

Madison Gas and Electric Company

Environmental Cooperative Agreement

Annual Report 2010



Blount Station
Madison, Wisconsin



your community energy company

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INTRODUCTION

This is the third annual report of the second term of the Environmental Cooperative Agreement (ECA) between Madison Gas and Electric Company (MGE) and the Wisconsin Department of Natural Resources (WDNR) covering Blount Station (Blount). The ECA allows MGE some regulatory flexibility in exchange for achieving superior environmental performance. The original Agreement between MGE and the WDNR expired in September 2007. MGE summarized its major accomplishments during the ECA's first term in a separate report entitled "Environmental Cooperative Agreement: Major Accomplishments, 2002 - 2007." This report can be viewed on MGE's Web site at <http://www.mge.com/environment/stewardship/agreement.htm>.

MGE and the WDNR have renewed the ECA through 2012 and continue to work on modifying the renewed Agreement to reflect the changes in regulations, goals, and other conditions since it was first adopted. MGE will continue to satisfy the commitments established under the 2007 renewal document throughout the modification process and until a revised Agreement is approved. This annual report focuses on Blount's 2010 generation and provides an update on ongoing commitments.

Blount became the first power plant in the state to be certified to the International Organization for Standardization's (ISO) 14001 standard. In 2010, MGE passed its second three-year reassessment audit which extended ISO 14001 certification for Blount to June 25, 2013. The Certificate of Registration with the ISO is provided in the Appendix.

MGE met with the Community Environmental Advisory Group (CEAG) two times in 2010 and will continue meeting semiannually with the CEAG. Each meeting offered the opportunity for continued discussions about Blount's environmental compliance and MGE's ongoing commitment to the environment. In particular, MGE and the CEAG received overviews of MGE's *2010 Environmental Responsibility Report*, upcoming environmental regulations, and a synopsis of the history and goals of the ECA.

Section 1 of this report summarizes Blount's 2010 generation and emissions data. During the past year, MGE has made excellent progress toward implementing the ECA commitments to move beyond regulatory compliance and achieve superior environmental performance including the following accomplishments:

- Purchased over 10,700 gallons of biodiesel fuel, reducing carbon monoxide (CO), particulate matter, and other emissions from fleet vehicles up to 20%.
- Resolved one noise inquiry in 2010 to the satisfaction of the inquirer.
- Diverted 1,230 tons of fly ash for beneficial ash use rather than to landfill.

- Continued to remove mercury-containing equipment in an effort that has resulted in recycling over 284 pounds of mercury in Blount since 2006. All known and replaceable mercury-containing devices in Blount have been replaced with non-mercury containing devices.

Section 2 of this report includes an environmental assessment by an independent auditing firm, Environmental Compliance & Engineering, Inc. (ECE), and an update on the actions MGE has taken to correct any instances of nonconformance identified by the auditors. This assessment measured MGE's compliance with the ECA commitments as well as its conformance with federal, state, and local environmental requirements.

The audit firm found MGE complies with all ECA commitments and found no evidence of any substantive exceedances of permit or regulatory limitations which would have posed a threat to public health or the environment. MGE's participation in the ECA has significantly improved its environmental record keeping which in turn allowed auditors to examine MGE's records in even greater detail. Although third-party audits are not typically made public, as part of our ECA participation, MGE maintains a level of audit transparency that goes beyond standard practice and encourages further improvements at Blount.

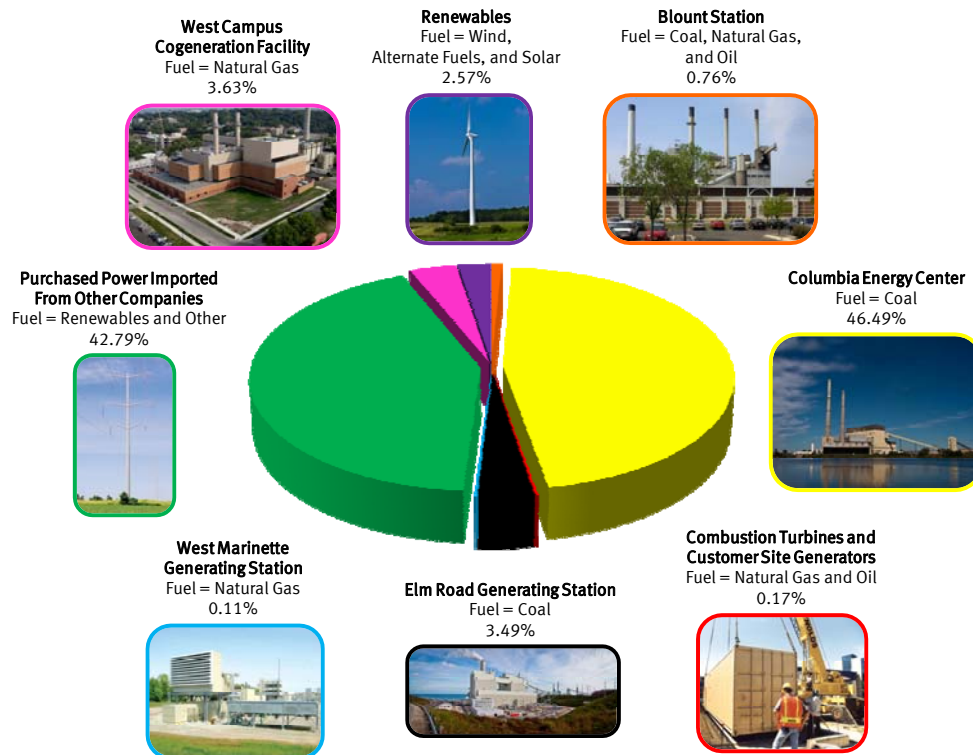
2010 MGE Power Sources

During 2010, MGE continued to receive most of its electricity from coal generation. However, 2010 marked significant changes in MGE's generation portfolio.

First, in early 2010, MGE switched to natural gas as the primary fuel at Blount. Although Blount is no longer a major source of the electricity used by our customers, it continues to make an important contribution to MGE's electric system reliability, especially in downtown and central Madison where electric transmission options are limited.

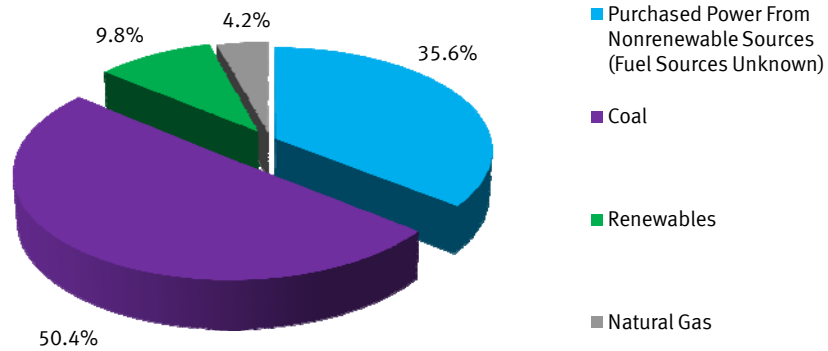
Second, MGE owns 100 megawatts of the Elm Road Generating Station (ERGS) in Oak Creek. Unit 1 came online in late 2010, and Unit 2 was operational in early 2011. This state-of-the-art coal plant features advanced environmental control technologies to dramatically cut air emissions. Results show the emission controls at ERGS cut nitrogen oxide (NO_x) by 85%, mercury by 90%, and sulfur dioxide (SO₂) by 97%.

