

**Clean Air Act Advisory Committee
Permits/New Source Review/Air Toxics Subcommittee
Utility MACT Working Group
Summary of Working Group Meeting 05/13/02**

The seventh meeting of the working group established under the Clean Air Act Advisory Committee's (CAAAC) Permits/New Source Review/Air Toxics Subcommittee was held on May 13, 2002 at the EPA facility in Research Triangle Park, North Carolina.

Mike Durham, ADA Environmental Solutions, made a presentation on the activated carbon injection tests performed at the Alabama Power Plant Gaston and Wisconsin Electric Pleasant Prairie facilities. Included in the presentation was some information on the variability one sees after a control device versus that seen before the control device (i.e., uncontrolled). Bill O'Sullivan then presented similar data on New Jersey municipal waste combustors showing inlet and outlet data. The variability in inlet constituent concentrations is, to a great extent, dampened through the control device such that outlet readings show less variability.

These presentations were followed by Working Group discussion. The following points or questions were made during the open discussion:

- sorbent costs,
- the costs of waste disposal,
- the possible need for increased baghouse size if the carbon injection rate is substantial, and
- whether activated carbon injection was a floor option or a method available for compliance with any standard.

A brief presentation of the initial Integrated Planning Model (IPM) runs was made by EPA. It was indicated that the runs were made for the purpose of comparing subcategorization options only, and not for evaluating any specific mercury removal level. The model is not currently configured to allow a meaningful analysis of the high removal case and so only an approximation of emissions for that case was presented. The presentations were followed by Working Group discussion. The following points were made during the open discussion:

- The model needs further inputs before levels of control can be analyzed in more detail.
- It was suggested that the effects of subcategorization on regional coal production be further delineated to 7 sub-regions.
- Some questioned the conclusion that coal generation fell (less than 0.05%) for the low control subcategorized by coal type option.

The Working Group was asked to check further the model assumptions on the model website (<http://www.epa.gov/airmarkets/epa-ipm>) and then to email questions/comments to EPA by May 22.

A presentation was made by EPA on the approaches employed in past MACTs to account for variability.

1. Set the emission limit based on worst case performance within the floor facilities as determined on the basis of either a statistical analysis of actual performance or good engineering judgment.
2. Establish an averaging period (12-month rolling average; 365-day rolling average) for determining compliance which accounts for variability over time.
3. Base the emission limit on a type of control technology which employees parameters (carbon feed rate) which can be adjusted to deal with a variety of input concentrations.
4. Base the standard on either/or approach (% reduction or emission rate). on the review of those tests that indicated negative mercury removal.

The EPA made a presentation on its analysis of the statistical questions raised during the February 2002 Working Group meeting in the draft paper (authored by John Holmes) put forward by the “ranking” mini-group. The EPA conclusions were that the data are log-normally distributed, rather than normally distributed as presented in the paper, and that more than three data points are available for the variability analysis.

The Working Group then discussed two issues that have been held up by questions of data adequacy -- non-mercury HAP and oil-fired units (with regard to nickel emissions). The non-mercury HAP mini-group indicated that they would put aside the data adequacy issue and focus on other issues such as ways to consider these HAP in groups, possible controls, and potential surrogates. The oil-fired unit mini group agreed to do the same.

All presentations will be placed on the utility MACT website (<http://www.epa.gov/ttn/atw/combust/utiltox/utxpg.html>).

Review of action items and discussion of next steps

June 3 and July 9 were set as the dates for the next two meetings, which will be all-day (10:00 a.m. to 4:00 p.m.) meetings at the STAPPA/ALAPCO facilities in Washington, D.C. August 5 and September 9 dates (in Research Triangle Park) were set for the next meetings. The following topics/action items were suggested for the June meeting:

- The “non-mercury HAP” mini-group will address moving forward under the assumption that the existing data are adequate.

- The “oil-fired unit” mini-group will similarly address moving forward under the assumption that the existing data are adequate.

**CLEAN AIR ACT ADVISORY COMMITTEE
PERMITS/NEW SOURCE REVIEW/AIR TOXICS SUBCOMMITTEE
UTILITY MACT WORKING GROUP**

May 13, 2002

**U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Room C111
Research Triangle Park, North Carolina**

AGENDA

10:00 a.m. - 10:15 a.m.	Introductions and opening remarks by Sally Shaver and John Paul, Co-chairs
10:15 a.m. - 10:45 a.m.	ADA presentation on data variability (Ranking mini-group) - Praveen Amar
10:45 a.m. - 11:00 a.m.	New Jersey experience on data variability - Bill O'Sullivan
11:00 a.m. - 12:00 a.m.	Working Group discussion of data variability
12:00 p.m. - 1:00 p.m.	Lunch
1:00 p.m. - 1:30 p.m.	EPA presentation of initial IPM modeling runs
1:30 p.m. - 2:30 p.m.	Working Group discussion of initial IPM runs
2:30 p.m. - 2:45 p.m.	EPA response to variability issue
2:45 p.m. - 3:00 p.m.	EPA response to Ranking mini-group statistical paper distributed at February 5, 2002 meeting
3:00 p.m. - 3:15 p.m.	Working Group discussion of statistical paper
3:15 p.m. - 3:45 p.m.	Hold for discussion of non-mercury HAP and oil issues
3:45 p.m. - 4:00 p.m.	Review of action items and discussion of next steps
4:00 p.m.	Adjourn