

National Emission Standards for Hazardous Air Pollutants for
Reciprocating Internal Combustion Engines (RICE Rule) Training Module
40 CFR 63 Subpart ZZZZ
Script- Major Source New Non-Emergency Spark Ignition 4-Stroke Rich Burn
Engine greater than 500 Horsepower

NARRATOR:

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Welcome to the Connecticut Department of Energy & Environmental Protection's Online Training for the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines, also known as the RICE Rule!

This tool is designed to help owners and operators of reciprocating internal combustion engines, also known as RICE, determine their requirements under 40 CFR Section 63, subpart ZZZZ. By answering the successive questions, your specific requirements have been estimated. Please note that they may not be complete, and refer any questions to your local authority.

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We have established that you own or operate a new, non-emergency spark ignition 4-stroke rich-burn engine greater than 500 horsepower, located at a major source. Now, let's discuss your requirements.

To comply with this rule, you must either limit the formaldehyde concentration in the engine exhaust to less than or equal to 350 parts per billion at 15% oxygen or reduce the formaldehyde emissions by 76% or more. As an alternative you may show that the engine is achieving at least a 30% average reduction of total hydrocarbon, or THC, emissions.

To achieve this standard your engine will probably require the installation of non-selective catalytic reduction, also known as NSCR. An estimate of the capital and annual operating costs of retrofitting your engine with NSCR is indicated here.

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You must comply with emission limits and operating limits at all times and you must operate and maintain all equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved.

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If your engine uses NSCR, you must maintain the catalyst so that the pressure drop does not change by more than two inches of water, while operating at 100% load, from the pressure drop across the catalyst that was measured during the initial performance test. Maintain the temperature of the engine exhaust between 750° Fahrenheit and 1,250° Fahrenheit. If your engine is not using NSCR, then comply with any operating limitations approved by EPA.

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An initial emission performance test is required within 180 days of the compliance date. You may not be required to conduct an initial test on units for which a test has been previously conducted, but the test must meet the following conditions:

- The test must have been conducted following the required methods

- The test must have been performed within the last two years and been reviewed and accepted by EPA.
- There have been no process or equipment changes made since the test was performed, **or** you must be able to demonstrate that the results of the performance test, with or without adjustments, reliably demonstrate compliance.
- The test must have been conducted at 100% load, plus or minus 10%.

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You must conduct subsequent performance tests semi-annually unless you have demonstrated compliance for two consecutive tests; then you may reduce the frequency to annually. However, if the results of any subsequent annual test indicate non-compliance with the emission limit, or you deviate from any of your operating limits, then you must resume semi-annual tests.

If your engine is currently non-operational, you may conduct the test when the engine is started up again.

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You must reduce the emissions of formaldehyde or THC in the engine exhaust using the procedures and approved methods indicated here. All sampling to demonstrate a reduction of formaldehyde or THC emissions must be performed at the inlet and outlet of the control device and all measurements to determine oxygen concentration and moisture content must be made at the same time and location as the measurements for formaldehyde.

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If you choose to limit the concentration of formaldehyde in the engine exhaust, you must use the procedures and approved methods indicated here. If using a control device, the sampling site must be located at the outlet of the control device. All measurements to determine oxygen concentration and moisture content must be made at the same time and location as the measurements for formaldehyde concentration.

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All measurements must be based on the average of three 1-hour test runs. Use the equation listed here to determine compliance with the percent reduction requirement.

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You must normalize the THC or formaldehyde concentrations at the inlet and outlet of the control device to a dry basis and to 15% oxygen, or an equivalent percent carbon dioxide. If pollutant concentrations are to be corrected to 15% oxygen and carbon dioxide concentration is measured in lieu of oxygen concentration measurement, a carbon dioxide correction factor is needed. Calculate the carbon dioxide correction factor as described here.

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If you comply with either a limitation on the concentration of formaldehyde in the engine exhaust or the requirement to reduce the emissions of formaldehyde or THC in the engine exhaust and you are not using a NSCR, you must petition EPA to establish operating limitations determined during the initial test or obtain approval of no operating limitations prior to conducting the test.

Any petition for approval of operating limitations must include the parameters you propose to use as operating limitations and their relationship to the HAP emissions, identifying how you will establish the upper and/or lower values for these parameters, and the methods and instruments you will use to measure and monitor these parameters.

Finally the petition shall include the relative accuracy and precision of the methods and instruments, and the frequency and methods for recalibrating the instruments you will use.