Where MGE Electricity Comes From

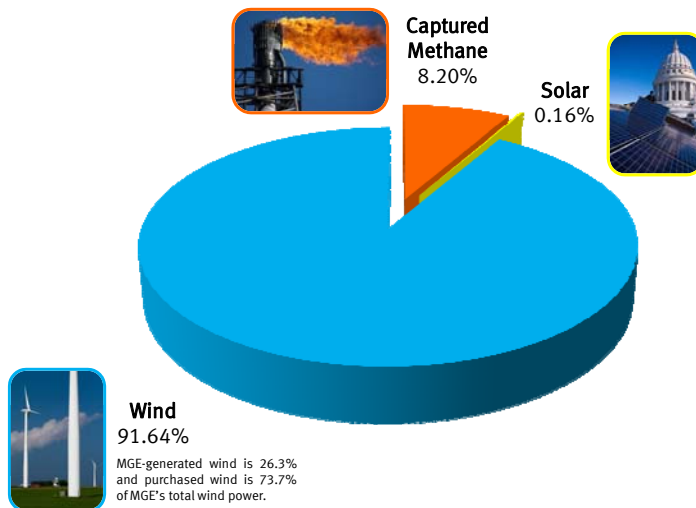


Many energy sources provide the fuel to generate electricity at MGE. In 2010, MGE delivered more than 370,000 megawatt-hours (MWh) of renewable energy to customers. This includes energy produced from solar, methane gas captured from landfills, and wind.

2010 Fuels Used to Generate Electricity

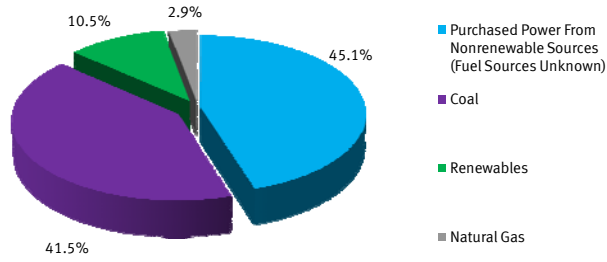


Sources of Renewable Energy

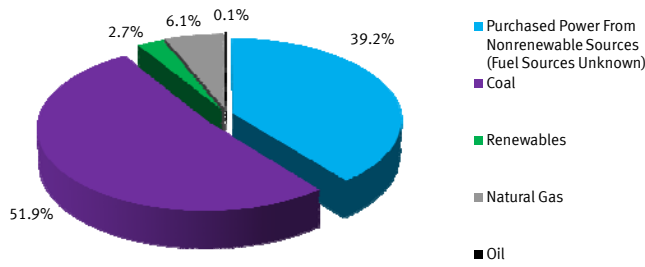


MGE Annual Fuel Comparison

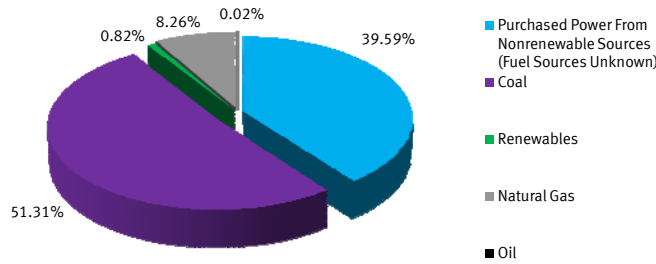
2009



2008



2007

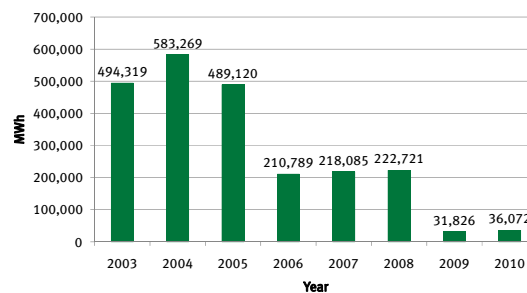


Blount Generation and Midwest Independent System Operator

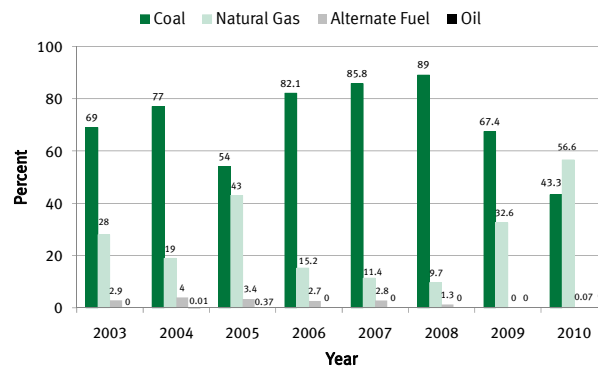
The graphs below show the total generation at Blount since the inception of the ECA.¹ In 2005, Blount began participating in the new Midwest Independent System Operator (Midwest ISO) "Day 2" market. Midwest ISO is a neutral operator responsible for balancing the electric grid by dispatching power plants to match demand to available generation in a cost-effective manner. In the Midwest ISO market, Blount only generates electricity when Midwest ISO dispatches the plant based on economic and reliability criteria. As a result, not only has Blount's gross annual generation dropped significantly in the last few years, but the way in which Blount has been operated has changed dramatically. Because Blount is often called upon by Midwest ISO to provide reliability support, rather than generation to meet demand, it is more often run at low loads for shorter periods of time.

¹ The ECA was signed in September 2002, but the first full reporting year was 2003. For reporting purposes, we are only including those years in which an annual report was required.

Blount Gross Annual Generation



Percent of Fuels Used in Generation of Blount Total Btus



2010 PERFORMANCE DATA

Alternate Fuel Usage

The changes in operation due to the manner in which Midwest ISO dispatches Blount also negatively affected the ability to burn paper-derived fuel (PDF). Although this fuel was discontinued in 2009, MGE continues to be committed to using alternate fuel at Blount. Other alternate fuel options are currently being investigated and actively tested. MGE is happy to report that during the six years Blount burned PDF under the ECA, 44,496 tons of PDF were diverted from the landfill and 47,847 tons of coal were displaced. In addition to these benefits, the combustion of PDF also resulted in over 28,577 tons of avoided emissions that would have been produced had coal been burned in place of PDF. Below is a table that details the avoided emissions from PDF burned.

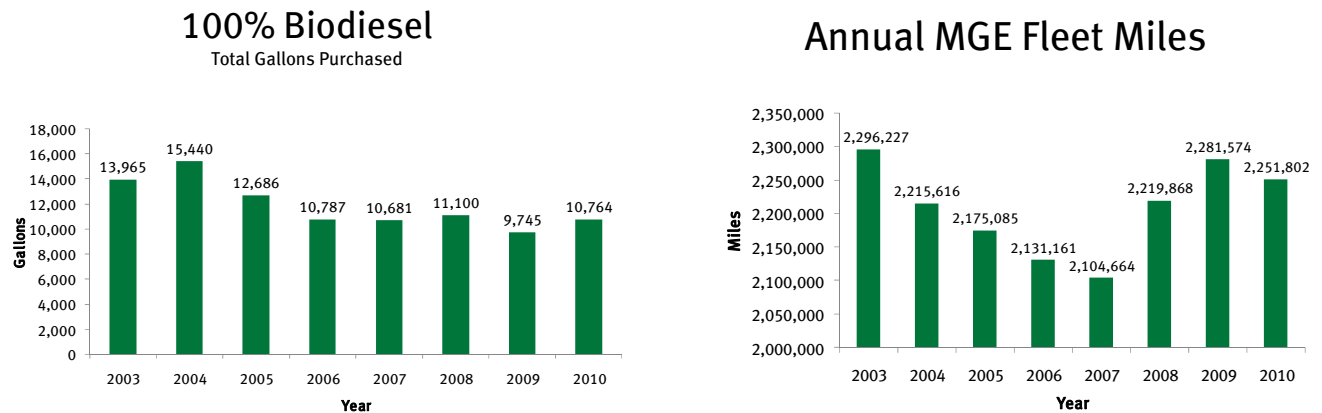
Avoided Emissions From PDF Burned Since Inception of the ECA

	Tons PDF Burned	Tons Coal Displaced	SO ₂ Tons	NO _x Tons	Hg Pounds	PM Tons	CO ₂ Tons
2003	8,092	10,758	306	1.0	0.41	9.0	5,704
2004	14,642	14,174	359	9.4	0.09	9.0	8,454
2005	14,134	14,374	328	11.0	0.70	12.0	8,422
2006	3,076	3,407	70	3.1	0.13	2.4	2,234
2007	3,071	3,443	74	3.3	0.10	2.6	2,238
2008	1,481	1,691	31.5	1.6	0.10	1.6	290.2
Total	44,496	47,847	1,169	29.4	1.53	36.6	27,342

Biodiesel Fuel

After the ECA signing in September 2002, MGE began using biodiesel fuel (B20) in all fleet vehicles and off-road equipment that refuel at its downtown Central Service Station. Biodiesel fuel is produced from a number of renewable sources including waste vegetable oils, cooking oil, soybean oil, and animal fats. Biodiesel is renewable and biodegradable and can replace petroleum diesel. Based on Environmental Protection Agency (EPA) data, replacing petroleum-based diesel fuel reduces CO emissions by 10%, particulate matter by 15%, sulfates by 20%, and hydrocarbons by 20%. Biodiesel may cause a slight increase in NO_x emissions. (See the EPA fact sheet in the Appendix for more details.)

