

Boiler NSPS and MACT Electronic Reporting

By Steve Norfleet, P.E.

©RMB Consulting & Research, Inc.

Presentation Summary

- ❖ Discuss Boiler MACT Electronic Reporting and Other Electronic Reporting Requirements Affecting Industrial Boilers
- ❖ Review Progress on Revisions that Address Similar Electronic Reporting Requirements for MATS Affected Utility Sources
- ❖ Highlight Regulatory Trends and Potential Efforts that Could Improve Industrial Boiler Reporting

Subpart DDDDD Electronic Reporting

❖ Compliance Report via CEDRI

- Company/facility/process information
- Emissions/operating parameter limit
- Date of report and reporting period (begin/end dates)
- Total operating time during reporting period
- Monitoring equipment information
- Date of monitoring equipment last certification or audit
- Description of fuels and total fuel use for period
- Statement indicating whether operational changes have occurred since last test that could increase emissions

Subpart DDDDD Electronic Reporting

- ❖ Compliance Report via CEDRI (continued)
 - New fuel use statement or demonstration (e.g. HCl, Hg or TSM compliance calculations or intent to conduct new test)
 - Monthly fuel analyses summary (if used for compliance)
 - Emission limit and monitoring deviations information
 - Process/control equipment malfunction information (dates/times and reason/corrective action for each events)
 - Date of the most recent tune-up / burner inspection
 - If emissions averaging is used, a certification that emission level achieved or control technology employed is no less stringent than level or technology in initial NOCS

Subpart DDDDD Electronic Reporting

- ❖ Compliance Report via CEDRI (continued)
 - All CEMS (or PM CPMS) compliance averages for reporting period (30-day or 10-day averages, as applicable)
 - Responsible official information and certification
 - SU/SD information required under §63.7555(d)
 - For deviation that occur where a CMS is not used:
 - » Description, duration, and reason/corrective action
 - » If during performance test, date test was completed
- ❖ ERT Submittal for Every Performance Test or Performance Evaluation Test (e.g., RATA)

Subpart JJJJJ Electronic Reporting

- ❖ Notification of Compliance Status
- ❖ ERT Submittal for Every Performance Test or Performance Evaluation Test (e.g., RATA)

NSPS Electronic Reporting Rule

- ❖ On 12/21/2016, EPA Administrator Gina McCarthy signed a final rule to impose CEDRI/ERT reporting for all sources under many NSPS subparts
 - Indicated Subparts D, Da, Db and Dc addressed “under a separate and independent rulemaking”
 - Would have impact Subpart GG and KKKK sources
- ❖ Status – withdrawn from Office of Federal Register prior to publication by new administration

New Test Report Requirements

- ❖ New performance test report requirements under Part 60 and Part 63
 - Published August 30, 2016 (Effective October 31, 2016)
 - Apply to reports submitted via “electronic or paper”
- ❖ Previous report requirements
 - §60.8(a): “...a written report of the results of such performance test(s)”
 - §63.7(f)(1): “...results of a performance test shall include the analysis of samples, determination of emissions, and raw data.”
- ❖ New rule expands requirements

New Test Report Requirements

- ❖ Mailing address and actual address of facility
- ❖ Owner, operator or responsible official name and email
- ❖ FRS number and brief process description
- ❖ Unit description, including fuel burned, control devices, vent characteristics and appropriate source classification code (SCC)
- ❖ Permitted maximum process rate

New Test Report Requirements

- ❖ Purpose of test including regulation requiring test, pollutant(s) measured, units of standard or pollutant emissions, and any process parameter component
- ❖ Sampling site description
- ❖ Description of sampling and analysis procedures and any modifications to standard procedures
- ❖ Quality assurance procedures
- ❖ Record of operating conditions, including operating parameters for which limits are being set during the test

