

WCEV Application No. 317-07 Auxiliary Boiler 112(g) Supplemental Information

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Julie & Matt - Based on our telephone conversation on Wednesday, August 27 the WCEV project team has re-evaluated the data used for our proposed Auxiliary Boiler 112(g) emission limitations in the document transmitted to you via email on August 13, 2008. We have decided to revise our proposed case-by-case MACT analysis as follows:

Organic HAPs

WCEV proposes to use VOC as an indicator of compliance with the control of organic hazardous air pollutant (HAP) emissions rather than CO. Organic HAPs are a subset of VOC emissions from the oil-fired auxiliary boiler. The combination of the specific design, equipment, and operational standard of maintaining good combustion is the case-by-case MACT technology. Using the operational standard of maintaining VOC at PSD BACT levels one-time stack testing provides the directly measured compliance mechanism to demonstrate that all VOC, including organic HAPs are being controlled equivalently to the best controlled similar source.

Review of the RBLC shows a VOC limit of 0.0015 lb/MMBtu for #2 fuel oil (back-up fuel) on a 20 MMBtu/hr boiler at the Daimler Chrysler Toledo Paint Shop (RBLC ID OH-0309). However, compliance with that value has never been demonstrated by testing and there is no test requirement in their permit. The next lowest value in the RBLC for a similar sized unit is for a 99 MMBtu/hr aux boiler at AES Red Oak in New Jersey (RBLC ID NJ-0036) at 0.005 lb/MMBtu. The AES Red Oak level of emission rate is identified in the RBLC as representing the Lowest Achievable Emission Rate (LAER).

WCEV is proposing a MACT limit of 0.0042 lb/MMBtu based on a vendor guarantee with compliance demonstration through periodic stack test using USEPA Method 25 or 18.

Acid Gases

WCEV is proposing to revise its MACT limit for HCl from 0.0009 lb/MMBtu to 0.0007 lb/MMBtu based on the information published by the National Association of Clean Air Agencies (NACAA) in their report entitled Reducing Hazardous Air Pollutants from Industrial Boilers: Model Permit Guidance (June 2008), with compliance demonstration through periodic stack tests using USEPA Method 26A.

Metal HAPs

WCEV is proposing to revise its MACT limit for PM from 0.03 lb/MMBtu to 0.015 lb/MMBtu based on the information published by the National Association of Clean Air Agencies (NACAA) in their report entitled Reducing Hazardous Air Pollutants from Industrial Boilers: Model Permit Guidance (June 2008), with compliance demonstration through periodic stack tests using USEPA Method 5 (filterable only).

Please let me know if you have any questions regarding this supplemental information.

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