

EMISSIONS REPORTING Opportunities and Challenges

Jackie Padgett NLA Meeting · November 5, 2010





History & Background

- Arline's presentation yesterday:
 - Starting point for EPA to assess residual risks is the National Emissions Inventory.
 - Erroneous data could potentially flag the industry and result in additional standards being applied to our operations.
- Earlier this year, NLA asked all member companies with major sources subject to the lime MACT to:
 - review 2008 emissions inventory data for HCI, VOC & CO.
 - inform Arline of any errors or questionable entries
- This is an opportunity for us to reflect on our reporting protocols and focus efforts to improving this process going forward.



Emissions Reporting - Opportunities

- Ensure consistency among regulatory submissions
 - Examples: TRI v/s Annual Emissions Inventory, Quarterly Fuels Reports, GHG Reporting
- Apply factors derived from emissions testing as opposed to default emissions factors (EFs) from AP-42.
- Ensure EFs are applied to appropriate material & units
 - Example: an EF may be established as lb/ton stone feed. Make sure it is applied to stone feed data, <u>not</u> lime data.
 - Example: AP-42 EF for VOCs for PC coal-fired boilers is 0.6 lb VOC/ton coal (not per ton/lime)
 - Example: If an EF is generated in some unit of time, verify it is routinely applied in that same unit.



Emissions Reporting - Opportunities

- Develop consistent reporting protocol. Update as needed.
 - Select an emissions factor
 - Document the source of the emissions factor
 - Consistently use the factor to estimate emissions
 - Until better data becomes available at which time the protocol should be updated.
- Peer Review
- For companies with multiple kilns/sites, compare emissions from comparable kilns
 - Significant differences in emissions suggests opportunity to evaluate kiln operating parameters or air pollution control performance



Emissions Reporting - Challenges

- Response to outlying data
 - Consider additional testing
 - Consider alternative test methods for pollutants:
 - FTIR v/s ASTM/EPA Methods
- Challenge "black box" emission factors
 - Some state inventory programs use 1 digit EFs. As a result, factors are rounded up or down and can result in variances in emissions data.
 - Some states that generate their own EFs to estimate kiln emissions use them inconsistently (i.e., the factor is different from plant to plant).
 - Perform emissions testing?
 - Will state agencies incorporate emissions test results to estimate emissions?



Emissions Reporting - Challenges

- Consider alternative emission factors
 - Use average of emissions test results vs a single test
 - Some states may challenge this approach
 - Data would be more representative
- Understand impact of unreasonably high permit limits
 - May subject the facility / industry to additional scrutiny
- Unreasonably low limits will establish MACT Floor



Discussion/Questions

- Other members' experiences?
- Question: Is it better to err on the side of being too high w/ EFs?
- Pollutant specific questions:
 - Why not test for PM2.5 filterable?
 - PM2.5 condensible?
 - Is SOx, NOx & P.M2.5 NAAQS modeling inevitable? If so, why not test?
 - For NEI entries based on vintage stack tests that differ significantly from AP-42, why not test?
 - If it is inevitable that EPA will require Hg stone & stack testing, if so, why not test?