New Test Report Requirements

- ❖ If test method requires you “record or report:”
 - Record of preparation of standards
 - Record of calibrations
 - Raw data sheets for field sampling
 - Raw data sheets for field and laboratory analyses
 - Chain-of-custody documentation
 - Example calculations
- ❖ Identification information for the company conducting the performance test including a contact person and his/her email address

2018 Proposed Test Method Revisions

❖ Proposed Test Method Revision Package

- Published January 26, 2018
- Expansion of “Performance Evaluations” Reporting Requirements
 - » Revisions to §63.7(g)(2) and §63.8(e)(5)(i) to require same reporting for CEMS QA tests as performance tests

CEDRI Reporting

- ❖ EPA CEDRI/CDX is a conduit/platform for reporting emissions/compliance data
 - EPA has developed web forms/excel templates and some multiple file submission options
 - Progress with XML reporting option
 - Limit reporting instructions

ERT Reporting

- ❖ Support electronic reporting but ERT is the wrong tool for the job
 - Cumbersome data entry and awkward tool for state agency personnel that want to use the data
 - Originally touted as all-in-one tool to replace "time-intensive manual preparation and transcription" of test plans and reports but only but not adopted by states or tester
 - » Testers already have tools they have developed and verified over time
 - » Does not even allow you to report your compliance average
 - » Includes data not required by rules and much more than needed to establish compliance or to develop emission factors
 - » Agency forced use for ICR and despite issues continues to push it

We Don't Need a Tool We Need an Actual Format

MATS Reporting Revisions

- ❖ Original Rule – multiple systems, duplicative reporting, ERT woes, etc.
- ❖ Workgroup focused on developing XML reporting alternatives for MATS
 - Utility, software vendors and stack testers
 - Goal - Improve, streamline and simplify MATS electronic reporting
- ❖ Interim Reporting Rule (published 3/24/15)
 - Instituted interim reporting requirements through 4/16/17 while changes were to be developed (later extended to 6/30/18 to give EPA more time to finalize rule)
 - » Replaced CEDRI/ ERT Requirements with PDF reporting
 - » All electronic reporting via ECMPS (Part 75 reporting tool)

MATS Reporting Revisions

- ❖ Proposed MATS Reporting Revisions
 - Published September 29, 2016
 - Included Proposed New XML Reporting Requirements
 - » Quarterly Compliance Report
 - Replaces Semi-Annual Report
 - Streamlined “Excess Emission” Reporting
 - 30 - (or 90 -) Day CEMS Compliance Averages
 - Performance Test Results/Critical QA Data
 - » Supplemental XML Stack Test Data

