



**We Energies**  
231 W. Michigan St.  
Milwaukee, WI 53203  
www.we-energies.com

December 17, 2025

Mr. Nate Willis  
Wastewater Section Manager  
Wisconsin Department of Natural Resources  
PO Box 7921  
Madison, WI 53707-7921

**SUBJECT: WISCONSIN ELECTRIC POWER COMPANY – VALLEY POWER PLANT  
NOTICE OF PLANNED PARTICIPATION UNDER 40 CFR 423  
PERMANENT CESSATION OF COAL COMBUSTION BY DECEMBER 31, 2034**

Dear Mr. Willis:

Valley Power Plant (“VAPP”), owned and operated by Wisconsin Electric Power Company (d/b/a We Energies) (“We Energies” or the “Company”), generates both electricity and steam for We Energies customers. VAPP is subject to wastewater effluent limitations guidelines (“ELG”) for the steam electric power generating point source category, federally regulated under 40 CFR Part 423 and state regulated under Wisconsin Administrative Code chapter NR 290. The federal steam electric ELG Rule was revised in 2015, 2020, and 2024, and established new technology-based limitations and associated compliance timelines for wastewater discharges from coal fueled facilities. While the state version of this ELG regulation set forth at chapter NR 290 was last updated in 1986, Wisconsin Administrative Code NR 220.13 authorizes the Wisconsin Department of Natural Resources to incorporate the updated federal effluent limitations guidelines in Wisconsin Pollutant Discharge Elimination System (“WPDES”) Permits.

The 2024 ELG Rule revision<sup>1</sup> of the regulations at 40 CFR 423 established zero-discharge limitations for three coal-related wastewaters, but provided an alternative compliance pathway for facilities. The 2024 ELG Rule established a compliance subcategory for electric generating unit(s) (“EGU”) that will permanently cease coal combustion by December 31, 2034 (“2034 PCCC”). EGUs seeking to qualify for this subcategory must submit a Notice of Planned Participation (“NOPP”) by December 31, 2025, submit subsequent annual progress reports, and continue to meet the 2020 ELG Rule limitations for coal-related wastewaters until permanent cessation of coal combustion is achieved by either retirement or fuel conversion. After permanent cessation of coal combustion is achieved, EGUs must meet combustion residual leachate (“CRL”) limitations as outlined in 40 CFR 423.13(l)(2)(i)(A). This provision is applicable to Valley Power Plant because, prior to the 2014-15 fuel conversion described below, coal combustion residuals (“CCR”) from coal-fueled operations were disposed of at the currently active Caledonia Ash Landfill. Therefore, We Energies is filing a NOPP for VAPP as it qualifies to be covered by the 2034 PCCC subcategory requirements for CRL effluent limitations applicable to the Caledonia Ash Landfill.

Originally constructed as a coal-fueled facility in the 1960s, Valley Power Plant was converted to a natural gas-fueled facility in 2014 and 2015. Because coal operations ceased, coal-related wastewater streams are no longer produced nor discharged under the authority of the facility’s WPDES Permit, WI-0000931. Coal combustion residuals generated by VAPP prior to the natural gas fuel conversion were disposed at CCR Landfills, including the Caledonia Ash Landfill (Wisconsin Department of

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<sup>1</sup>Supplemental Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category, 89 FR 40198 (May 9, 2024)

Natural Resources License No. 3232), owned and operated by We Energies. The Caledonia Ash Landfill is an active CCR Landfill located in the Village of Caledonia, Wisconsin, and continues to receive CCR materials from other We Energies facilities. Combustion residual leachate from the Caledonia Ash Landfill is reused in the landfill for CCR conditioning and dust control or hauled by tanker truck to the We Energies operated Oak Creek Power Plant/Elm Road Generating Station for treatment with other site wastewaters prior to discharge to Lake Michigan under the authority of WPDES Permit No. WI-0000914.

As outlined above, pursuant to 40 CFR 423.19(h)(1), We Energies submits the enclosed NOPP seeking to qualify Valley Power Plant Units 1 and 2 as EGUs that achieved permanent cessation of coal combustion by December 31, 2034.

