



Boiler MACT

What Can We Do Now?

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What Can Happen?

- EPA can request an additional extension of their court ordered deadline
- EPA can promulgate the final rule – Expect immediate court challenges
 - ◆ Option 1: Rule can be “stayed”
 - ◆ Option 2: Rule can be held in place while being reviewed (PC MACT)

Proposed Rule → Final Rule

What Could Change

- Emission limits
 - ◆ EPA has continued to accept test data
- Compliance options
 - ◆ Health-based Compliance Alternatives
- Emissions averaging limits
 - ◆ 10% Penalty?
- Testing requirements
 - ◆ Test frequency
 - ◆ Test length
- Etc.



What Can We Do Now?

Review Stack Test Reports

- Previous testing can be helpful
 - ◆ Careful, limits apply during start-up and shutdown
- Particulate Matter
 - ◆ Only use “filterable” (front-half) results
- Carbon Monoxide
 - ◆ Less likely to be available – but valuable
- Upcoming Tests?
 - ◆ Modify to match pollutants and averaging times

Evaluate Fuel Analysis Options

- Only available for two pollutants
(no credit for controls)
 - ◆ HCl (surrogate for inorganic HAPs)
 - ◆ Hg
- Evaluate current fuel inventory
- Determine if compliant fuels are available
- Remember to perform test according to Boiler MACT requirements

Using Fuel Analysis Results

- Explore fuel supplier options
 - ◆ Pricing changes can affect operations
- Determine if add-on controls are necessary
 - ◆ HCl – likely to require scrubbing
 - ◆ Hg – likely to require either efficient particulate controls and/or carbon injection
- Frequent testing can expose variability in pollutant concentrations

If Controls Are Necessary

- Planning will become important
 - ◆ Budgeting for capital costs and expenses
 - ◆ Timelines for obtaining permits

- Where to estimate costs
 - ◆ EPA Air Pollution Control Cost Manual
 - ◆ Vendor quotes (capital only)

- Lessons learned from recent MACT Promulgations
 - ◆ Vendors can run short on equipment
 - ◆ Emissions controls don't always work to specifications out of the box (test prior to compliance date)

Additional Items to Remember

- Initial Notifications §63.9(h)
 - ◆ 120 days after publication in Federal Register
 - ◆ Required for all sources (not just those with emission limits)
- Permitting can require excessive time
 - ◆ Change in method of control requires permits in many States
 - ◆ No Federal Pollution Control Project option exists
- Additional required reports
 - ◆ Notification of performance testing
 - ◆ Notification of compliance status

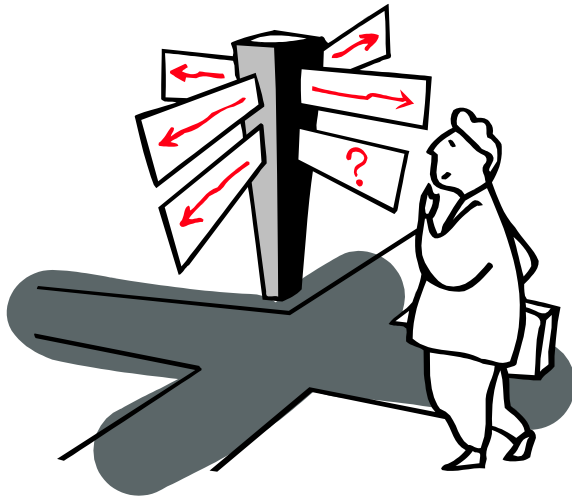
Natural Gas is the Fuel of Last Resort

- Why?
 - ◆ No emissions standards
 - ◆ No performance testing
 - ◆ No monitoring*
- Energy Efficiency Audit is still required



Questions

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