



Boiler MACT and NHSM

Office of Information and Regulatory Affairs

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Overview

- Key Remaining Issues
 - Classify more biomass residuals as fuels
 - Need more time to comply
 - Achievable MACT

NHSM

- List P&P wastewater treatment residuals – proposed
 - meets contaminant, management and fuel value criteria
- EPA should propose new listings under section 241.4
 - Have record to proceed now – create certainty
 - Maintain status as fuel – prevent land filling of current fuels
 1. Paper recycling residuals – where burned, extensively used
 2. Creosote-treated wood (e.g. railroad ties) – not discarded, purchased fuel, data shows comparable to traditional fuels
 3. Processed construction and demolition (C&D) wood not discarded, purchased fuel, data shows comparable to traditional fuels
- Contained Gas – need clarity, do not create confusion and uncertainty

Adequate Compliance Time Needed

- Create safe harbor for states to grant 4th year upfront
- Provide certainty if meet one of the following criteria:
 1. Ambiguity over NHSM status
 2. Capital or vendor procurement challenges
 3. Conversion/retrofitting to natural gas (pipeline construction)
 4. Adoption of Co-generation/CHP
 5. Multiple emission reduction investments
 6. Multiple regulatory obligations beyond MACT
 7. State planning/permitting delays
- Allows time for industry to recover – afford_{CON} trols

Achievable and Affordable MACT

- Further analysis on CO and organic HAPs
 - Good surrogate but ...
 - At low levels, relationship falls apart
 - Set cutoff at 200 ppm for all fuels (coal, oil and biomass)
- No PM CEMs for biomass/multi-fuel boilers
 - CPMS and certification concerns
- Workable dioxin work practices
 - Good Combustion Practices

Achievable and Affordable limits

- Achievable new source limits - biomass
 - confirm test methods and detection adjustments
 - fail to reflect variability since depending on single source/test
- 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