

THURSDAY, AUGUST 5, 2010

7:30-9:00 AM REGISTRATION - **Casco Bay Foyer – Outside Casco Bay Hall**

HOT BREAKFAST – **Casco Bay Hall**

8:00-9:00 AM Fundamentals of Working with State Regulators – **Casco Bay Hall**
Ann McIver, Citizens Thermal
Donald (Don) van der Vaart, NC DENR - Division of Air Quality

9:00 AM **REGULATORY WORKSHOP – CASCO BAY HALL**

A roundtable discussion of the realities of industrial emission compliance/technology applications with Industrial Owner/Operators, Engineering/Technical Equipment Suppliers, Support Service Providers and Regulators, to assess the implications of the previous days' presentations and to discuss specific technology application potentials within the industrial, commercial and institutional sectors.

9:00 AM Introduction
Frederick (Fred) P. Fendt,
The Dow Chemical Company, Conference Chairman

9:15 AM What Makes Me Lose Sleep

Associations - **Christopher (Chris) Recchia**,
Biomass Energy Resource Center (BERC)

Equipment Supplier – **Earle Pfefferkorn**, Cleaver-Brooks, Inc.

Boiler Owner/Operator – **Scott Darling**, Alcoa, Inc.

Environmental Support – **Robert (Bob) Fraser**, AECOM Environmental

State Regulator – **Jeffrey (Jeff) Underhill**,
N.H. Dept. Environmental Services

Independent Consultant – **Norbert (Norb) Wright**, Energy Consultant

COFFEE BREAK (as needed)

11:15 Develop Agenda and List of Questions for Discussion

Moderators: **Patrick (Pat) Dennis**, Archer Daniels Midland Company
Andrew (Andy) Bodnarik, N.H. Dept. Environmental Services
No Holds Barred General Discussion

Process Questions

- 4. Will CIBO gather a list of questions?**
- 5. Will CIBO file comments?**
- 6. Will States file comments?**
- 24. Demonstration projects for CEMs? CIBO sponsored?**
- 7. How did top 12 achieve the proposed limits?**
- 23. HBCA??**
- 20. Extensions to compliance time? Even more than 3 years?**
- 9. Comment period driven by litigation? How will comments be addressed by EPA? Will change happen?**
- 14. Energy assessment? What is “significant equipment”?**
- 10. Solid fuel boilers? Mixed fuel boilers? Wood with more than 10% coal. Limits based on percentage of each fuel burned?**
- 1. What resources do you need for MACT Compliance?
Test Data? Fuel options? Control Technology Assessments? CFD modeling?**

2. Will it be possible to permit a significant new project?

3. Do you need to do air quality modeling? No? Are you sure?

Existing plant may not pass

Is the state likely to declare area a non-attainment area?

How can you manage these new risks?

CAA Questions

34. Can December 16 deadline be extended?

What happens if litigation. Will states have to do case-by-case MACT?

46. Common sense? If can't get there with rules do we need to change the Clean Air Act??

48. How do we change the paradigm? Are we even asking the right questions for solving the problem?

51. Remands create uncertainty. How we get to final/ post litigation rule?

27. How can we educate the decision makers? Congress? Public? Regulators?

Data problems. Insufficient data. Biomass and

coal limits will cause shutdowns. Hg limits not achievable. HCl methods and measurement methods not ready for measuring low levels/proposed limits.

5. Why CO?

Accuracy/Measurement/Detection Limits Issues

28. Can you accurately measure/control emissions?

19. CO difficult. CO not good surrogate below 100 PM. Alternate surrogate? Ditto

22. Tune-ups, CO analysis before and after tune-up. Portable analyzers

Small Business Issues/Operator Training

30. Boiler operator training? New equipment? New compliance requirements? Small facilities need help.

Technical Feasibility

Compliance limits are approaching detection limits. Test methods may not be good enough?

How do we deal with non-detects? Data quality issues. Cal gases? Method 26A not good below 20 ppm. Mercury measurement methods. Dioxins/furan methods. Non-detects = 0? Biases in Methods.

35. What levels are achievable? At what cost? PM limits require membrane bags.

8. When will money be spent? When will contracts be developed?

11. How can compliance be achieved? Need options? What about job impacts?

12. Any optimism left? Litigation causes uncertainty. Switch to gas may not work. Coal may no longer be viable. Time to leave town? Move offshore?

13. What is a young person to do?

15. This is just the beginning. Lack of clarity. What is the small company to do? Where can

small companies get answers?

16. Coal ash regulations Hazardous waste/regulated non-hazardous waste? Existing sites?

17. Just say no? Simultaneous compliance is not achievable.

18. Wake up call for industry. Rule itself needs to change. How can we make change happen?

21. Combination boilers?

25. Incentive programs? Increase flexibility allowed? Cap & trade?

26. How deep can we go before backlash? Contingency planning for backlash?

29. Utility MACT coming. Are resources/manpower available to meet time

schedule? Utilities will suck up a lot of resources.

31. Don't send me mud. New PM standards. How do we screen out background?

33. EPA still in comment period. Will there be any positive comments? Need help advice.

36. HBCA worked 1st round. Do we have data for reductions from HBCA? Why can't we use good science to justify it in this round?

37. Energy assessment voluntary now? Mandated later? Uncertainty.

38. Limited Use of alternate fuels could change status/compliance limits

39. How did we get here? How did unintended consequences happen?

40. CO limits not achievable. CO emissions

higher during startup, shutdown or malfunction.

41. Will companies need more staff to meet monitoring, recordkeeping, and recording requirements?

42. Any alternate fuel available?

43. One size fits all. Need more subcategories, e.g. limited use

**44. Change to natural gas/effect on coal markets?
Fuel price changes**

45. Other multi-media impacts e.g. water/solid waste? Do you have access to additional water?

47. What is percentage of CIBO member facilities that will be shutdown if MACT implemented?

49. We are losing the battle of public opinion. Do we need a one week combustion holiday to share the pain?

50. EPA needs to hear what can be achieved by

your facility. Are you willing to provide your own site/boiler specific data? Performance, testing methods, accuracy of methods data needed

51. MACT on MACT really causes problems. Remands create uncertainty. How we get to final/post litigation rule?

12:00 Working Lunch Provided – **Casco Bay Hall**

1:00 Discussion Continues

3:30 or as needed Concluding Statements

CONFERENCE ADJOURNS

2.3 CEU's will be awarded for attendance at all sessions without Thursday Workshop.

2.6 CEU's will be awarded for attendance at all sessions with Thursday Workshop.