

**CIBO Environmental Committee
Meeting
Boiler MACT & Related Rules Status**

December 3, 2013

CIBO Comments on MATS Proposed Rule

- CIBO commenting on MATS due to applicability to member facilities and impact on Boiler MACT rule reconsideration
- Support prior commenters' positions; flexibility is critical
- Highest flexibility would be for each source to use unit-specific procedures to determine the end of startup
- Use of a common definition needs to be applicable to a large percent of units to be of value- that means longer time periods
- Combination of load and time is a valid approach to pursue, but detail is critical
- Time needs to be reset if a unit fails during startup to reach the end of startup

CIBO Comments on EGU Startup Assessment

- Unknown representation of all EGUs or the range of EGUs
- Without known representation, it is also unknown to what extent conclusions and proposed numbers are applicable
- Waste coal fired CFBs are particularly under-represented
 - Most were coal fired CFBs
 - Need much longer time to build up bed material and stabilize operation and emissions controls
 - Unit specific approach is needed for those units
- Recognize that EPA had much data from EPA Clean Air Markets on EGUs in order to do even this analysis
 - Similar ICI Boiler/Process Heater MACT unit data is not available

CIBO Comments- MATS

- Undoubtedly all units cannot meet the EPA proposed load/time combinations
- Must also include an alternative approach to defining startup
 - Allow unit-specific procedures to define minimum stable operating load conditions and stable emissions control system operation
 - Procedures can be reviewable and approvable
 - Can also monitor and document startups against those procedures
 - Frame to prevent continual in/out of startup

CIBO Comments- MATS- Other Issues

- Expand clean fuels to include those in Subpart DDDDD
 - Natural gas, synthetic natural gas, propane, distillate oil, syngas, ultra-low sulfur diesel, fuel oil-soaked rags, kerosene, hydrogen, paper, cardboard, refinery gas, and liquefied petroleum gas
- Expand clean fuels to include biodiesel and other renewable fuels
- Recognize the inherent need to cofire startup fuel with primary fuel as a transition during the startup process
- Include recognition of need to have appropriate boiler conditions and all APCDs on line during startup
 - Specifically- ESP energization
- Consider use of parametric monitoring or other parameters to indicate normal operation of boiler(s) not in SU/SD mode while 1 or more other boilers are in SU/SD with CEM data not used for compliance during those periods

Boiler MACT/GACT Issue Discussion

Recent OAQPS Discussion- Amy

- Reconsideration schedule up in the air
 - Gov't shutdown
 - Focus on GHG rules with outreach
 - Have not reviewed draft rule packages with upper management
- EGU GHG NSPS rule is top focus- Fed. Reg. early Jan 2014
- JJJJJ rule may get separated from others due to upcoming compliance date
- Rule packages simply ask for comment on items mentioned in the reconsideration letters & many technical corrections/clarifications based on Q&A documents + OECA/state questions

EPA Letter Recon Issues Reminder

- Subpart DDDDD
 - Definitions of startup and shutdown periods and the work practices that apply during such periods;
 - Revised carbon monoxide (CO) limits based on a minimum CO level of 130 ppm; and
 - The use of continuous parameter monitoring systems (CPMS), including the consequences of exceeding the operating parameter.

- Subpart JJJJJ
 - The definitions of startup and shutdown periods;
 - Alternative particulate matter standard for new oil-fired boilers that combust low-sulfur oil;
 - Establishment of a subcategory for limited-use boilers and the applicable standards for that subcategory;
 - Provision that eliminates further performance testing for particulate matter for boilers whose initial compliance test shows that its particulate matter emissions are equal to or less than half of the particulate matter emission limit; and
 - Provision that eliminates fuel sampling at coal-fired boilers that demonstrate compliance with the mercury emission limit by fuel analysis based on the results of the boiler's initial compliance demonstration.

EPA Letter Recon Issues Reminder

- CISWI
 - Definition of “CEMS data during startup and shutdown periods”
 - PM limit for the waste-burning kiln subcategory

Recent OAQPS Discussion Cont'd

- Packages do not propose substantive changes to startup/shutdown
- EPA would like to take similar approach to MATS
 - Want a bright line approach like 25% load plus 4 hours
 - CIBO MATS comments and AFPA White Paper advocating site specific alternative approach for those that cannot use
- EPA has said that if a shutdown is not completed, then there is no shutdown event and cannot go back into startup
 - e.g., fuel lost for a short period and recovered
 - Therefore, a malfunction if excess opacity, CO, etc.

Recent OAQPS Discussion Cont'd

- CO threshold issue
 - EPA is checking the procedural box- providing opportunity for comment
 - Any additional information would be good to provide
- OMB has decided rule packages are “not significant”, so no OMB review required
- Schedule
 - Likely 45 day comment period on proposed rules
 - Aim to finalize within about 2 months
 - However- no contractor support (hoping for limited comments)
 - Redline/strikeout rules will be posted to TTN

Recent OAQPS Discussion Cont'd

- SSI court ruling on 99% UPL concerns EPA/OGC
- OGC asking all MACT project managers to characterize their data sets
 - Concern that 99% UPL is not a good statistic for small data sets
 - Especially where adjusted new source limit down to existing source limit
 - Delaying EPA work on several rules
 - This issue is not addressed in the current draft rule packages

Discussion Topics?

- Need for further position development on SU/SD?
- Need for further Q/As to prompt EPA support?
- Others?

Backup Slides

Prior Potential Discussion Topics

- Further SU/SD issues for D5/J6/CISWI
- Part 75 CEM issues relative to existing CEMS and conversion to natural gas firing
- Solid fuel emission controls
 - Current performance and DSI/ACI testing
 - Ability to schedule; results; project timing; sorbent availability
- Natural gas conversion- existing boilers
 - Burner availability
 - Impact on boiler performance
 - Emissions projections
- Replacement boilers- availability
- Compliance path forward decision and timing
- Permitting issues for any cases
- Others?