

ACC Boiler MACT Issues

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- EPA Database Issues
- Gas Fired Units
- Coal Fired Units
- Health Threshold

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EPA Database Errors Drive Inaccurate Top 12% Performers/Limits

- Database contains errors
 - Direct fired units in database
 - Emission value errors
 - Sources placed in wrong fuel category e.g. sources with cyclone control device in gas fired category
 - Zeros instead of limit of detection found in database
 - Sources entered zeros for non-detected values for Hg monitoring fractions
 - QA/QC performed only on Top 12%
 - Data collection and entry directions incomplete for Phase I (give example)
- EPA must QA/QC of database used to calculate Top 12%



ACC Concerned That Controls Will Not Ensure Compliance

- Previous Boiler MACT did not address existing units
- Floors set at or near limit of detection
- EPA and industry cannot define controls to achieve limits
- Source of certain HAP unknown
 - EPA/Industry needs to study the source of Dioxin/Furans from gas fired boilers in stacks; therefore setting a D/F limit at this time is inappropriate.
- EPA analysis of regulatory impact will be incomplete if control strategies unknown

Apply work practice standards (112)(h)(2)(a, b) for the combination of gas at chemical plants (natural gas/fuel gas).





Data and Control Issues

- Hydrogen Chloride (HCl) Controls
 - Standard may be 15 times more stringent than previous
 - Vast majority of units have one test
 - HAP variability must be fully considered when establishing standard
 - HCl is a threshold pollutant and no sense regulating below health threshold
 - Collateral benefits from SO₂ reductions should not be used to justify these controls



- Metals/Particulate Controls
 - PM (surrogate) floor appears to be at or below guarantee levels for new fabric filters

 - Based on anticipated standard, existing coal fired units will need to install fabric filters

 - Alternate TSM (total selected metals) appears extremely low and needs more development
 - Very limited dataset; Phase II data biased toward data from best performers; Additional Phase I survey data should be included





- **Mercury Controls**
 - Standard may be 6 times lower
 - Database is suspect and may be biased low due to non-detect issue
 - Again, vast majority of units have only one stack test
 - Fuel variability must be properly considered
 - Inclusion of "combo" units may bias floor low (need ratio-ed limits like NSPS)

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- **Dioxins/Furans**
 - Standard may be extremely low – maybe 100 times lower than hazardous waste incinerators
 - Database is not fully representative: Only 40 units, all with one stack test. Repeatability is an unknown.
 - No technically feasible/proven method to control D/Fs from coal-fired boilers

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- Carbon monoxide/Hydrocarbon Controls
 - Combustion controls not always able to lower CO without increasing NOx or wasting fuel
 - No technically feasible/proven post-combustion method to control CO from coal-fired boilers

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EPA Avoiding Use of 112(d)(4) Health Threshold Provision

- CAA allows for a Health Threshold when setting a pollutant emission standard where health impact for a pollutant is established. This is the case for hydrogen chloride (HCl).
- Under the original Boiler MACT reg , many facilities used 112 (d)(4) to show no adverse health impact.
- Controls will lead to a number of new adverse environmental issues e.g. increased NOx, decreased efficiency, and permitting issues.

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