MANITOWOC PUBLIC UTILITIES

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Mr. Randy Matty, P.E.
Air Management Engineer
Wisconsin Department of Natural Resources
2984 Shawano Ave.
Green Bay, WI 54313-6727

May 02, 2013

RE: Summary of MPU Subpart ZZZZ of Part 63 RICE Units

Dear Mr. Matty:

This report is a review of the existing MPU stationary RICE units subject to Subpart ZZZZ of Part 63 regulations that become effective May 3, 2013.

A. Existing compression ignition stationary RICE located at a major source of HAP emissions. The following RICE units are located at the MPU Power Plant, 701 Columbus Street.
   1. Per our recent discussions, 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. The applicable requirements were detailed in the Full Air Compliance Evaluation Summary issued on April 12, 2013.
   2. The P28 unit is also equipped with two air compressors, one of which is a powered by a ~15 Hp diesel engine. The engine would be classified as an emergency stationary CI RICE and would have the applicable oil, air cleaner, hose and belts inspection/maintenance requirements. This compressed air system is utilized for starting the P28 engine.
   3. The MPU office has a backup generator powered by a 64 Hp diesel engine. The engine would be classified as an emergency stationary CI RICE and would have the applicable oil, air cleaner, hose and belt inspection/maintenance requirements.

B. Existing compression ignition stationary RICE located at a major source of HAP emissions. The following RICE unit is located at the MPU Custer Energy Center CT, 5740 West Custer Street.
   1. The Custer CT is started with a 500 Hp diesel engine. The engine would be classified as a black start stationary CI RICE and would have the applicable oil, air cleaner, hose and belt inspection/maintenance requirements. Dave Minkey is aware of this RICE and will be including the applicable requirements in the operating permit renewal he is currently working on.

C. Existing compression ignition stationary RICE located at an Area source of HAP emissions.

1. The following RICE unit is located at the MPU Electric Distribution Center, 1540 Dewey Street. The facility has a backup generator powered by a ~134 Hp diesel engine. The engine would be classified as an emergency stationary CI RICE and would have the applicable oil, air cleaner, hose and belt inspection/maintenance requirements in addition to ULSD fuel oil.
2. The following RICE unit is located at the MPU New York Reservoir Water Distribution facility, 1906 New York Avenue. The facility has a backup municipal water pump powered by a ~150 Hp diesel engine. The engine would be classified as an emergency stationary CI RICE and would have the applicable oil, air cleaner, hose and belt inspection/maintenance requirements in addition to ULSD fuel oil.
3. The MPU South-West municipal water booster station has a backup water pump powered by a ~250 Hp SI natural gas fueled engine. It is our understanding that because this unit is less than 500 Hp there are no applicable requirements.

If you have any questions regarding this report, or require additional information, please contact me.

Sincerely,

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