



Boiler MACT and NHSM

Office of Information and Regulatory Affairs

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Overview

- Progress in December Reproposal
- Provided extensive comments in February
- Key Remaining Issues
 - Need for more time to comply
 - Listing more biomass residuals as fuels
 - Achievable limits throughout rules

Improvements in Reconsideration

- Dioxin Work Practices
- Longer averaging times for CO and parameters
- Listed resinated wood & TDF as non-waste fuel
- No PM CEMs for ALL biomass – they don't work
- New subcategories – suspension burners; heavy & light oil
- Kept work practices for Gas I boilers

Extra Compliance Time

- Create presumption for states to grant 4th year
- Provide certainty if meet a criteria
 - Ambiguity over NHSM status
 - Capital or vendor procurement challenges
 - Conversion/retrofitting to natural gas – may need more time
 - Adoption of Co-generation/CHP
 - Multiple emission reduction investments
 - Multiple regulatory obligations beyond MACT
 - State permitting delays

NHSM

- We support EPA's listing of resinated wood and TDF as fuels
- Need to list P&P wastewater treatment residuals
 - When use as fuel, burn vast majority
 - Has comparable contaminants, and managed/stored like fuel
 - Processed to remove water - >30% solids when burned
- If not list, at least create "safe harbor" for other materials
 - Paper recycling residuals
 - Processed construction and demolition (C&D) Wood
 - Railroad ties

NHSM-CISWI interface

- Contained gas definition - put back in
- Homogeneous waste - go back to statutory definition
 - Many P&P mill boilers are Qualified Facilities
 - Self-determination, no petition process

Achievable and Affordable limits

- Biomass CO
 - use alternative floor method and data that accounts for variability
 - both short and CEM limits
- Coal and Oil CO – adopt work practice or 100 ppm
 - Done in Utility MACT
 - No relationship with HAPs below 100 ppm of CO
- Better new source limits
 - confirm test methods and detection adjustments

Achievable and Affordable limits – con't

- Include fuel variability factors for Hg and HCl
 - Wide range of Hg and HCl levels in fuels
 - Keep broad solid fuel subcategory
- Support broad averaging across subcategories
 - help with high cost of HCl controls – little health benefit
- Emission credit for repowering to natural gas
 - covered by work practice in long run