Due to the increased cost of diesel engines and diesel fuel compared to gasoline, MGE had fewer diesel-fueled vehicles on the road in 2010 than in past years. Biodiesel continues to be used in our remaining diesel fleet vehicles and in as many cost-effective situations as possible. In addition to biodiesel use, MGE added six hybrid vehicles in 2010 bringing the Company's total hybrid vehicles to 23.



MGE has made efforts to improve the efficiency of its fleet by aggressively reducing fleet miles whenever possible. Starting in 2008, however, MGE began shifting work that had been previously performed by contractors over to MGE staff, thereby significantly increasing overall annual fleet miles. However, it is important to note that approximately 30% of MGE's total fleet miles were generated using hybrid (255,808 miles) and biodiesel-fueled (418,808 miles) vehicles.

Regulated Emissions

MGE consistently maintains emissions at levels below regulatory limits as shown by the following charts which include data for 2010.

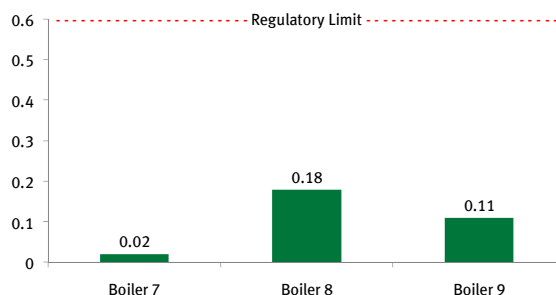
Particulate Matter

Blount's air permit limits particulate matter emission rates to 0.6 pounds per million British thermal unit (mmBtu).^{*} New particulate matter tests have been performed on all three boilers in accordance with their regulatory schedules. The chart shows all three boilers continue to operate well below the regulatory limit.

^{*} A Btu is a measure of the heating value of the fuel being burned. Burning 91 pounds of coal generates one million Btu of heat.

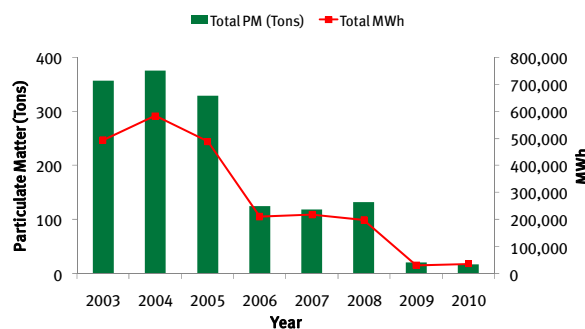
Total particulate matter emissions correlate directly to the level of MWh production. High MWh production from 2003 through 2005 created higher total particulate matter emissions. After participation in the Midwest ISO market in 2005, reduced overall MWh production resulted in a reduction of particulate matter emissions. The slight increase in particulate emissions in 2008 can be attributed to an increase in MWh production, coupled with a slightly lower gas rate and higher coal usage rate. The decrease in 2009 and 2010 follows the decrease in MWh output.

Blount Particulate Matter Emission Rate¹
Emission Rate in Pounds Per Million British Thermal Unit (lbs/mmBtu)



¹The particulate matter data represents total particulate matter.

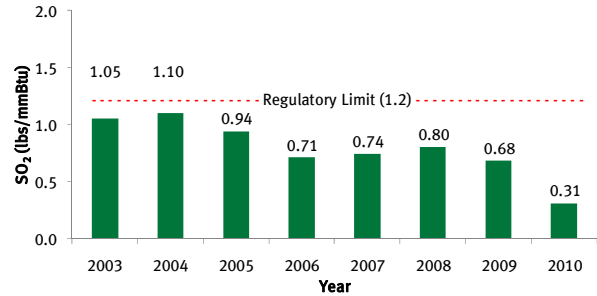
Blount PM Emissions vs. MWh Production



SO₂

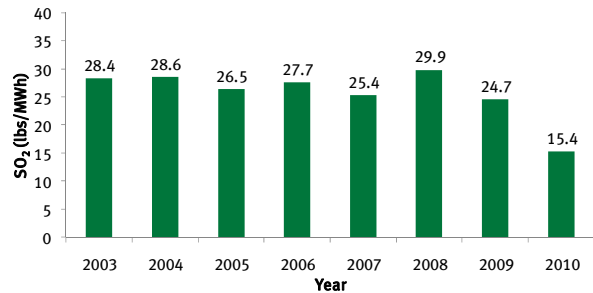
The Wisconsin Acid Rain Law limits the annual average SO₂ emission rate to less than 1.2 pounds per mmBtu for all boilers throughout MGE's generation system. MGE's emission rate is calculated using Continuous Emissions Monitoring System (CEMS) data collected at Blount, Columbia Energy Center, and the West Campus Cogeneration Facility (WCCF). The CEMS consists of equipment and computers that track how much SO₂ and NO_x the plants are releasing. The overall decrease in MGE's system emission rate can be attributed to the commissioning of WCCF in 2005 and more recently to the reduction of coal burning at Blount and the commissioning of ERGS.

MGE System SO₂ Emission Rate
Emission Rate in Pounds Per Million British Thermal Unit (lbs/mmBtu)



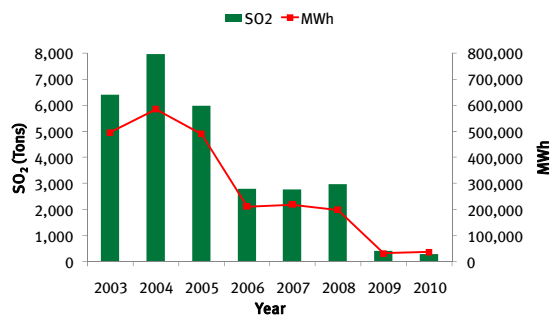
Blount SO₂ emission rates have declined over the past few years. The decrease seen in 2010 can be attributed to the reduced amount of coal used as fuel and the increased time the boilers were operating at low loads.

Blount SO₂ Emission Rates



SO₂ emissions correlate directly to the level of MWh production. High MWh production from 2003 through 2005 created higher SO₂ emissions. After participation in the Midwest ISO market in 2005, reduced overall MWh production resulted in a reduction of SO₂ emissions.

Blount SO₂ Emissions vs. MWh Production

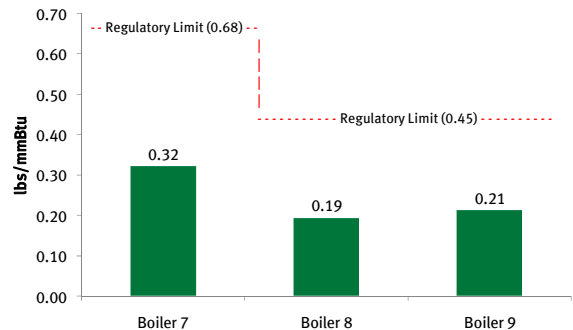


NO_x

The EPA Acid Rain Program limits Blount's NO_x emissions from each boiler. The EPA set different limits for different types of boilers. Boiler 7 has an annual NO_x limit of 0.68 pounds per mmBtu. Boilers 8 and 9 have a NO_x limit of 0.45 pounds per mmBtu. The 2010 NO_x emission rate shown for each boiler is based on CEMS data collected at Blount.

