

Floor Setting Issues in Boiler MACT

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EPA MACT Floor Setting

- Recently finalize Hospital, Medical, Infectious, Waste Incinerator (HMIWI) rule lays out floor approach
- Pollutant-by-pollutant – for boiler HAPs include Hg, HCl, PM as surrogate for metals, CO/THC as surrogate for organic HAPs, and maybe dioxin
- Consider only emission test data from units in the lowest 12% of units with test data
 - Testing plan (\$15M) focused on best performers – biased
 - Many tests at limit of detection for methods
- Adjust statistical test if not “normally” distributed
- Address variability using 99% upper confidence level

Potential Boiler MACT Limits – Biomass Subcategory Example

	HCl (lb/10 ⁶ Btu)	Mercury (lb/10 ¹² Btu)
Vacated MACT Limit Solid Fuels	0.09	9
Projected limits based on HMIWI MACT method	0.0012	0.4
Factors more stringent	75	22

Concerns and Solutions with Floors

- Avoid “cherry picking” data – best of the best, theoretical composite facility
 - No facility exists that meets all HAP limits – “uber” facility
 - New HAP test data from best performers unlikely to change outcome
- Create a “pool” of ALL best performers for each HAP for each Subcategory – “Honor Roll”
 - Mix best performers for each HAP together into a “pool”
 - Calculate floor using emissions for each HAP and factor in variability and limit of detection
 - Consider additional subcategories to end up with “achievable” limits