

**DEPARTMENT OF ENERGY
CLEAN AIR WORK GROUP (CAWG)**

Call Notes

DATE: August 4, 2011

TIME: 1:00 to 2:30 PM EDT

CALL-IN NUMBER: U.S. Toll: 303.248.0285
Access Code: 5863657

WEBSITE: <https://cc.readytalk.com/r/y69f8sqscawn>

PLACE: DOE/FORS- Room 6B-104

CHAIR: Larry Stirling, Office of Environmental Policy and Assistance, HS-22

PARTICIPANTS: Members of the CAWG

I. Climate Change / Greenhouse Gases (GHGs)

Q: Have any other sites received a call from EPA contractors asking why the site had not signed up for e-GGRT? We received a call and explained that we had determined that our site would not fall under the reporting requirements.

A: No other sites reported receiving a similar call. Please follow up with Larry Stirling if your site receives a call.

A. 2010 GHG Report due September 30, 2011

Reporting of 2010 (GHG) emissions as required by the federal mandatory reporting rule (40 CFR, Part 98) is due September 30, 2011. DOE sites that meet federal mandatory reporting requirements likely meet them under the stationary fuel combustion sources category and emit $\geq 25,000$ MT CO_{2e}. This reporting requirement is separate from the annual reporting under E.O. 13514.

The final date for e-GGRT registration was August 1, 2011. You can still sign up, but it will be after the deadline. Users of the central data exchange (CDX) (RMP*eSubmit, eNOI, TRI-ME, and RadNet users) are already registered in e-GGRT. For those user accounts, e-GGRT can be accessed with the same user id. E-GGRT can be accessed at <https://ghgreporting.epa.gov>

B. GHG Stationary Fuel Combustion Simple Reporting for 2010

For those facilities reporting only stationary fuel combustion units under §98.2(a)(3), an abbreviated report can be submitted. For those reporting other units, a full report must be submitted. The simple reporting applies to stationary fuel combustion units that emit at least 25,000 MT CO_{2e} and operate at ≥ 30 mmBtu/hour. This simple reporting option is only available for the 2010 reporting year. The simple reporting option only requires reporting the following: biogenic (biomass combustion) CO₂, non-biogenic (other than biomass combustion) CO₂, methane, nitrous oxide, and the total CO_{2e}. The EPA calculator in E-GGRT can be used to assist in this reporting. Alternatively, combustion sources can be lumped together and reported using the standard reporting method.

EPA is proposing changes to the GHG reporting rules. Most of these changes are editorial in nature such as changes to deadlines and some calculations. Changes to

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Subpart A include a delay in newer GHG categories that were promulgated in 2010. For subparts I, W, DD, II, RR, TT, UU EPA proposes reporting delays until 9/28/2012. The 2012 reporting process may be bifurcated with reporting for “older” subparts from 2009 (subpart C) proposed to be due on March 31, 2012 although data can be amended until September 30, 2012. The delays are a due to the need to test new subparts in e-GGRT prior to reporting. EPA also proposes a requirement to retain records for 3-year according to a March 31st submittal date of each year. EPA proposes changes to Subpart W, oil and natural gas systems, which may be significant for those sites engaged in oil and natural gas exploration activities.

C. California Cap & Trade

California Air Resources Board (CARB) adopted a resolution in support of a cap and trade regulation in December 2010. The cap and trade regulation was mandated in California by AB32, the Global Warming Solutions Act 2006, and CARB intends to promulgate a final regulation in October 2011. DOD has requested exemption from compliance obligations and covered entity status due to legal constraints.

Q: Is e-GGRT up and ready to accept data entry?

A: As of last week, it was not up and running for data entry. There has been no additional information from EPA on when that capability may be available.

II. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

A. Emergency Reciprocating Internal Combustion Engines (RICE) DRAFT Information Brief

Thank you to those sites that reviewed the Fall 2011 Regulatory Agenda and responded to the informal survey on areas where more information would be appreciated. Four DOE requested more info on RICE. DOE developed a 2-step strategy for providing additional guidance on RICE. As most sites that responded only use RICE under emergency conditions, an Emergency RICE Information Brief has been developed. The information brief is currently in the approval process. The second step is a more extensive RICE Technical Assistance Tool and will provide assistance for RICE in general in addition to emergency use.

B. RICE Technical Assistance Tool

The RICE technical assistance tool will discuss NESHAP and New Source Performance Standards (NSPS) requirements for all rice. This tool will also include the information for emergency RICE that is discussed in the information brief. The tool is currently under development.

C. Boiler Reconsideration Timeline

On March 21, 2011, in addition to publishing the industrial, commercial, and institutional boilers and process heaters NESHAP for major and area sources, EPA published a “Notice of Reconsideration” for the major source Boiler NESHAP. On May 18, 2011 EPA delayed the effective dates in the Boiler NESHAP until EPA completes the review or a judicial decision is reached. EPA intends to revise the Boiler NESHAP for major sources with a proposed rule in October 2011 with the final expected to be available in April 2012 if it remains on schedule. The Commercial and Industrial Solid Waste Incinerators (CISWI) NSPS is also part of the reconsideration. The Boiler NESHAP and

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CISWI NSPS reconsideration is likely to significantly expand state responsibilities without additional funds.

