



BWP AQ 30 CO₂ Budget Emission Control Plan

Application Instructions and Supporting Material

Table of Contents

- Introduction
- Instructions for completing a CO₂ Budget Emission Control Plan
- Frequently Asked Questions

Introduction

The purpose of MassDEP regulation 310 CMR 7.70 is to establish the Massachusetts CO₂ Budget Trading Program, which is designed to stabilize and then reduce anthropogenic emissions of CO₂, a greenhouse gas, from CO₂ Budget sources in an economically efficient manner. 310 CMR 7.70(8) requires the owner or operator of all affected units to determine and report CO₂ mass emissions from certified systems on or after January 1, 2009. To ensure that the CO₂ mass emissions are determined accurately and consistently, 310 CMR 7.70 requires the owner or operator to submit a CO₂ Budget Emission Control Plan (ECP), which contains an emissions and an energy output monitoring plan.

Who must apply?

The owner or operator of a facility with one or more CO₂ Budget Units must apply for a CO₂ Budget ECP approval. Applicability of this program to a facility is determined by 310 CMR 7.70 (1) (d) and includes any fossil fuel-fired stationary boiler, combustion turbine, or combined cycle system that, at any time on or after January 1, 2005, serves an electricity generator with a nameplate capacity equal to or greater than 25 MWe. Any source that includes one or more such units shall be a CO₂ Budget source.

What are the application deadlines?

The deadline for submittal to the MassDEP of a complete CO₂ Budget ECP application under 310 CMR 7.70(3)(c) is August 1, 2008 or 12 months before the date on which the CO₂ Budget source, or a new unit at the source, commences operation, whichever is later.

Pre-Application Consultation

You should contact Michelle Blanchard of MassDEP's Air Facilities and Permits Branch in Boston at 617-292-5664 early in the process of preparing to apply for an initial or modified CO₂ Budget ECP. A pre-application conference can save you time, spare you frustration, and often results in faster processing by the agency. If you submit an application without scheduling such a meeting, MassDEP may require one anyway, before it can determine whether your application is administratively complete.

Instructions

The application is an online form that can be found at: <https://permitting.state.ma.us/CitizenAccess>

You will need to create an account to access the form. Screen by screen instruction to assist you in completing the form is available at: <http://mass.gov/dep/aq-co2>

Please note that when completing the form online, every field with a red asterisk is required data. You will not be able to advance to the next page in the form or submit the form without entering something in each field of the form marked with a red asterisk.

The form allows the preparer to "Save and Resume Later" any form you start. It is recommended that the first person to open a form in the online system enter the first page of data and then click "Save and Resume". This action will create a PIN that can be shared with another person (consultant, staff or signatory). Once another person activates the PIN in their account, they will be able to open the form and add information or



BWP AQ 30 CO₂ Budget Emission Control Plan

Application Instructions and Supporting Material

approve it as the signatory. See <http://mass.gov/dep/aq-co2> for more detailed instruction on activating a PIN and sharing a form.

The following provides general instruction on the forms by section.

Step 1: Facility and Facility Owner Information

Provide general information such as facility name, facility owner, address, and EPA Identification number. You can search for your facility from a pre-loaded list. If you are proposing a new facility you can enter the information for the proposed facility and NOT select from the existing facility list.

The form also requires you to enter information about the facility Owner and Contact. If you have previously completed an on-line application for the same facility or owner, you may be able to look up and select ownership information.

Finally, you are required to enter either the ORIS Code. The Office of Regulatory Information Systems Identification (ORIS ID) number is issued to the facility by the Energy Information Agency (EIA).

Step 2: Application Information

Application Information is collected in a series of tables and / or questions.

Page 1 - Facility Description

On page 1, identify the purpose of the application (New CO₂ Emission Control Plan or Modification of an Existing Emission Control Plan). Once the application type has been selected click “Continue Application” to move on to the next page.

Page 2 - Emission Unit Description

On page 2, identify and describe each CO₂ Budget Unit (“emission unit”) that is included in the Emission Control Plan. The table also includes three questions that must be answered for each emission unit:

- Is this Emission Unit subject to the Acid Rain Program?
- If yes, do you have a monitoring plan that meets the requirements of 310 CMR 7.70(8)?
- Will this unit operate as dispatched by ISO?