We Energies staff are closely following proposed changes to the ELG rule. On October 2, 2025, the United States Environmental Protection Agency ("USEPA") published a Direct Final Rule<sup>2</sup> and Proposed Rule<sup>3</sup> to extend certain compliance deadlines associated with the 2024 ELG Rule. In addition to the specific extensions to regulatory deadlines, USEPA proposed to update the existing transfer provisions in 40 CFR 423.13(o) to allow facilities to switch between compliance alternatives and create authority in 40 CFR 423.18 for alternative applicability dates and paperwork submission dates, based on site-specific factors. USEPA also announced its intent to undertake a further reconsideration of certain aspects of the existing regulations and conduct a subsequent rulemaking. On November 28, 2025, USEPA withdrew its October 2025 Direct Final Rule.<sup>4</sup> As of the date of submission, USEPA has not yet finalized its October 2025 Proposed Rule. We Energies will continue to monitor the ELG Rule revision developments.

We Energies does not waive, and expressly reserves, all rights or options available to it pursuant to 40 CFR Part 423, and any revisions thereto, including 40 CFR 423.13(o) (regarding transferring to another compliance option), 40 CFR 423.18 (regarding qualifying events), the ability to withdraw this NOPP submission to the extent permitted by law, or any other provision of state or federal law that may apply.

If you have any questions regarding this submittal, please contact me by phone at (414) 221-4337 or by email at [alison.castronovo@wecenergygroup.com](mailto:alison.castronovo@wecenergygroup.com).

Sincerely,



Alison Castronovo, P.E.  
Principal Engineer

Enclosure

cc: Sawyer Hanson, WDNR – Madison  
Jacob Van Susteren-Wedeky, WDNR – Milwaukee

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<sup>2</sup>Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category – Initial Notification Date Extension, 90 FR 47617 (Oct. 2, 2025).

<sup>3</sup>Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category – Deadline Extensions, 90 FR 47693 (Oct. 2, 2025).

<sup>4</sup>Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category – Initial Notification Date Extension; Withdrawal of Direct Final Rule, 90 FR 54588 (Nov. 28, 2025).

**Notice of Planned Participation under 40 CFR 423**  
**Permanent Cessation of Coal Combustion by December 31, 2034**  
**We Energies – Valley Power Plant**

Pursuant to 40 CFR 423.19(h), Wisconsin Electric Power Company (d/b/a We Energies) (“We Energies” or the “Company”) submits this Notice of Planned Participation (“NOPP”) for Valley Power Plant (“VAPP”). We Energies hereby notifies the Wisconsin Department of Natural Resources (“Department”) that the facility has achieved permanent cessation of coal combustion (“PCCC”) at Valley Power Plant Units 1 and 2.

We Energies does not waive, and expressly reserves, all rights or options available to it pursuant to 40 CFR Part 423, and any revisions thereto, including 40 CFR 423.13(o) (regarding transferring to another compliance option), 40 CFR 423.18 (regarding qualifying events), the ability to withdraw this NOPP submission to the extent permitted by law, or any other provision of state or federal law that may apply.

In accordance with 40 CFR 423.19(h)(2), elements required to be submitted with this notice are provided in italicized font, followed by the Company’s response.

**Unit Identification**

*Identify the electric generating units intended to achieve the permanent cessation of coal combustion.*

- Valley Power Plant Unit 1
- Valley Power Plant Unit 2

**Projected Dates**

*The expected date that each electric generating unit is projected to achieve permanent cessation of coal combustion.*

- VAPP Unit 1 achieved PCCC on November 5, 2014.
- VAPP Unit 2 achieved PCCC on November 16, 2015.

**Method to Achieve Permanent Cessation of Coal Combustion**

*Whether each date represents a retirement or fuel conversion.*

- VAPP Unit 1 achieved PCCC through fuel conversion to natural gas.
- VAPP Unit 2 achieved PCCC through fuel conversion to natural gas.

**Regulatory Approval**

*Whether each retirement or fuel conversion has been approved by a regulatory body, and what the relevant regulatory body is.*

On April 26, 2013, pursuant to Wis. Stat. 196.49 and Wisconsin Administrative Code chs. PSC 112 and 140, Wisconsin Electric Power Company submitted an application to the Public Service Commission of Wisconsin (“PSC”) for a Certificate of Authority (“CA”) to convert the coal-fueled Valley Power Plant to a natural gas-fueled facility (PSC Docket Number 6630-CU-101). Also on April 26, 2013, Wisconsin Gas LLC submitted a companion application for a CA to install facilities to supply natural gas to VAPP (PSC Docket Number 6650-CG-235). On March 17, 2014, the PSC issued an Order (PSC reference number 200566) approving both projects.

