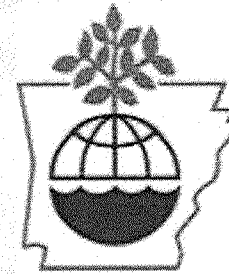




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Arkansas  
Environmental  
Federation

*Industries for the Environment*

# **Major Source Boiler MACT: *2016 Action Items***

Jesslynn Hale

**Arkansas Environmental Federation  
April 12, 2016 Air Workshop**

# Boiler MACT *Recent* Timeline

- > 2013: Final reconsideration of the rule
- > 2015: 2<sup>nd</sup> reconsideration proposal
- > November 20, 2015: Final rule with changes published
- > January 31, 2016: Initial compliance date, unless 1 year extension

# Now What?

- > Initial Compliance Test
- > Notification of Compliance Status Report
- > Compliance Reports
- > Records

# Initial Compliance Test

- > Deadline to conduct
  - ❖ Existing boilers: 180 days from January 31, 2016 (i.e., July 29, 2016)
  - ❖ New Boilers: 180 days from startup
- > 60-day notification is required
- > Site-Specific Monitoring Plan and Site-Specific Test Plan
- > Fuel Analysis required if more than 1 type of fuel
- > Test report: Due 60 days from date of test and submitted via CEDRI on the CDX

# Notification of Compliance Status

- > Must be submitted within 60 days of the initial performance test
- > Must include performance test results and fuel analysis (if required)
- > Not submitted via CEDRI/CDX

# Compliance Report

- > Submitted semi-annually, unless the boiler does not have an emission limit or Table 4 operating limits
- > Existing boilers do not have a report due in 2016
- > First report for existing boilers is not due until January 31, 2017
  - ❖ Covers the reporting period of January 31, 2016 - December 31, 2016.
  - ❖ Submitted semi-annually thereafter by July 31<sup>st</sup> and January 31<sup>st</sup>
- > Include information specified in §63.7550(c), (d), and (e) as applicable

# Records

- > Keep a copy of everything!
  - ❖ Each notification, report, and supporting documentation
  - ❖ Each performance test, fuel analyses, or other performance evaluation, as applicable
- > For continuous monitoring systems, keep records required by Table 8 of the subpart, as applicable
- > If your boiler or process heater is subject to an emission limit, you must keep the following
  - ❖ Monthly fuel records for each source including type(s) of fuel and amount(s) used
  - ❖ Documentation for non-hazardous secondary waste that is not a solid waste

# Records

- > If your boiler or process heater is subject to an emission limit, you must keep the following (cont'd)
  - ❖ Calculations and supporting documentation for HCl, Mg, and TSM (if applicable) compliance
  - ❖ Records of malfunction of the source, control equipment, and/or monitoring equipment
  - ❖ Records of actions taken during malfunction periods
  - ❖ Records of startup and shutdown
  - ❖ Records of fuels used during startup and shutdown
  - ❖ Additional records are required if you choose to comply with definition (2) of “startup” in §63.7575
  - ❖ Additional records are required if you elect to average emissions, elect to use efficiency credits, or use an alternative fuel for gas 1 subcategory sources



# Common Pitfalls

- > Forgot to complete Energy Assessment or Tuneup for Gas 1 Boiler
- > Forgot about the 60 day notification for performance test
- > No operating parameter strategy/planning before day of performance test
- > Don't have all required records during ADEQ inspection
- > Don't have Startup Shutdown Plan if applying definition (2) of "startup" in §63.7575

# For More Information:

**Jesslynn Hale**

**[jhale@trinityconsultants.com](mailto:jhale@trinityconsultants.com)**

**501-225-6400 ext. 121**