

Boiler Trade Call

February 5, 2010

Present: Bill Perdue, Amy Marshall, Chris O, Jim Griffin, Dean Kaiser, Jeff B, Doug McWilliams, Susan Miller, Tim Hunt, John Wagner, Melvin Keener, Tim Hunt, Matt Todd, Debra Lane, Joy Brocks (Environ), Bob Bessette, Jeremy Paul, Britt Fleming, Glenn England, John DeRuyter;

EPA developments

- No release of MACT floors by EPA either on Boiler or CISWI – OGC doesn't want to share, appears to be final decision
- Share Point working – if don't have access contact Amy Marshall (or Tim Hunt)
- New release of Boiler and CISWI data bases occurred during call; expect THC corrections (as carbon vs as propane), requested dioxin corrections to be released
- QA/QC review – everyone encouraged to review and correct errors with EPA; outliers and false data; see note on SharePoint from Amy
- EPA make data available when signed (unless still pulling together at last minute)
- Still on track for April 15th signature with 30 day comments period that can be extended to 45 days if hearing requested

Assessments of data

- Subcategory for dry biomass – Furniture considering, EPA not receptive at this point, not affect other biomass subcategories (outside of top 12%); post to SharePoint site soon
- Two floor methodologies – details posted on SharePoint by URS; top 12, then run by run, determine skewness (normal or log-normal) which determines either 99% or natural log then 99% CI; log normal results in higher MACT floor; if make case that data is skewed then use more favorable results
- Alternative statistical analysis (Haz Combust Waste) – may lead to better floors (within and between test variability) although results fall between statistical approaches for HWIMI for PM
- Use of Phase II only data leads to better/higher MACT floors (rather than both Phase I and II) especially for mercury and biomass and coal boilers (different methods for tests) – higher than 2005 limits; need to look at coal type
- URS posted coal, oil and biomass limits using both HMIWI methods – 10% coal is coal subcategory, limits quite low
- Pooled approach (best performer for each HAP combined into new best performer data set) – 10 times higher than straight methodology and higher than 2005 limits; if add more HAPs (dioxin) then limits will get even higher; alternatives – looking at different confidence intervals (95%); post units on SharePoint with fuel quality (BTU, CI and Hg); bundle into two groups (metals

with PM, Hg and HCl and organics with THC and dioxin) rather than one to get more realistic numbers

- Can always go more stringent in an above the floor analysis
- Gas-fired – should have results to share early next week, limits are very low, look at method issues; subcategories for gas I, gas II and process gas similar with gas II slightly higher
- Quantitation limit vs. detection limit – two different adjustments; NCASI sent letter to EPA on Hg issues with biomass

List of wastes and fuels

- Briefly reviewed what appears to be EPA’s initial judgments on fuels and solid waste (see below)
- Distinctions based on fuel value, processing of material, onsite vs offsite generation and contamination of material.

Materials in Boiler MACT database (presumably these are fuels)	Materials in CISWI database (presumably these are waste)
Bagasse	Chipped railroad crossties
Wood/Biomass/Hog Fuel/Bark	Animal carcasses, soiled cage bedding, and autoclaved waste containing plastics
Wood: Unadulterated Timber/Lumber	Construction and demolition wood
Industrial sludge	OCC rejects
TDF	Petroleum and coal tar contaminated soil
Paper and paper residues	Whole tires
Plywood, Particleboard (containing glues or resins)	Treated wood
Petcoke	Oily rags
Plant-based Agricultural Residue	Plastics
Deinking Residuals	Contraband
Hydro pulper refuse	
Landfill Gas	
MDF Scraps/Plywood Sander Dust	
Tall oil, tall oil derivatives	

Dewatered combustible residues	
Knots and Knotter Rejects	
In general, materials that are like other fuels and are generated onsite (e.g., knotter rejects are like bark) may be fuels	In general, contaminated materials and materials that have been discarded may be wastes (e.g., treated wood and whole tires)
Corrugated Cardboard or Container Scraps - listed both places, may depend on whether onsite generated	
Used Petroleum-based Oils - listed in both places, probably depends on whether onspec/onsite	

Boiler GACT:

- Reviewed summary provided before call
- AF&PA interested in issue given area sources in sector (sawmills); others contact Tim if interested in working on.

Other items:

- Consider alerting EPA that data is of poor quality – individually at this point
- Small business ombudsman of EPA (Joan Rodgers: rogers.joanb@epa.gov) organizing meeting with EPA Deputy Administrator Bob Perciasepe on March 4th 10-12 for EPA to review implications of Brick MACT vacatur, impacts of multiple regulations on sectors, GHG regulation (Tailoring and PSD), TSCA inventory update, definition of solid waste (assumably hazardous), feed manufacturers MACT; others encouraged to reach out to Joan Rodgers if want to attend); make sure Boiler MACT is recognized as important issue for small businesses.

Next Steps:

- Friday, February 19th at 3 PM (ET) using 1-800-582-9079; *4632588*
- Planning for comment period – how divvy up work and drafting