## **NOPP – Permanent Cessation of Coal Combustion by December 31, 2034**

### **We Energies – Valley Power Plant**

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On April 25, 2013, pursuant to the requirements specified in Wisconsin Administrative Code chapter NR 406, Wisconsin Electric Power Company submitted a Minor Air Pollution Control Construction Permit Application to the Wisconsin Department of Natural Resources for the VAPP Natural Gas Conversion Project. We Energies proposed physical and operational changes to convert the VAPP boilers from coal as the primary fuel source to natural gas. On November 11, 2013, the Department issued Air Pollution Control Construction Permit No. 13-RSG-067 approving the fuel conversion.

#### **Supporting Documentation**

*Include a copy of the most recent integrated resource plan for which the applicable state agency approved the retirement or repowering of the unit subject to the ELGs, or other documentation supporting that the electric generating unit will permanently cease the combustion of coal by December 31, 2034.*

In Wisconsin, utilities are not required to submit Integrated Resource Plans to the PSC or any other state agency. Other supporting documentation for the VAPP fuel conversion is provided, as follows.

- Attachment 1 is an excerpt of the March 17, 2014, PSC Order authorizing the Valley Power Plant fuel conversion from coal to natural gas. The full order is publicly available at <https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=200566>.
- Attachment 2 is the First Quarter 2016 progress report, prepared by We Energies and submitted to the PSC on April 20, 2016. The progress report included the in-service dates of both VAPP units following the natural gas fuel conversion. The progress report is publicly available at <https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=285051>.
- Attachment 3 is an excerpt of the November 11, 2013, Air Pollution Control Construction Permit No. 13-RSG-067 authorizing the modification and operation of the VAPP boilers from coal-fueled to natural gas-fueled. The complete permit is available upon request.

#### **Timeline**

*Include, for each such electric generating unit, a timeline to achieve the permanent cessation of coal combustion. Each timeline shall include interim milestones and the projected dates of completion.*

Permanent cessation of coal combustion at VAPP is complete. Table 1 and Table 2 below provide the interim milestones and actual completion dates for VAPP Unit 1 and Unit 2, respectively.

*Table 1: Timeline to achieve permanent cessation of coal combustion at VAPP Unit 1*

<b>Milestone</b>	<b>Actual Date</b>
Submit Minor Air Pollution Control Construction Permit Application to Department	04/25/2013
Submit Applications to PSC to request Certificate of Authority for fuel conversion	04/26/2013
Receive Air Pollution Control Construction Permit from Department	11/11/2013
Receive Order providing Certificate of Authority from PSC	03/17/2014
Commence construction on boilers to enable fuel conversion	07/07/2014
Start-up and Commissioning of natural gas fueled boilers:	
• Boiler 1 – Process B21, Control Device C21 (Flue Gas Recirculation System), Stack S11 – 900 MMBtu/hour Natural Gas Fired Boiler	10/02/2014
• Boiler 2 – Process B22, Control Device C22 (Flue Gas Recirculation System), Stack S11 – 900 MMBtu/hour Natural Gas Fired Boiler	10/03/2014
VAPP Unit 1 achieved PCCC through fuel conversion	11/5/2014

## **NOPP – Permanent Cessation of Coal Combustion by December 31, 2034**

### **We Energies – Valley Power Plant**

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*Table 2: Timeline to achieve permanent cessation of coal combustion at VAPP Unit 2*

<b>Milestone</b>	<b>Actual Date</b>
Submit Minor Air Pollution Control Construction Permit Application to Department	04/25/2013
Submit Applications to PSC to request Certificate of Authority for fuel conversion	04/26/2013
Receive Air Pollution Control Construction Permit from Department	11/11/2013
Receive Order providing Certificate of Authority from PSC	03/17/2014
Commence construction on boilers to enable fuel conversion	04/15/2015
Start-up and Commissioning of natural gas fueled boilers:	
• Boiler 3 – Process B23, Control Device C23 (Flue Gas Recirculation System), Stack S12 – 900 MMBtu/hour Natural Gas Fired Boiler	08/07/2015
• Boiler 4 – Process B24, Control Device C24 (Flue Gas Recirculation System), Stack S12 – 900 MMBtu/hour Natural Gas Fired Boiler	07/21/2015
VAPP Unit 2 achieved PCCC through fuel conversion	11/16/2015

