



Boiler Blast News



Representing the Interests of America's Industrial Energy Users Since 1978

APRIL 2018

Energy - Energy is a lot more difficult to get people to think about until it is not there. Someone once asked what the “E” was for on the automobile gas gauge. Most would answer “Empty.” The wise old saying answered, “Enough because there is either enough or not enough to do what has to be done, and you only find out when there is not enough.” This is probably a good indicator that energy is perceived as a commodity, widely available at acceptable cost and without daily concern. We had one of our members, who during the cold snap in January, received a call from their LDC saying in two hours your NG contracted for at a maximum of \$X dollars per million would not be available, but would be at \$30/MMBtu and there was not going to be a curtailment order. Two hours later the availability was now at \$60/MMBTU (no curtailment order). After threatening to release the Lawyers, a curtailment order was received. This had a tremendous impact on the profitability of that facility. After a conversion from coal to gas, any weather event can have serious implications for a company. Last week we sent out a Chamber piece to

Members on the average cost of electricity by state.

https://www.globalenergyinstitute.org/average-electricity-retail-prices-map?utm_source=Email&utm_medium=Email&utm_campaign=Energy%20Price%20Map

<https://www.eia.gov/electricity/monthly/archive/february2018.pdf>

Electricity prices will continue to go up as utilities shut down additional paid for coal fired units to replace them with higher price Natural Gas fired capacity supporting renewable energy. Everyone would probably do the same if we were guaranteed returns on equity and it can be justified because of the variable load capabilities of the turbines versus the base load operational needs of the coal and nuclear units. The energy world is very much different today than it was only 3 or 4 years ago. As Electric prices increase, so too will the ability to justify energy efficiency and CHP. This will be a prime focus of the September Implementing Sustainability – Management and Best Practices Conference.

Environment - Environmental activity is interesting as we heard at the Committee Meetings last month. NSR Reform is moving forward. The White House continues to craft Executive Orders and guidance to Departments and Agencies to look for ways to mitigate unrealistic regulations and make changes in the way evaluations are undertaken. Once In Always In, International Transport and Exceptional Events are all examples of what could have tremendous benefits to all our members. We are looking for examples of MACT projects that were accomplished reducing emissions to levels below the threshold for Major Source MACT (10 tons of any single HAP or 25 tons of all HAPS) at a facility because by doing so they became an Area Source; or projects that by doing so and reducing emissions could now be justified.

Under NHSM and fuel use, because of the Court ruling in American Petroleum v. EPA, 862 F.3d 50 (“API III”). Regarding the legitimacy criterion, we may now be able to expand the range of byproduct fuels allowed to be burned as fuels.

There are a lot of good things happening from our prospective. On the other hand, the ENGO community is growing more and more agitated. Just reading some of the headlines in Inside EPA lately (short listing below) tends to send a shiver up the back of those who see others who think there are no more environmental problems of concern (the Trump administration is here to prevent that from happening):

[EPA Rejection of Equity Petitions Spurs Shift In 'Citizen Science' Strategy](#)

[State's Petition For EPA NSR 'Maintenance' Rule Could Revive Legal Fight](#)

[EPA, Environmentalists At Odds Over Response Schedule For CRA Petitions](#)

[Environmentalists Threaten New Suit Over Latest EPA Denial Of CWA Petition](#)

[Environmentalists launch suit challenging EPA's TSCA rules](#)

[Top Democrats Urge EPA To Quickly Craft Enforceable SDWA Limit For PFAS](#)

[ALA ties ozone spike to global warming](#)

[Partisan EPW Split On CWA Groundwater Liability Imperils Legislative Fix](#)

We will be talking at the Committee Meetings in June about both the good news and the bad news activities that could directly impact each of us. If the ENGO community can get issues to go to the courts, any certainty we think we have relative to doing our jobs and complying with our current understanding or environmental rules could put us in serious jeopardy.

We will be putting together a White Paper regarding the science and reality of CO emissions as a surrogate for HAPS at the 130 ppm level. The actual number could be somewhat higher than that. We will also be doing this for Combustion Turbines to help EPA as they may have to set limits for all new and existing turbines before the end of the year. You should be able to check these issues out and participate in real time on the CIBO Communities Communications Platform (Turbine

Community and Boiler MACT/Combustion Community).

