1303 South 8th Street P.O. Box 1090 Manitowoc, WI 54221-1090 920-683-4600 FAX 920-686-4348 www.mpu.org

Attn: Mr. Randy Matty, P.E.
Wisconsin Department of Natural Resources
Northeast Region Headquarters
2984 Shawano Avenue
Green Bay, WI 54313-6727

February 24, 2014

Subject: 2013 Annual Power Plant Air Operation Permit Compliance Certification

Dear Mr. Matty:

Permit condition I.K.(5)(2) of Manitowoc Public Utilities' operation permit #: 436035930-P22 requires MPU to submit an **annual certification of compliance** covering the period of January 1, 2013 to December 31, 2013. This report is to be submitted within 60 days after the end of the monitoring period. We are also required to submit the report to:

US EPA Region V
Air Enforcement Compliance and Assurance Branch
AE-17J
77 West Jackson Blvd.
Chicago, Illinois 60604-3507

The following significant events occurred during this monitoring period:

- EPA CAIR and Acid Rain Program (ARP) annual SO_2 reconciliation reports for compliance year 2012 received March 4, 2013 with sufficient allowances available for compliance.
- EPA CAIR NOx annual reconciliation report for compliance year 2012 received March 4, 2013 with sufficient allowances available for compliance.
- Submitted and certified the 2012 eGGRT report with EPA on March 25, 2013. Submitted and certified the revised 2010 and 2011 eGGRT reports with EPA on April 10, 2013.
- WDNR completed the Full Air Compliance Evaluation Summary and issued a report on April 12, 2013 concluding the facility was in compliance with all Wisconsin Air regulations.
- Prepared and submitted Summary of MPU Subpart ZZZZ of Part 63 RICE Units report to the WDNR On May 2, 2013. The P28 dual fuel diesel generator was removed from the MISO

model as a generator effective March 1, 2013. The unit is available for MISO to call up under emergency conditions only.

- Filed request with the WDNR for new source CAIR allowance for unit 9. Responded to the WDNR request to review the Wisconsin CAIR NOx allocations for 2015 to 2019.

- Submitted an air pollution control operation permit application, plans and specifications on May 14, 2013. WDNR issued draft operating permit#: 436035930-P22 on June 3, 2013 to address the changes requested in the application.

- The Part 75 and Part 60 Relative Accuracy Test Audit (RATA) performed on the SO2/NOx/CO2/CO/Flow CEM system installed in the S20 Stack on July 23, 2013. Mechanical Systems Inc. assisted by Interpoll Laboratories performed the RATA testing.

- The Part 75 and Part 60 Relative Accuracy Test Audit (RATA) performed on the SO2/NOx/CO2/CO/Flow CEM system installed in the breaching of boiler B09 July 23-24, 2013. Mechanical Systems Inc. assisted by Interpoll Laboratories performed the RATA testing.

- The WDNR issued operating permit#: 436035930-P22 on July 22, 2013.

- Received the 2013 allocation of NOx annual and ozone season allowances from the EPA on September 24, 2013. EPA CAIR NOx ozone reconciliation report for compliance year 2013 received December 12, 2013 with sufficient allowances available for compliance.

- Quarterly excess emission reports filed on April 15, 2013 (Q1), July 15, 2013 (Q2), October 23, 2013 (Q3) and on January 28, 2014 (Q4).

Please find enclosed the 2013 Air Operation Permit Compliance Certification for the Power Plant. We believe this report contains all the information you need to evaluate MPU's compliance status. However, if you need additional information or have any questions about this report or its contents, please don't hesitate to contact Mr. Jerry Ahlswede of my staff at (920) 686-4211.

Sincerely,

Nilaksh Kothari.

