



cibo NEWS

Powering a sustainable energy future

June 2022

EVENTS

June 21, 22, 23, 28, 29, 2022

VIRTUAL Boiler Operations, Maintenance and Performance Conference

August 2-3, 2022

IN-PERSON Industrial Emissions Control Technology Conference, Hilton Garden Inn, Crystal City, VA

Sept 20-21, 2021 / Virtual

Environmental, Energy & Sustainability Working Group (SWG) Committee Meeting

November 2-3, 2022

IN-PERSON 44th Annual Meeting, Hilton Garden Inn, Crystal City, VA

Dec 13-14, 2022 / Virtual

Environmental, Energy & Sustainability Working Group (SWG) Committee Meeting

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- [Details on BOMP Conference \(Virtual – Next Week!\)](#)
- [Details on IECT Conference \(In-Person – August 2-3\)](#)
- [The EPA Ozone Transport Plan: An Overview Analysis](#)

[Register Now – CIBO Virtual Boiler Operations, Maintenance & Performance Conference \(5 Afternoon Sessions: June 21, 22, 23, 28, 29 1:00pm-5:00pm \(Eastern\)\)](#)

Please [register now](#) to join us during the upcoming BOMP – virtual afternoon sessions ([Agenda Attached](#).) The theme of our Conference, consisting of 5-afternoon sessions (by video conference), is “Setting Policy for De-Carbonization of Energy.” During our First Session we set the stage, focusing on the current work of the Department of Energy, including research and funded projects dedicated to industrial manufacturing sectors and the specific decarbonization challenges that facility operations now confront in working toward a zero-carbon future. Our Second Session, on June 22nd, is devoted to existing powerhouse operations, including boiler safety, operations controls, and heat tube extraction challenges. For the Third Session, we focus on transition fuels, including various biofuels, pellets and RDF solid fuel combustion, and renewable natural gas (RNG). In addition, noting the resurgence of interest in nuclear energy, including operations scaled to industrial operations, we will dive into Small Modular Nuclear Reactors. CIBO member Eastman Chemical Company is providing a presentation on this topic and the company’s focus on nuclear energy deployment as well. We also have separate afternoon sessions on hydrogen, carbon capture (CCUS) and CHP/distributive generation. Highlights of our list of presentations includes these specific topics:

- A look at Critical Minerals: Challenges for Industrial Operations.
- Boiler Safety – Basics and New Developments.
- Powerhouse – Advanced Process Controls & Data Monitoring Optimization.
- Steam Generation Optimization for Biomass.
- Robotic Hydroblasting.
- Use of Liquid BioFuels in Gas Turbines.
- Pellets and RFD Solids Fuel Combustion.
- Hydrogen Hubs – Consortiums Under Way.
- New Hydrogen System Projects: Escalante (NM) and the Ohio Valley GEM Initiative.
- Hydrogen Firing Impacts – Gas Turbines.
- Carbon Capture - Specific Projects and Research. Update on ADM’s Decatur, IL Production Facility.
- CHP - Industrial Facility Use; Case Study – University of Oregon Thermal Energy Project.

Also Register Now for the CIBO IECT - Industrial Emissions Control Technology Conference: IN – PERSON August 2-3 – Washington, DC

Our IECT Conference, now scheduled for August 2-3 in Washington, DC (Hilton Garden Inn – Crystal City, VA – near DCA Reagan National Airport) is perfectly timed to apply our focus to a range of critical, emerging regulatory challenges. This is also CIBO’s first In-Person meeting in several years! This year’s Conference is entitled, “The Emerging Energy – Regulatory Landscape: a Look at Control and Compliance – Combustion and other Technology Challenges.” The biggest regulatory elephant in the room – and still growing is: NOx!! Our panel – topic discussions include:

- Update and Further Analyses on the Proposed EPA Ozone Transport FIP Rule.
- Carbon Emissions: GHG Reporting and Control Strategies, SEC – ESG Disclosure.
- Other EPA Air (SSM, Boiler MACT) and Water (WOTUS, PFAS) Regulations.
- NOx Control Strategies: SNCR, Low-NOx Burners, Combustion Systems & Technologies.
- State-Level Regulatory Compliance Challenges: Title V, SIP Modeling, Alternative Fuels Permitting.
- Environmental Justice Enforcement.
- Testing Methodologies, including Stack vs. CEMS Emissions Monitoring.
- Data Analysis, Management Software, and Sustainability Performance Testing.

A Message from Bob Morrow – Detroit Stoker Co.: Co-Chair of the BOMP and IECT Conferences & CIBO Environmental Committee Chair

“On behalf of the Environmental Committee, I strongly urge you to [register](#) for the CIBO Boiler Operations, Maintenance and Performance Conference which starts next week. The agenda still has sessions on existing boiler assets and what improvements are continuing being developed; but additional sessions have been added to provide additional insights and information on the present and future aspects of biofuels, Hydrogen and even small nuclear. These future fuel sessions are integral to the worldwide focus for decarbonization of energy for society. There will also be sessions on both CCS and the benefits for CHP. Both important subjects as they have demonstrated their abilities to provide effective technologies/process for reduction of GHG’s and not depend on fuel switching.”