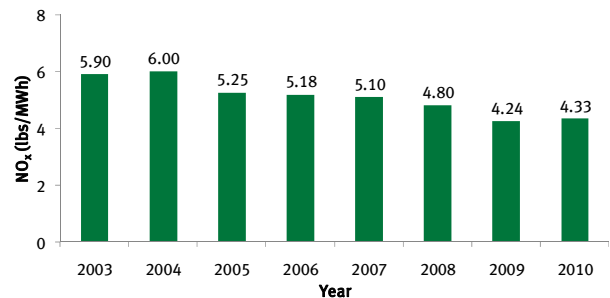
Blount NO_x Emission Rate 2010

Emission Rate in Pounds Per Million British Thermal Unit (lbs/mmBtu)



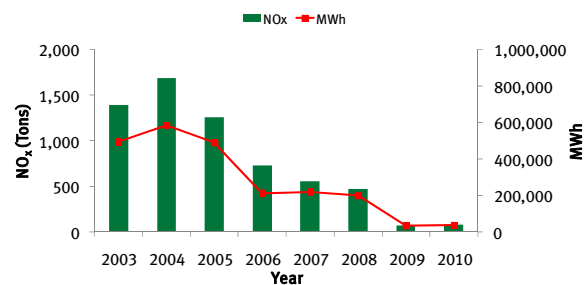
Emission rates at Blount have declined over the last several years. The chart shows NO_x emission rates have continued to drop since 2003 which is the result of a multiyear boiler combustion improvement project and the operation of the boilers at low loads.

Blount NO_x Emission Rate



NO_x emissions correlate directly to the level of MWh production. High MWh production from 2003 through 2005 created higher NO_x emissions. After participation in the Midwest ISO market in 2005, reduced overall MWh production resulted in a reduction of NO_x emissions.

Blount NO_x Tons vs. MWh Production



COMPLIANCE AUDIT

Introduction

As part of the ECA process, an independent auditing firm, ECE, evaluated Blount to determine its conformance with federal, state, and local environmental requirements including the ECA. Three environmental professionals performed the audit the week of November 15, 2010. The auditors performed a physical survey of operations, closely reviewed relevant records, and interviewed key MGE personnel. ECE's Statement of Qualifications, included in the Appendix, shows their extensive experience in performing environmental audits on industrial operations throughout North America.

ECE's audit report, presented in the first part of this section, shows that MGE is in conformance with all aspects of the ECA. The audit found a few instances of nonconformances which have been addressed. MGE recognizes that any finding of nonconformance requires swift action to immediately correct any problems and long-term solutions that prevent future noncompliance. The Table of Findings included in the second half of this section describes immediate action taken to address each finding. Furthermore, the Table of Findings has been updated to explain ways MGE is implementing new programs the ECE audit identified as areas for continued improvement. Although third-party audits are not typically made public, as one of our ECA provisions, MGE is committed to a level of audit transparency that goes beyond standard practice and helps us improve.

Environmental Audit Report
Prepared by Environmental Compliance & Engineering, Inc.

Environmental Audit Report
Madison Gas & Electric
Blount Street Station
Madison, Wisconsin

January 2011

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Madison, Wisconsin*

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Introduction

This report summarizes the results of an environmental audit of the Madison Gas & Electric (MGE) Blount Street Station (Facility) located in Madison (Dane County), Wisconsin. The objective of this audit was to evaluate the conformance status of representative facility operations with respect to Federal, State of Wisconsin, Dane County and City of Madison statutes, ordinances and the Wisconsin Department of Natural Resources (WDNR)/MGE Environmental Cooperative Agreement (ECA). The objective of the attached report is to communicate the audit results. This report is not meant to imply legal certification of compliance or non-compliance.

The scope of this audit was generally directed toward facility operations related to air quality (asbestos, CFCs, construction/operating permits, NSPS, NESHAPs, PSD), emergency planning (EPCRA/CERCLA reporting, SPCC/OPA/FRP, hazardous waste contingency plans, RMP, homeland security), regulated materials (PCBs, pesticides, radiation, TSCA), underground/aboveground storage tanks, waste management (hazardous, non-hazardous, medical, universal, used oil), and water quality (groundwater, WPDES, storm water, underground injection, process wastewater, wells, drinking water). The period of review for this audit was from December 4, 2009 – November 19, 2010. The onsite portion of the audit took place from November 15, 2010 – November 19, 2010.

The audit was based on a physical survey of the facility and examination of a sample of environmental, administrative and/or operating records and interviews with key personnel.

This report includes all non-conformance findings identified during the audit, regardless of the significance of the issue. Findings are categorized as “exceptions”, which are confirmed instances of non-conformance, or “observations”, which are instances where non-conformance is suspected but unconfirmed, or where there is an elevated risk of non-conformance if action is not taken.

Executive Summary

Facility operations reviewed were noted to be in substantive conformance with Federal, State of Wisconsin, Dane County and City of Madison statutes or regulations, except as provided in the findings tables of this report. The findings of non-conformance relate to recordkeeping and reporting matters. ECE found no evidence of any substantive exceedances of permit or regulatory limitations which would have posed a threat to public health or the environment. The findings are summarized as follows:

Program Area	Exceptions	Observations
Air Quality	2	1
Emergency Planning	4	1
Regulated Material	0	0
USTs/ASTs	0	0
Waste Management	2	0
Water Quality	0	1
Total	8	3

Additionally, the facility was in conformance with conditions of the Environmental Cooperative Agreement (ECA).

Based on ECE's experience, MGE personnel have a thorough working knowledge of applicable regulatory requirements and consider environmental compliance to be a priority. MGE personnel demonstrated a thorough understanding of the applicable environmental regulatory programs.

The following tables present the full text of the environmental non-conformance findings that were identified during the audit. Included are the regulatory citations for those findings driven by regulatory requirements.

Table of Findings – Exceptions

Topic	Conformance Exception	Recommendation
Air	<p>Boiler #2 operated for 5,104 hrs during the rolling 12-month period ending on October 31, 2010. The Title V Permit limits operations to no more than 5,100 hrs/rolling 12 months.</p> <p>Title V Operating Permit Special Term and Condition (A)(4)(1)(b). (Page 7)</p>	<p>The facility should review the “Monthly Operating Hours Report” to determine the number of hours that each boiler can operate the following month before exceeding the 5,100 hrs/rolling 12 month limit. Switch operation between Boiler #1 and #2 as necessary to ensure future compliance.</p>
Air	<p>The following deviations occurred as reported on the “Quarterly Excess Emissions and Monitor Downtime Report” during the period of review:</p> <p><u>January 13, 2010 Report:</u> Boiler #8 – COM and CEM downtime, excess VE emissions</p> <p><u>April 23, 2010 Report:</u> Boiler #7 – COM and CEM downtime Boiler #8 – COM and CEM downtime Boiler #9 – COM and CEM downtime</p> <p><u>July 28, 2010 Report:</u> Boiler #8 – COM and CEM downtime Boiler #9 – COM and CEM downtime</p> <p><u>October 27, 2010 Report:</u> Boiler #7 – COM and CEM downtime Boiler #8 – COM and CEM downtime, excess VE emissions Boiler #9 – COM and CEM downtime</p> <p>NR 439.09 (10)</p>	<p>The deviations have been properly reported to the WDNR as part of the Annual Compliance Certification report. No further action is required.</p>

Table of Findings – Exceptions

Topic	Conformance Exception	Recommendation
SPCC	<p>The maintenance shop has a parts washer unit with a shell capacity of 90 gallons. The parts washer solvent (petroleum distillate) meets the regulatory definition of oil and when located in containers with a capacity of 55 gallons or greater, is regulated under the SPCC requirements. The parts wash unit is not currently included in the facility’s SPCC plan. [40 CFR 112.7(a)(3)]</p>	<p>The facility’s SPCC plan must be amended to include the parts washer unit.</p>
SPCC	<p>The facility’s “Slick Sleuth” system is currently designed to send an alarm signal to the control room operator upon detection of oil in the sump. Upon acknowledgement of the alarm, the operator is trained to immediately inspect the sump to verify the oil condition and shut down the sump pumps if oil is present. This is an example of an “active” containment system, where a certain action is required by facility personnel to provide containment. Bulk oil storage areas (new oil and used oil aboveground storage tanks) require passive containment systems, where containment measures remain in place and do not require facility personnel to act. Passive secondary containment systems are currently not in place for some of the bulk oil storage areas. [40 CFR 112.8(c)(2)]</p>	<p>The facility should provide a “passive” means of secondary containment for all bulk oil storage areas.</p>
SPCC	<p>The “Slick Sleuth” system does not provide system operators with an alarm upon system power loss or other unit failure. To ensure that the oil detection sensors are continuously operating, the sensors should be equipped with a means to alert the system operators when not functioning due to power loss or unit failure. [40 CFR 112.7(c)]</p>	<p>The facility should update the alarm system in a manner that alerts facility personnel upon loss of power or other unit failure.</p>