Nilaksh Kothari, P.E.
General Manager

cc. Red Jones - (MPU) w/attachments
Jerry Ahlswede - (MPU) w/attachments
Tom Reed - (MPU) w/attachments
Scott Karbon - (MPU) w/attachments

US EPA Region V
Air Enforcement Compliance and Assurance Branch
AE-17J
77 West Jackson Blvd.
Chicago, Illinois 60604-3507

Source: Y:\Group File Folders\Reed\MPU Environmental\Environmental Reports\Annual - Compl Cert\Power Plant\Ann_compl cert 2013.docx

MPU03839

State of Wisconsin
Department of Natural Resources
Bureau of Air Management
dnr.wi.gov

Air Operation Permit Compliance Certification

Form 4530-170 (R 10/10)

Notice: Under ss. NR 407.09(4)(a)3. and 439.03(1)(c), Wis. Adm. Code, all sources issued an air operation permit by the Wisconsin Department of Natural Resources must submit an annual (or more frequent) certification of compliance with all operation permit terms and conditions over the reporting period specified in the permit. You may use this form to submit your compliance certification to the Department, and to EPA Region V. Please note that compliance certifications must be signed by a responsible official, as defined in NR 400.02(136), Wis. Adm. Code. Please retain records and all other material information used to certify compliance with your air operation permit for Department review. Use of this Form is voluntary. Personally identifiable information collected on this Form is unlikely to be used for any purpose other than that for which it was originally collected, but may be provided to requesters as required by Wisconsin's Open Records law (ss. 19.31-19.39, Wis. Stats.).

A.) Facility Information

1) Facility Name **Manitowoc Public Utilities**

2) FID: **436035930**

3) a. Permit Number **436035930-P22** | b. Permit Issue Date **July 22, 2013**

4) Reporting Period Covered by this Certification **January 1, 2013 through December 31, 2013**

5) FOR PART 70 SOURCES ONLY:

All Part-70 sources must also submit a copy of the compliance certification to the **US EPA-Region V**, in addition to the **appropriate WDNR regional field office**. Addresses are listed in your Part-70 air permit. Please check the following box, if applicable to your facility:

☐ A copy of the Compliance Certification has been submitted to US EPA-Region V.

B.) Facility Compliance Information

6) Check either (a) "CONTINUOUS COMPLIANCE" or (b) "INTERMITTENT COMPLIANCE" below
(Terms "continuous" and "intermittent" compliance are defined in Instructions, page 3 of 4).

a)_____ **Facility Was in Continuous Compliance** (During the entire reporting period identified in this compliance certification, this facility was in **continuous** compliance with **all** conditions specified in the permit identified in this compliance certification. The method used to determine compliance for each condition is the method specified in the permit identified in this compliance certification)

b)__X___ **Facility Was in Intermittent Compliance** (During the entire reporting period identified in this compliance certification, this facility was in continuous compliance with **all** conditions specified in the permit identified in this compliance certification, **EXCEPT** for the deviations identified on the attached deviation report. The method used to determine compliance for each condition is the method specified in the permit identified in this compliance certification, unless otherwise indicated and described in the enclosed deviation report.)

NOTE: If you select this option, you must complete and attach the Air Operation Permit Deviation Summary Report, in which you list deviations from any conditions of the permit for the reporting period covered by this Compliance Certification.

C.) Alternative Permit Requirements

In certain circumstances where the underlying applicable requirement allows, permits may include a choice of limits and/or standards, alternate operating scenarios, alternate monitoring methods, alternate recordkeeping, and the like. Where the permit includes such options or alternate requirements, the source must specifically identify the permit terms and conditions which applied over the entire reporting period. Many federal MACT standards provide a choice of emission standards and associated monitoring requirements. For example, the pulp and paper MACT (40 CFR part 63 subpart S) requires certain control devices to either reduce total hazardous air pollutant emissions by weight, or by volume, or through the use of a thermal oxidizer operating under certain parameters, or through other specified means.

