Industrial, Commercial and Institutional Boilers – Maximum Achievable Control Technology (IB-MACT)

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Consumers Energy and Michigan

- Provides electric and natural gas service to 6.5 million of Michigan’s 10 million residents throughout the Lower Peninsula
- 2.9 million customer accounts
- Fifth-largest combination utility in U.S.
- 2012 marked 125 years of service to Michigan
Projects include some recently completed, and others in progress or planned. Completion of several projects will extend beyond the 2012-2016 time period.

Consumers Energy is one of the largest investors in Michigan’s economy.
Electric Generation

Hydro, Wind, Gas, Coal

- 5 Coal fired Sites
  - JH Campbell
  - DE Karn
  - JC Weadock
  - JR Whiting
  - BC Cobb
- 1 Gas Site
  - Zeeland Generation Station

Gas Services

Transmission and Storage

- 12 Compressor Stations, Storage Fields

Distribution
- 5 oil fired units
- 37 gas units
- 1 Limited Use by Permit
- 3 Units that we will be requesting extension for as they will be permanently shutdown by July 2016
  - One gas/oil fired – 23mmBtu/hr
  - One oil fired - 0.6 mmBtu/hr
  - One gas fired – 32mmBtu/hr

No Units with Emission Limits
Overview of Reporting Requirements

Major Sources

• New Units
  ■ Initial applicability notification within 15 days of start-up
  ■ Notice of Compliance Status (NOCS) within 180 days of start-up
    ◆ No NOCS due if only reporting tune-up compliance
  ■ Semi-annual compliance reports
    ◆ Compliance reports starting semi-annually, at least 180 days past compliance date, on January 31 or July 31.

• Existing Units
  ■ Initial applicability in May 2013
  ■ NOCs by January 31, 2016
  ■ Semi-annual compliance reports starting July 31, 2016
    ◆ For tune-up/EA units only, report by January 31, the year after the tune-up (every 1, 2 or 5 years)
• If have emission limits, NOCS Must include: (63.7545)

  ◆ Facility ID, Unit ID and subcategory, controls used for IB MACT compliance, fuels burned

  ◆ Summary of all performance tests, fuels analysis and calculations demonstrating compliance with limit

  ◆ Max CO levels during performance test if no CO CEMS

  ◆ Identify compliance method – testing, CEMS, or fuels analysis or emissions averaging, energy conservation
• If have emission limits, NOCS Must include: (63.7545) cont…

  ◆ Signed certification that you have met all emission limits/WP Standards

  ◆ Deviations – description, duration, and corrective action

  ◆ The following statements, signed by a responsible official:
    – This facility complies with the required initial tune-up according to …
    – This unit has had an energy assessment performed according to …
    – No secondary materials that are solid wastes were combusted in any affected unit” (except for gas units)
No NOCs for new sources with only tune-up requirement – submit compliance report on Jan 31 following tune-up.

If no emission limits, NOCS Must include: (63.7545)

- Facility ID, Unit ID and subcategory, controls used for IB MACT compliance, fuels burned
- The following statements, signed by a responsible official:
  - This facility complies with the required initial tune-up according to ....
  - This unit has had an energy assessment performed according to ....
  - No secondary materials that are solid wastes were combusted in any affected unit” (except for gas units)
- Reconsideration Proposal has different language for the tune-up statement
Other Notification

- If you switch fuels or make physical change to boiler that affects the subcategory, provide notice to Administrator w/in 30 days
  - Date of change, date of notice
  - Current applicable subcategory
  - The date upon which the change occurred
Compliance Reports (63.7550)

• Submit reports in CEDRI
• Due semi-annual if you have emission limits
  ■ January 31 and July 31
  ■ Can request from Administrator to move dates to ROP semi-annual reporting (March, Sept)

• No emission limits, only tune-up
  ■ Due Jan 31 following most recent tune-up (at frequency of 1, 2, or 5 years)

■ Reports must contain – read paragraph c!
  ◆ If subject to tune-up:
    – Company/facility info
    – Process unit info
    – Date report and of reporting period (ie January – December 2016)
Compliance Reports (63.7550)

- Reports must contain (cont…)
  - The total operating time during the reporting period
    - Reconsideration requires this only for limited use units

  - Date of most recent tune-up, including delayed burner inspection
    - Delay of burner inspection allowed by Paragraph 63.7540(a)(10)(i):
      - As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;

  - Signed statement by responsible official
Compliance Reports (63.7550)

• Other Submissions – 60 days after test event

  - Submit results of performance test in CEDRI with ERT upload
  - Submit results of CEMS performance evaluation test in CEDRI
Electronic Reporting

- **CDX** – EPA’s Central Data Exchange
  - Facilities may already be set up in CDX for GHG Reporting or other NSPS reporting
  - Password expires every 90 days

- **CEDRI** – Compliance and Emissions Data Reporting Interface
  - Set up company, facilities and roles
    - If approver already set up in CDX for a facility, ensure that you pick the same Company and Facility code with setting up the CEDRI account.
    - Role sponsorship for delegated certifier can take some time to do (a week or two), get this done early, or
    - Get prior written authorization from RO to be a delegated certifier and register as such
    - Save answers to your security questions somewhere

- **MDEQ**
  - Submit hard copies of everything to District
Other Tid-bits / Recommendations

• Inventory of all applicable equipment
  - Date of install
  - Date of Tune-up
  - Date of EA
  - When NOCs is due
  - When Compliance Report due

• If many plants/many units, create a report form for the NOCs and Compliance Report for uniformity

• Set up the tune-ups in Maintenance System at required frequencies, attach a tune-up checklist and report form

• Indirect fire boiler with glycol/water mix, exempt if used for comfort/space heating – under Process Heater Definition
Other Tid-bits / Recommendations

- Have you checked limited use? Saves on tune-up frequency and energy assessment. Get PTI application in asap

- Need an extension? Allowed for in 63.6 if meet criteria. Contact MDEQ

- Records, 63.7555 (d)(3), Limited Use: Monthly fuel use is acceptable per Jim Eddinger of EPA (courtesy of DTE)

- Reconsideration Proposal:
  - Clarifies recordkeeping for start-up/shutdown in 63.7555 (i) and (j), adds them under (d) 11 and 12.
Reporting Example

- [www.epa.gov/cdx](http://www.epa.gov/cdx)

- Questions?