Click on “Add a Row” to add a line to the table for each emission unit. If you wish to edit a previously entered row, click on the box to the left of the row you want to edit and click on the “Edit Selected”.

Once the table is complete, click “Continue Application” to move on to the next page.

Page 3 - Net Energy Output Monitoring

On page 3, complete a summary of the Net Energy Output Monitoring Plan for each unit. This is simply a summary. There is a space to attach the full plan in the next section of the application.

Click on “Add a row” to add a line to the table for each emission unit. Provide a brief description of the plan. Up to 2000 characters (including spaces) are available in each field to describe the characteristics of the Net Energy Output Monitoring Plan. While a specific description for each emission unit should be entered, it is possible to cut and paste the information from the first emission unit into lines for other emission units, if the information is the same. Cutting and pasting may be done by highlighting the text to be copied and clicking <Ctrl><c>, then placing the cursor where the copied material to should appear, and clicking <Ctrl><v>.



BWP AQ 30 CO₂ Budget Emission Control Plan Application Instructions and Supporting Material

Step 3: Documents

Page 1 - Project Checklist

On page 1, confirm the scope and content of the Net Energy Output Monitoring Plan that will be attached to the application. There are a series of questions that are to be answered “yes,” “no,” or “not applicable” depending upon the circumstances of the project. An answer to each question must be provided.

Page 2 – List of Documents

On page 2, attach the documents to support the application. A list of required documents is provided and includes:

- Detailed Description or Quality Assurance or Quality Control Procedures;
- Manufacturers Specifications and Supporting Information for Combustion Equipment, and/ or Air Pollution Control Equipment; and
- Net Energy Output Monitoring Plan with Schematic Diagram

When uploading file document(s) the maximum file size allowed is **50 MB**. If necessary, break down the documents into several files to fit this limit. Other limitations include:

- The 'File Name' (including file extension) **MUST NOT** exceed **75 characters** in length.
- The document 'Description' **MUST NOT** exceed **50 characters** in length.

Documents that exceed any of these limits will be removed by the system, and cannot be retrieved, which may delay the review process.

The document attachment process is very similar to attaching a document to an email. Start by clicking on the “Browse” button. This will bring up a pop-up box. Click on “Browse” again and you can search your computer for the document you want to attach. Once you have clicked on the document you wish to attach you can click “Browse” again to attach another document or click “Continue” which brings you back to the main screen.

On the main screen you will be asked to identify the attachment type (pick from a drop down list) and provide a brief description of the attachment. The description cannot exceed 50 characters (including spaces). Click “Save” when done. It may take a couple of minutes to complete the upload. When the upload is complete you can click “Continue Application”.

Step 4: Account Representatives

For Sources subject to the Federal Acid Rain Program (ARP) at 40 CFR Part 72, the CO₂ Authorized Account Representative and the Alternate CO₂ Account Representative must each be the same person as the ARP Designated Representative or Alternate Designated Representative

The CO₂ Authorized Account Representative and the Alternate CO₂ Account Representative must create an account in ePLACE and access the application to submit it. No other person can submit the application. When the signatory logs into the application, their name as provided in their account information will show up in the box labelled “Applicant Information.”

On this screen, indicate the name and contact information for the CO₂ Authorized Account Representative and the Alternate CO₂ Designated Representative. The CO₂ Authorized Account Representative or the Alternate CO₂ Authorized account representative as identified should log in and view the form at this stage.



BWP AQ 30 CO₂ Budget Emission Control Plan Application Instructions and Supporting Material

Only the CO₂ Authorized Account Representative or the Alternate CO₂ Authorized Account Representative as identified above can certify the following questions:

The energy output monitoring system for this CO₂ Budget source consists entirely of billing meters.:

The energy output monitoring system for this CO₂ Budget source includes non-billing meters that meet the accuracy requirements for non-billing meters at 310 CMR 7.70(8)(h)4.b.:

Step 5: Applicants and Contributors

The Applicant Contributors page identifies the CO₂ Authorized Account Representative and the Alternate CO₂ Account Representative. If either of these people are logged in, their name will appear as well as names of other people who contributed to the application.

