

Attachment B

NACWA SSI Rule Overview and Flow Chart Instructions

The Sewage Sludge Incinerator Rule (SSI Rule) is composed of two rules, one for new or modified units (NSPS), and one for existing units (EG-SIP). The SSI Rule sets emission limits for all SSI units, and ensures compliance with those limits through a combination of operating limits, monitoring and recordkeeping requirements, and reporting requirements. The requirements are similar for new/modified and existing units, but there are important differences.

For most pollutants, the SSI Rule gives facilities several options to demonstrate compliance with the applicable emission limits. To demonstrate compliance, facilities may use: 1) traditional stack testing; 2) Continuous Automated Sampling Systems (CAS); or 3) Continuous Emission Monitors (CEM). Traditional stack testing may be used for all pollutants, with one exception: new/modified units must use a CEM to demonstrate compliance with the carbon monoxide (CO) limit. Facilities conducting stack testing must establish operating limits during the test that can be tracked to assure continuous compliance between tests. For instance, operating limits for a wet scrubber would include a minimum pH and water flow rate. All SSI units must establish a minimum combustion chamber temperature and must track sludge feed. Facilities using stack test compliance demonstrations must install Continuous Parametric Monitoring Systems (CPMS) to track these operating parameters against their site-specific limits.

Operating limits and CPMS can be avoided by installing CEMS or continuous automated sampling, but for most compounds continuous systems are more costly to maintain and calibrate and less reliable than the stack test approach. A CAS system automatically collects integrated samples over time to avoid spikes that could lead to unrepresentative test results. Regardless the type of monitoring chosen, facilities must develop monitoring plans for all monitoring equipment (CAS, CEM, and CPMS) used at the facility and perform regular maintenance and calibration checks to ensure their accuracy.

The SSI Rule also contains various other requirements, including general notification, recordkeeping and reporting requirements, operator training requirements, sewage sludge monitoring requirements, and bypass stack provisions. The attached flow charts are designed to assist in the navigation of the SSI Rule.

Flow Chart Instructions

The following flow charts provide a summary of the requirements of the SSI Rule. Because the SSI Rule has different provisions for new units and existing units and offers multiple compliance options, not every page of this flow chart will apply to every utility. To identify the requirements that apply to your SSI units, you must first determine whether the unit is a new or modified unit, or an existing unit. The NACWA *Advocacy Alert* accompanying these charts will help classify SSI units as new/modified or existing on the first page of the flow chart, which will then direct you to Page 2 (for new or modified units) or Page 3 (for existing units).

Pages 2 and 3 act as a table of contents for the requirements for your unit. You should review all of the requirements flowing from the “Requirements Applicable to All Units” box. For the “Compliance Demonstration Requirements” box, you will only need to review certain pages that apply to you. As mentioned above, the SSI Rule gives you three options for demonstrating compliance: stack testing, CAS, or CEM. If you demonstrate compliance using a CAS or CEM you do not have operating limits, so the same requirements apply regardless of which pollutant you are monitoring. However, if you demonstrate compliance using stack testing, you will have operating limits that vary depending on the pollutant and the control equipment used to control that pollutant.

Since you may choose to use a CEM for some pollutants and stack testing for others, the stack testing requirements are broken down by pollutant/control device. Review only those pages that correspond with the compliance options that you choose. It is assumed that all units have a PM control device (fabric filter, scrubber, or electrostatic precipitator). If you use a different control device for these pollutants, you will need to work with EPA to establish site-specific operating limits. If you do not use any control device, compliance can be demonstrated by stack test with continuous temperature monitoring to show the SSI unit is meeting the minimum combustion temperature established during the test.

LIST OF ACRONYMS

C/A	Corrective Action
CAS	Continuous Automated Sampling
CEM	Continuous Emission Monitor
CMS	Continuous Monitoring System (includes CEM, CAS, and CPMS)
CPMS	Continuous Parametric Monitoring System (used to monitor flow rate, etc.)
EG	Emission Guidelines
FIP	Federal Implementation Plan
NSPS	New Source Performance Standards
O&M	Operation & Maintenance
OTP	Operator Training Procedures
QA/QC	Quality Assurance/Quality Control
SIP	State Implementation Plan
SSI	Sewage Sludge Incinerator