

Wert, Mark (DEP)

From: Shepherd, Don <don_shepherd@nps.gov>
Sent: Wednesday, December 19, 2018 10:19 AM
To: Wert, Mark (DEP)
Cc: Keith, Glenn (DEP); Brewer, Patricia; kirsten_king@nps.gov
Subject: Re: [EXTERNAL] follow-up to NPS letter/discussions
Attachments: updated MA RP facilities.xlsx; CAAI Article 8 Permit Application Project Overview FINAL.pptx

Hi Mark,

Thanks for the info. I have attached a revised list of facilities that we think should be considered for a four-factor analysis under the Reasonable Progress provisions of the Regional Haze Rule. I am also including a few initial comments on the potential for reducing emissions from some of those facilities.

For example, we are currently evaluating a potential permit application from Covanta to increase utilization at its MWC facility in northern VA--please see attached PowerPoint. Covanta is proposing to retrofit this MWC that began operating in 1988 with Low-NOx Burners to achieve 110 ppm on 24-hr average. We believe that the Covanta facility could be a "model" for controlling emissions from MWCs of that era.

The MWCs on our revised list consist of:

SEMASS PARTNERSHIP: The operating permit issued 2/12/2004 appears to limit NOx emissions to 250 ppm for units 1 & 2 and 180 ppm on unit 3 (with SNCR). Would lower NOx emission limits be feasible here?

WHEELABRATOR MILLBURY: The operating permit issued 2/22/2017 appears to limit NOx emissions to 205 ppm for units 1 & 2 (with SNCR). Would lower NOx emission limits be feasible here?

WHEELABRATOR NORTH ANDOVER: The operating permit issued 6/27/2016 appears to limit NOx emissions to 205 ppm for units 1 & 2 (with SNCR). Would lower NOx emission limits be feasible here?

WHEELABRATOR SAUGUS: The operating permit issued 11/26/2008 appears to limit NOx emissions to 205 ppm for units 1 & 2 (with SNCR). Would lower NOx emission limits be feasible here?

Mystic Station: EIA data for 2017 and partial 2018 indicates that Mystic is still burning a lot of 0.5% S residual oil--will that be addressed by regulations already on the books or is that something to consider for this next round of RP?

MEDICAL AREA TOTAL ENERGY PLANT--I cannot find any info on this facility

NEA Bellingham: CAMD shows only steam injection to control NOx from these combined cycle combustion turbines, so it looks like additional NOx controls could be considered.

Please feel free to contact me with any questions or comments...

thanks again,

On Tue, Dec 11, 2018 at 11:54 AM Wert, Mark (DEP) <mark.wert@state.ma.us> wrote:

Hi Don . . .

As a follow-up to our conversation yesterday we have some additional information for you regarding the facilities that NPS had asked us to review (per letter of October 22, 2018 from Carol McCoy to Kristine Kirby). Please let us know if you have any questions on it.

We look forward to continuing consultations with NPS as we proceed with our SIP process.

New RACT Rules

MassDEP updated its NO_x RACT rules on March 9, 2018. Units covered included boilers, turbines, and municipal waste combustors (MWCs). The links to documentation are below:

Rules: <https://www.mass.gov/regulations/310-CMR-700-air-pollution-control>

<https://www.mass.gov/media/1596301/>

Background documents:

<https://www.mass.gov/media/1898906>

<https://www.mass.gov/media/1898911> (MWCs)

Facility-specific updates we discussed are elaborated on below.

AQID Facility

0420086 SOLUTIA INC

Status: Operating

Update: The coal boiler was converted to natural gas in 2016 under MassDEP permit below. Note that the other units are also gas only. This is the only industrial facility in MA determined by the MANE-VU screening process to have a potential for significant impact. You can view the latest operating permit here <https://www.mass.gov/doc/springfield-solutia-inc/download> which contains the following notes:

- Plan Approval #WE-14-013, X261407 dated 2/4/2015 was added to the Powerhouse section of the OP. This Plan Approval was for the conversion of Boiler #11 (EU 150 S03) from a coal-fired boiler to natural gas;
- Letter from the Permittee dated December 2, 2013 to change the fuel source of the #9 and #11 Boilers (EU 150 S01 and EU 150 S02, respectively) to natural gas only;

The other large industrial coal-fired boiler in MA has also converted to gas and that was codified in an Emission Control Plan earlier this year (<https://www.mass.gov/doc/worcester-saint-gobain-abrasives-inc-saint-gobain-ceramics-plastics-inc/download>).

1200217 MM TAUNTON ENERGY LLC

Status: Operating

Update: The facility reported 669 tons of NO2 in their 2014 Source Registration. This was in error and the facility is correcting this amount down to a level similar to other recent reports which are generally less than 25 tpy.

1200856 ARDAGH GLASS INC

Status: Closed

Updates: Permits were terminated per 9/26/2018 request from the facility.

Mark . . .

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"the man who really counts in the world is the doer, not the mere critic" TR 1891