

Compliance Issues for the Utility MACT as Proposed

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Presentation Topics

- The proposed Utility MACT – the good, the bad & the ugly
- Feasibility issues to address
- Wish List for the Final Rule

There ARE Good Things in UMACT:

- No emission limits for Organic HAPs or D/F
- SO₂ surrogate option for acid gas HAPs
- Alternative compliance by averaging among similar units within one plant site is allowed (§ 63.10009)

Now for the Bad:

- Performance testing is required for both “the surrogate and the pollutant”
- Even if CEMS are used to demonstrate compliance, the “operating limits” on control equipment must be continuously monitored and maintained within tight constraints

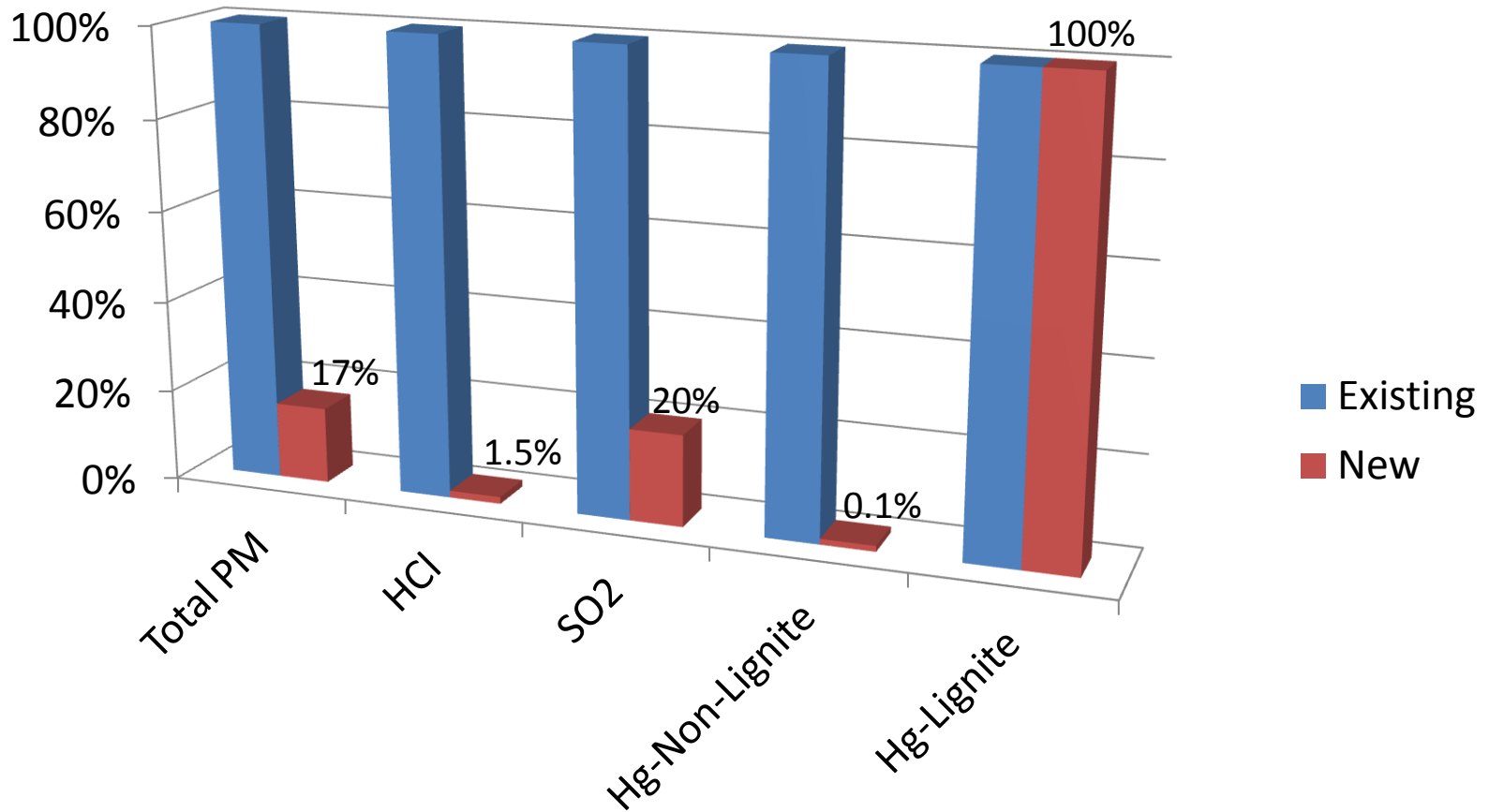
...and the UGLY:

- Total PM [filterable plus condensable] is the surrogate for non-mercury metallic HAPs
 - No CEM technology exists for “Total PM”
 - Compliance must be measured by Method 5 & Method 202
 - The true “operating limit” for PM emissions is to be set based on the PM CEMS data collected during the performance test
 - This PM CEMS limit must be met on a 30-day rolling average
 - This limit will be different for every source

...and the *UGLIEST*:

- The MACT limits for New Units are impossibly low, compared to values for which guarantees can be obtained from equipment suppliers
- No guarantee = No financing for a new unit
- No financing = No project
- Is this “the end” for new coal plants?
- Is that what EPA intended?

Proposed Utility MACT Emission Limits Comparison of Existing vs. New (Basis: Existing Unit Limit = 100%)



Feasibility Issues

- Can PM CEMS demonstrate compliance with a 30-day average emission limit including startup and shutdown?
- Can DSI achieve compliance with HCl emission limits?
- Where can I buy a CEMS for HCl?

Feasibility Issues

- EPA projects 166,000 MW of fabric filters will be required for compliance with the UMACT
- EPA's IPM modeling says 542 boilers will need baghouses
- Can 542 baghouses be installed in 3 years (or even 4 years)?
- History says no

Final UMACT Wish List

- Filterable (only) PM limit set at 0.03 lb/mmBtu
- Blanket exemption for units with very low capacity factors (enforceable by permit)
- Elimination of “operating limits” for units using CEMS to demonstrate compliance
- A usable plantwide averaging compliance option
- Relief from “the Franken-plant” effect
- A final rule that will withstand judicial review
- A reconsidered CSAPR schedule that works with UMACT

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