

## Sheplak, Scott

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**From:** Stevenson.Walt@epamail.epa.gov  
**Sent:** Thursday, January 22, 2009 11:45 AM  
**To:** Sheplak, Scott  
**Subject:** Re: May 10, 2006 federal amendments for MWCs

**Attachments:** Pasco Response to RAI.pdf; JohnPower1010056-006-AVRAI.pdf



Pasco

Response to RAI.pdf6-006-AVRAI



JohnPower1

Scott

Yes -- there was a Federal Register error in the HCl testing schedule and fugitive ash testing schedule. It will be corrected in the future. If more detail is needed on this issue, please call.

take care

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TABLE 1.—FINAL EMISSION LIMITS FOR LARGE MWC UNITS—Continued

Pollutant	Emission limit for existing MWC units <sup>a</sup>	Emission limit for new MWC units <sup>a</sup>
Lead (Pb) .....	400 micrograms per dry standard cubic meter	140 micrograms per dry standard cubic meter.
Mercury (Hg) .....	50 micrograms per dry standard cubic meter or 85 percent reduction of mercury emissions.	50 micrograms per dry standard cubic meter or 85 percent reduction of mercury emissions.
Particulate Matter (PM) .....	25 milligrams per dry standard cubic meter ....	20 milligrams per dry standard cubic meter.
Hydrogen chloride (HCl) .....	<sup>b</sup> 29 parts per million dry volume or 95 percent reduction of hydrogen chloride emissions.	<sup>b</sup> 25 parts per million dry volume or 95 percent reduction of hydrogen chloride emissions.
Sulfur dioxide (SO <sub>2</sub> ) .....	<sup>b</sup> 29 parts per million dry volume or 75 percent reduction of sulfur dioxide emissions.	<sup>b</sup> 30 parts per million dry volume or 80 percent reduction of sulfur dioxide emissions.
Nitrogen Oxides (NO <sub>x</sub> ) .....	Varies by combustor type (see table 1 to subpart Cb of part 60).	<sup>b</sup> 180 parts per million dry volume/150 parts per million dry volume after first year of operation.

<sup>a</sup> All emission limits are measured at 7 percent oxygen.

<sup>b</sup> No change promulgated.

### C. Are other amendments being promulgated?

The final amendments also make the following changes based on information received during implementation of the MWC emission guidelines and apply equally to the NSPS and emission guidelines, unless otherwise specified. Following is a list of the most significant changes compared to the 1995 NSPS and emission guidelines.

#### Operating Practices

- The final amendments revise the operator stand-in provisions in § 60.54b(c) to clarify how long a shift supervisor is allowed to be off site when a provisionally certified control room operator is standing in. A provisionally certified control room operator may stand in for up to 12 hours without notifying EPA; for up to 2 weeks if EPA is notified; and longer than 2 weeks if EPA is notified and the MWC owner demonstrates to EPA that a good faith effort is being made to ensure that a certified chief facility operator or certified shift supervisor is on site as soon as practicable. In the final amendments, a provisionally certified operator who is newly promoted or recently transferred to a shift supervisor position or chief facility operator position is able to serve up to 6 months without notification before taking the American Society of Mechanical Engineer's (ASME) Standard for the Qualification and Certification of Resource Recovery Facility Operators (QRO) certification exam for full certification.

- The final amendments add two additional classifications of MWC units to the emission guidelines and add associated carbon monoxide limits to assure good combustion practices. The two new classifications are "spreader stoker fixed floor refuse-derived fuel (RDF)-fired/100 percent coal capable

combustor" and "semi-suspension RDF-fired combustor/wet RDF process conversion."

#### Operating Parameters

- The final amendments revise § 60.58b(m) to establish an 8-hour block average for measuring activated carbon injection (ACI) rate. This makes the NSPS and emission guidelines for large MWC units consistent with the newer (year 2000) CAA section 129 regulations for small MWC units (40 CFR part 60, subparts AAAA and BBBB), which monitor ACI rate using an 8-hour block average.

#### Performance Testing and Monitoring

- The final amendments revise the annual mercury testing requirements to additionally allow for optimization of mercury control operating parameters by waiving operating parameter limits during the mercury performance test and during the 2 weeks preceding the mercury performance test. This is already done for dioxin testing. It is recommended that both dioxin and mercury testing be done during optimization testing.

- The final amendments revise the relative accuracy criterion for sulfur dioxide and carbon monoxide CEMS.

- The final amendments add flexibility to the annual compliance testing schedule so that a facility tests once per calendar year, but no less than 9 months and no more than 15 months since the previous test. The revision provides flexibility to facilities when facing scheduled and unscheduled outages, adverse local weather conditions, and other conditions, while still meeting the intent of the compliance testing. The final amendments also require at least five compliance tests be completed in each 5-year calendar period.

- The final amendments allow the use of parametric monitoring limits

from an exceptionally well-operated MWC unit (*i.e.*, MWC unit with dioxin emissions for 2 years in a row below 15 nanogram/dry standard cubic meter (ng/dscm) for existing MWC units and below 7 ng/dscm for new MWC units) be applied to all identical units at the same plant site without retesting for dioxin.

- The final amendments revise the particulate matter and mercury compliance testing requirements to allow the optional use of a particulate matter CEMS or mercury CEMS in place of stack testing and would allow the optional use of multi-metal, hydrogen chloride, dioxin/furan CEMS in place of stack tests after which performance specifications for these CEMS are promulgated.

- The final amendments add provisions for monitoring the activated carbon injection pressure or equivalent parameter.

- The final amendments revise the data availability requirement for CEMS. Data must be available for at least 90 percent of the hours of operation per calendar quarter and at least 95 percent of the hours of operation per calendar year.

- The final amendments clarify the exclusion of monitoring data from compliance calculations during periods of startup, shutdown, or malfunctions, but requires identification of such periods and an explanation for exclusion of such data.

#### Other Amendments

- The final amendments clarify the meaning of the term "Administrator" in the standards.

### D. Is an implementation schedule being promulgated?

Yes. Under the emission guidelines, and consistent with CAA section 129, revised State plans containing the revised emission limits and other