



October 26, 2012

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**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Daniel R. Adams, Senior Environmental Consultant  
We Energies  
231 W. Michigan Street (A231)  
Milwaukee, WI 53203

Dear Mr. Adams:

The Bureau of Air Management, Department of Natural Resources, received your application on August 13, 2012, requesting an exemption from the requirement to obtain an air pollution control permit to install equipment for testing or research for a limited time.

The proposal includes the installation of temporary fuel additive equipment upstream of the existing coal crushers and the addition of non-combustible materials to the coal prior to crushing. The additives are expected to enhance the control of nitrogen oxides, sulfur dioxide, and mercury.

The proposed testing may be exempted from permitting requirements under sec. NR 406.04(1)(i), Wis. Adm. Code, provided that the testing or research will not present a significant hazard to public health, safety, or welfare or to the environment. The department has determined that these tests will not present a significant hazard.

The Department will now accept public comment on this project for ten (10) days from the date of publication. Even though a final decision is being issued, the department will consider any comments received and determine whether the decision needs to be modified based on those comments.

The following conditions are proposed for the exemption:

1. We Energies (WE) may evaluate the use of refined coal as described in the August 13, 2012, exemption application. The addition rate of the non-combustible additive may not exceed 3.50 tons in any hour nor more than 7,560 tons during the duration of this exemption approval (90 days of maximum operation). WE shall keep hourly records of the additive addition rate.
2. WE may not install any permanent changes to the Pleasant Prairie facility for this research and testing project. This includes, but is not limited to, footings, storage units or any other type of permanent installation.
3. WE shall perform a stack test to evaluate particulate matter emissions, using U.S. EPA method 5 and method 202 or other test methods approved by the Department, at least once during the period of this exemption.

4. All testing and additive addition allowed under this exemption shall cease within 12 months of the initial addition of additive to the coal. In addition, this exemption approval expires 18 months after issuance regardless of the date of first additive addition.

5. The company shall provide written notification to: Ted Cauwels, Southeast Region Air Program, 9531 Rayne Road, Suite 4, Sturtevant WI 53177 at least five (5) days prior to start of the testing and first addition of additive.

If the testing is successful and WE decides to use this, or a similar system, on a continuous basis, WE will need to submit construction permit application forms for a permit and obtain approval to operate on a continuous basis.

We have received the fee of \$1,250 associated with the issuance of a testing or research exemption under NR 406.04(1)(i), Wis. Adm. Code.

— Sincerely,

s/s 10/26/2012  
Steven Dunn, P.E.  
Permits & Stationary Source Modeling Section  
Bureau of Air Management

Attachments

cc: Ted Cauwels – Sturtevant Service Center