Association of
Metropolitan
Sewerage Agencies

March 13, 2003

Docket ID No. OAR-2002-0058
EPA West (Air Docket)
U.S. EPA (MD-6102T)
Room B-108
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: *Proposed Rule on National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters, 68 Fed. Reg. 1659, (January 13, 2003)*

Dear Sir or Madam:

The Association of Metropolitan Sewerage Agencies (AMSA) is pleased to provide comments on the U.S. Environmental Protection Agency's (EPA's) proposed *National Emission Standards for Hazardous Air Pollutants for Industrial/ Commercial/Institutional Boilers and Process Heaters*. Founded in 1970, AMSA represents the interests of over 280 of the nation's publicly owned treatment works (POTWs). AMSA members serve the majority of the sewered population in the United States and collectively treat and reclaim over 18 billion gallons of wastewater everyday.

General Comments

AMSA submits the following general comments on the proposed standards for your consideration.

AMSA supports the Agency's decision to exempt existing liquid and gaseous-fueled boilers from the National Emission Standards for Hazardous Air Pollutant (NESHAP) requirements. EPA, however, is proposing that facilities with new units continuously monitor carbon monoxide (CO) emissions and that all new, large or limited use units meet a 400 parts per million (ppm) CO emissions limit. AMSA believes that the proposed standards do not establish a direct relationship between CO and HAPs concentration and do not support the necessity of continuous CO

1816 Jefferson Place, NW, Washington, DC 20036-2505 • 202.833.2672 • 202.833.4657 FAX
info@amsa-cleanwater.org • http://www.amsa-cleanwater.org

monitoring. AMSA recommends that the Agency exempt new, as well as existing, gaseous-fueled boilers from any NESHAP requirements.

Specific Comments

AMSA submits the following specific comments on the proposed standards for your consideration.

1. Average Cost Analysis for New Sources Does Not Meet Reasonableness Test

Table 3 (68 *Fed. Reg.* 1688) in the preamble shows that the proposed standards will incur capital costs of $51 million and annualized costs of $11 million per year for 3,463 new gaseous units. This translates to an average capital cost of $14,727 per unit and an annualized cost of $3,176 for each boiler. AMSA presumes that most of the costs are associated with installing and maintaining the CO continuous emissions monitoring system (CEMS) as there are no other add-on control technology requirements for this subcategory. AMSA believes that EPA's cost estimates are extremely low, perhaps by an order of magnitude. Based on member agency information, EPA's estimated average capital costs for CEMS are insufficient to purchase a CO analyzer much less the system into which it must be integrated. Based on competitively bid source testing data, the estimated annualized costs in the proposal are insufficient to cover the Quality Assurance/Quality Control or Relative Accuracy Test Audits of the CEMS.

Given that the costs of CEMS and the costs of complying with the extensive requirements of the Part 63 General Provisions, as well as the complete absence of any projections of HAPs emissions reduced as a result of the CEMS, AMSA urges the Agency to reconsider their intention to regulate the gaseous-fueled boiler subcategory.

2. CEMS Should Only Be Required for the Largest Boilers

As discussed above, the cost of the CO CEMS would be the principal expense of the proposed standards for gaseous-fueled boilers and would be significantly higher than EPA's estimates. AMSA believes that even if EPA eventually decides to retain CO CEMS requirements for new boilers it is unreasonable to require such systems for all new gaseous-fueled units with a capacity over 10 MMBtu/hr. Consider the proposed Reciprocating Internal Combustion Engine (RICE) NESHAP (67 *Fed. Reg.* 77829), which requires CO CEMS only for large engines above 5000 HP. Using an engine efficiency factor of 30%, a 5000 HP engine is roughly comparable to a 40 MMBtu/hr boiler on a heat input basis. This might be a more reasonable size boiler on which to require a Part 60 CEMS. Otherwise annual CO stack testing is appropriate for boilers between 10-40 MMBtu/hr. If stack tests for three consecutive years show compliance, then stack testing should only be required every 36 months similar to the provisions in §63.7515 (a) and (b).

3. Handheld Monitors with EPA-Approved Testing Protocols Should be Encouraged

AMSA believes that EPA should allow sources to use handheld monitors on a routine basis according to EPA approved calibration and testing protocols in lieu of periodic source testing. Frequent boiler checks with convenient instrumentation of reasonable accuracy are extremely cost effective and will do more to improve the environment than expensive and precise yet infrequent source tests. AMSA would welcome the opportunity to work with EPA to develop this concept.

4. Minimum Size Thresholds Are Appropriate

The proposed NESHAP does not have applicability thresholds for boiler sizes. In other words, a one Btu/hr boiler could be subject to the standards. The proposed RICE NESHAP exempts engines under 500 Horsepower (HP) and the proposed Combustion Turbine NESHAP exempts units under 1 MW. Therefore, AMSA recommends that EPA exempt small boilers under 5 MMBtu/hr from the proposed standards to reduce the possible substantial impact on both sources and regulators.

5. Hexavalent Chromium Emissions

The Agency claims that toxic metals emissions represent about 4% of the total HAP emissions from boilers. It correctly states that hexavalent chromium is classified as a Group A human carcinogen while chromium III is not carcinogenic (68 *Fed. Reg.* 1664). AMSA was unable to confirm emissions of hexavalent chromium from boilers. If EPA possesses such information, it should be included in the text of the document.

6. Boilers at Title V Facilities

AMSA supports the Agency's statement that Title V facility operators submitting their semi-annual reports should not be required to additionally submit any separate boiler-emissions deviation information (68 *Fed. Reg.* 1711). However, the statements on the following page (68 *Fed. Reg.* 1712) seemingly contain a requirement to report any deviation to the local permitting authority. Does the Agency intend that such deviation should be submitted to the local permitting authority even if the facility does not have CO CEMS requirements? It was AMSA's understanding that Title V facilities report Title V permitting deviations to EPA only.

AMSA appreciates the opportunity to comment on the proposed standards. If you have questions or wish to discuss our comments further, please contact AMSA Air Quality Committee Chairman Mr. Ed Torres at 714/593-7082 or Will Pettit, AMSA, at 202/833-3280.

Sincerely,

Chris Hornback
Director of Regulatory Affairs