



Combustion Turbine MACT Update

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Turbine NESHAP 40 C.F.R. 63, Subpart YYYY

- Turbine NESHAP Final Rule
 - Proposed rule:
 - 68 Fed. Reg. 1,888 (Jan. 14, 2003)
 - “New” if reconstructed on or after Jan. 14, 2003
 - Final rule & effective date:
 - 69 Fed. Reg. 10,513 (Mar. 5, 2004)



Turbine NESHAP 40 C.F.R. 63, Subpart YYYY

- Final rule - formaldehyde emission standard
 - 91 ppbvd @ 15%O₂ for new / reconstructed turbines located at a major source of HAP emissions
 - Affected units are ≥ 1 MW at ISO conditions



Rule Stay / De-listing Status



- De-listing petition filed
- EPA proposed to delist 4 subcategories
- Rule stayed for Gas-Fired Turbines on Aug. 18, 2004
- But pursuant to the Plywood NESHAP case, *source categories* (e.g., turbines) can be delisted, but not *subcategories* (e.g., natural gas-fired turbines)
- De-listing request for gas-fired turbine subcategories will likely be denied and stay rescinded

Residual Risk & Technology Review (RTR)



- Rulemaking schedule set by lawsuit re: failure to conduct 8-year RTR for 20 source categories (including turbines)
- EPA outreach to stakeholders re: RTR
 - Mar. 2018 - INGAA submitted comments (e.g., new technology or add-on controls, catalyst costs, formaldehyde measurement)
 - Apr. 2018 – EPA outreach to INGAA and others
 - May 2018 – INGAA provided additional feedback to EPA



Response to April EPA Inquiry



- Concerns with EPA's data: Some turbines have modeled risk above acceptable thresholds
 - 1 compressor station in LA with inhalation risk above 1 in a million
 - Emission rate
 - Stack exit velocity
 - Exhaust temperature
 - Arsenic above screening value
 - 17 liquid-fired units



Additional Concerns

- Future considerations:
 - Standards for existing units, smaller units, etc.
 - Startup requirements or a “work practice” approach similar to RICE NESHAP?
 - EPA may allow 2 years or more to comply



Questions?