MATS Reporting Revisions

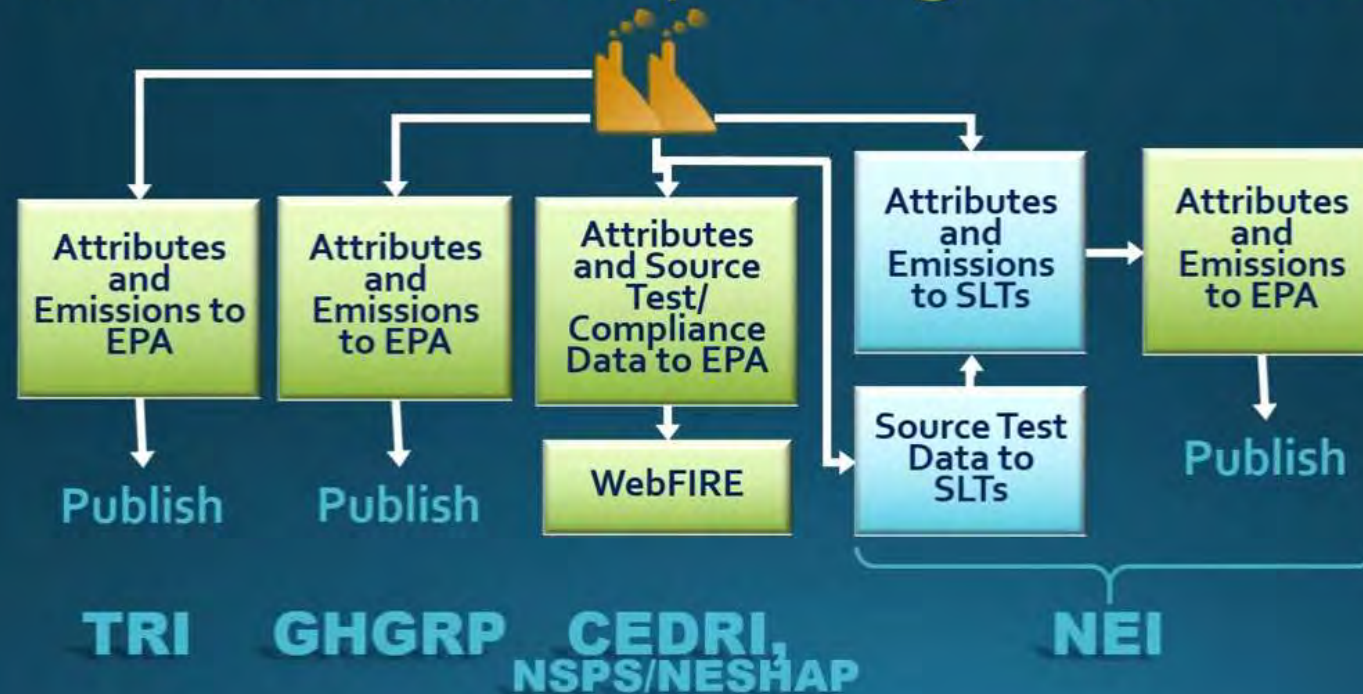
- ❖ Proposed MATS Reporting Revisions Package included draft reporting instructions for Compliance Report
 - Largely based on schema/instructions developed by RMB/utility workgroup
- ❖ But Package included no instructions for Supplemental Stack Test Data
 - Workgroup did not develop XML schema for proposed reporting rule
 - » Advocated a more balanced approach
 - Point-by-point data not needed for every test
 - Performance test results/critical QA Data in Compliance Report sufficient with full PDF report
 - Workgroup continues to promote balanced approach but has since drafted instructions for proposed XML Supplemental Stack Test Data

Unified Reporting Project

- ❖ E-Enterprise Combined Air Emissions Reporting (a.k.a., Unified Reporting) project seeks to "streamline multiple emissions reporting processes."
 - Effort Between SLT Agencies and Federal EPA Started in 2015
 - » Reduce industry burden for point source reporting
 - » Improve timeliness and transparency of data
 - » Create consistent information across air emissions programs
 - » Improve data quality
 - » Improve accessibility and usability of data
 - » Support more timely decision-making
 - Focused on Issues that Do Not Require Regulatory Changes
 - Has Primarily Worked on TRI and NEI Issues Related to AERR