“Please mark your calendars for return of the 1st in-person [IECT conference](#) in three years. Within this latest addition of the June CIBO Newsletter you will note the section on the proposed ozone transport rule. We believe this will have impacts on the industrial boiler owners and operators and CIBO is actively pursuing comments to the proposed rule. This could affect industrial units, in the same way MACT did. As a result, the IECT will be focusing in on NOx control and abatement technologies and processes. The IECT will also have a round table discussion forum to discuss those governmental affair issues effecting energy environmental policies that are being discussed. Planning began several weeks ago, and progress is being made to frame the topics and agenda.”

EPA – Ozone Transport Plan: CIBO and Coalition Register Strong Concerns

CIBO is joining with the Midwest Ozone Group (MOG) and other industrial sector trade coalitions to submit formal comments and to register detailed, constructive input on the proposed Regional Ozone Transport Rule [[EPA summary attached](#)] **Put simply, we see major flaws and deep problems with this proposal.** The larger goal with our response efforts is to be sure that the rulemaking record includes specifics on the flaws, both fundamental and technical – tied into the data, the assumptions, analyses and conclusions of the regulation, which pertain to industrial sources. Be assured that we will certainly share our final comments to you once submitted later this month. We appreciate the help and input on this effort from CIBO members!

Our formal comments address several critical policy concerns and technical issues where our members have deep expertise. The Rule, an ambitious proposal to expand and strengthen the CSAPR interstate emission program, would promulgate Federal Implementation Plan (FIP) requirements under the Clean Air Act for twenty-six identified states, including several Western states as well, tied to interstate transfer affecting the attainment of the 2015 Ozone NAAQS. As outlined by the EPA, the proposal is designed to ensure that states meet their “good neighbor” obligations under the CAA, which directs states to craft state implementation plans, or SIPs to mitigate their “significant contribution” to the problems of downwind states attaining and maintaining NAAQS. **This proposed rule includes requirements for certain industrial source categories (non-EGU’s) in**

twenty-three states , with unit – specific emissions limitations beginning in 2026, affecting existing and new units, to help attain interstate ozone reduction goals. EPA has asserted that it has taken this step directed at industrial unit sources based on its evaluation of air quality modeling information, annual emissions and potential controls. The Rule includes seven identified non-EGU source categories covered by the proposed FIP: boilers and other types of emission units in chemical manufacturing, pulp, paper and paperboard mills, iron and steel mills, gas pipelines, glass manufacturing, cement and concrete operations, and oil refining and coal products manufacturing. In addition, unlike the EGU's, the affected industrial sector units within the 23-state region are not included in the EPA allowance trading program. Allowance trading for the EGUs is designed to enable more cost – effective NOx emission reductions, as well as compliance flexibility.

Until this point, EPA has regulated non-utility boilers under the CSAPR. The data contained in the docket for the proposed rule indicates that only limited emissions reductions can be achieved within the same cost-effectiveness (\$/ton) applied to the EGUs. EPA also appears to have overestimated the reductions this proposed rule could achieve overall, while significantly underestimating the costs of compliance. Many industrial sectors, in fact, have experienced significant decreases in NOx emissions in recent years, as facilities have worked to lower energy costs, improve efficiencies, and reduce emissions. In addition, with the implementation of Boiler MACT standards and other NAAQS reductions, many industrial facilities have also indirectly achieved lower NOx reductions, including by way of fuel-switching. This proposed FIP comes as EPA has also acted recently to formally disapprove the Good Neighbor plans of many of the so-called upwind states. Industry sectors are urging EPA to re-orient and apply its regulatory aim to NOx sources geographically closer to downwind monitors. In their general public responses to the proposed rule, industrial sectors have also noted their support for some specific provisions recommended. For example, EPA has asked for submission of public comment on their recommendation to continue to exempt cogeneration units – those that already meet the Acid Rain Program exemption requirements. Past EPA analyses has given clear indications that little additional NOx reductions could be realized by including these units, among other reasons.

CIBO will keep you updated on our efforts and further developments.

CIBO is Proud to Profile:

Detroit Stoker Company is the leading, global, designer and supplier of solid fuel grate combustion systems, parts, and services for utilizing a wide range of renewable energy fuel sources for heating, industrial steam processing, and electric power generation. Besides the traditional woody biomass fuels such forest waste; Detroit's experience also includes a variety of agricultural fuels and process residues not commonly considered fuels in the past. Detroit® provides gas/oil fired burner systems specific for Industrial boiler applications. Detroit Stoker was founded in 1898 as Detroit Automatic Stokers by George Morrow and incorporated to present name in 1910. The company consolidated all Engineering, Sales, and Manufacturing to current location in Monroe Michigan in 1956. www.detroitstoker.com

