# STATE OF CONNECTICUT
## DEPARTMENT OF ENVIRONMENTAL PROTECTION

February 3, 2006

Air Docket
U.S. Environmental Protection Agency
Mail Code 6102T
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Attention: Docket # OAR-2005-0117

**Re:** ***Comments of the Connecticut Department of Environmental Protection on the Proposed Rule for Large Municipal Waste Combustors***

Dear Docket Administrator:

The Bureau of Air Management of the Connecticut Department of Environmental Protection (CTDEP) has reviewed the U.S. Environmental Protection Agency's (EPA's) Proposed Rule revising the *Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Large Municipal Waste Combustors* (70 FR 75348; December 19, 2005). Based on our considerable experience administering our state plan for the state's five large municipal waste combustors (MWC) facilities, we recommend the incorporation of the following revisions in the final rule:

- ***Increased reliance on continuous emissions monitoring.*** The proposed rule addresses allowing continuous emissions monitors (CEMs) for particulate matter (PM), hydrogen chloride (HCl), mercury (Hg) and multi-metals to substitute for annual stack testing of these pollutants. In making this allowance, EPA would update the Performance Specifications for the associated CEMs. We encourage EPA to make this allowance and update the corresponding Performance Specifications.

- ***CEM for ammonia.*** We strongly encourage EPA to add ammonia to the list of pollutants that MWC owners and operators must monitor, and we recommend the use of CEMs for such monitoring. At the very least, annual emissions testing for ammonia, along with ongoing parametric monitoring to assure optimized reagent usage, should be required. Under this proposal and the emissions limitations for MWCs in 40 CFR subparts Cb and Eb, EPA considers selective non-catalytic reduction (SNCR) to reflect maximum achievable control technology (MACT) for nitrogen oxides (NOx). Since ammonia is a significant by-product of the use of SNCR and an important precursor to particulate matter (PM), we believe that ammonia should be monitored in order to provide a baseline for EPA's future development of an emissions limitation for ammonia. Such a limitation will be particularly important when the NOx emissions limits for MWCs proposed in this rule become effective, about the same time that states will be implementing efforts to reduce PM emissions to comply with federal requirements for PM fine and PM coarse.

- ***New combustor definitions.*** EPA proposes defining two new subcategories of MWC technology, *"semi-suspension refuse-derived fuel-fired combustor/wet refuse-derived fuel process conversion"* and *"spreader stoker refuse-derived fuel-fired combustor/100 percent coal capable."* EPA's proposal fails to justify either the establishment of these subcategories or the associated increases to the carbon monoxide (CO) emission standard for units in the subcategories. The docket indicates that EPA has created these categories and standards for individual facilities without review of data from like-kind facilities. Three MWC units that meet the definition of a "spreader stoker refuse-derived fuel-fired combustor/100 percent coal capable" operate at a facility in Connecticut, and the operator has had no difficulty operating the three units to comply with the existing standard. We encourage EPA to review the emissions data and operating and design characteristics for *all* units that would be assigned to these new subcategories before finalizing this proposal. Such a thorough review will ensure that EPA does

not establish a national standard based on data from a single facility that, compared to other similar units, may not be designed or operated optimally to limit emissions.

- ***PM CEM and opacity monitoring.*** EPA requested comment on dropping the requirement to monitor opacity on units that use PM CEMs. CTDEP agrees with EPA that it is not necessary for an owner or operator complying with appropriate PM CEM requirements to monitor opacity. Opacity CEMs have typically been useful for indicating gross exceedances of PM emissions standards and failures of the control equipment. Accordingly, opacity CEMs may not be the most appropriate monitoring device for sources with PM emissions that result largely from fine particulate matter and PM precursors. Alternatively, if EPA were to adopt appropriate performance specifications for bag leak detectors (triboelectric monitors), such detectors could also serve in lieu of opacity monitors.

- ***Fine PM and the Method 5 test***. Currently, compliance with the particulate matter emission standard is determined by stack testing with Method 5. In light of the trend toward regulating finer particulate, we recommend that EPA give further consideration to the test methods and investigate including a revised Method 202 to quantify the total particulate emissions from these sources. Method 5 does not require reporting of the back-half catch of condensable particulate.

- ***Annual stack test schedule.*** There appears to be a misprint in EPA's proposed change to the timeframe for conducting the Hg emissions test (proposed wording for 40 CFR 60.58b(d)(2)(ix)) as the language requires that the test be conducted between 9 and 12 months from the previous test. A requirement to conduct such test between 9 and 15 months from the prior test would be consistent with the language that occurs in the other test schedules [i.e. "... shall conduct a performance test... on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test)."] In any event, we believe that the proposed changes to the testing timeframe for all the pollutants is unnecessary and will not accomplish the purported goal. We recommend against extending the timeframe for conducting performance tests and prefer the existing language regarding test frequency.

- ***Increase the CEMS quarterly data availability from 90% to 95%.*** In 2003, the CTDEP analyzed three years of CEM data to review quarterly data availability. This review showed that among all the sources required to operate CEMS, 95% data availability was met 97% of the time. The frequency of meeting this availability rate was even higher for the MWC category. Based upon this study and our experience, we support EPA's proposal for increased data availability. We note however that our study did not include data from Hg, PM or HCl CEMS.

CTDEP appreciates the opportunity to comment on the proposed rule in furtherance of our mutual environmental goals. If you or members of your staff have any questions regarding this letter, please do not hesitate to get in touch with Kiernan J. Wholean at 860-424-3425.

Sincerely,

Anne R. Gobin, Chief
Bureau of Air Management