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# Department of Energy Clean Air Work Group Meeting January 6, 2011

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## e-GGRT - 1

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- Electronic greenhouse gas reporting tool (e-GGRT), is available for user registration
  - Must use Internet Explorer 7+ or Mozilla Firefox 3+ to access e-GGRT
  - New user registration takes about 10 minutes
  - Must create a username, password, secret question & answer, and challenge questions & answers
  - User picks challenge questions, which will allow e-GGRT to verify the user when submitting GHG report
  - Secret question & answer are user generated
  - Must print, sign, and mail an electronic signature agreement (ESA) – about 5 business day turnaround
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## e-GGRT – 2: Designated Representative

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- “Designated Representative (DR)” - person submitting GHG report
- The DR is the “gatekeeper” and can “invite” others (Alternate DR & agents) to access the facility’s data
- 40 CFR 98.4(i)(4)(ii) - designated representative have the necessary authority to carry out the duties and responsibilities under 40 CFR part 98
- DR prints, signs, and mails Certificate of Representation to EPA to access facility data
- DOE site office and support contractors should coordinate roles (DR, ADR, agent)

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## NESHAP - 1: RICE

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- The Reciprocating Internal combustion Engine (RICE) NESHAP establishes emissions limitations and testing, record keeping, reporting and control requirements
- RICE are used as electrical generators or fire pumps
- Emergency RICE are generally exempt from the emissions limits, testing, and control requirements
- Emergency RICE can be used for up to 15 hours per year as “Emergency Demand Response - EDR”
- EDR - the utility discounts electrical power in exchange for the operation of on-site electrical power generation during periods of peak use

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## NESHAP - 2: RICE

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- By limiting EDR to 15 hours for emergency generators:
  - Existing emergency generators would have to be re-classified as non-emergency generators (emissions limits and control requirements); or
  - The site no longer participates in the EDR program, resulting in more brownouts / blackouts
- EPA requested comment on the 15-hour EDR limit
- DOE is forming an ad-hoc sub-group to the CAWG to discuss this issue and present unified and meaningful comments to EPA regarding EDR

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## NESHAP – 3: Boilers & Incinerators

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- EPA has filed for an extension to the court-ordered schedule for both the major and area source boiler NESHAPs
- Final rule was supposed to be published in January 2011
- EPA is requesting an extension until April 2012

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# Fine Particulate Testing - 1

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- Particulate matter  $\leq 2.5$  microns ( $PM_{2.5}$ )
- PM has two components: filterable (resides on filter) and condensable (condenses from vapor when stack temperature is reduced)
- EPA revised Method 201A and 202
- Method 201A now uses a particle sizing device (cyclone) to measure filterable  $PM_{2.5}$
- Method 202 is the “back-half” or condensable portion of a standard Method 5
- Changed Method 202 to standardize condensable PM collection and reduce  $SO_2$  bias

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## Fine Particulate Testing - 2

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- Air authorities will be required to require  $PM_{2.5}$  testing
  - To determine total PM emissions (condensable PM may not be measured during a stack test)
  - To better estimate  $PM_{2.5}$  emissions in  $PM_{2.5}$  non-attainment areas
- Method 5 – Total filterable PM
- Method 201A – filterable  $PM_{2.5}$  or  $PM_{10}$
- Method 202 – condensable PM (counted as  $PM_{2.5}$ )
- Follow guidance provided by your air permitting authority during next air emissions test



# Ozone NAAQS

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- EPA announced a delay in determining the final 8-hour Ozone (O<sub>3</sub>) National Ambient Air Quality Standard until July 31, 2011
  - EPA is asking the Clean Air Science Advisory Committee what they used to set their recommendation of 60-70 ppb for the 8-hr O<sub>3</sub> std.
  - The previous standard of 80 ppb will be very difficult to achieve and will create more non-attainment areas across the U.S. than any other standard
  - Every 5 ppb the standard is lowered results in dozens of more non-attainment areas (up to ½ U.S.)
  - Ozone non-attainment has unique legal concerns
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# EPA Fall 2010 Regulatory Agenda

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- Some items that may be of interest:
  - EPA to review PM<sub>2.5</sub> NAAQS
  - EPA to review the secondary (welfare-based) NO<sub>x</sub> and SO<sub>2</sub> standards
  - EPA to review NESHAP Subpart W: Standards for Radon Emissions From Operating Uranium Mill Tailings
  - Revise MACT malfunction reporting

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# Ozone Depleting Substance Section 608

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- EPA is proposing:
  - A lower the trigger rate for repairing leaks to equipment with refrigerant charges >50 lbs. of Class I or Class II ozone depleting substances (ODS)
  - To establish similar leak repair requirements for comfort cooling, commercial refrigeration, and industrial process refrigeration appliances
  - Increase record keeping and verification requirements to lower ODS use and remove older ODS equipment from service

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# Ozone Depleting Substance Disposition

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- The ODS ~~Guide~~ Technical Assistance Tool needs modified, again, to reflect ODS Disposition
- Specifically, if the ODS cannot be used onsite, the ODS should be posted on the DOE material exchange website, before trying to transfer it to DoD
- The DOE material exchange website no longer exists
- What is the priority?
  - Obtaining critical use ODS from other sites?
  - Switching over to an alternative material?
- All Class II ODS will be phased out by 2030