We will wait to talk about emerging contaminants and electronic reporting until the Committee Meetings in June.

Technical - The Technical Focus Group session on "Integrating Energy (50001) and Environmental (14001) for Implementing Sustainability" associated with the March EE Committee Meetings was very informative and timely, and provided a good foundation for the September **Implementing Sustainability – Energy and Environmental Management & Best Practices Conference**. Mike Zebell, Environmental Resources Management, moderated the session, gave a Sustainability Overview and presented "ISO 50001 Implementations and Lessons learned." Andy Polzin, Barr Engineering, presented "ISO 14001 Implementations and Lessons Learned." Presentations are on the CIBO members' only website www.cibo.org. The days of assuming we are in compliance and not knowing what is really coming into and going out of your facility, plant or building are gone. Sustainability is the driver through which this has come to pass. It will be a fact of the future in any business or institutional endeavor. With water becoming a greater issue and many of our members putting water, and now thinking about putting CO₂, into the ground, the next Focus Group session in June will be regarding the six (6) EPA Injection Well Classification and the associated requirements and permitting needs. If a facility is putting something into the ground via a well, this is an issue that could be very important. There are few of us who know much of what is required.

Technical Focus Group, Energy, Environmental Committee Meetings June 5-6, 2018 Arlington, Virginia

Focus Group Topic is **EPA Injection Well Classifications and Associated Permitting & Requirements**.

Key Topics of Committees to be addressed include: Boiler MACT Remand,

Combined Heat & Power, Combustion Turbine MACT, Energy Bills, Energy Efficiency, Future of Electronic Emissions Reporting, and Updates on National Ambient Air Quality Standards, Regulatory(NSR) Reform, Litigation and Water Issues.

CIBO 2018 Conferences:

The **Boiler Operations, Maintenance, and Performance Conference** will be held May 14-16 in Hershey, Pennsylvania. For the last 20 years the primary focus of most companies has been environmental compliance and aspect of normal operation has taken a back seat. Operation and maintenance has been in the back seat, until there was an emergency and the energy was not there to run the operation. In reality there were not many of those times, considering the economy as mostly in a recession and the need for high capacity was minimal. In that same period many of the old guys retired and energy changed drastically. We are finding that companies are now asking for increased capacity and energy certainty looking at Operations, Maintenance and Performance. Those problems that were in the back seat have now come into the front seat. Addressing those problems and preventing outages to maximize performance and production has become a driver under sustainability. This conference will solely focus on operations, systems management performance and maintenance issues for the powerhouse as we look at what it will be and where we have to be in the new energy era. This is where we consider the real issues of making and using the energy we need to make or support our core businesses. The conference will continue to provide time for FBC, Stoker, Gas and Oil fired boiler owners to address their unique concerns. An optional tour will be offered Thursday AM May 17th at the York County Resource Recovery Center plant. As you look at the conference agenda, the speakers, technical content and subject matter is probably the best ever when looking at power house operations performance and maintenance in the world we live in today by the plant operators, engineers, maintenance staffs and energy

managers. The agenda is on the Website.. Check it out. Knowing who can help and how to prevent upsets, could be very helpful, way beyond that of the Google search or internet archives.

The **Industrial Emissions Control Technology XVI Conference** will be held in Durham, North Carolina, July 30-August 2.

Our focus this year will again be toward case study compliance presentations and look at the latest emission control technologies coming on line, as well as, addressing the implications of other rules and issues, like the Ozone NAAQS, RICE, Turbine MACT, PSD, NSR, modeling, monitoring, data collection, and enforcement along with the whole host of issues that must be complied with to keep the energy assets of your facility operating. Being located at RTP, North Carolina this year, we expect to have significant participation from our friends at EPA. Visit <https://www.cibo.org/industrial-emissions-control-natural-gas-conference/emissions-control-natural-gas-conference-abstract-submittal/> to submit an abstract.