The CO₂ Authorized Account Represented or the Alternate CO₂ Account Representative should complete the Signatory Authority Information. Entering in the Signatory Authority Information includes:

- Entering in the Company Name,
- Selecting the appropriate organization type (LLC, Corporation, Sole Proprietorship), and
- Picking the appropriate title or position for the CO₂ Authorized Account Representative or Alternate CO₂ Account Representative.

The CO₂ Authorized Account Representative or Alternate CO₂ Account Representative must create an account in ePLACE and access the application to submit it. No other person can submit the application. When the signatory logs into the application, their name as provided in their account information will show up in the box labelled “Applicant Information”

As required by 310 CMR 7.70(2)(a)4., a CO₂ Budget ECP approval shall not be issued, and a CO₂ Allowance Tracking System account shall not be established for a CO₂ Budget Source, until MassDEP has received a complete account certificate of representation under 310 CMR 7.70(2)(d) for a CO₂ authorized account representative of the source and the CO₂ Budget units at the source.

Please contact the Department for a CO₂ Budget Trading Program certificate of representation form.

Step 6: Application Review and Submittal

The entire application is presented for final review in this step. You can reopen the application to edit it by clicking on the “Edit Application” button at the top or, if the information provided is complete and accurate, you can proceed to submit the application.

At the bottom of the review page is the applicant certification statement. The CO₂ Authorized Account Representative or the Alternate CO₂ Account Representative must certify that the information contained on the form is true, accurate and complete by clicking a box of agreement.

Click “Continue Application” to finalize the submittal.

Once the application is submitted the CO₂ Authorized Account Representative or the Alternate CO₂ Account Representative will receive an email notice of a successful submittal and within five minutes the applicant will receive a printable copy of the application as submitted (minus attachments) called a “Proof of Record” or POR.



BWP AQ 30 CO₂ Budget Emission Control Plan Application Instructions and Supporting Material

After Submittal

If you log into ePLACE, and click on the “My Records” button, you will be able to view the status of your application through the review and approval process. The timeline for review will not start until the fee has been paid or a fee exemption (if requested) has been verified).

If the CO₂ Budget Source is required to have an Operating Permit under 310 CMR 7.00: Appendix C, such Operating permit shall be modified in accordance with the procedures in 310 CMR 7.00: Appendix C(8).

Frequently Asked Questions (FAQ)

1. What are the application fees and timelines?

BWP AQ 30 is not subject to 310 CMR 4.00 and therefore is not subject to fees and timelines established under that regulation.

The completed CO₂ Budget ECP must be submitted by the source’s CO₂ Authorized Account Representative or Alternate CO₂ Account Representative. Note that for sources subject to the federal Acid Rain Program (ARP) under 40 CFR Part 72, the CO₂ Authorized Account Representative must be the same person as the ARP designated representative; the Alternate Authorized Account Representative must be the same person as the alternate ARP designated representative.

2. How do I decide which monitoring plan option applies to each CO₂ Budget unit?

In Step 2: Application you must choose an option to describe the purpose of the application. The choices are “New Budget Emission Control Plan” or “Modification of an Existing CO₂ Emission Control Plan.”

New Budget Emission Control Plan. You should choose this option if the facility does not currently have an existing CO₂ Budget Emission Control Plan.

Modification of an Existing Control Plan. You should choose this option if the facility currently has an existing CO₂ Budget Emission Control Plan and you would like to:

- (1) Make a modification/ change to an existing unit(s); or
- (2) Add a new unit(s) to the existing plan

3. What other information should be considered when applying?

Emissions Monitoring. The source’s CO₂ Authorized Account Representative or Alternate CO₂ Account Representative need to submit emissions monitoring plans or emissions certification documents in compliance with 40 CFR 75.62. See Section 6 of these FAQs for more information.

