

Read, David

From: Read, David
Sent: Tuesday, June 16, 2015 1:24 PM
To: Read, David
Subject: Explanation and recommended course of action: Part 63 Subpart LLL: Portland Cement Manufacturing Plants Compliance date extension for HCl and Hg limit compliance demonstrations

From: Nizich, Sharon
Sent: Wednesday, May 13, 2015 2:15 PM
To: Lancey, Susan; Dholakia, Umesh; VanOsten, Cathleen; Page, Lee; Trine, Rae; Barrett, Richard; Doolan, Stephanie; Parker-Christensen, Victoria; Law, Nicole; Narvaez, Madonna; Johnson, Steffan; Segall, Robin; Hedgpeth, Zach
Cc: Merrill, Raymond; Barnett, Keith; Rapp, Steve; Aldred, Charles; Osbahr, Bill; Fortescue, Darren; Silverman, Steven
Subject: Explanation and recommended course of action: Part 63 Subpart LLL: Portland Cement Manufacturing Plants Compliance date extension for HCl and Hg limit compliance demonstrations

As most of you have been made aware, we in OAQPS believe that your states and other delegated authorities will be getting a large slew of compliance extension requests, which are allowed under Section 63.6(i)(4)(i)(A) of the General Provisions, relative to the Subpart LLL NESHAP for Portland Cement Manufacturing Plants (compliance date is September 9, 2015). There are circumstances related to monitoring and installation of controls that are due to no fault of the affected facilities, which preclude the sources from demonstrating compliance on September 9, 2015. The issues are as follows:

Continuous Monitoring for Hydrogen Chloride (HCl) Emission Standard

1. The new performance specification (PS) for the measurement of HCl is PS-18. This PS, which will provide the regulated facilities with significantly more technology and quality assurance options than the currently required PS, has been delayed, and thus will not be promulgated until later this summer. Subpart LLL currently specifies PS 15, but allows for the use, upon promulgation, of any other performance specification for HCl CEMS in appendix B to part 60 of this chapter (78FR10051). This section of the rule is actually referring to PS-18, which has been in development for three years with industry stakeholder involvement, and is the preferred PS for both the industry and the Agency. The actual promulgation date of PS-18 does not allow enough time for sources to purchase and install equipment, certify the monitoring system, and initiate the 30-day compliance test period by the September 9, 2015 date.
2. The required NIST-traceable (National Institute for Standards and Technology) calibration gases required for HCl CEMS are not widely available.^[1] This second delay also impacts the compliance date for HCl, since the calibration gases that must be shown to be traceable to NIST are currently only available from one vendor. This delay impacts the ability for all sources to get these gases in adequate time to meet the compliance date.

Continuous Monitoring for Mercury (Hg) Emission Standard

1. The delay impacting the compliance date for the mercury emission standard relates to availability of the high level mercury gas standard developed by NIST used to confer NIST-traceability to the high level mercury calibration gas generators required for use with Hg CEMS by Portland Cement facilities with in-line raw mills (that experience high mercury emissions when the raw mill is off). Though the

NIST reference standard could be ready later this month,^[2] there will be significant additional time needed to confer NIST traceability to the mercury gas generators used by each facility causing a delay in the ability of the facility to properly run their process/controls and meet the compliance date.

¹This was confirmed through recent EPA staff discussions with representatives of NIST and specialty gas vendors.

² Based on recent EPA staff discussions with NIST representative.

These issues are tied to installation of controls whereby processes/control systems cannot be effectively operated without the feedback from the associated continuous emissions monitoring systems. Thus, we believe approval of these requests for extension of compliance is recommended for a period of one year regarding both the HCl compliance limit and the mercury compliance limit. Please find below some recommended language for an extension approval:

Dear Mr. CEO:

Your one year compliance extension request regarding Part 63 Subpart LLL, limited to HCl compliance limit and Hg compliance limit demonstrations, is granted until September 9, 2016. All other requirements of Part 63, Subpart LLL remain in effect. Results of HCl and Hg performance tests must be submitted in accordance with Section 63.1348 of Section 63, Subpart LLL.

Thank you for your attention to this matter. Please contact me if you have questions.

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^[1] This was confirmed through recent EPA staff discussions with representatives of NIST and specialty gas vendors.

^[2] Based on recent EPA staff discussions with NIST representative.