Table of Findings – Exceptions

Topic	Conformance Exception	Recommendation
TRI – 2009	<p>The following discrepancies associated with the TRI reports were observed:</p> <p>1. HCl – Section 5.2; TRI report indicates emissions of 23,970 lbs for RY 2009. The 2009 air emission inventory report indicates emission of 17,953 lbs</p> <p>2. HCl – Section 8.6; Facility reported a treatment method in section 7A (electrostatic precipitator and other). However, section 8.6 (quantity treated onsite) was reported as NA.</p> <p>(40 CFR 372.85)</p>	<p>1. The facility should verify that the chemical emission amounts reported on the air emission inventory (and any other environmental report) match that which is reported on the Form R reports. Preparation of a revised Form R report should be considered.</p> <p>2. The facility should report a numerical value in Section 8.6 if a treatment method was selected in Section 7A. A value of 0 can be an appropriate response.</p>
Waste – Universal	<p>A universal waste container was dated 8/28/09. Universal waste may be accumulated no longer than one year from the time that the waste was first placed in the container. (40 CFR 273.15)</p>	<p>The facility should recycle the universal waste as soon as possible. All future containers of universal waste should be shipped offsite for recycling in less than one year.</p>
Waste – Hazardous	<p>Three drums of electronic waste (e-waste) were observed near the former #11 boiler. One of the drums was dated 8/7/09. WDNR guidance document (PUB-WA 1473 2010; “Managing Electronic Wastes Destined for Recycling”) indicates that e-waste may not be stored onsite longer than one year. If not managed according to the recycling standards, the waste is subject to the hazardous waste determination standards under 40 CFR 262.11.</p>	<p>The facility should recycle the electronic waste as soon as possible. All future containers of electronic waste should be shipped offsite for recycling in less than one year.</p>

Table of Findings – Observations

Topic	Observation	Recommendation
Air	<p>Total particulate matter (PM) control efficiencies identified in the “Device Comments” section of the 2009 Air Emissions Inventory Summary Report are inaccurate. For example, under Control Device C19, it states, “from permit calculations, the cyclone control efficiency is 58.1% efficient and the electrostatic precipitator control efficiency is 90.21%. The total particulate matter control efficiency is identified as 62.2%”. Assuming the values given, the overall control efficiency is calculated as 95.9%, not 62.2%. This same issue is found in multiple locations within the report.</p> <p>Note - The actual emissions reported are not calculated using the erroneously documented CE rates.</p>	<p>Facility personnel indicate that these control efficiencies were originally entered into the system by a WDNR representative, and have not been reviewed or changed subsequently. It is suggested that these inconsistencies be reviewed with WDNR, and updated in the report if possible to avoid future confusion.</p>
SPCC	<p>Section 3.17 of the facility’s Spill Prevention Control and Countermeasure (SPCC) Plan discusses the facility’s “shop-fabricated” gasoline and diesel fuel tanks. The facility does not currently have any gasoline or diesel fuel tanks onsite.</p>	<p>The SPCC plan should be updated to remove discussion of the gasoline and diesel fuel tanks.</p>
Water - Storm	<p>The Storm Water Pollution Prevention Plan (SWPPP) requires that the scrap metal dumpsters located outside of the 3 Turbine Area remain covered while not in use. At the time of the audit, a portion of one of the scrap metal dumpsters was covered by a canvas tarp that was torn.</p> <p>Note – Preparation of the SWPPP is not required by permit or by the Environmental Cooperative Agreement.</p>	<p>The facility should replace the damaged tarp to ensure that the scrap metal dumpster remains covered while not in use.</p>

Table of Findings

Topic	ECE's Exceptions and Recommendations		MGE's Corrective Action and Status	
	Conformance Exception	Recommendation	Corrective Action	Status
Air	<p>Boiler #2 operated for 5,104 hrs during the rolling 12-month period ending on October 31, 2010. The Title V Permit limits operations to no more than 5,100 hrs/rolling 12 months.</p> <p>Title V Operating Permit Special Term and Condition (A)(4)(1)(b). (Page 7)</p>	<p>The facility should review the "Monthly Operating Hours Report" to determine the number of hours that each boiler can operate the following month before exceeding the 5,100 hrs/rolling 12 month limit. Switch operation between Boiler #1 and #2 as necessary to ensure future compliance.</p>	<p>In accordance with Condition I.A.3.b.(1), MGE shall calculate the operating hours for B22 for each consecutive 12-month period by summing the monthly operating hours for each boiler for the previous 12 consecutive months. This calculation shall be conducted within 15 business days of the end of the previous consecutive month period.</p> <p>In response to the deviation, MGE has elected to complete the calculation and evaluation on a daily basis.</p>	Completed.

Topic	Conformance Exception	Recommendation	Corrective Action	Status
Air	<p>The following deviations occurred as reported on the "Quarterly Excess Emissions and Monitor Downtime Report" during the period of review:</p> <p><u>January 13, 2010 Report:</u> Boiler #8 – COM and CEM downtime, excess VE emissions</p> <p><u>April 23, 2010 Report:</u> Boiler #7 – COM and CEM downtime Boiler #8 – COM and CEM downtime Boiler #9 – COM and CEM downtime</p> <p><u>July 28, 2010 Report:</u> Boiler #8 – COM and CEM downtime Boiler #9 – COM and CEM downtime</p> <p><u>October 27, 2010 Report:</u> Boiler #7 – COM and CEM downtime Boiler #8 – COM and CEM downtime, excess VE emissions Boiler #9 – COM and CEM downtime</p> <p>NR 439.09 (10)</p>	<p>The deviations have been properly reported to the WDNR as part of the Annual Compliance Certification report. No further action is required.</p>	<p>No follow-up necessary.</p>	<p>No follow-up necessary.</p>
SPCC	<p>The maintenance shop has a parts washer unit with a shell capacity of 90 gallons. The parts washer solvent (petroleum distillate) meets the regulatory definition of oil and when located in containers with a capacity of 55 gallons or greater, is regulated under the SPCC requirements. The parts wash unit is not currently included in the facility's SPCC plan. [40 CFR 112.7(a)(3)]</p>	<p>The facility's SPCC plan must be amended to include the parts washer unit.</p>	<p>The parts washer will be added to the oil container inventory in the Spill Prevention, Control, and Countermeasure (SPCC) Plan and quarterly inspection checklist.</p>	<p>Completed.</p>

Topic	Conformance Exception	Recommendation	Corrective Action	Status
SPCC	<p>The facility's "Slick Sleuth" system is currently designed to send an alarm signal to the control room operator upon detection of oil in the sump. Upon acknowledgement of the alarm, the operator is trained to immediately inspect the sump to verify the oil condition and shut down the sump pumps if oil is present. This is an example of an "active" containment system, where a certain action is required by facility personnel to provide containment. Bulk oil storage areas (new oil and used oil aboveground storage tanks) require passive containment systems, where containment measures remain in place and do not require facility personnel to act. Passive secondary containment systems are currently not in place for some of the bulk oil storage areas. [40 CFR 112.8(c)(2)]</p>	<p>The facility should provide a "passive" means of secondary containment for all bulk oil storage areas.</p>	<p>Reconfigurations to the sump systems now act as passive secondary containment. The system was reconfigured so the pumps will shut off during loss of power and/or Slick Sleuth system failure. This will ensure nothing is pumped from the sumps during that time. Also, if oil is detected with the Slick Sleuth, the pumps will automatically shut off until an operator can inspect the sump.</p>	Completed.
SPCC	<p>The "Slick Sleuth" system does not provide system operators with an alarm upon system power loss or other unit failure. To ensure that the oil detection sensors are continuously operating, the sensors should be equipped with a means to alert the system operators when not functioning due to power loss or unit failure. [40 CFR 112.7(c)]</p>	<p>The facility should update the alarm system in a manner that alerts facility personnel upon loss of power or other unit failure.</p>	<p>The Slick Sleuth alarm system has been updated to include alarms that alert facility personnel in cases of power loss to the equipment or complete unit failure.</p>	Completed.

