

Update and Issues

2015 Boiler MACT Reconsideration Rule

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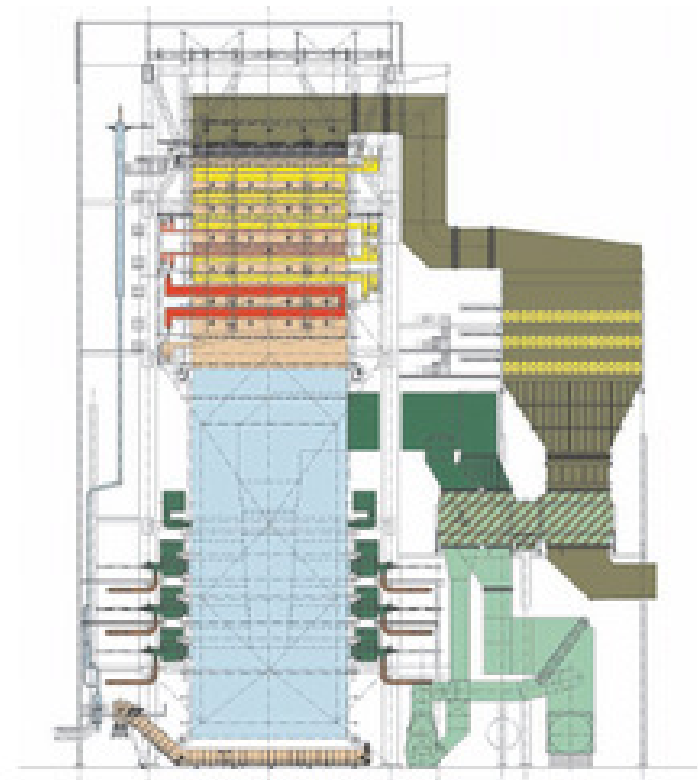
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Agenda

- Update on timeline
- Remaining Technical Issues/Requested Technical Corrections
- Other related rules
- Discussion



Boiler MACT Rule Timeline

- 2011 – Boiler rules and waste definition finalized, then reconsidered, then re-proposed
- 2013 – Final reconsideration rule, reset compliance time
- 2015 – 2nd reconsideration proposal 1st quarter, final rule with changes Nov. 20, 2015
- **Jan. 31, 2016** – initial compliance date, unless 1 year extension
- 180 days to demonstrate compliance with limits
- 60 days to submit NOCS after all compliance activities complete of 60 days after compliance date for Gas 1 (note – **NOCS for BMACT is NOT in CEDRI**)
- **Jan. 31, 2017** – 1st compliance report

EPA Planning a Technical Corrections Package

- 1.14.16 revision to EPA QnA document on the TTN.
- Compliance by fuel analysis – need technical corrections to remove references to P90 for ongoing compliance in Table 8 and text. QnA 30 acknowledges error and EPA will fix in future technical correction.
- Fuel analysis during stack testing - QnA 31 issued that acknowledges error in language that specifies timing of samples. The intent of the language was to instruct facilities to spread the fuel samples out equally during the test runs, not to lengthen the test runs. EPA intends to correct 63.7521(c)(1)(ii) in a future FR notice.



Technical Corrections

- PM CPMS – still one place where “certify” remains. QnA 47 issued that acknowledges error. Certify is only meant to apply to PM CEMS. EPA intends to correct 63.7540(a)(9) in a future FR notice.
- We have brought additional issues/questions to EPA that they have not committed to addressing in a technical corrections FR notice.

Other Clarifications

- Timing of NOCS for new Gas 1 units - 63.7545(e) now says that units without an initial compliance demonstration submit NOCS within 60 days of the compliance date. EPA had previously provided guidance that new Gas 1 units should submit the NOCS after they did their first tune up (their first compliance activity under the rule, since they don't do a tune up at startup and aren't included in energy assessment). Jim Eddinger by email: This change was meant for existing units.

Other Clarifications

- EPA added additional requirements to the rule if CO₂ is used as diluent for CO monitor rather than O₂ that were not in proposal. The rule language is unclear as to whether the source “may” ask for alternate test method under 63.7 or must ask for one if CO₂ is used. The language in 63.7 with respect to alternate test method does not seem to fit this circumstance. Jim Eddinger by phone: Anyone wanting to use CO₂ as a diluent for CO CEMS must get approval on the approach from the measurement group (Steffan Johnson/Kim Garnett).
- Rule requires PM stack test for initial compliance even if you are using a PM CEMS. Eddinger by phone: you can request a waiver from the measurements group.

NHSM Rule Revision – 3 More Fuels Added

- Construction and demolition (C&D) wood processed from C&D debris according to best management practices;
- Paper recycling residuals generated from the recycling of recovered paper, paperboard and corrugated containers and combusted by paper recycling mills whose boilers are designed to burn solid fuel; and
- Creosote-treated railroad ties that are processed and then combusted in the following types of units. (i) Units designed to burn both biomass and fuel oil as part of normal operations and not solely as part of start-up or shut down operations, and (ii) Units at major source pulp and paper mills or power producers subject to 40 CFR 63 Subpart DDDDD that had been designed to burn biomass and fuel oil, but are modified (e.g., oil delivery mechanisms are removed) in order to use natural gas, instead of fuel oil as part of normal operations and not solely as part of start-up or shut down operations.

<https://www.epa.gov/rcra/final-rule-additions-list-categorical-non-waste-fuels>

Area Source Boiler and CISWI Rules

- EPA still has not issued the final reconsideration rules for area source and CISWI.

Questions?



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