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From: [Larry Baronowsky](#)

Sent: Monday, November 28, 2011 1:59:00 PM

To: [Bob Berry](#)

Subject: It appears that the MACT emission limits are on a 30 day rolling average.

Importance: Normal

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This is what I found in the report.

Appendix 1 Page 29:

EPA proposed subcategorizing the coal-fired EGU source category as follows:

Subcategory Description

Coal-fired unit designed for coal

≥ 8,300 Btu/lb if: 1. combusts coal;

2. meets the proposed definition of “fossil fuel fired;” and

3. burns any coal in an EGU designed to burn a coal having a calorific value (moist, mineral matter-free basis) of ≥ 8,300 Btu/lb in an EGU with a height-to-depth ratio of <3.82.

Coal-fired unit designed for coal

<8,300 But/lb if: 1. combusts coal;

2. meets the proposed definition of “fossil fuel fired;” and

3. burns any virgin coal in an EGU designed to burn a nonagglomerating fuel having a calorific value (moist, mineral matter-free basis) of <8,300 Btu/lb in an EGU with a height-to-depth ratio of 3.82 or greater.

All of the BREC coal-fired boilers fall into the “designed for coal ≥ 8,300 Btu/lb” subcategory, and will be subject to the emission limits and work practice standards proposed for existing units in that subcategory.

Appendix 1 Page 33:

The Proposed Utility MACT rule includes acid gas emission limits for existing coal-fired EGUs. For the existing coal-fired $\geq 8,300$ Btu/lb subcategory, EPA proposed an HCl emission limit of 0.002 lb/MMBtu (30-day average).¹⁶ As an alternative, for existing units equipped with an FGD control system, EPA proposed an SO₂ emission limit of 0.20 lb/MMBtu (30-day average) as a surrogate for the acid gas emissions. Existing coal-fired units equipped with an FGD control system can choose to demonstrate compliance with the Utility MACT acid gas requirement by demonstrating compliance with either the HCl or SO₂ emission limits.

Footnote 16 on Page 33

¹⁶ The MACT emission limits proposed by EPA are 30-boiler operating day averages. In other words, block 24-hour emissions measured from the boiler will be averaged over 30-boiler operating days. A boiler operating day means a 24-hour period between midnight and the following midnight during which any fuel is combusted at any time in the steam generating unit. It is not necessary for the fuel to be combusted the entire 24-hour period.