#### **Certification Statement**

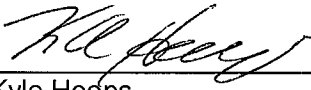
*Include, for each such electric generating unit, a certification statement that the facility is in compliance with the following limitations or standards: (i) the applicable limitations or standards for FGD wastewater in §423.13(g)(1) or (g)(2)(ii) or (iii) or §423.16(e)(1) or (2); and (ii) the applicable limitations or standards for bottom ash transport water in §423.13(k)(1) or (k)(2)(i) or (iii) or §423.16(g)(1) or (2).*

VAPP never generated flue gas desulfurization (“FGD”) wastewater and ceased discharge of bottom ash transport water (“BATW”) in 2015 following the fuel conversion to natural gas. Therefore, the ELG limitations or standards for FGD wastewater and BATW in 40 CFR 423.13 and 40 CFR 423.16 are not applicable to VAPP.

**Certification Statement**

I hereby certify that Valley Power Plant Units 1 and 2, owned and operated by Wisconsin Electric Power Company, are subject to 40 CFR 423 and Wisconsin Administrative Code NR 290 requirements applicable to steam electric power generating facilities. In accordance with 40 CFR 423.19(h)(1), I am providing notice that Valley Power Plant Unit 1 achieved permanent cessation of coal combustion on November 5, 2014 and Valley Power Plant Unit 2 achieved permanent cessation of coal combustion on November 16, 2015. In accordance with 40 CFR 423.19(h)(2), I certify that Valley Power Plant Units 1 and 2 do not generate flue gas desulfurization wastewater and bottom ash transport water, and therefore, the limitations or standards for these wastewaters in 40 CFR 423.13 and 40 CFR 423.16 do not apply.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
\_\_\_\_\_  
Kyle Hoops  
Senior Vice President Power Generation

12-17-25  
\_\_\_\_\_  
Date

## **Attachments**

- 1 – Public Service Commission of Wisconsin, March 17, 2014, Final Decision and Order (Excerpt)

Application of Wisconsin Electric Power Company for Authority to Convert the Valley Power Plant from a Coal-Fired Cogeneration Facility to a Natural Gas-Fired Cogeneration Facility, 6630-CU-101

Application of Wisconsin Gas LLC, as a Gas Public Utility, for Authority to Install and Place in Service Facilities to Supply Natural Gas to Wisconsin Electric Power Company's Valley Power Plant, in the City of Milwaukee, Milwaukee County, Wisconsin, 6650-CG-235

- 2 – Wisconsin Electric Power Company, April 20, 2016, First Quarter 2016 Report to Public Service Commission of Wisconsin regarding the conversion of Valley Power Plant from a Coal-Fired Cogeneration Facility to a Natural Gas-Fired Cogeneration Facility, 6630-CU-101
- 3 – Wisconsin Department of Natural Resources, November 11, 2013, Air Pollution Control Construction Permit No. 13-RSG-067 (Excerpt)

Attachment 1

Public Service Commission of Wisconsin, March 17, 2014, Final Decision and Order (Excerpt)

Application of Wisconsin Electric Power Company for Authority to Convert the Valley Power Plant from a Coal-Fired Cogeneration Facility to a Natural Gas-Fired Cogeneration Facility, 6630-CU-101

Application of Wisconsin Gas LLC, as a Gas Public Utility, for Authority to Install and Place in Service Facilities to Supply Natural Gas to Wisconsin Electric Power Company's Valley Power Plant, in the City of Milwaukee, Milwaukee County, Wisconsin, 6650-CG-235



**PUBLIC SERVICE COMMISSION OF WISCONSIN**

Application of Wisconsin Electric Power Company for Authority to  
Convert the Valley Power Plant from a Coal-Fired Cogeneration Facility  
to a Natural Gas-Fired Cogeneration Facility 6630-CU-101

Application of Wisconsin Gas LLC, as a Gas Public Utility, for  
Authority to Install and Place in Service Facilities to Supply Natural  
Gas to Wisconsin Electric Power Company's Valley Power Plant, in  
the City of Milwaukee, Milwaukee County, Wisconsin 6650-CG-235