For non-Title V, Area Source Boilers, new and existing gas-fired boilers are exempt. To qualify as a gas-fired boiler, boilers must burn gas. Qualifying gases include biogas, coal-derived gas, hydrogen, natural gas, landfill gas, process gas, and refinery gas. The qualifications get more complicated for co-fired or dual-fuel boilers. Gas-fired boilers may burn another fuel only during periods of gas supply emergencies, gas curtailment, and periodic testing that cannot be more than 48 hours per year. If sites want to keep the boiler categorized as a “gas-fired” boiler, sites will have to meet those requirements.

According to §63.11194(d): "A boiler is a new affected source if you commenced fuel switching from natural gas to solid fossil fuel, biomass, or liquid fuel after June 4, 2010." This statement affects existing dual fuel boilers as they would be considered new sources if they switched from natural gas. Existing dual-fired natural gas must comply with new requirements of NESHAP when switched to liquid fuel including particulate emissions limit and potential operating permit prohibition, which may preclude the boiler from being able to switch to an alternate fuel. Existing dual-fired oil boilers must comply with existing requirements of NESHAP and can use either fuel with no emissions limits. Currently this is still in the planning stages, so while the June 4, 2010 deadline has passed, sites can still select the category that a boiler will fall under.

- D. Mercury Air Toxic Standards (MATS) for Electric Generating Utilities (EGUs)
The MATS replace the old Clean Air Mercury Rule (CAMR). MATS only apply to EGUs that burn coal or oil to generate electricity for public sale. Sites that do not sell to the public do not fall under MATS. In addition mercury, MATS will reduce the following hazardous air pollutants: hydrogen fluoride, hydrogen chloride, chromium, arsenic, and nickel. MATS also establish a dioxin and furan reduction program without establishing limits. According to court order, the final rule must be signed by November 16, 2011.

III. New Source Performance Standards (NSPS)

A. Revisions to the RICE NSPS

EPA issued revisions to the Compression Ignition and Spark Ignition NSPS. The final rule requires more stringent standards for stationary compression engines with displacement $\geq 10L$ and $< 30L$ per cylinder (displacement is the total volume swept in a single movement by all of the pistons inside the cylinders of the engine and does not include the total volume of the internal combustion chamber). Minor revisions made to the spark ignition NSPS were made to more closely align it with the compression ignition NSPS. Most of the compliance burden is placed on the engine manufacturer. Users will need to purchase certified engines, use engines according to the manufacturer's recommendations, and only use approved fuels to meet the NSPS. Additional details will be provided in the RICE technical assistance tool, which is under development.

IV. Other

A. National Ambient Air Quality Standards: Secondary Standards for Nitrogen and Sulfur Oxides

While primary standards focus on public health, secondary NAAQS focus more on public welfare and environmental effects. Secondary standards for nitrogen oxides (NO_x) and sulfur oxides (SO_x) were published on August 1, 2011 (76 FR 46084-147). EPA retained

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the annual NO_x secondary standard and both the annual and 24-hour SO_x secondary standards. EPA also established 1-hour secondary standards at the same level as the primary standards. This enables EPA to later adjust the 1-hour secondary standards according to the results of a pilot program to study water acidification and the aquatic acidification index (AAI).

EPA delayed reconsideration of the ozone (O₃) primary and secondary NAAQS past the July 29, 2011. EPA is reconsidering the primary and secondary O₃ NAAQS established in 2008 of 75 ppb. The original recommendation from the scientific advisory board was 60-70 ppb for primary and 7-15 ppm-hour for secondary O₃. A ppm-hour is a measure of exposure, with one ppm-hour representing the exposure of 1ppm of O₃ for one hour. The original recommendations were not taken into consideration previously, and EPA is currently revisiting the standards to see if they should be revised to comply with the original recommendations. Currently, 241 counties in the US cannot comply with the 80 ppb standard. If the standard were made more stringent, the number of counties that would be in nonattainment according to 2008 data rises to 322 for a 75 ppb standard, 515 for a 70 ppb standard, and 608 counties for a 65 ppb standard. If the standard were set at 60 ppb, 650 counties would be in violation, and every state but Montana would have areas of non-attainment. This would significantly increase the regulatory burden, and the path forward toward attainment is unclear at this time. Regarding the secondary O₃ standard, currently 196 counties are in violation of the 15 ppm-hour standard. If the standard is reduced to 7 ppm-hours, 579 counties would be in secondary non-attainment. Mobile sources are significant contributors to O₃, and it is unclear how attainment under these potential standards can be reached without technologies to address mobile emissions.

B. Overview of Air Pollution Training

Module 1: Air Pollution Laws, Management and History

A rough draft of the training module was presented to the working group. The first module under development focuses on the background and history of air pollution control. The second stage describes the major federal air regulations (NAAQS, NSPS, NESHAP, etc.). Each training module concludes with a quiz. The training is about an hour if you select to have the module read the text aloud. Please contact Larry Stirling if you are interested in reviewing the materials and are willing to provide feedback.

Next Meeting

October 6, 2011, 1:00 PM to 2:30 PM Eastern Daylight Saving Time