7) If the facility operated under alternative permit requirements for all or part of the reporting period covered by this compliance certification, please identify the permit condition that describes the alternative permit requirements, list the emission unit operated according to these requirements, and list the begin and end dates during which the emission unit was operated according to these requirements: (Add additional pages if necessary)

a) Permit Condition Reference:	b) Emission Unit:	c) Alternative Requirement Begin and End Date:

D.) Facility Compliance Certification

NOTE: A responsible official, **as defined in s. NR 400.02 (136), Wis. Adm. Code**, must sign this compliance certification. Compliance certifications that are not signed by a responsible official will be returned as incomplete.

I have reviewed this facility's compliance status with respect to *ALL* air operation permit conditions for the reporting period specified in this compliance certification. Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

N. Nilaksh Kothari.
Signature of Responsible Official

Nilaksh Kothari
Typed or Printed Name of Signatory

General Manager
Title

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Date

For questions concerning compliance certification, contact your regional compliance engineer by phone, via email, or via facsimilie.

State of Wisconsin
Department of Natural Resources
Bureau of Air Management
dnr.wi.gov

Air Operation Permit Deviation Summary Report

Form 4530-171 (R 9/10)

Notice: Deviation Reports are required under s. NR 439.03(1)(b), Wis. Adm. Code. Use of this Table to report deviations is voluntary. Personally Identifiable Information collected on this form is not likely to be used for purposes other than the purpose for which it is being collected. This table may be submitted in conjunction with the Air Operation Permit Compliance Certification to report deviations from permit conditions contained in the Air Operation Permit. Complete items A-C to report deviations. Provide information on each deviation in a separate row of the table. Copy this page as needed to list all deviations for the reporting period specified in this Deviation Summary Report. Personally identifiable information collected on this Form is unlikely to be used for any purpose other than that for which it was originally collected, but may be provided to requesters as required by Wisconsin's Open Records law (ss. 19.31-19.39, Wis. Stats.).

A.) Facility Information

1.) Facility Name **Manitowoc Public Utilities**	2.) FID **436035930**
3.) Permit Number **436035930-P22**	4.) Permit Issue Date **July 22, 2013**

5.) Reporting Period Covered by this Deviation Report **January 1, 2013 through December 31, 2013**

B.) Deviation Summary Report

1.) Permit Condition Reference	2.) Emission Unit	3.) Deviation Period Start and End Dates	4.) Date Deviation Previously Reported to DNR	5.) Deviation Description	6.) Method Used to Identify Deviation	7.) Reason for Deviation and Corrective Action Taken
I.D.10.a(1)	B09	08/20/2013	08/21/2013	6 minutes of Opacity > 20%	COM Alarm	By-pass damper partially open during fan test, damper closed.
I.E.3.a(1)	B28	01/14/2013	04/15/2013	6 minutes of Opacity > 20%	COM Alarm	Boiler start-up.
		02/05/2013	02/05/2013	30 minutes of Opacity > 20%	COM Alarm	Boiler start-up.
		04/09/2013	07/15/2013	12 minutes of Opacity > 20%	COM Alarm	Boiler start-up.
		06/17/2013	06/18/2013	12 minutes of Opacity > 20%	COM Alarm	Baghouse by-pass due to plugged dP purge line, cleaned line.
		07/05/2013	07/05/2013	12 minutes of Opacity > 20%	COM Alarm	Baghouse by-pass due to high temperature, reduced inlet temp.
I.L.1.b.(4)	P15 silo vent	01/04/2013 07/22/2013	April 2013	Baghouse dP above permit range	WDNR site inspection	Permit condition was incorrect and revised permit issued 07/22/2013 to correct the range.

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Air Operation Permit Deviation Summary Report

Form 4530-171 (R 9/10)

C.) Responsible Official Certification

NOTE: A responsible official, **as defined in s. NR 400.02(136), Wis. Adm. Code**, must sign this deviation summary report. Deviation summary reports that are not signed by a responsible official will be returned as incomplete.

I have reviewed this facility's Deviation Summary Report. Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Nilaksh Kothari.
Signature of Responsible Official

Nilaksh Kothari
Typed or Printed Name of Signatory

General Manager
Title

2 / 27 / 14
Date