Long-term Cold Storage.¹ You must have a certified emissions monitoring system that meets the requirements of 310 CMR 7.70(8)(a)1.a through 1.c (that does not use equation G-1 to calculate CO₂ emissions) by January 1, 2009. However, a unit is considered to meet these requirements if the monitoring system is uncertified, the unit did not operate before January 1, 2009, and notification has been provided to US EPA that the unit is a ‘long-term cold storage unit’ (shut down for at least two years) in accordance with 40 CFR 75.61(a)(7). In addition, under 40 CFR 75.64, no quarterly reports will need to be submitted for these units until they recommence operation.

¹ *Long-term cold storage* means the complete shutdown of a unit intended to last for an extended period of time (at least two calendar years) where notice for long-term cold storage is provided under 40 CFR 75.61(a)(7). (40 CFR 72.2 Definitions)



BWP AQ 30 CO₂ Budget Emission Control Plan Application Instructions and Supporting Material

Net Energy Output Monitoring and Schematic Diagram. As required by 310 CMR 7.70(3)(c) and 310 CMR 7.70(8)(h)3, you must submit a net energy output monitoring plan, and corresponding schematic diagram, for any:

1. Proposed new unit; or
2. Modification to an existing net energy output monitoring plan for an existing unit

The monitoring plan and schematic diagram must include all of the requirements listed in 310 CMR 7.70(8)(h)3.a-d.

4. Who should I send my CO₂ emissions monitoring and testing data and electronic monitoring plans to?

The US EPA is the Department's agent for these purposes. You can find the appropriate US EPA contact at: <http://www.epa.gov/airmarkets/business/industry/contacts.html>

5. Do I need to send the CO₂ Account Certificate of Representation to US EPA?

No. The CO₂ authorized account certificate form must be signed by the CO₂ Authorized Account Representative (CO₂ AAR) and, if any, the Alternate CO₂ Authorized Account Representative (CO₂ AAAR).

Note that for sources subject to the federal Acid Rain Program (ARP) under 40 CFR Part 72, the CO₂ Authorized Account Representative must be the same person as the ARP designated representative; the alternate CO₂ authorized account representative must be the same person as the alternate ARP designated representative. No additional account certificate of representation form needs to be submitted to US EPA for the purposes of 310 CMR 7.70. Please contact the MassDEP if you wish to change either the CO₂ AAR or CO₂ AAAR. Any changes made to either the CO₂ AAR or the CO₂ AAAR, must correspond to respective changes made with US EPA to the ARP designated representatives.

6. When do I submit my electronic monitoring plan to US EPA?

CO₂ Authorized Account Representatives for ARP CO₂ Budget Units and Non-ARP CO₂ Budget Units must submit and maintain the complete electronic, up to date, monitoring plan file with the US EPA pursuant to 40 CFR 75.62.

40 CFR 75.62(a)(1) states that the authorized account representative for an affected unit "shall submit a complete electronic, up to date monitoring plan file... no later than 21 days prior to the initial certification tests; at the time of each certification or recertification application submission; and (prior to or concurrent with) the submittal of the electronic quarterly report where an update of the electronic monitoring plan information is required..."

7. Does my CO₂ monitoring system need to be certified (or recertified)?

If you are proposing to use certain heat input methodologies (e.g., certified fuel flow meters, the long term fuel flow heat input method or Maximum Rated Hourly Heat Input Rate (MHHI) values previously approved under 310 CMR 7.28 and/or 310 CMR 7.32) for a non-ARP CO₂ Budget Unit to calculate CO₂ emissions, then you must perform a Data Acquisition and Handling System (DAHS) verification and any other appropriate diagnostic test to ensure that the monitoring system accurately calculates CO₂ emissions from each fuel that is burned in the unit. DAHS verifications are diagnostic tests that do not require a Relative Accuracy Test Audit (RATA) and thus are not re-certification events² and do not need to be submitted. Certified fuel flow meters do not need to be recertified to begin reporting under 310 CMR 7.70.

² 40 CFR 75.20(b) "Any change to a flow monitor or gas monitoring system for which a RATA is not necessary shall not be considered a recertification event."



BWP AQ 30 CO₂ Budget Emission Control Plan Application Instructions and Supporting Material

No recertification is required under 310 CMR 7.70 for ARP units with monitoring systems that have been certified under 40 CFR 75.

