

Boiler MACT/CISWI Strategy

CIBO Environment Committee
Meeting

March 3, 2009

CIBO Issues

- Definition of Solid Waste
- CISWI Limits
- MACT Floor-setting Methodology
- Subcategories
- Variability
- GACT
- Interactions with Other Rules
- Overall Cost Impacts

Example Company Impacts

- **Assumes HMIWI pollutant-by-pollutant methodology is employed**
- **50+ boilers would need new/upgraded PM controls at \$1 to \$10 million/unit**
- **Comparable # of units would need HCL scrubbers at \$1 to \$15/million/unit unless able to switch to low chlorine fuel**
- **Some units may need activated carbon injection for mercury, though advanced PM control will help; look for low Hg coal?**
- **CO limits may be unachievable for some boiler types (stokers?), difficult to achieve for others, with uncertain impacts on NOx emissions**

Other Rules—Death by a Thousand Cuts

- **Besides Boiler MACT, CISWI, and Area Source GACT, we may have:**
 - The end of SSM exemptions (potentially advantageous?)
 - CAIR replacement rule with possible (likely?) inclusion of large industrial boilers
 - Climate regulation and/or legislation; initial target an NSPS for boilers?
 - Tightened PM_{2.5} and ozone NAAQS, with implications for RACT & LAER
 - Next round of regional haze SIPs, reconsideration of current ones
 - New focus on NSR and BACT
 - PS-17 rules for CEMs, COMs, and parametric monitoring
 - Possible re-opening of other MACT rules & residual risk

Strategy Needed!

- Initial thoughts:
 - CIBO needs to work both alone and with other groups. Grassroots activity may be needed.
- Targets include:
- **EPA career, legal, and political staff**
 - **The Administration—CEQ, CEA, OMB**
 - **Governors and ECOS members**
 - **Federal & state legislators**
 - **Labor leaders**