Unified Reporting Project

Air Emissions Reporting "As is" State

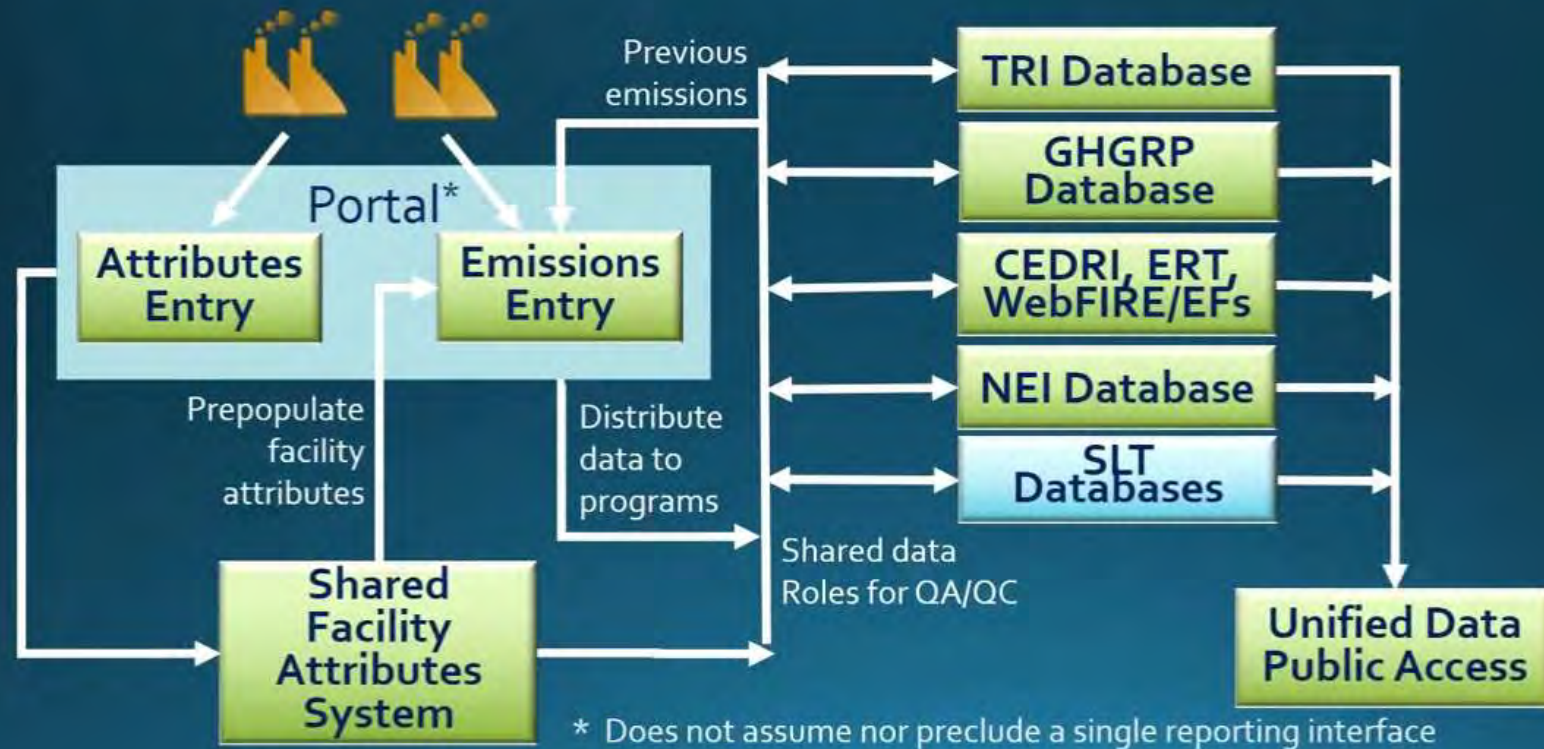


8

Source: March 2016 CAER Webinar

Unified Reporting Project

Air Emissions – Proposed Future State

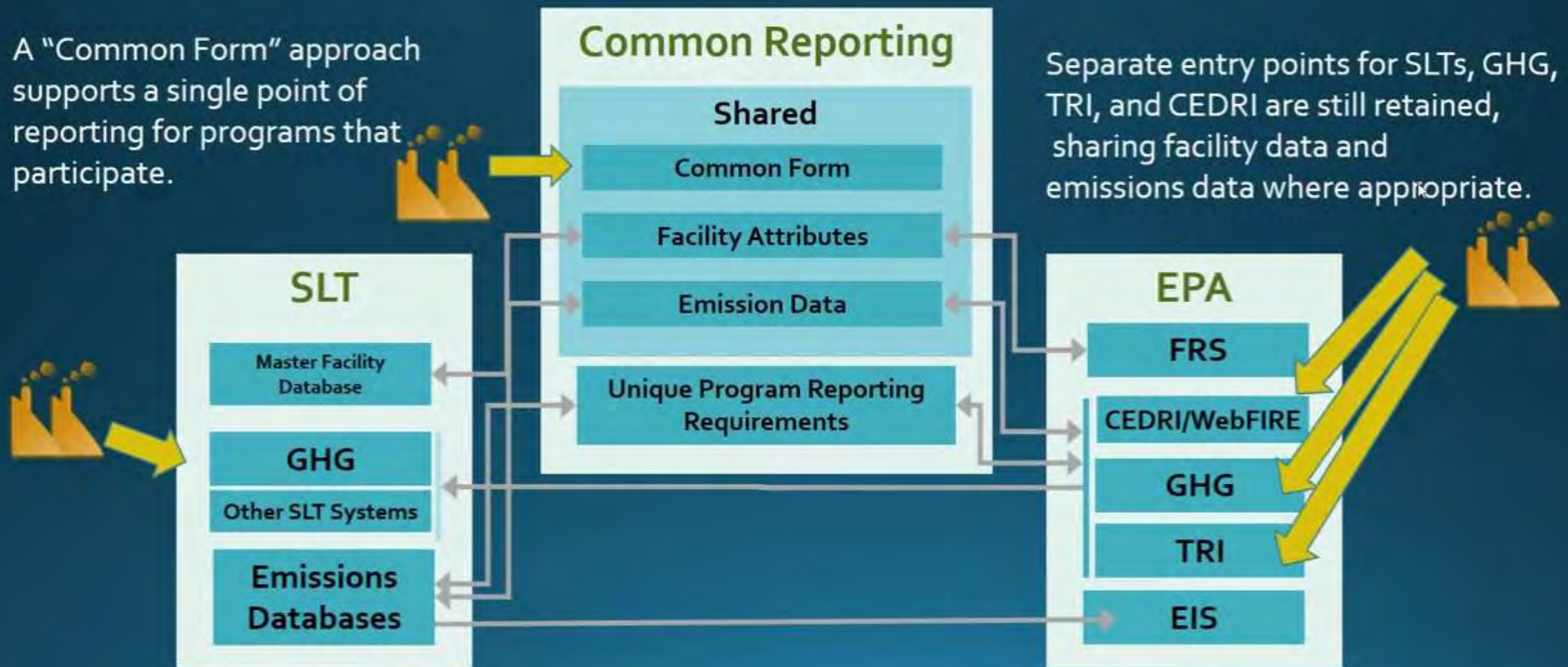


Source: July 2017 CAER Webinar

Unified Reporting Project

Proposed "Future State" Concept

A "Common Form" approach supports a single point of reporting for programs that participate.



Separate entry points for SLTs, GHG, TRI, and CEDRI are still retained, sharing facility data and emissions data where appropriate.

“Regulatory Reform” Effort

- ❖ In response to Executive Order, EPA requested comments on potential rule changes to reduce “regulatory burdens”
 - Task force to recommend changes to address “outdated, unnecessary, or ineffective” requirements or where “costs that exceed benefits”
- ❖ What Happened?
 - Comment period closed May 15, 2017 - EPA received over 460,000 comments
 - Final report issued October 25, 2017 (16 Pages)
 - Four findings (some specific actions in appendix, e.g., Clean Power Plan)
 - » NSR permitting process reform
 - » NAAQS reform
 - » Employment evaluations (cumulative effects of regulations)
 - » "Smart Sectors" initiative (EPA to examine how it engages with industry)

Electronic Reporting Next Steps

- ❖ While the regulatory pace has slowed, electronic reporting push likely to continue
 - Compliance Reports - EER and compliance averages
 - Stack Test Data for Performance Tests and CEMS QA
- ❖ Potential benefits of electronic reporting
 - Streamlining possible but not an Agency focus
 - Need clear reporting instructions and an actual format to replace ERT
 - Could use proposed MATS reporting requirements as a template - similar workgroup approach could be used to assist the Agency address current reporting voids