



January 18, 2012

Ms. Susan Hedman
Regional Administrator
U.S. Environmental Protection Agency
77 West Jackson Boulevard, R-19J
Chicago IL 60604-3507

Subject: Wisconsin's Implementation of Best Available Retrofit Technology (BART)

Dear Ms. Hedman:

The Wisconsin Department of Natural Resources (WDNR) hereby submits its implementation of Chapter NR 433, Protection of Visibility by Application of BART. This submittal is one major component of Wisconsin's State Implementation Plan (SIP) for compliance with the federal Regional Haze Rule issued in 1999 and modified in 2005 (*64 FR 35714* and *70 FR 39104*). The remaining portions of Wisconsin's Regional Haze SIP, such as plans to address 2018 reasonable further progress (RFP) goals for visibility protection in federal Class I Areas, will be submitted under separate cover letter.

The WDNR determined that ten (10) facilities are subject to BART. This included nine (9) electric generating units (EGUs) and one (1) non-EGU source. The original EGU and non-EGU BART technical support documents prepared by the WDNR are included as attachments, as well as the final BART analysis and summary of changes. In addition, modeling demonstrations are provided for three (3) other non-EGU sources that are not subject to BART. Furthermore, a draft Administrative Order (AO) and draft permit revisions are provided.

The following are some key dates related to WDNR's implementation of BART requirements:

- March 6, 2009 – BART analysis submitted to WDNR by Georgia-Pacific (GP) Consumer Products LP (*included as attachment*)
- July 29, 2010 – Public hearing conducted in Madison, WI (*proof of hearing and summary / response to comments included as attachment*)
- January 13, 2011 – Regional Haze SIP, including BART analysis, submitted to the Federal Land Managers (FLMs) for a 60-day review and comment period.
- July 1, 2011 – Revised Regional Haze SIP, including BART analysis, submitted to the FLMs for another 60-day review and comment period.
- September 13, 2011 – Public hearing conducted in Madison, WI (*proof of hearing and summary / response to comments included as attachment*)

The WDNR has the legal authority under Wisconsin law to adopt and implement these requested SIP revisions. Section 285.11 (6), Wis. Stats., authorizes the WDNR to develop and revise the SIP for prevention, abatement, and control of air pollution.

In accordance with the April 6, 2011 McCabe Memo, one paper copy of the SIP revision documents are enclosed. In addition, an electronic copy of these documents is provided as well on an enclosed CD. If you have any questions regarding this submittal, please feel free to call either Joseph Hoch at 608-267-7543 or Ralph Patterson at 608-267-7546.

Sincerely,



William B. Baumann, Acting Director
Bureau of Air Management

cc: Patrick Stevens – AD/8
Joseph Hoch – AM/7
Ralph Patterson – AM/7
Cheryl Newton – U.S. EPA Region V (A-18J), 77 West Jackson Boulevard, Chicago, IL 60604
Douglas Aburrano – U.S. EPA Region V (AR-18J), 77 West Jackson Boulevard, Chicago, IL 60604
Jacqueline Nwia – U.S. EPA Region V (AT-18J), 77 West Jackson Boulevard, Chicago, IL 60604

Summary of Attachments: Hard Copy and Electronic

Attachment 1 – U.S. EPA SIP checklist

Attachment 2 – Draft BART Technical Support Document for EGUs – Dated July 1, 2011

Attachment 3 – Draft BART Technical Support Document for Non-EGUs – Dated July 1, 2011

Attachment 4 – Final BART Determination and Summary of Changes from Draft Technical Support Documents

Attachment 5 – BART Modeling for PCA-Tomahawk, Thilmany, and Wausau-Mosinee

Attachment 6 – Draft Administrative Order (AO) for Georgia Pacific

* To be finalized after proposed approval by the U.S. EPA

Attachment 7 – Template for EGU BART Permit Revisions for Implementation of BART

* To be finalized in EGU specific permits after proposed approval by the U.S. EPA

Attachment 8 – BART Analysis Submitted by Georgia Pacific

Attachment 9 – Proof of Public Hearing on July 29, 2010 (Response to Public Comments Included in Attachment 3)

Attachment 10 – Proof of Public Hearing on September 13, 2011 and Summary / Response to Public Comments