

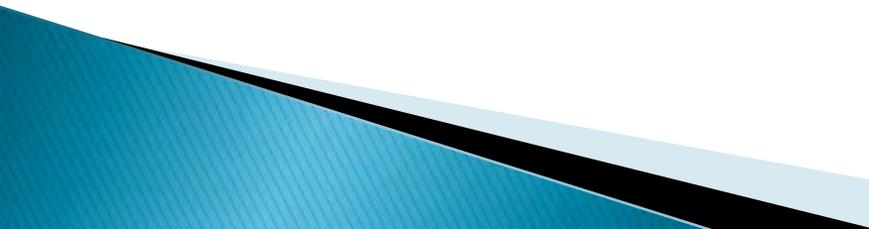
Boiler MACT Reconsideration Issues

CIBO Quarterly Meeting
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Boiler MACT Reconsideration – Major Remaining Issues

- ▶ Startup and Shutdown
 - Definitions
 - ESPs
 - Time
 - Electronic Reporting
 - ▶ O₂ Trim Systems
 - ▶ Timing of Final Rule

 - ▶ Met with EPA in May to discuss
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What is the End of Startup?

- ▶ Focus on safety, time depends on boiler design and processes served
- ▶ Definition 1 – supplying heat or steam for **any purpose** is not the end of startup
 - EPA does not propose to change Defn. 1
- ▶ Definition 2 – 4 hours is not enough time for all designs (e.g., FBC). EPA only reviewed EGU data, CIBO provided data for industrial units.
- ▶ Useful thermal energy – add primary purpose concept
 - ▶ EPA seems ok with this

PM Control Devices During Startup

- ▶ ESP start up must consider safety interlocks and prevent fouling/damage to equipment
 - Consider appropriate temperature (above acid dew point) and O₂ levels (e.g., <10%)
 - Additional information on startup procedures provided
 - Little time to get extension of 1-hr requirement in place, state agency needs delegation under 63.7570
 - No requirement for max clean fuel use here like EGUs, some facilities have limited access to gas.
- ▶ Ask: Remove 1-hour requirement for PM controls (Table 3, item 5, (c)(2))
- ▶ CIBO/AF&PA providing additional info to support these startup issues (white paper).

SS Electronic Reporting

- ▶ The rule (63.7550(c)(v)(xvi) and (xviii)) seems to require quite a bit of data to be reported electronically, including during startup and shutdown.
- ▶ We understand the need for CEMS data, test data, and deviation information, but requiring all parameter monitoring data to be uploaded will overwhelm the system (1,000's of data points) and is information that will require additional resources to provide and likely won't be used by EPA.
- ▶ EPA to consider this further in June. Need data for 8-year review.

Automatic O₂ Trim Systems



Microsoft Word
Document

- ▶ 5-year tune up frequency and streamlined monitoring approach allowed for units that have automatic O₂ trim systems.
- ▶ There are limited operating modes where the system must be put in manual mode for short periods.
- ▶ CIBO submitted a draft QnA to EPA to get clarification that this is acceptable.
- ▶ We would like to address these situations in the site specific monitoring plan (not reasonable to add additional recordkeeping).

Opacity – operating parameter limit, not emission limit

- ▶ Confusion in rule, noted in industry comments:
- ▶ **Good:** 63.7500 (a)(2): “If you wish to establish and monitor an alternative operating limit, you must apply to the EPA Administrator for approval of alternative monitoring under § 63.8(f).”
- ▶ 63.7570 (b)(2): authorities listed in....(b)(1) through (5)...are retained by the EPA...and are not transferred to the state,
 - **Bad:** (2) Approval of alternative opacity emission limits in §63.7500(a) under § 63.6(h)(9) [*rulemaking*]
 - **Good:** (4) Approval of major change to monitoring under § 63.8(f) and approval of alternative operating parameters under § 63.7500(a)(2) [*administrative procedure*]
- ▶ OAQPS: Intent was to allow alternate monitoring request for opacity. Will clarify in final Reconsideration rule, OGC/OECA on board.

Other Issues

- ▶ Gas-fired EGU exemption still planned, may tweak some.
- ▶ Schedule for promulgating final rule likely 4th quarter.
- ▶ Regulatory uncertainty/compliance extensions.