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
- SO$_2$ 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%)

- Total PM: 17%
- HCl: 1.5%
- SO2: 20%
- Hg-Non-Lignite: 0.1%
- Hg-Lignite: 100%

Legend:
- Existing
- New
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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