Topic	Conformance Exception	Recommendation	Corrective Action	Status
TRI – 2009	<p>The following discrepancies associated with the TRI reports were observed:</p> <p>1. HCl – Section 5.2; TRI report indicates emissions of 23,970 lbs for RY 2009. The 2009 air emission inventory report indicates emission of 17,953 lbs</p> <p>2. HCl – Section 8.6; Facility reported a treatment method in section 7A (electrostatic precipitator and other). However, section 8.6 (quantity treated onsite) was reported as NA.</p> <p>(40 CFR 372.85)</p>	<p>1. The facility should verify that the chemical emission amounts reported on the air emission inventory (and any other environmental report) match that which is reported on the Form R reports. Preparation of a revised Form R report should be considered.</p> <p>2. The facility should report a numerical value in Section 8.6 if a treatment method was selected in Section 7A. A value of 0 can be an appropriate response.</p>	<p>MGE's Toxic Release Inventory (TRI) has been using an industry-wide emissions standard for calculating emissions of hydrochloric acid (HCl). This standard is consistent with other 2009 TRI calculations and how HCl has been calculated historically for TRI. The Air Emissions Inventory uses an EPA-based emissions factor, which is an acceptable factor for reporting under this program. Although the two numbers do not match, there is not a regulatory requirement that says they must match. For clarity, going forward we will evaluate discrepancies between these two reporting requirements and reconcile them where appropriate.</p>	Completed.
Waste – Universal	<p>A universal waste container was dated 8/28/09. Universal waste may be accumulated no longer than one year from the time that the waste was first placed in the container. (40 CFR 273.15)</p>	<p>The facility should recycle the universal waste as soon as possible. All future containers of universal waste should be shipped offsite for recycling in less than one year.</p>	<p>The universal waste in question has been recycled. All universal waste will be recycled during each waste pickup during the year. Accumulated waste will be tracked on a quarterly basis using the waste management database to ensure no waste is on-site longer than allowed.</p>	Completed.

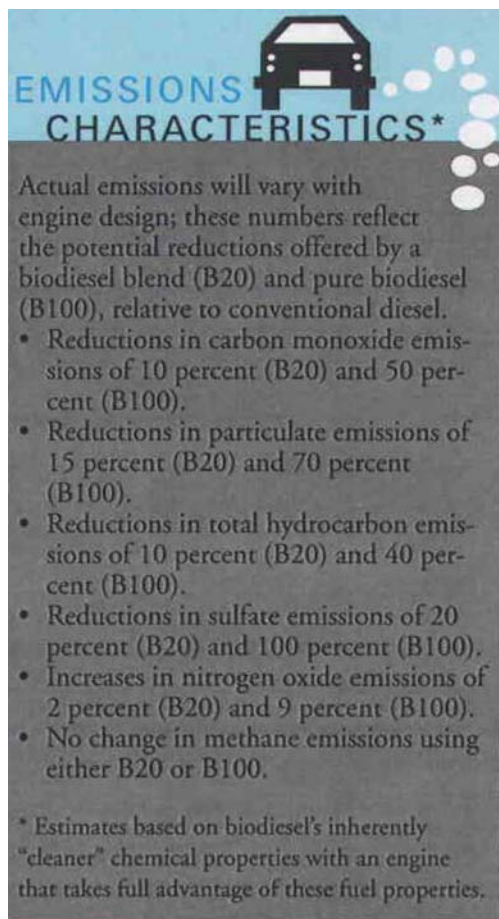
Topic	Conformance Exception	Recommendation	Corrective Action	Status
Waste – Hazardous	Three drums of electronic waste (e-waste) were observed near the former #11 boiler. One of the drums was dated 8/7/09. WDNR guidance document (PUB-WA 1473 2010; "Managing Electronic Wastes Destined for Recycling") indicates that e-waste may not be stored onsite longer than one year. If not managed according to the recycling standards, the waste is subject to the hazardous waste determination standards under 40 CFR 262.11.	The facility should recycle the electronic waste as soon as possible. All future containers of electronic waste should be shipped offsite for recycling in less than one year.	All e-waste generated at Blount will be recycled with other MGE departmental e-waste. Accumulated waste will be tracked on a quarterly basis using the waste management database to ensure no waste is on-site longer than allowed.	Current on-site e-waste to be shipped out by the end of March 2011.

Topic	ECE's Observations and Recommendations		MGE's Corrective Action and Status	
	Good Management Practice Observations	Recommendation	Corrective Action	Status
Air	<p>Total particulate matter (PM) control efficiencies identified in the "Device Comments" section of the 2009 Air Emissions Inventory Summary Report are inaccurate. For example, under Control Device C19, it states, "from permit calculations, the cyclone control efficiency is 58.1% efficient and the electrostatic precipitator control efficiency is 90.21%. The total particulate matter control efficiency is identified as 62.2%". Assuming the values given, the overall control efficiency is calculated as 95.9%, not 62.2%. This same issue is found in multiple locations within the report.</p> <p>Note - The actual emissions reported are not calculated using the erroneously documented CE rates.</p>	<p>Facility personnel indicate that these control efficiencies were originally entered into the system by a WDNR representative, and have not been reviewed or changed subsequently. It is suggested that these inconsistencies be reviewed with WDNR, and updated in the report if possible to avoid future confusion.</p>	<p>MGE will request the WDNR amend the documented control efficiencies in the Air Emission Inventory Report with correct efficiencies provided by MGE. The Air Emission Inventory Report comment period opens April 15, and all comments must be submitted by May 20, 2011.</p>	<p>Will be completed by May 20, 2011.</p>
SPCC	<p>Section 3.17 of the facility's Spill Prevention Control and Countermeasure (SPCC) Plan discusses the facility's "shop-fabricated" gasoline and diesel fuel tanks. The facility does not currently have any gasoline or diesel fuel tanks onsite.</p>	<p>The SPCC plan should be updated to remove discussion of the gasoline and diesel fuel tanks.</p>	<p>References to the "shop-fabricated" diesel and gasoline tanks will be removed from the SPCC Plan.</p>	<p>Completed.</p>

Topic	Good Management Practice Observations	Recommendation	Corrective Action	Status
Water - Storm	<p>The Storm Water Pollution Prevention Plan (SWPPP) requires that the scrap metal dumpsters located outside of the 3 Turbine Area remain covered while not in use. At the time of the audit, a portion of one of the scrap metal dumpsters was covered by a canvas tarp that was torn.</p> <p>Note – Preparation of the SWPPP is not required by permit or by the Environmental Cooperative Agreement.</p>	<p>The facility should replace the damaged tarp to ensure that the scrap metal dumpster remains covered while not in use.</p>	<p>A new tarp has been placed on the dumpster.</p>	<p>Completed.</p>

APPENDIX

EPA Fact Sheet

The graphic features a blue header with the text "EMISSIONS CHARACTERISTICS*" in white. To the right of the text is a black silhouette of a car with white circles representing exhaust emissions. The background of the main text area is dark grey with a vertical gradient and a decorative pattern of white circles on the right side.

EMISSIONS CHARACTERISTICS*

Actual emissions will vary with engine design; these numbers reflect the potential reductions offered by a biodiesel blend (B20) and pure biodiesel (B100), relative to conventional diesel.

- Reductions in carbon monoxide emissions of 10 percent (B20) and 50 percent (B100).
- Reductions in particulate emissions of 15 percent (B20) and 70 percent (B100).
- Reductions in total hydrocarbon emissions of 10 percent (B20) and 40 percent (B100).
- Reductions in sulfate emissions of 20 percent (B20) and 100 percent (B100).
- Increases in nitrogen oxide emissions of 2 percent (B20) and 9 percent (B100).
- No change in methane emissions using either B20 or B100.

* Estimates based on biodiesel's inherently "cleaner" chemical properties with an engine that takes full advantage of these fuel properties.

