required to submit three calendar years or 720 operating hours of operating data for the unit in order to demonstrate that the unit qualifies as gas-fired under 40 CFR 72.2. The purpose of this data submission requirement is to provide assurance that the conversion is permanent. As described above, in the petition WPS has provided other information intended to demonstrate the permanence of the conversion. Specifically, the unit is undergoing physical modifications that render them incapable of combusting coal and the title V operating permit has been modified to prohibit combustion of fuels other than natural gas. EPA views these factors as providing sufficient assurance that the conversion of Unit 2 from coal to gas combustion is permanent, fulfilling the purpose of the operating data submission requirement and making that requirement unnecessary in this instance.

In view of these considerations, EPA approves WPS’s petition for a waiver of the requirement to provide three calendar years or 720 hours of unit operating data to demonstrate that Weston Unit 2 meets the definition of “gas-fired” under 40 CFR 72.2. This unit shall be considered gas-fired for the purposes of 40 CFR part 75, the Acid Rain Program, and CSAPR as soon as it begins to operate after the conversion to natural gas combustion. EPA notes that this approval by itself does not alter any requirement to continue to use a CEMS or COMS that may

arise under legal authority other than 40 CFR part 75, such as the facility's title V operating permit, a state regulation, or the consent decree described above.

As conditions of this approval to be considered a gas-fired unit for purposes of 40 CFR part 75, the Acid Rain Program, and CSAPR without the submission of operating data that would otherwise be required, WPS shall:

1. Make all necessary revisions to the electronic monitoring plan for Weston Unit 2 to represent the change from coal combustion to natural gas combustion. The monitoring plan revisions include, but are not limited to, assigning appropriate closeout dates, activation dates, and codes for fuel type, monitoring systems, monitoring methodologies, emissions and heat input rate formulas, and monitoring system span and range values;
2. Ensure that the natural gas flowmeter(s) is certified according to section 2.1.5 of appendix D to part 75; and
3. Ensure that the data acquisition and handling system is properly programmed for the appendix D methodology for quantifying SO<sub>2</sub> mass emissions and Equation G-4 in appendix G to part 75 for quantifying CO<sub>2</sub> mass emissions.

EPA's determination relies on the accuracy and completeness of WPS's April 24, 2015 petition and is appealable under 40 CFR part 78. If you have any questions regarding this determination, please contact Louis Nichols at (202) 343-9008. Thank you for your continued cooperation.

Sincerely,

/s/

Reid P. Harvey, Director  
Clean Air Markets Division

cc: Michael Compher, EPA Region V  
Ethan Chatfield, EPA Region V  
Andrew Seeber, WDNR  
Louis Nichols, EPA, CAMD