



# MACT Attack!

## Latest Trends & Lessons Learned

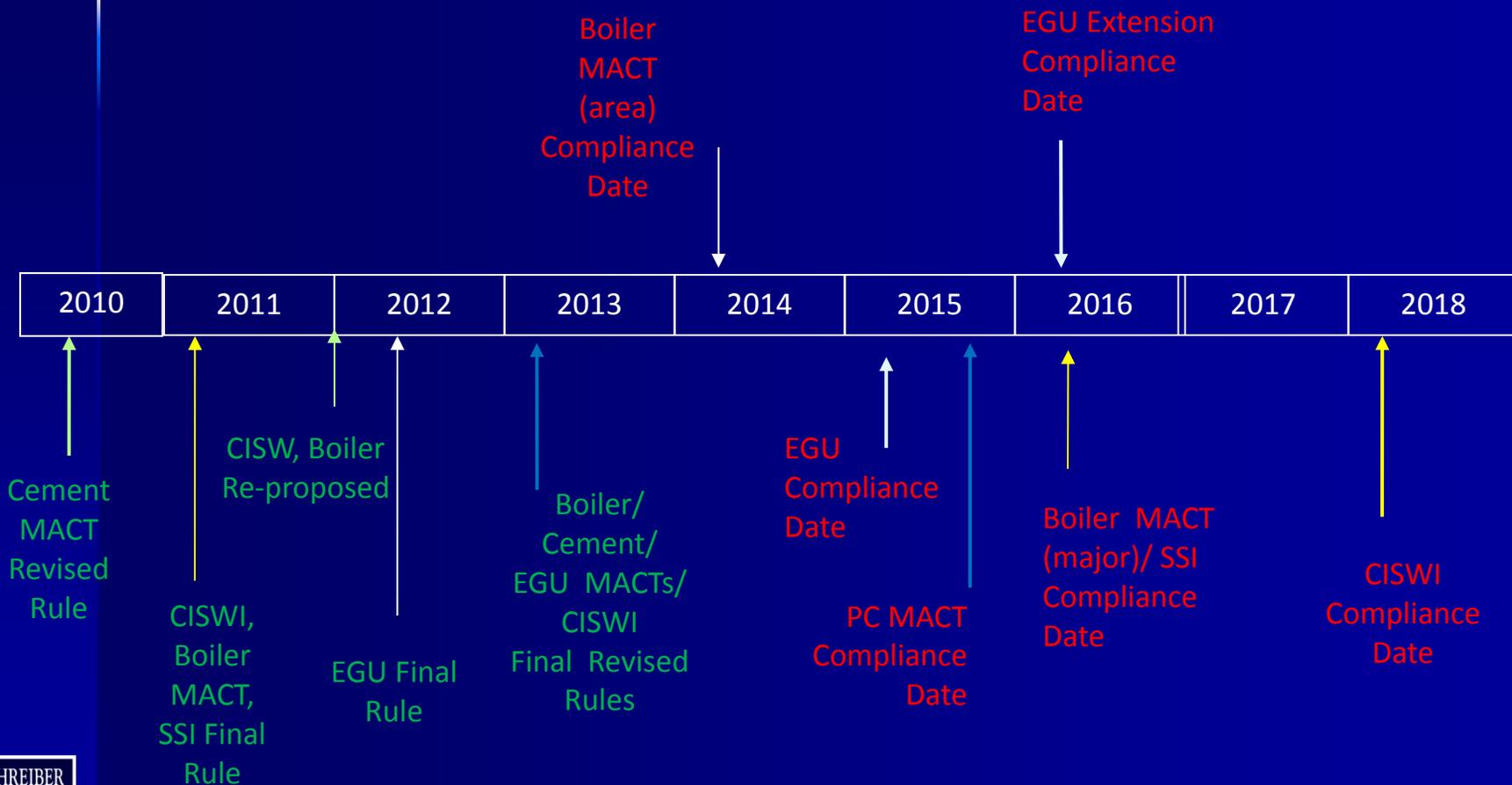
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# Ready, Get Set . . . . .

