

Post-Finding Activities -- Utility HAP Regulatory Development

Meeting with Stakeholder Groups
March 12, 2001



Purpose

- ⌘ To get stakeholder input on regulatory approach for oil- and coal-fired electric utility steam generating units
- ⌘ To discuss next steps
 - ☒ Section 112 rule
 - ☒ Timing
 - ☒ Process



Background

⌘ EPA announced finding on 12/14/2000

☒ Regulation not necessary for gas-fired boilers

☒ Gas-fired finding does not apply to combustion turbines being covered under another rulemaking

☒ Proposal expected in next several months

☒ Regulation necessary for oil- and coal-fired boilers

☒ Based on

☒ Public health concerns

☒ Mercury emissions from power plants

☒ Information that mercury from power plants can be controlled



Finding Follow-up

⌘ Actions to review finding

- ☑ Have received one petition for administrative reconsideration (from UARG)
- ☑ Two petitions have been filed with the Court of Appeals for the District of Columbia Circuit (by UARG and EEI)

⌘ Cannot address these actions today



Section 112 Rule

- ⌘ “Best of the best” for new sources
- ⌘ Average of the top performing 12 percent (e.g., top 6 percent) for existing sources
- ⌘ Allows for subcategorization
- ⌘ Listing decision triggers section 112(g) case-by-case MACT determinations for new coal- and oil-fired sources



Section 112 Focus

- ⌘ Most of attention has been on mercury from coal-fired units
- ⌘ Also concerned about
 - ☑ Other HAP from coal-fired units
 - ☑ Nickel from oil-fired units



Timing

- ⌘ Settlement agreement with NRDC provides for
 - ☑ Proposal of section 112 regulations by 12/15/2003
 - ☑ Promulgation of section 112 regulations by 12/15/2004
- ⌘ Compliance date of 12/15/2007



Current Activities

- ⌘ Stakeholder meetings
- ⌘ Data analyses
- ⌘ Coordination activities
- ⌘ Additional activities



Stakeholder Meetings

- ⌘ Continue the open process outlined at the June 2000 Public Meeting
- ⌘ Starting today, meetings with stakeholder groups to obtain input
 - ☑ Ideas
 - ☑ Establish a workgroup under existing NSR, Permits, Toxics Subcommittee to CAAAC, or similar
 - ☑ Semi-annual meetings
 - ☑ Meetings at stakeholder request
 - ☑ Other - ?
- ⌘ Website still available