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Any petition for approval of *no* operating limitations must include the parameters associated with operation of the engine, any emission control device which could change intentionally or unintentionally on a routine basis or over time, and the relationship between changes in the parameters and changes in HAP emissions. For parameters which could change in such a way as to increase HAP emissions, the petition shall include a discussion of whether establishing limits on the parameters would serve to limit HAP emissions, and how you could establish upper and/or lower values for the parameters which would establish limits on the parameters in operating limits. You should also include in the petition a discussion identifying the methods that will be used to measure the parameters and the instruments you could use to monitor them, as well as the relative accuracy, precision, frequency and methods for recalibrating the instruments. Finally, include an explanation of why you feel it is infeasible or unreasonable to adopt the parameters as operating limits.

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Engine testing must be performed at a specific load as determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load in a specific application. The following information shall be included in the Notification of Compliance Status: the engine model number, manufacturer, year of purchase, site brake horsepower, and ambient conditions encountered during the test. An explanation of all assumptions that were made to estimate or calculate percent load during the performance test and the model number and estimated accuracy of any measurement devices used to determine percent load shall also be included in the Notification of Compliance Status.

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If you are complying with the requirement to reduce formaldehyde or THC emissions using NSCR, then you have demonstrated initial compliance if the average reduction of formaldehyde or THC emissions determined from the initial performance test is greater than or equal to the required percent reductions, you have installed a continuous parameter monitoring system, or CPMS, to monitor catalyst inlet temperature according to the requirements in this module, and you have recorded the catalyst pressure drop and catalyst inlet temperature during the initial performance test. If you are not using an NSCR then you may seek approval from EPA to record alternative operating parameters in place of the pressure drop and catalyst temperature.

If you are complying with the requirement to limit the concentration of formaldehyde and using an NSCR, then you have demonstrated initial compliance if the average formaldehyde concentration, corrected to 15% oxygen, from the three test runs is less than or equal to the formaldehyde emission limit, you have installed a CPMS to monitor catalyst inlet temperature and you have recorded the catalyst pressure drop and inlet temperature during the initial performance test.

If you are not using an NSCR to limit the concentration of formaldehyde then you must monitor operating parameters approved by EPA and record the approved operating parameters during the initial performance test.

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If you are using NSCR, during the initial performance test you must maintain your catalyst so that the pressure drop does not change by more than two inches of water from the pressure drop across the catalyst measured during the initial performance test. You must also maintain the temperature of the engine exhaust so that the catalyst inlet

temperature is between 750 and 1,250° Fahrenheit. If you are not using NSCR, comply with any operating limits approved by EPA

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During the initial performance test, you must establish the aforementioned operating limits and submit a Notification of Compliance Status containing the results of the initial compliance demonstration, before the close of business on the 60th day following completion of the initial compliance demonstration.

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If you are complying with the requirement to reduce formaldehyde or THC emissions and you are using a CPMS, you must prepare a monitoring plan that addresses the monitoring system design, data collection, and the quality assurance and quality control elements outlined here. You must also install, operate, and maintain each CPMS in continuous operation according to the procedures in your monitoring plan and collect data at least once every 15 minutes.

Your CPMS must be audited at least annually in accordance with your monitoring plan.

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You must minimize engine idling time and limit startup time to a period needed for appropriate and safe loading of the engine. Engine startup may not exceed 30 minutes, after which time the non-startup emission limits apply.

[Slide 20:]

You must continuously monitor emissions at all times the engine is operating, except for monitor malfunctions, associated repairs, required performance evaluations and required quality assurance or control activities. You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. Monitoring failures caused in part by poor maintenance or careless operation are not malfunctions.

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If you are complying with the requirement to limit the concentration of formaldehyde and using NSCR, then collect the catalyst inlet temperature data according to the requirements in this module, reduce the data to 4-hour rolling averages, and maintain the 4-hour rolling averages within the operating limits. You must also measure the pressure drop across the catalyst once per month and demonstrate that the pressure drop is within the operating limitation established during the performance test.

If you are not using NSCR then you may replace temperature with an approved parameter.

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If you are complying with the requirement to reduce formaldehyde emissions and your engine is greater than or equal to 5,000 horsepower, then conduct semi-annual performance tests to demonstrate that the required formaldehyde or THC percent reduction is achieved.

[Slide 23:]

Let's talk about your recordkeeping and reporting requirements. You are required to keep records of each notification and report submitted and all supporting documentation, the occurrence and duration of each malfunction, any performance tests and evaluations, required maintenance performed on air pollution control and monitoring equipment, and any actions taken during malfunctions to minimize emissions and corrective actions.

If you have a CPMS, you must keep records of each period during which a CMS is malfunctioning, inoperative or out-of-control, all required measurements needed to demonstrate compliance with a relevant standard, all CMS performance test results and evaluations, and the conditions during the performance tests and evaluations. All CMS calibration checks, adjustments and maintenance performed on the CMS, previous versions of the performance evaluation plan, and requests for alternatives to the RATA plan shall also be included.