A new CIBO Conference: **Implementing Sustainability – Energy and Environmental Management & Best Practices** will be held in Arlington, Virginia September 11 & 12, 2018

This conference will be the first to address the reality of implementing the energy and environmental legs of corporate and institutional sustainability plans and objectives. This will be accomplished through a discussion of national policy drivers, energy and environmental technological alternatives, integrated energy and environmental management and implementation best practices. More simply stated, the conference where the “Rubber” of the energy and environmental sustainability drivers hits the “Road” of reality and implementation at the plant energy operations level. This conference will address the technologies and strategies for implementing corporate and institutional sustainability goals and objectives based on national policy drivers

in an age of a demand for transparency and demonstration by an educated and activist public. Subjects to be considered will be: Combined Heat and Power (CHP), distributed energy, Microgrids, advanced maintenance and control systems, renewable energy and storage, and demonstration of environmental benefits via the use ISO 14001, ISO 14047, and ISO 50001 environmental, water and energy management systems respectfully. If you or someone at your company wants to be part of the conference development team let us know.

From the President's Desk – Bob Bessette

Welcome new CIBO members Montrose Environmental Group, Inc. and Neundorfer, Inc. Check out their profiles that follow and click on their websites. As we continue through these rapidly changing times their expertise and participation will sure benefit the whole CIBO family. It sure has been a busy couple months. It is hard to believe we are almost 1/3 of the way through the New Year. Time goes by fast when you're having fun, they say. As we head through Spring, we are seeing the break up of what may seem to be ice jams holding back direct energy and environmental action on the part of the Trump administration. We are in there helping the process.

CIBO's ability to address the current energy and environmental issues facing our members from the point of real operations and performance perspectives continues to be our strength.

Our Membership Committee and Board of Directors are great and looking out into the future to make sure we are there, our mission is supported and we can maximize the benefits to our members. It is truly a great time to be a CIBO member.

WE PROUDLY PROFILE CIBO NEW MEMBERS:



For more than 40 years, we have been dedicated to helping owners and operators of air quality control systems reduce emissions and improve pollution control system performance – through design, modeling, consulting, controls, software, mechanical improvements, and service. Our highly skilled, technically oriented team uses a proven process that combines in-depth analysis, experiential knowledge, and a focus on both the technical and economic challenges that are unique to each customer.

We strive to create profit opportunities for our customers by optimizing capital expenditures, maintenance costs, and operating expenses while identifying opportunities to increase efficiency and performance. For decades we have been able to provide high-value, low-cost solutions with proven results. In the end, our customers achieve the lowest cost per unit of pollutant removal. For more info visit <http://www.neundorfer.com> or contact Halle Horvath halleh@neundorfer.com



Montrose Air Quality Services (MAQS), a part of Montrose Environmental Group (MEG), is committed to being the nation's premier and largest provider of air emissions measurement services. The MAQS network of consultants, project managers, technicians and engineers are located in over 30 offices nationwide providing our clients with personalized service along with regional expertise. MAQS offers complex source (stack) emission test

programs, ambient monitoring, fence line programs, VOC leak detection and repair (LDAR), and related services. MEG is an environmental services provider offering measurement and analytical services as well as environmental resiliency and sustainability solutions. With over 50 offices across the country, our qualified engineers, scientist, technicians, associates and policy experts are ready to provide solutions for a diverse range of environmental needs. Contact <http://montrose-env.com/> or Scott Churbok schurbock@montrose-env.com for more info.

2018 Events

June 5-6/Dec 4-5 - Technical Focus Group, Energy & Environmental Committee Meeting / Hilton Garden Inn, Arlington, VA

May 14-16, May 17 Tour – Boiler Operations, Maintenance and Performance Conference, Hershey Lodge, Hershey, PA

July 30-Aug 2 – Industrial Emissions Control Technology XVI Conference, Sheraton Imperial Hotel, Durham, NC

Sept 11-12 – Implementing Sustainability – Energy and Environmental Management & Best Practices, Hilton Garden Inn, Arlington, VA

Oct 24-26 – 40th Annual Meeting, Lowes Ventana Canyon, Tucson, AZ