

Clean Air Act Advisory Committee
Permits/New Source Review/Air Toxics Subcommittee
Utility MACT Working Group
Summary of Working Group Meeting 08/08/02

The tenth 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 August 8, 2002 at the Edison Electric Institute offices in Washington, D.C.

Bob Wayland presented an update to the alternative approach presented at the July meeting in which a statistical analysis of the data is used to set the floor and incorporate data variability. This was followed by Working Group discussion. The following points or questions were made during the open discussion:

- can emission values be provided for the alternative methods of incorporating variability (e.g., worst-case scenario) for comparative purposes?
- the data are limited and represent only short-term periods. Other methods are available to look at the variability using all of the data.
- how do the pound/trillion Btu values presented relate to percent reduction and overall nationwide emission reductions?.
- the best stack tests may not be the "best performers" in that they may have been tested on a "good day" and may not be able to meet the established limit all the time..
- fuel variability is the largest source of variability in the emission values; the approach outlined at the July meeting better accounted for fuel variability..
- every fuel must have a MACT level that it can meet..
- the worst-case coal needs to be looked at..
- what is EPA's definition of "achievable"? (Ans. - that level that is reasonably expected to be attained, given the constraints of using the top 12 percent.)

Mike Durham, ADA Environmental Solutions, made a presentation summarizing the activated carbon injection tests performed at the Alabama Power Plant Gaston and Wisconsin Electric Pleasant Prairie facilities and providing preliminary information on the tests performed at the PG&E National Energy Group Brayton Point facility. George Offen, EPRI, then made a presentation summarizing activated carbon injection tests conducted on one lignite (Stanton Station) and two subbituminous (Comanche, Laskin Energy Center) facilities.

Michael Shore provided comments on work done by the oil-fired mini group. There was some further discussion of the mini group's July presentation of two sets of recommendations on what a standard should or could look like.

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

- because of no acute nickel toxicity, some members feel that a longer-term average emission rate or tonnage cap is appropriate.
- is there any precedent for EPA using or not using pilot-scale data? (Ans. - not sure but EPA would give weight to full-scale data.)
- the problem with an annual tonnage cap from the point of view of some members is that it relies on historical fuel use data rather than on what is actually being done now.
- would a declining cap resolve this concern? This could lead to a reduction in the nickel content of the oils burned.

The mini-group will hold further discussions and return at the next meeting. They will also explore what oil refineries are doing to comply with other EPA regulations (e.g., Phase II sulfur rules; diesel rules).

There followed a further discussion of how the members would provide the information and what the general process would be for getting the information into a format for presentation to the full CAAAC. The following format and schedule was agreed upon:

- within two weeks -- the three stakeholder groups will provide to Sally Shaver and John Paul their nominee for member on the "writing" group.
- by September 2 -- each stakeholder group will provide to EPA their summary table and written report on the issues on which they are providing advice/recommendations.
- September 9 -- presentations on each report will be given at the meeting and the "writing" group will be named (to also include John Paul as the Working Group co-chair and Bill Maxwell, EPA, for logistical and Contractor support). The format of the meeting is envisioned as being three panels presenting to the remainder of the members with open discussion following each panel presentation..
- by October 9 -- the "writing" group will provide to the members the draft report to the full CAAAC that will incorporate all views. It is envisioned that the report will be 15 to 20 pages in length..
- October 16 -- Working Group meeting to review, and revise if necessary, the draft report to the CAAAC. **[Note that the Edison Electric Institute conference room is not available on October 16. Therefore, the meeting date has been changed to Thursday, October 17.]**
- by October 22 -- the report will be distributed to the full CAAAC..
- October 30 -- the report will be presented at the CAAAC meeting.

A further meeting may be held in the late November/December time frame to discuss the IPM results and compliance method issues.

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

Review of action items and discussion of next steps

The next meeting will be September 9, 2002 at the Edison Electric Institute facilities in Washington, D.C., and will be from 9:30 a.m. to 4:00 p.m. The following topics/action items were suggested for the July meeting:

- The stakeholder groups (or combinations of groups) will bring to the table their specific advice/recommendations on issues they feel EPA must address in a MACT standard (e.g., subcategories, floors, averaging period, format of the standard). These recommendations will be provided to EPA by September 2 so that they may be distributed electronically to the members prior to the September 9 meeting.
- EPA will provide feedback to the members on the questions asked about the statistical approach to handling variability presented at this meeting, including the paper discussing the approach.

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

August 8, 2002

**Edison Electric Institute Headquarters
Thomas A. Edison Conference Center, Fourth Floor
701 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2696**

AGENDA

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| 9:30 a.m. - 9:45 a.m. | Introductions and opening remarks by Sally Shaver and John Paul, Co-chairs |
| 9:45 a.m. - 10:45 a.m. | EPA presentation on statistical variability analyses |
| 10:45 a.m. - 11:30 a.m. | Presentation by ADA on preliminary activated carbon injection testing being done at PG&E Brayton Point Station - Rob LaCount |
| 11:30 p.m. - 12:30 p.m. | Lunch |
| 12:30 a.m. - 1:15 p.m. | Presentation by EPRI on testing being done on western fuel-fired units - Bill Bumpers/Lee Zeugin |
| 1:15 p.m. - 1:45 p.m. | Presentation by Oil Mini Group followed by Working Group discussion - Michael Shore/Bill Bumpers (Debra Jezouit) |
| 1:45 p.m. - 2:30 p.m. | Open discussion by the Working Group on process and format for presenting advice and recommendations |
| 2:30 p.m. - 3:00 p.m. | Review of action items and discussion of next steps |
| 3:00 p.m. | Adjourn |