

# Combustion MACT Standards

Implementation Topics and Q&A

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**IowaDNR**

The Iowa Department of Natural Resources



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# Current Delegation Status

- Iowa DNR currently does not have delegation of:
  - Major Source Boiler MACT (Subpart 5D)
  - Area Source Boiler NESHAP (Subpart 6J)
  - Utility MACT (Subpart 5U)
  - 2010 and later amendments to RICE NESHAP (Subpart ZZZZ)
- EPA is the regulatory authority for these standards in Iowa
- Once all reconsiderations have been completed, DNR will seek stakeholder input on adopting these rules

# Permit Language

- If DNR hasn't adopted the standard, a general statement will be included in the Title V permit:
  - “This equipment is of the source category affected by...”
- Construction permit will include a similar statement, for informational purposes only
- Permits will not include specific requirements for a standard DNR hasn't adopted
- REMEMBER: facilities must comply with all applicable MACT requirements, whether those requirements are listed in a permit or not

## “Significant” for Title V

- An emission unit with an applicable MACT requirement can't be considered an “Insignificant Activity” for Title V
  - Small boilers, process heaters, and engines may be moved from the Insignificant Activity List to the Emission Point-Specific Section of the Title V
  - Once a unit is “significant” for Title V:
    - Emissions are subject to EIQ reporting and fee payment
    - Equipment will need to be included on Annual Title V Compliance Certification

# Title V Question

- If an emission unit is significant for Title V, but the MACT compliance date hasn't passed yet, what needs to be included in the Title V Annual Compliance Certification?
  - You're not required to certify compliance with MACT limits if the MACT compliance date hasn't passed yet.
  - You do need to certify compliance with any other requirements listed in the Title V permit for that equipment (e.g. opacity, PM, and SO<sub>2</sub> limits).

# Title V Question

- Will Boiler MACT requirements replace a CAM (Compliance Assurance Monitoring) Plan?
  - If the boiler is subject to a MACT emission limit, and the same pollutant is addressed by a CAM plan, Boiler MACT requirements should eventually replace CAM.
  - CAM will apply at least until the Boiler MACT compliance date. After that date, facility can request that CAM plan be removed.

# Construction Permitting Question

- Do I need to modify my construction permit before installing control equipment to comply with MACT?
  - Installation of air pollution control equipment may be exempt from permitting under 567 IAC 22.1(2) “g” if:
    - Stack parameters won’t change
    - Emission rates of each pollutant are reduced or unchanged
  - This exemption requires the facility to submit information to AQB at least 30 days prior to installation of controls.

# Required information for exemption “g”

- Name and location of facility
- Identification of the equipment being modified (include permit numbers)
- Detailed description of the change
- Emissions estimate of actual and potential emissions for all regulated pollutants
- Height of the emission point and nearby buildings
- Date of anticipated construction and operation startup
- Statement that project is not subject to PSD and that the area is not non-attainment
- Truth and accuracy statement signed by the responsible official



# Construction Permitting Questions

- Do I need to modify my construction permit before switching fuels?
  - Yes, unless your current permit allows alternate fuels.
- I have a gas-fired boiler with diesel back-up. Do I need permit limits on diesel usage to be classified as a gas-fired boiler?
  - No. MACT subcategory is based on the fuel actually burned in the boiler.
- I have a back-up boiler that only runs a few weeks each year. Will this boiler be considered a “limited use boiler” under the Boiler MACT?
  - To be considered “limited use” under the current Boiler MACT, a boiler must have a federally enforceable limit of no more than 876 hours of operation per year.

# Notification and Reporting

- Title V facilities can follow the Title V semi-annual report schedule for semi-annual MACT reports
  - This can be done by submitting two separate reports, or the reports can be combined
  - If combining reports, be sure to include all the required MACT information
- DNR can't accept electronic submittal of MACT reports
- Initial notifications for the Boiler MACT will need to be submitted once the reconsideration is finalized, even if the facility submitted a notification under the “old” Subpart 5D

# Notification and Reporting Question

- Who do the notifications and reports go to?
  - Right now, these submittals are only required to be sent to EPA Region 7.
  - We ask that a courtesy copy be submitted to DNR, and to Polk or Linn County for facilities in those areas.
  - Once DNR/Polk/Linn take delegation of these standards, reports will need to be sent to Region 7, DNR, and the local agency.

# Stack Test Reports

- The Boiler MACT and Utility MACT require stack test data to be submitted electronically to EPA using its Electronic Reporting Tool (ERT)
  - Currently, DNR only accepts hard copy submittals
  - DNR is reviewing ERT, to see whether the data would fulfill our needs
- Deadlines for stack test report submittal (once DNR takes delegation)
  - If test is being done for MACT compliance only, follow MACT reporting deadlines (these differ from the “typical” DNR timelines for stack test reports)

# Stack Testing Questions

- I'll be doing some engineering tests to evaluate control equipment requirements. Do I need to notify DNR prior to this testing?
  - No, unless the testing is also being done to fulfill a test requirement in a permit.
- Am I required to notify DNR if the engineering tests show an emission limit exceedance?
  - Yes. Follow the excess emission reporting requirements in your permit.

# Compliance Extensions

- Subpart A allows for up to a one year extension to comply with MACT requirements, if the time is needed to install control equipment
  - Extension requests are due 120 days before the compliance date
  - Until DNR takes delegation of a MACT, extension requests for that MACT should be submitted to EPA Region 7

# Thank You

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