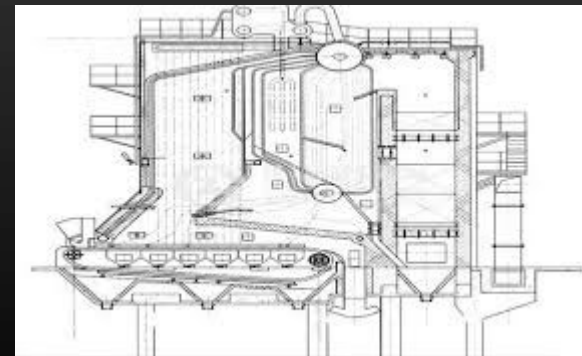


Boiler and CISWI Rules – Compliance Challenges and Updates

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Boiler MACT – State of Play

- Initial compliance for existing units required January 31, 2016 or 2017.
- Electronic reporting is required for test reports (ERT) and compliance reports (CEDRI).
- First CEDRI electronic compliance reports were due January 30, 2017 or 2018 and every 6 months thereafter for units with emission limits.
- Existing boilers/process heaters in North Carolina have been under §112j case by case MACT requirements, but must comply with the federal Boiler MACT rule on May 20, 2019. First compliance reports will be due July 30, 2019.

Boiler MACT – Compliance Challenges/Opportunities

- NOCS:
 - Not including all the required supporting information
 - Improperly setting the operating parameter limits
- Multi-fuel boilers:
 - Forgetting that calculating monthly maximum fuel pollutant input is required
- Compliance plans:
 - Having final/up-to-date versions of plans
 - Not having enough detail or site specific information in the monitoring plan
- Startup/shutdown
 - Clarity on what startup definition is being used
 - Not having complete records of all the data required by the rule, including end of startup and timing of shutdowns

Boiler MACT – Compliance Challenges (2)

- CPMS:
 - Failing to submit the CPMS performance evaluation notification or documentation
 - Failing to keep calibrations current for all parameter monitors (e.g., DSI hopper weight scale)
- Other Monitoring:
 - Using incorrect parameter PI tags (e.g., uncorrected instead of corrected CO)

Boiler MACT – Compliance Challenges (3)

- Reporting:
 - Not submitting reports to CEDRI, or not submitting them in a timely manner
 - Confusion about what goes through CEDRI and what goes to the state on paper
 - Failure to submit compliance reports for boilers only subject to tune-ups
 - Figuring out how to get the right people CEDRI accounts
- Testing:
 - Exceeding other state permit limits or operating limits during the Boiler MACT test
 - Not evaluating the operating parameter limits for reset
 - Not making sure the equipment is operating properly prior to testing
 - Figuring out how to account for the full range of operating conditions (or how to get approval for alternate monitoring or alternate operating scenarios)

Boiler MACT – Compliance Challenges (4)

- Tune-ups:
 - What parts of the tune-up do you do when the unit is operating versus not operating?
 - *“As applicable, inspect the burner, and clean or replace any components of the burner as necessary (**you may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown**). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;”*
 - Do you remember to do the rest of the tune-up the next time the unit is shut down? What constitutes a scheduled shutdown? What if I can’t get someone scheduled to do the inspection during the shutdown window?

Boiler MACT – What's next?

- Two unresolved issues around CO as a result of two court cases
 - Whether CO is an appropriate surrogate for non-dioxin organic HAP (and whether there are any controls in use on industrial boilers/process heaters that control organic HAP but not CO)
 - Whether the 130 ppm CO cutoff is appropriate
 - Boiler coalition working on a technical paper to send EPA
- EPA is also obligated to re-calculate MACT floors for several subcategories to include multi-fuel boilers. They have re-engaged their subcontractor and are working on a rule package.
- ... and soon they will have to do the risk and technology review (RTR).

EPA Progress on MACT RTRs

<https://www3.epa.gov/airtoxics/rrisk/rtrpg.html>

- Many rules are beyond their 8 year deadline
- Finalized RTRs for about 61 source categories
- RTRs required for about 55 additional categories, 42 of which are subject to court ordered deadlines
- August 7, 2018 deadline suit to force RTRs for Gasoline Distribution, Iron and Steel, Wood Preserving rules
- Several RTR reconsiderations and petitions for administrative and judicial review are also ongoing
- RTRs are a focus for Office of Air Quality Planning and Standards (OAQPS) and they have a lot to do and limited time for robust data collection/analysis

Upcoming RTRs on Court Ordered Schedules

December 31, 2018	March 13, 2020	June 30, 2020	October 1, 2021
Wood Building Products	Asphalt Processing and Roof Mfg	Iron and Steel Foundries	Mercury Emissions from Hg Cell Chlor-Alkali Plants
Leather Finishing	Auto and Light Duty	Lime Manufacturing	Semiconductor Manufacturing
Fabric Printing (coating)	Boat Manufacturing	Misc. Coating Manufacturing	Cyanide Chemicals Manufacturing (GMACT II)
Large Appliances (coating)	Cellulose Products Manufacturing	Plywood and Composite Wood Products	Spandex Production (GMACT II)
Metal Furniture (coating)	Engine Test Cells/Stands	Rubber Tire Manufacturing	Carbon Black Production (GMACT II)
Friction Materials	Ethylene Processes	Taconite Iron Ore Processing	Primary Copper Smelting
Wet Formed Fiberglass	Hydrochloric Acid Production		Flexible Polyurethane Foam Fabrication
	Integrated Iron and Steel		Refractory Products Manufacturing
	Metal Can		Primary Magnesium Refining
	Metal Coil		
	Municipal Waste Landfills		
	Misc. Metal Parts		Still to Come (no deadlines yet):
	Misc. Organic NESHAP (MON)		Gasoline Distribution Facilities (Major and Area)
	Organic Liquids Distribution		Industrial Boilers and Process Heaters
	Paper and Other Web Coatings		RICE
	Plastic Parts		
	Reinforced Plastics and Composites		
	Site Remediation		
	Solvent Extraction for Vegetable Oil		
	Stationary Combustion Turbines		

CISWI Update

- July 29, 2016 US Sugar court decision remanded to the EPA to:
 - Set emission standards for cyclonic burn barrels;
 - Determine whether burn-off ovens, soil treatment units, and space heaters are CISWI units and, if so, to set standards for those types of units.
- EPA proposed technical corrections to the CISWI rule on June 15, 2018 but did not address the above issues.
- Federal Plan to implement the CISWI emission guidelines
 - Proposed by EPA on January 11, 2017
 - Has not been finalized and the compliance date has passed (2/7/18)
 - EPA has a lot of RTRs to do and says it can't finalize until 2020
 - Facilities in states that have not adopted the EG into their SIP are in limbo.
- Sierra Club sued EPA due to its failure to complete the FP, but a 9/14/18 court decision determined that EPA did not have a deadline to complete the FP.

An aerial photograph of a city skyline at sunset. The sun is low on the horizon, casting a warm, golden glow over the city. The sky is filled with soft, wispy clouds. In the foreground, several tall skyscrapers are visible, including one with the AECOM logo on its roof. The city extends into the distance, with a hazy horizon line.

Questions?

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