Boiler MACT Q&A and CEDRI Reporting

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Boiler MACT Q&A and CEDRI Reporting

- Provide some Q&A with USEPA on questions along the way.
- Provide feedback on CEDRI experience

Q&A: In or Out

- You must accept limits that make you a minor source before the compliance date.
- Once you are in, there is no going back once a major source.

Coal Definition

- The Fuel Type “Coal” includes bituminous, subbituminous, and lignite
- Conduct the fuel blending and testing to be conservative for ongoing compliance.
- Example of blending low sulfur PRB and high sulfur eastern bituminous,
- During testing, define a window of blends that covers supply issues and allows flexibility.

Q&A: Tune-ups

Question:
Is there an alternative procedure available if it is not practical to tune an affected burners?

Answer: Yes
I discussed this with OECA and it seems reasonable to us that they could conduct the tune-up as required in the rule by using their routine inspection and maintenance. 63.7540(a)(10) list the components of the tune-up. 63.7540(a)(10)(i)-(iii) are requirements to inspect, as applicable, the burner, the flame pattern and the air-to-fuel ratio. These they could do, if applicable, under their routine inspections. 63.7540(a)(10)(iv) and (v) require optimizing and measuring CO. 63.7540(a)(10)(iv) states to optimize consistent with manufacturer's specifications. If these process heaters can't be tuned, or only limited adjustment, then that is all that would need to be done to meet 63.7540(a)(10)(iv). 63,7540(a)(10)(v) requires measuring CO before and after adjustment. If no adjustments are possible then that is all they would need to report.

Q&A: Data Acquisition & Handling

Question:

The rule does not include language to differentiate an hour of operation in startup or shutdown mode, from normal operation. Other rules, such as Subpart UUUUU, include language for EGUs that states “any fraction of an hour counts as a full hour for startup and shutdown.” Can one use the definition in Subpart UUUUU to determine periods of startup and shutdown in Boiler MACT.

Answer:

My opinion is that using the Subpart UUUUU definition is a practical way to base the data acquisition and handling systems. I base this on what the rule considers to be valid data. That is, there must be a minimum of four successive cycles of operation, one representing each of the four 15-minute periods in an hour, to have a valid hour of data under normal (non-startup/shutdown) operation.

Q&A: Applicable Limits

Question:
If one vents solid fuel boilers of different subcategories through a common stack, is the PM or TSM limit set by the methodology 63.7522(j) [Emission Averaging]

Answer:
You are correct that the methodology in §63.7522(j) sets the PM or TSM limit when affected boilers of different subcategories that vent through a common stack.

Q&A: NOCSR Date

Question:

Is the latest date to complete compliance stack testing July 29, 2016 (6 months after the compliance date), or does the stack testing have to be completed 60 days before this date in order to submit the Notification of Compliance Status report by July 29, 2016?

Answer:

Under the rule and the General Provisions, a source must complete/perform the initial compliance performance tests no later than 180 days after the compliance date that is specified. So, the latest date to complete compliance stack testing would be July 29, 2016. However, the initial tune-up and energy assessment are required to be performed by the compliance date, as stated in 63.7510(e)

Q&A: Parametric Monitoring

Question:

I have a client that has a CFB boiler where dry sorbent injection (DSI) was installed for acid gas control to meet the hydrogen chloride limit in Boiler MACT. The unit now has two means of controlling acid gas emissions: 1) bed injection of limestone, and 2) the new DSI system. I am of the opinion that the DSI system is the only necessary parametric monitoring point for the purpose of Boiler MACT compliance and have advised the client to run the compliance test with the normal bed injection rate to determine the DSI rate necessary for compliance, and then set and monitor the DSI rate for purposes of parametric monitoring of ongoing compliance. I am of the opinion that it is not necessary to monitor the bed injection rate as part of their ongoing Boiler MACT CPMS. Do you concur with this advice?

Answer:

I concur with you're the advice you have given. It is consistent with the amended item (2) of the definition of "Minimum sorbent injection rate" in 63.7575.

Reporting

- § 63.7550 What reports must I submit and when?
  - Table 9

    Information required in § 63.7550(c)(1) through (5);

    Annual,

    Semiannual Compliance Report, 1/31, 7/31, and

    Biennial
- Notification of Compliance Status Reports - 60th day following the completion of the relevant compliance demonstration activity specified in the relevant standard

Reporting

- CEDRI reports must be submitted via CDX System
- Relatively easy to use – registration video on YouTube
  - Find facility
  - Identify Boiler MACT as applicable to facility
  - Identify preparer – upload reports, add/remove
  - Identify certifier – Certifier must submit
  - Attach report (pdf)
- Cover letter including the language - "Based on reasonable inquiry, the information submitted in this report is, to the best of my knowledge and belief, true, accurate, and complete." (Also included with certifier)

CEDRI

- Preparer – Print out the work periodically when preparing a large submission.
- Changes made to CEDRI without advance notice.
- Include Electronic Reporting Tool (ERT) as a deliverable in the stack testing firm's scope.
- Reporting seems to have duplicate reporting of tune-up reports (be consistent)
- States without delegation are not familiar with CEDRI – submit hard copy.

Questions

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