**FINAL DECISION**

On April 26, 2013, pursuant to Wis. Stat. § 196.49 and Wis. Admin. Code chs. PSC 112 and 140, Wisconsin Electric Power Company (WEPCO) submitted an application for a Certificate of Authority (CA) to convert the coal-fired cogeneration Valley Power Plant (Valley) to a gas-fired cogeneration facility at an estimated cost of \$62,000,000, excluding Allowance for Funds Used during Construction (AFUDC). Also on April 26, 2013, Wisconsin Gas LLC (WG) submitted a companion application for a CA to install facilities to supply natural gas to Valley at an estimated cost of \$3,708,000, excluding AFUDC. Both projects are located in the city and county of Milwaukee, Wisconsin, and are essentially a unified construction project. Hereafter, the term "project" denotes both applicants' construction work, unless otherwise expressly stated or required by context.

A CA is granted to WEPCO for the conversion of Valley from coal to natural gas fuel, subject to conditions, at an estimated cost of \$62,000,000, excluding AFUDC. A CA is also granted to WG for necessary natural gas main extensions, service laterals, and federally required service regulators, subject to conditions, at an estimated cost of \$4,258,000, excluding AFUDC.

In summary, the overall environmental impact of the project would be positive. The exact reduction in emissions would depend on the amount of electricity generated at the site. Wastewater discharges related to the coal pile runoff would be eliminated.

### **Certificates**

The Commission grants WEPCO a CA to convert Valley from a coal-fired cogeneration facility to a natural gas-fired cogeneration facility, as described in the application, at a total cost of \$62,000,000, excluding AFUDC.

The Commission grants WG a CA to install and place in service facilities necessary to supply natural gas as fuel for Valley, as described in the application, and with required additional service regulators as discussed herein, at an estimated cost of \$4,258,000, excluding AFUDC.

This CA is subject to conditions, as discussed above.

### **Order**

1. WEPCO is authorized to construct and place in operation facilities converting Valley from coal to natural gas at a total estimated cost of \$62,000,000, excluding AFUDC. WG is authorized to construct and place in operation the natural gas mains and laterals to Valley at a total estimated cost of \$4,258,000, excluding AFUDC.

2. WG shall include four service regulators as required by 49 C.F.R. § 192.197(c) as in its construction.

3. The proposed construction work of WEPCO and WG, and the addition of service regulators to the WG project, as modified by this Final Decision, are approved.

4. WEPCO's request to accrue AFUDC on 100 percent of CWIP on the conversion project at a rate of 9.09 percent is approved. WG's request to accrue AFUDC on 50 percent of

- c. The date when the deadlines expire for requesting administrative review or reconsideration of this Final Decision and of the permits, approvals, and licenses described in par. b.
- 13. This Final Decision takes effect the day after the date of service.
- 14. Jurisdiction is retained.

**Concurrence**

Chairperson Montgomery concurs and writes separately (see attached).

**Concurrence and Dissent**

Commissioner Callisto concurs, dissents in part, and writes separately (see attached).

Dated at Madison, Wisconsin, this 17<sup>th</sup> day of March, 2014.

By the Commission:



Sandra J. Paske  
Secretary to the Commission

SJP:MV:jlt:DL: 00904277

Attachments

See attached Notice of Rights

## Attachment 2

Wisconsin Electric Power Company, April 20, 2016, First Quarter 2016 Report to Public Service Commission of Wisconsin regarding the conversion of Valley Power Plant from a Coal-Fired Cogeneration Facility to a Natural Gas-Fired Cogeneration Facility, 6630-CU-101



**We Energies**  
231 W. Michigan St.  
Milwaukee, WI 53203  
www.we-energies.com

April 20, 2016

Ms. Sandra J. Paske  
Secretary to the Commission  
Public Service Commission of Wisconsin  
Post Office Box 7854  
Madison, WI 53707-7854

Dear Ms. Paske:

**Application of Wisconsin Electric Power Company for Authority to  
Convert the Valley Power Plant from a Coal-Fired Cogeneration Facility  
to a Natural Gas-Fired Cogeneration Facility – PSCW File 6630-CU-101**

On March 17, 2014, the Commission issued an Order in the above referenced docket. In accordance with Condition 10 of the Order, the Company is submitting the quarterly report for the first quarter, 2016.