For More Information

Alternative Fuels Data Center

Web site: www.afdc.nrel.gov

EPA Alternative Fuels Web Site

www.epa.gov/otaq/consumer/fuels/altfuels/altfuels.htm

National Alternative Fuels Hotline

Phone: 800 423-1DOE

National Biodiesel Board

1907 Williams Street, Suite B
Post Office Box 104898

Jefferson City, Missouri 65110-4898

Phone: 573 635-3893 or 800 841-5849

Fax: 573 635-7913

E-mail: biodiesel@socket.net

Web site: www.biodiesel.org

ISO 14001 Certificate of Registration

789 North Dixboro Road, Ann Arbor, Michigan 48105
(888) NSF-9000

Certificate of Registration

This certifies that the Environmental Management System of
Madison Gas & Electric Company

133 South Blair Street
Madison, Wisconsin, 53703, United States

has been assessed by NSF-ISR and found to be in conformance to the following standard(s):

ISO 14001:2004

Scope of Registration:

Madison Gas and Electric Co.- Blount Station - Electric Power
Generation

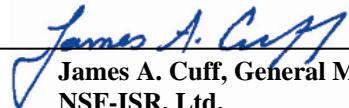
Exclusions: None.

Industrial Classification:

IAF - EMS: 25
SIC: 4931
NACE: E 40.2, E 40.1

Certificate Number: 2Z621-EM4
Certificate Issue Date: 29-JUN-2010
Registration Date: 26-JUN-2010
Expiration Date *: 25-JUN-2013




James A. Cuff, General Manager
NSF-ISR, Ltd.

Environmental Compliance & Engineering, Inc.
Statement of Qualifications



Environmental Compliance & Engineering, Inc.

PROFILE

Introduction

Environmental Compliance & Engineering, Inc. (ECE) was established in February, 1995 to provide engineering and environmental consulting services to the industrial, commercial and legal community. ECE is a general practitioner in the regulatory compliance field with a special area of expertise in the electroplating industry. ECE has conducted over 330 Environmental Compliance audits for various industries. Other services offered by ECE includes, but is not limited to the following: Air Permitting; Air Emission Inventories; Title V permit application preparation; Spill Prevention Control & Countermeasure plan preparation; NPDES Wastewater Discharge permitting, Storm Water permitting and Storm Water Pollution Prevention Plan preparation; SARA Title III, Tier II and Form R preparation; Phase I Site Assessments; RCRA Annual Report preparation; RCRA, SARA and Storm Water training.

Client List

Abbott Laboratories, Inc.	Hawk Corporation
Acutus Gladwin Corporation	Hoffman Plating
Adirondack Environmental Services, Inc.	Allen A. Kacencjar, Attorney at Law
Air Systems, Inc.	Krueger International
Alta Consulting, Inc.	McLaren/Hart Environmental Eng, Inc.
Anheuser-Busch, Inc.	Mercury Capital
Aurora Plastics, Inc.	Metal Container Corp.
Baker & Hostetler	Millcraft SMS Services
Busch Entertainment Companies (SeaWorld, Busch Gardens)	NPC Dehydrators, Inc.
Cantex, Inc.	Partners Environmental
Calfee, Halter & Griswold	PPG Industries
Cleveland Steel Container	Rogers & Wells
Commercial Anodizing Company, Inc.	Sandusky Limited
Eagle Snacks, Inc.	Sara Lee Corporation
The Earthgrains Company, Inc.	Shearer's Foods
Eaton Corporation	Smith St. John
Etna-TEC, LTD.	Thermorite Manufacturing, Inc.
Federal Coach	Thermagon, Inc.
Food Service Supplies, Inc.	Troy Laminating
GE Capital Realty Group, Inc.	USA Instruments
GE Consumer Products	Union Tank Car
GE Industrial	Van Breusegen & Associates, Inc.
GE Lighting	Walter & Haverfield
GE Reuter-Stokes	Willow Hill Industries

THOMAS J. LAUBACHER, ChE.

Education

B.S., Chemical Engineering, University of Cincinnati, 1984

Registrations

EIT, Ohio

Capabilities

Air Emission Inventory/Permitting
SARA Title III Compliance
RCRA Compliance
Storm Water Permitting
NPDES Permitting
Phase I Environmental Liability Assessments
Corporate Compliance Auditing
Corporate and Employee Training
Wastewater Pretreatment Compliance
Waste Minimization

- Special area of expertise in all phases of the electroplating industry.

Experience Summary

Mr. Laubacher has over seven years experience in industry, including oil refining, specialty steel manufacturing and the office furniture industry. While working in the office furniture industry, Mr. Laubacher was responsible for overall environmental compliance for five facilities.

Mr. Laubacher has extensive experience in the electroplating industry, including nickel, zinc, copper, brass, hot dipped tin and chromium plating lines. He was responsible for wastewater pretreatment compliance which included cyanide treatment, atmospheric evaporation, cation exchange, nickel recovery and continuous and batch precipitation and filtering systems. Mr. Laubacher was also responsible for an in house employee training program which included the preparation of a training manual to assist employees with plating solution flow patterns, wastewater equipment operations and solution sampling and testing.

Mr. Laubacher has over ten years of experience as a consulting engineer in the regulatory compliance discipline. Mr. Laubacher has extensive experience in performing Phase I environmental compliance and liability assessments. He has conducted over 250 environmental compliance assessments of mainly large industrial/manufacturing facilities. He has also conducted over 60 Phase I liability assessments which consisted of both industrial and commercial properties. Clients include industrial corporations, banks and law firms. As potential liability problems arise through the Phase I assessment, Mr. Laubacher has managed the subsurface investigations to identify site contamination and potential remediation alternatives.

Key Projects**Air Emission Inventory/Permitting**

Prepared installation and operation permit applications for several industrial clients located in Ohio, Michigan, Indiana, Wisconsin, Pennsylvania, South Carolina and Tennessee. Permit applications included sources such as rotogravure printers, painting operations, gluing operations, cast coaters, engine test stands, snack food industry and several material handling operations of various industries.

Mr. Laubacher has conducted several air emission inventories for industrial clients including a large specialty steel manufacturer, several military bases, a light bulb manufacturer and a large vinyl products manufacturer. The emission inventories were used to determine Title V applicability, permitting requirements and emission fee reporting. Mr. Laubacher also prepared Title V Permit applications for clients in Ohio. Mr. Laubacher has prepared Air Fee Emission Reports for more than 5 clients since 1997 using Ohio's STARSHIP software and Iowa's SPARS software.

SARA Title III Compliance

Responsible for SARA Title III compliance including Sections 302, 311, 312 and 313 for the office furniture industry for reporting years 1989 and 1990. Also has performed SARA Title III reporting for reporting years 1991 through 1993 for three large manufacturing facilities and a major automotive manufacturer. Has also performed threshold calculations and prepared Tier II and Form R reports for a large vinyl products manufacturer for reporting years 1994 - 2003 and Tier II and Form R reports for reporting year 1995 - 2000 for a primary steel repair facility. Mr. Laubacher uses a software program to compile data used for inventory and usage threshold calculations.

Gave SARA Section 313 presentation to an audience of 150 at the Motor Vehicle Manufacturers Association. Also made SARA reporting presentations at a Corporate Environmental Seminar attended by 25 plant environmental coordinators in Michigan and an in house auditor training seminar attended by 20 in Ohio.

Performed a 313 chemical usage threshold calculation for a large beverage supplier and uncovered three reportable chemicals that were never previously reported by company personnel. Also performed threshold calculation for large light bulb manufacturer and incubator manufacturer.

Corporate Environmental Compliance

Performed duties including hazardous waste disposal and documentation, annual hazardous waste inventory reporting, annual air and water emission reporting, pretreatment compliance with local POTW, air permitting and corporate recycling coordination. He was also involved with the Superfund process where he represented a Potentially Responsible Party in the cost recovery stage of two Superfund sites. He set up a program which virtually eliminated VOC emissions at glue booth spraying operations by using carbon adsorption units.

Mr. Laubacher was also responsible for organizing Corporate Environmental Seminars which included over 25 environmental coordinators of a large greeting card manufacturing company and 15 environmental coordinators at a rail car manufacturing company. He also made three 4-hour presentations on SARA, Clean Air Act, RCRA and Storm Water regulations to a large compressor manufacturing company.