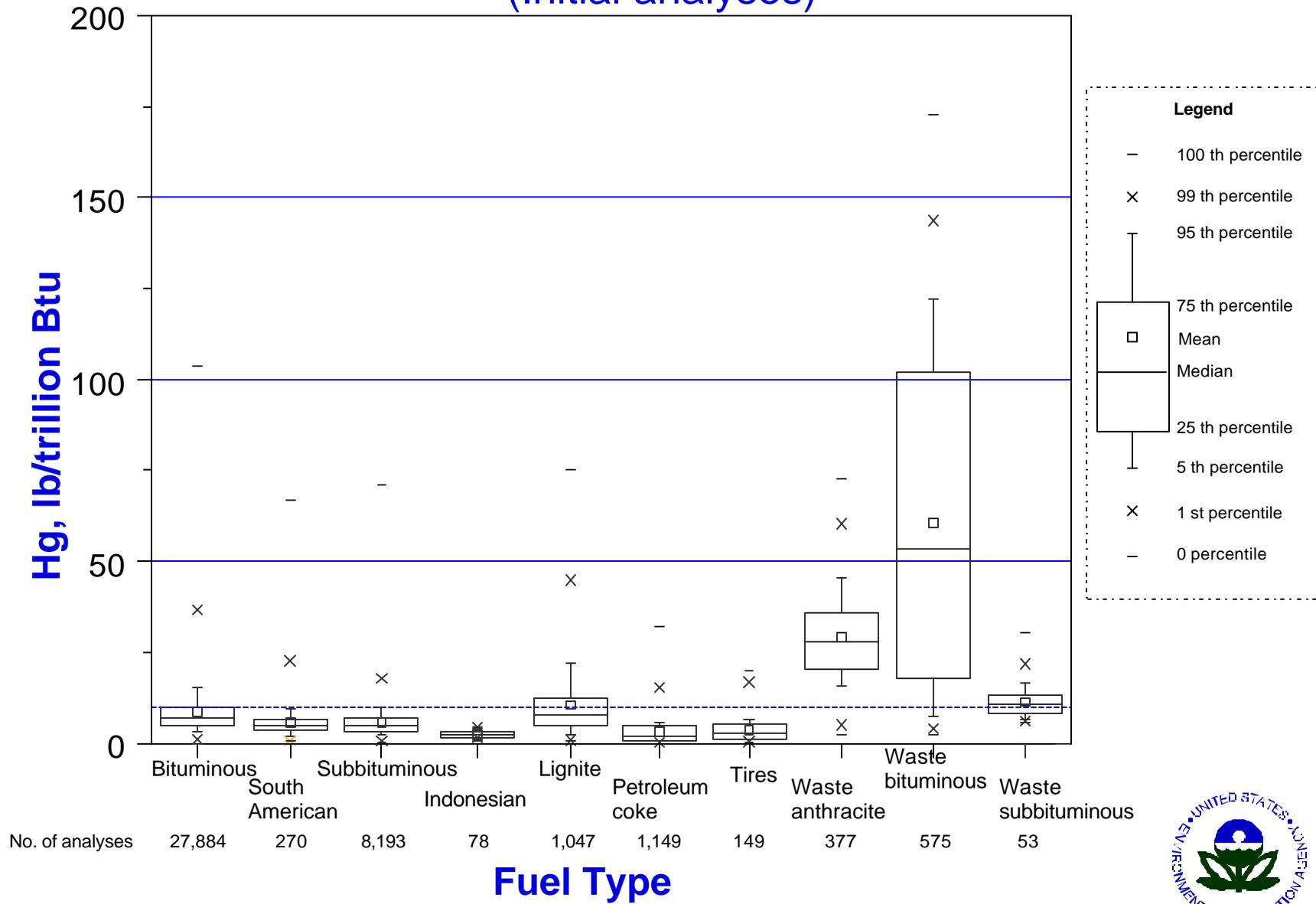
Data Analyses

- ⌘ Further analyze data for the purpose of establishing section 112 standards
 - ☑ Floor
 - ☑ Best performing
 - ☑ Preliminary analyses indicate that mercury content of coal does not necessarily dictate level of mercury emissions
 - ☑ Develop tool for use in case-by-case MACT determinations



1999 ICR Data Analyses - Mercury in Fuels

(Initial analyses)



Existing Controls - Hg Removal

Control technology * Average mercury control, percent

	Bituminous	Subbituminous	Lignite	Waste coals
Cold-side ESP	46 (18)	14 (18)	1 (3)	NA
Hot-side ESP	18 (12)	13 (12)	NA	NA
Cold-side FF	83 (9)	72 (6)	NA	99 (6)**
SDA + ESP	NA	38 (9)	NA	NA
SDA + FF	98 (6)	25 (9)	17 (6)	NA
PM scrubber	14 (6)	8 (12)	33 (3)	NA
Cold-side ESP + FGD	81 (3)	35 (9)	37 (6)	NA
Hot-side ESP + FGD	55 (3)	33 (15)	NA	NA

* Preliminary estimates from ICR data on PC boiler unless otherwise noted. Based on inlet and outlet of last control device. () indicates total number of tests for each category.

NA = not available

** FBC unit



Coordination Activities

⌘ Continue coordination with ORD, DOE, EPRI, UNDEERC, et al. on on-going mercury control research

- ☒ More testing on existing control devices and enhancements
- ☒ More testing on SCR/SNCR installations
- ☒ Fly ash issues
- ☒ Control device cost analyses



Additional Activities

- ⌘ More sophisticated deposition analyses using REMSAD and new mercury emissions data
- ⌘ Analyses using IPM looking at the costs and market impacts of a variety of potential levels of mercury control



Next Steps

⌘ Now we turn to you for your ideas

⌘ Final questions

- ☑ Format of stakeholder interaction -- how do you want to be involved in the regulatory development process and who do you want to work with?
- ☑ The end result -- what would you like to see as an outcome of the regulatory development process?