If you have any questions regarding this project, please contact me at (920) 433-1470.

Sincerely,

A handwritten signature in cursive script that reads "Dennis M. Derricks".

Dennis M. Derricks  
Director – Regulatory Affairs

attachment

**Wisconsin Electric Power Company  
VAPP Gas Conversion  
6630-CU-101  
Quarterly Progress report  
1<sup>st</sup> Quarter 2016**

1. Construction Status

- Unit 1 construction started April 2014 and is 100% complete.
- Unit 2 construction started November 2014 and is 97% complete.

2. Permit Status

- Asbestos Notification Summary was sent to WDNR on March 26, 2014. The City of Milwaukee is providing oversight of asbestos removal for WDNR .
- The Construction Air Permit was received from WDNR November 11, 2013.

3. Engineering Status

- Engineering is 100% complete.

4. Procurement Status

- Procurement is 98% complete.

5. Anticipated In-Service Date

- Unit 2 was placed in service November 16, 2015. Unit 1 was placed in service November 5, 2014.

6. Costs

Description	CA Estimate x1000	Actual to Date 3/31/2016 x1000
Structures and Improvements	9,000	8,400
Boiler Plant Equipment	46,200	43,400
Accessory Electric Equipment	5,600	5,200
Miscellaneous Power Plant Equipment	1,200	1,100
<b>Total</b>	<b>62,000</b>	<b>58,100</b>

Attachment 3

Wisconsin Department of Natural Resources, November 11, 2013, Air Pollution Control Construction Permit No. 13-RSG-067 (Excerpt)

**AIR POLLUTION CONTROL CONSTRUCTION PERMIT**

EI FACILITY NO: 241007800

CONSTRUCTION PERMIT NO.: 13-RSG-067

TYPE:

Construction Permit for Processes: B21, B22, B23, B24

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

Name of Source: Wisconsin Electric Power Company, D/B/A We Energies-Valley Station

Street Address: 1035 W. Canal Street,  
Milwaukee, Milwaukee County, Wisconsin

Responsible Official, & Title: Raul Villarreal, Asset Manager-Valley Power Plant

is authorized to modify and initially operate boilers B21, B22, B23, and B24 described in the plans and specifications dated April 26, 2013 (application received), in conformity with the conditions herein. The authority to construct, modify, replace and/or reconstruct any process covered in this Construction Permit expires forty two (42) months from the date of issuance. This approved period to construct, modify, replace and/or reconstruct may be extended for up to 18 months upon request for cause, prior to expiration, unless otherwise specified by this construction permit. The conditions of this construction permit are permanent and may only be revised through a revision of the construction permit or through the issuance of a new construction permit. [s. 285.60(1), Wis. Stats.]

Conditions of the construction permit marked with an asterisk (\*) have been created outside of the 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 Parts I and II hereof.

Dated at Milwaukee, Wisconsin

*November 11, 2013*

STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES  
For the Secretary

By

*Daniel Schramm*  
Daniel Schramm  
Air Management Supervisor  
Milwaukee Service Center



## Part I

- A. **Process B21, Control Device C21 (Flue Gas Recirculation System), Stack S11 – 900 MMBtu/hr Natural Gas Fired Boiler.**  
**Process B22, Control Device C22 (Flue Gas Recirculation System), Stack S11 – 900 MMBtu/hr Natural Gas Fired Boiler.**  
**Process B23, Control Device C23 (Flue Gas Recirculation System), Stack S12 – 900 MMBtu/hr Natural Gas Fired Boiler.**  
**Process B24, Control Device C24 (Flue Gas Recirculation System), Stack S12 – 900 MMBtu/hr Natural Gas Fired Boiler.**

Note: For each boiler, conditions in this section (I.A) are effective only after the boiler is converted from coal fired boiler to natural gas fired boiler.