Plating and Wastewater Pretreatment Compliance

Installed a nickel recovery system that eliminated nickel from the wastewater discharge through ion exchange. Mr. Laubacher also made a presentation on "Compliance Through Evaporation" at the Wisconsin Wastewater Operators Commission/Federation of Environmental Technologists Seminar.

Environmental Liability/Compliance Assessments

Conducted environmental compliance assessments of hazardous waste treatment, storage and disposal facilities in accordance with protocol set by consortium of waste generating industries.

Conducted over 250 environmental compliance audits in 36 states of mostly industrial/manufacturing facilities. Compliance audit clients include a large automotive parts manufacturer with locations throughout the US (40 audits), Aristech Corporation (9 audits), Beverage Manufacturing Company (50 audits), a Baking Company (20 audits), Union Tank Car Company (20 audits), and Acutus-Gladwin Industries (9 audits).

Mr. Laubacher has performed over 65 Phase I site assessments. Phase I site assessments have been performed at light and heavy manufacturing sites, commercial and multi-residential locations. Mr. Laubacher has been a Project Manager for a multi-site acquisition of a miscellaneous eyewear manufacturer, a multi-site acquisition of a baking company and a multi-site acquisition of a health care products manufacturer.

Spill Prevention Control and Countermeasure

Mr. Laubacher has prepared or reviewed over 50 Spill Prevention Control and Countermeasure Plans. Plans have been prepared for small facilities such as bakeries, warehouses and small manufacturing operations. Plans have also been prepared or reviewed from large and multi-site facilities including breweries, railcar manufacturers, theme parks and airport hangers.

Storm Water Compliance

Project Manager for storm water permitting for a Corporation which included over twelve sites in six states. Also prepared individual permit applications along with Storm Water Pollution Prevention Plans and written Monitoring Programs for a large trucking company which included four sites all in different states.

Project Manager for storm water permitting for a Corporation which included 28 sites in ten states. Project included preparation of Storm Water Pollution Prevention Plans, written Monitoring Programs and on-site storm water sampling training.

Mr. Laubacher made a presentation to an audience of 70 at the Wood Treaters Association Conference regarding storm water sampling techniques and the proposed multi-sector group permit for SIC Code 24.

RCRA Compliance

Made three one hour presentations to an audience of over 75 facility environmental coordinators of a large automobile manufacturer at a RCRA Workshop held in Detroit. The presentation included information concerning Manifest/DOT/Land Ban requirements. Also made three, four hour presentations to an audience of approximately 30 at a large Midwestern compressor manufacturer covering RCRA, Clean Air Act, Storm water and SARA. Also performed a two day RCRA training program for a large railcar manufacturing company for personnel from 15 facilities located in the US and Canada in 2000 and 2002.

Performed RCRA hazardous waste training for large quantity generators located in Indiana, Pennsylvania and Ohio. The project consisted of training management staff as well as hourly employees on all three shifts. Provided documentation of job titles and job descriptions as they relate to hazardous waste.

Assisted over 10 clients in performing a waste minimization review of facility operations. Mr. Laubacher's recommendations resulted in the change of generator status (either from LQG to SQG or SQG to CESQG) of more than half of the projects where his waste minimization techniques were employed.

Prepared annual and (biennial) hazardous waste reports from 1993 – 2002 for various industrial clients.

CHRISTOPHER H. PARKER

A knowledgeable specialist in air pollution control with over 25 years experience as a regulator, consultant and corporate air program leader. Detailed understanding of regulatory programs, manufacturing processes and related air issues. Demonstrated ability to analyze complex permitting/compliance issues, and develop cost-effective, well thought-out solutions. Establishes and maintains constructive relationships with all levels in manufacturing and regulatory settings. Has conducted over 50 compliance air audits and assisted with other protocols including SARA Title III, SPCC and various Health & Safety protocols. Successfully completed the Bureau of Environmental Auditors Certification (BEAC) exam in 2004.

Professional Experience

Environmental Compliance & Engineering, Inc.

2003 – Present

Senior Environmental Specialist who has conducted compliance audits and prepared air permit applications (construction, operating, Title V) for a wide variety of facilities. Prepares and submits actual air emission inventories. Reviews proposed process changes for construction and operating permit implications, providing detailed, accurate guidance. Has prepared accurate & defensible potential emission inventories. Has reviewed and summarized Title V Operating Permits, prepared monitoring/deviation/annual certification reports, and developed monitoring, recordkeeping and reporting plans. Reviewed and summarized final MACT regulations, describing compliance options and obligations. Served as expert witness in air permit appeal hearings. Assisted in preparation of SPCC and Storm Water Pollution Prevention Plans.

GE Lighting – Cleveland, OH

1991 – 2003

Global Air Leader with GE Lighting's corporate EHS function. Responsible for all air programs at 30 facilities in the US and approximately 30 additional facilities world-wide. Provided oversight in the development of all emission inventories, FESOP and Title V permit applications. Managed the development of permit applications for all new/modified sources. Wrote and maintained compliance assurance and self-assessment programs. Served as primary resource for all compliance issues, analyzing data and providing hands-on guidance until ultimate resolution. Managed several after-the-fact PSD applications with no resultant penalties. Became certified in Six Sigma.

Qsource Engineering – Miamisburg, OH

1986 – 1991

Project Manager for a wide variety of projects for diverse industries including paper coaters, printers, auto parts manufacturers, metal and plastic part fabricators/finishers, wood cabinet manufacturers, fluorescent lamp manufacturers, aluminum wheel manufacturers, iron foundries, electric motor manufacturers, etc. Prepared air permit applications for facilities located in Ohio, Indiana, Mississippi, and Arkansas. Prepared RACT, BACT and LAER determinations. Conducted numerous compliance inspections/determinations and permit applications. Prepared SARA Title III Form R Reports. Prepared PTI applications for direct and indirect wastewater discharges. Co-developed SPCC Plans.

Regional Air Pollution Control Agency – Dayton, OH

1977 – 1986

Air Pollution Control Specialist and analyst for a local agency. Responsibilities included performing compliance inspections for assigned facilities, reviewing and making recommendation on air permit applications and assisting facilities comply with new and existing legislation (State and Federal). While an analyst, performed detailed review of new/proposed regulations and provided agency comments to state and federal agencies. Responsible for mobile source and toxic air programs.

Glossary of Acronyms

AST - Aboveground Storage Tanks

Btu - British Thermal Unit

CE - Control Efficiency

CEAG - Community Environmental Advisory Group

CEM - Continuous Emission Monitoring

CEMS - Continuous Emissions Monitoring System

CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act

CFC - Chlorofluorocarbons

CO - Carbon Monoxide

COM - Continuous Opacity Monitoring

ECA - Environmental Cooperative Agreement

ECE - Environmental Compliance & Engineering, Inc.

EPA - Environmental Protection Agency

EPCRA - Emergency Planning and Community Right-to-Know Act

ERGS - Elm Road Generating Station

FRP - Facility Response Plan

HCl - Hydrochloric Acid

ISO - International Organization for Standardization

MGE - Madison Gas and Electric Company

Midwest ISO - Midwest Independent System Operator

mmBtu - Million British Thermal Unit

MWh - Megawatt-Hour

NESHAP - National Emission Standards for Hazardous Air Pollutants

NO_x - Nitrogen Oxide

NSPS - New Source Performance Standards

OPA - Oil Pollution Act

PCB - Polychlorinated Biphenyl

PDF - Paper-Derived Fuel

PM - Particulate Matter

PSD - Prevention of Significant Deterioration

RMP - Risk Management Plan

SO₂ - Sulfur Dioxide

SPCC - Spill Prevention, Control, and Countermeasure Plan

SWPPP - Storm Water Pollution Prevention Plan

TRI - Toxic Release Inventory

TSCA - Toxic Substances Control Act

UST - Underground Storage Tanks

VE - Visible Emissions

WCCF - West Campus Cogeneration Facility

WDNR - Wisconsin Department of Natural Resources

WPDES - Wisconsin Pollution Discharge Elimination System