

November 29, 2011
EO 12866 Meeting on USEPA's Boiler MACT Reconsideration

The American Petroleum Institute and the National Petrochemical Refiners Association submitted comments on EPA's proposed Boiler and Process Heater rule as well as the Reconsideration currently under review. Specific to the refining sector, we support a cost effective and achievable proposed rule.

- Good combustion work practices are an appropriate standard for ALL gas-fired units (they constitute less than 1 % of total emissions from all affected units).
- Boilers at remotely located refineries need to have achievable emission limits (see July 15, 2011 comments).
- EPA does not have the authority to require a facility-wide energy assessment including sources beyond those being regulated.