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
<b>1. Particulate Matter Emissions</b>	<b>(1)</b> Particulate matter (filterable and condensable) emissions from each Stack S11 and S12 may not exceed 0.10 pounds per million Btu heat input. [s. NR 415.06(2)(c), Wis. Adm. Code]	<b>(1)</b> The permittee shall only burn natural gas in the boilers (B21, B22, B23, B24).  [s. 285.65(3), Wis. Stats.]	<b>(1)</b> <u>Reference Test Method for Particulate Matter Emissions:</u>  Whenever compliance emission testing is required to determine compliance with the limit in Condition I.A.1.a.(1), U.S. EPA Method 5 in 40 CFR Part 60, Appendix A and Method 202 in 40 CFR Part 51, Appendix M or any other method approved by the Department in writing shall be used to demonstrate compliance. [s. NR 439.06(1), Wis. Adm. Code]  <b>(2)</b> The permittee shall keep records to indicate that natural gas is the only fuel fired (or capable of being fired) in the boilers. [s. NR 439.04(1)(d), Wis. Adm. Code]

- A. Process B21, Control Device C21 (Flue Gas Recirculation System), Stack S11 – 900 MMBtu/hr Natural Gas Fired Boiler.  
 Process B22, Control Device C22 (Flue Gas Recirculation System), Stack S11 – 900 MMBtu/hr Natural Gas Fired Boiler.  
 Process B23, Control Device C23 (Flue Gas Recirculation System), Stack S12 – 900 MMBtu/hr Natural Gas Fired Boiler.  
 Process B24, Control Device C24 (Flue Gas Recirculation System), Stack S12 – 900 MMBtu/hr Natural Gas Fired Boiler.

Note: For each boiler, conditions in this section (I.A) are effective only after the boiler is converted from coal fired boiler to natural gas fired boiler.

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
2. Visible Emissions	<p>(1) Number 1 of the Ringlemann chart or 20% opacity with the following exceptions:</p> <p>(a) When combustion equipment is being cleaned or a new fire started, emissions may exceed number 1 of the Ringlemann chart or 20% opacity but may not exceed number 4 of the Ringlemann chart or 80% opacity for 6 minutes in any one hour. Combustion equipment may not be cleaned nor a fire started more than 3 times per day.</p> <p>(b) Emissions may exceed number 1 of the Ringlemann chart or 20% opacity for stated periods of time, as permitted by the Department, for such purposes as an operating test, use of emergency equipment, or other good cause, provided no hazard or unsafe condition arises. [s. NR 431.05, Wis. Adm. Code]</p>	<p>(1) The permittee shall only burn natural gas in the boilers (B21, B22, B23, B24). [s. 285.65(3), Wis. Stats.]</p>	<p>(1) <u>Reference Test Method for Visible Emissions:</u></p> <p>Whenever compliance emission testing is required, U.S. EPA Method 9 shall be used to demonstrate compliance. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The permittee shall keep records to indicate that natural gas is the only fuel fired (or capable of being fired) in the boilers. [s. NR 439.04(1)(d), Wis. Adm. Code]</p>

- A. Process B21, Control Device C21 (Flue Gas Recirculation System), Stack S11 – 900 MMBtu/hr Natural Gas Fired Boiler.  
 Process B22, Control Device C22 (Flue Gas Recirculation System), Stack S11 – 900 MMBtu/hr Natural Gas Fired Boiler.  
 Process B23, Control Device C23 (Flue Gas Recirculation System), Stack S12 – 900 MMBtu/hr Natural Gas Fired Boiler.  
 Process B24, Control Device C24 (Flue Gas Recirculation System), Stack S12 – 900 MMBtu/hr Natural Gas Fired Boiler.

Note: For each boiler, conditions in this section (I.A) are effective only after the boiler is converted from coal fired boiler to natural gas fired boiler.

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
3. SO <sub>2</sub> Emissions	(1) The permittee may not cause, allow or permit sulfur dioxide to be emitted from any stack to the ambient air, averaged over any 24-hour period in amounts greater than 0.50 pounds per million Btu heat input. [s. NR 418.04(1)(a)1., Wis. Adm. Code]	(1) The permittee shall only burn natural gas in the boilers (B21, B22, B23, B24). [s. 285.65(3), Wis. Stats.]	(1) <u>Reference Test Method for Sulfur Dioxide Emissions:</u>  Whenever compliance emission testing is required by the Department, U.S. EPA Method 6, in 40 CFR Part 60, Appendix A, incorporated with s. NR 484.04, Wis. Adm. Code, shall be used to demonstrate compliance . [s. NR 439.06(2)(a), Wis. Adm. Code]  (2) The permittee shall keep records to indicate that natural gas is the only fuel fired (or capable of being fired) in the boilers. [s. NR 439.04(1)(d), Wis. Adm. Code]