Keep all records for five years from the date of creation.

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You must submit Notifications of: Applicability, Startup, Intent to Conduct Performance Testing and Compliance Status according to the dates shown here.

[Slide 25:]

Each year you are required to submit a Semi-Annual Compliance Report by January 31st, covering the period of July 1st to December 31st of the previous year, and by July 31st for the period covering January 1st through June 30th of the current year.

The report must contain a statement by a responsible official certifying the accuracy of the report and must indicate if any malfunctions occurred during the reporting period, including the number, duration, and a brief description for each type of malfunction which occurred and which caused or may have caused any limits to be exceeded. Also include actions taken during malfunction to minimize emissions and correct malfunctions. If no deviations occurred, or there were no periods during which the CMS was out-of-control, include a statement indicating so.

For each deviation that occurs where you *are not* using a CMS, the report must include the total operating time at which the deviation occurred, the number, duration, and cause of the deviations, and the corrective action taken.

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For each deviation that occurs where you *are* using a CMS, the semi-annual report must provide the information listed here, including but not limited to the date and time each malfunction or deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period. You must also include the date, time, and duration that each CMS was inoperative or out-of-control and a summary of the total duration of the deviation and the total duration as a percent of the total source operating time during that reporting period.

The report must include a breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes. Finally, the report shall include an identification of each parameter and pollutant that was monitored at the engine, a brief description of the engine and CMS, the date of the latest CMS certification or audit and a description of any changes in CMS, processes, or controls since the last reporting period.

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The Semi-Annual Compliance Report must include each instance in which you did not meet an emission limit, operating limit or any requirement of the general provisions. If you change your catalyst then you must reestablish the values of the operating parameters measured during the initial performance test and demonstrate that you are meeting the required emission limit applicable to your engine.

If your source has a Title V Operating Permit, report all deviations in the Title V Semi-Annual Monitoring Report.

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Notifications must be sent to EPA Region 1 at the address provided.

[Slide 29:]

You must comply with the rule upon startup.

[Slide 30:]

Your engine is subject to the spark ignition New Source Performance Standards, or SI NSPS, listed in 40 CFR 60 subpart JJJJ, if it was constructed, modified, or reconstructed after June 12th, 2006 and manufactured after July 1st, 2007. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

[Slide 31:]

If you are subject to the SI NSPS, you must meet emission and operating limits, and testing requirements.

[Slide 32:]

If you have a certified engine, you must install, configure, operate and maintain the engine according to the manufacturer's instructions. If you do not operate or maintain your engine according to the manufacturer's instructions, or your engine is not certified, then you must keep your maintenance plan and maintenance records, operate consistent with good air pollution control practices, and conduct an initial performance test and subsequent testing every 8,760 operating hours or three years, whichever comes first.

You must maintain records of the EPA Certificate of Conformity and maintain records of engine maintenance. If the engine is non-certified, submit an Initial Notification. A Notification of Intent to Conduct Performance Testing is required 30 days prior to a performance test. Results of performance testing must be submitted within 60 days of completing the test.

[Slide 33:]

This plate, mounted on an engine, shows proof of engine certification.

[Slide 34:]

In case you are not familiar with an EPA Certificate of Conformity, here's what it looks like.

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If you would like more information about the RICE rule, please visit the EPA RICE Compliance web page at the address provided. This site provides resources such as Q and A documents, fact sheets, sample notification forms, and recordings of webinars, all of which are designed to help you comply with this rule.

[Slide 36:]

Let's summarize the requirements for your major source, new non-emergency spark ignition four-stroke rich burn engine greater than 500 horsepower. You must limit the concentration of formaldehyde in the exhaust to less than or equal to 350 parts per billion at 15% oxygen or reduce formaldehyde emissions by 76% or more. Alternatively you can reduce total hydrocarbon emissions by at least 30%. This will likely require non-selective catalytic reduction, or NSCR.

If using NSCR, maintain that the pressure drop does not change by more than two inches of water at 100% load from the pressure drop across the catalyst measured during the initial test, and maintain the engine exhaust temperature so

that the catalyst inlet temperature is between 750° Fahrenheit and 1,250° Fahrenheit. If you are not using NSCR, you may comply with any operating limitations approved by EPA. Conduct performance testing as required.

[Slide 37:]

You must install, operate and maintain a CPMS. Keep all records of notifications, reports, malfunctions, corrective actions, tests, and maintenance for a period of five years. Submit Notifications of: Applicability, Startup, Intent to Conduct Performance Testing and Compliance. Finally, if you are subject to the SI NSPS, you must comply with the applicable recordkeeping, reporting and compliance requirements.