CO₂ Budget Units for which a new CO₂ or O₂ analyzer and/or stack flow monitor, or fuel flow meter, are being proposed to calculate CO₂ emissions, must certify their CO₂ monitoring system. Non-ARP CO₂ Budget Unit certification test data must be submitted to MassDEP within 45 days after completing all CO₂ monitoring system tests.

8. How do I report a Low Mass Emissions (LME) unit under the CO₂ Budget Program?

For CO₂ Budget Units subject to ARP LME unit status will continue to be determined by NO_x and/or SO₂ emissions pursuant to 40 CFR 75.19. Qualifying units must use the CO₂ emissions calculations for LME units under 40 CFR 75.19 for purposes of compliance with 310 CMR 7.70. No new qualifying information needs to be provided with this application for the CO₂ Budget Program. CO₂ Budget Units that are subject to NO_x ozone season emissions reporting requirements and that qualify for LME unit status will need to report CO₂ and NO_x emissions year round.

For CO₂ Budget units that are not subject to ARP qualification for LME unit status will be determined pursuant to 310 CMR 7.70(8)(a)3.c.iii.

9. Where and when do I submit my quarterly electronic data reports?

All quarterly electronic data reports must be submitted to US EPA. An electronic data report must be submitted for each CO₂ Budget Unit within 30 calendar days of the end of each of the four calendar quarters.

10. How do I certify each quarterly emissions submittal as required by 310 CMR 7.70(2)(a)6?

When any submission is made to US EPA's Emissions Collection and Monitoring Plan System (ECMPS), the required certification language in 310 CMR 7.70(2)(a)5 will appear and must be accepted and agreed to by the submitter.

11. How do I certify that my energy output monitoring system(s) meets the accuracy requirements of 310 CMR 7.70(8)(h)4?

The CO₂ Authorized Account Representative or Alternate CO₂ Account Representative must complete and sign the Certification by Authorized Account Representative section of the application form to certify that the energy output monitoring system(s) meet the accuracy requirements of 310 CMR 7.70(8)(h)4. This section of the application form **must be completed** for each new CO₂ Budget ECP application or modification to an existing CO₂ Budget ECP application even if there are no proposed changes to an energy output system that has been previously approved under 310 CMR 7.70.

12. I wish to co-fire biomass as a compliance mechanism – how should I complete the ECP application?

You must contact Michelle Blanchard at MassDEP to arrange a pre-application meeting to address site-specific issues before submitting the CO₂ Budget ECP application. Michelle Blanchard can be reached at 617-292-5664 or michelle.blanchard@state.ma.us.

13. Where and when do I submit my compliance certification reports?

Compliance certification reports shall be submitted, pursuant to 310 CMR 7.70(4), by March 1st following each relevant control period to RGGI CO₂ Allowance Tracking System (COATS).



Massachusetts Department of Environmental Protection
Bureau of Waste Prevention – Air Quality
BWP AQ 30 CO₂ Budget Emission Control Plan
Application Instructions and Supporting Material

Annual energy output reports shall be submitted, pursuant to 310 CMR 7.70(8)(h)6.c., by March 1st following each calendar year to Michelle Blanchard at the MassDEP Boston office. Energy output reports must be submitted in electronic format to michelle.blanchard@state.ma.us.

14. What is the annual compliance fee?

There is no annual compliance fee specifically for this program.

15. What are the regulations that apply to these permits? Where can I get copies?

These regulations include, but are not limited to:

Massachusetts Air Quality Regulations, 310 CMR 7.00.

The state regulations may be purchased at:

State Bookstore (in State House)
Room 116
Boston, MA 02133
617-727-2834

State House West Bookstore
436 Dwight Street, Room 102
Springfield, MA 01103
413-784-1376

An unofficial copy of these regulations may also be obtained at:

<http://www.mass.gov/eea/agencies/massdep/air/regulations/>

Federal Regulations:

Continuous Emission Monitoring Regulations, 40 CFR Part 75.

These may be purchased at:

U.S. Government Bookstore
Thomas P. O'Neill Building
Room 169
10 Causeway Street
Boston, MA 02222
617-720-4180

These regulations may be obtained through the federal government web site:

<http://www.gpoaccess.gov/cfr/index.html>