- A new level of interesting regulations . . . .
  - New improved MACT rules
  - Similar NSPS actions
- Are we finally at steady state?
  - Ongoing legal challenges, rule 'fixes' and residual risk
- Regardless, planning is in full swing
  - Operations and environmental action items
  - Interaction with EPA and MDNR

# A Few MACT and NSPS Rule Activities



# MACT/NSPS Preparatory Actions: 3 / 5 Year Implementation Planning

Updated  
Standards

CEMs/  
CMSs

Operating  
Limits

O&M  
Plan

Testing

Affirmative  
Defense

Workplace  
Standards

Site-  
specific  
Monitoring  
Plan

Alternative Fuel? Fuel Switching

# New/Revised Implementation Challenges

- Increased pollutant standards and lower limits for major and area sources
  - New APCDs
  - Increased CMS/CEMS
- Rules applicable at all times – **SSM** Changes!
  - Startup/shutdown definitions and work practices
  - Compliance required during malfunctions –  
Affirmative Defense option added
- Fuel Switching requirements
- Procedures for **changes** in operations

# New/Revised Implementation Challenges (con't)

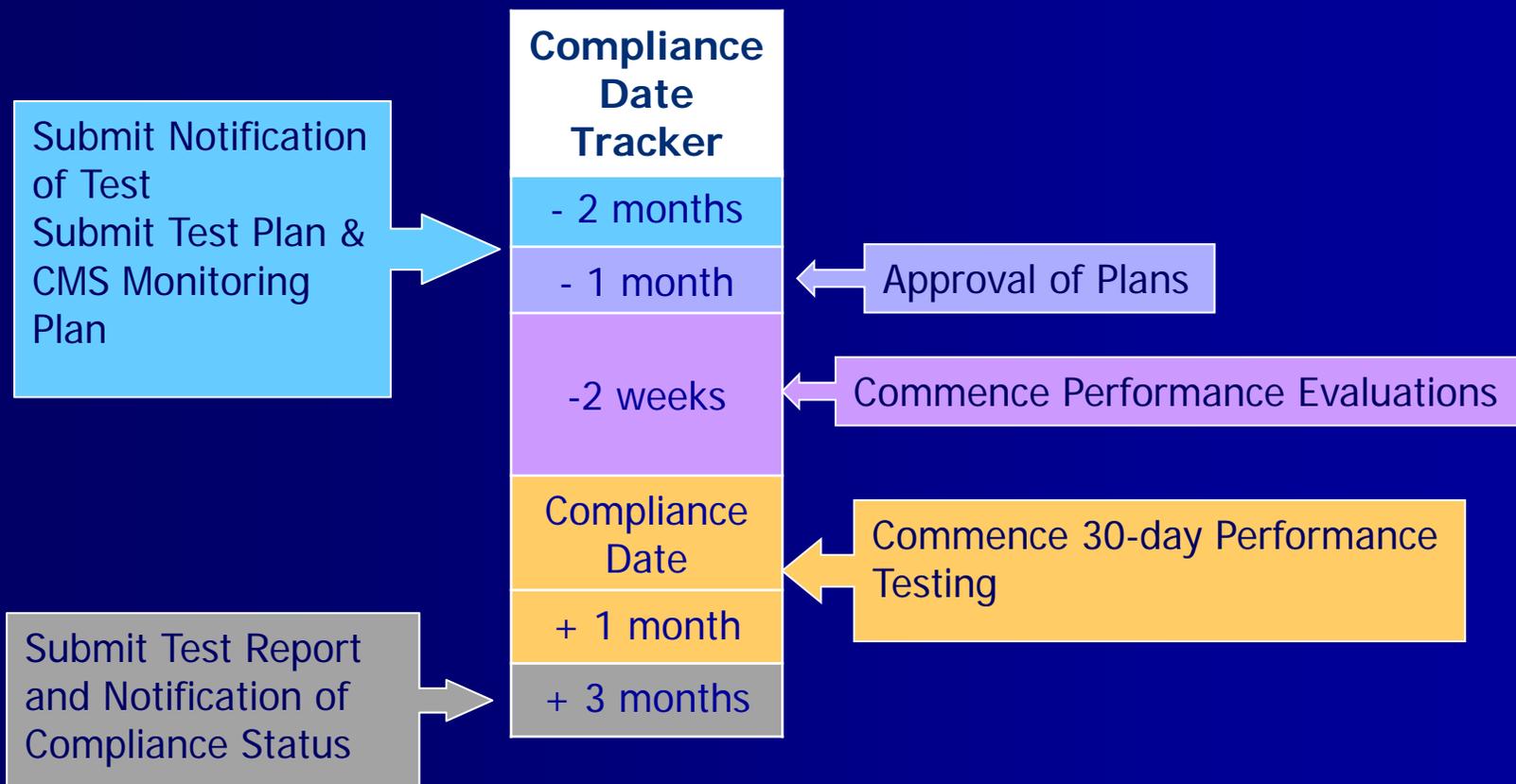
- More instrumentation
  - CEMs/CMS monitoring
  - CPMS approach for PM
  - Specifications/QA/accuracy requirements
  - Site-specific monitoring plan requirement
- Initial and continuing test requirements
  - Plan/test/report cycle frequency increasing
  - Establishment of new operating limits during testing
    - increases testing challenges



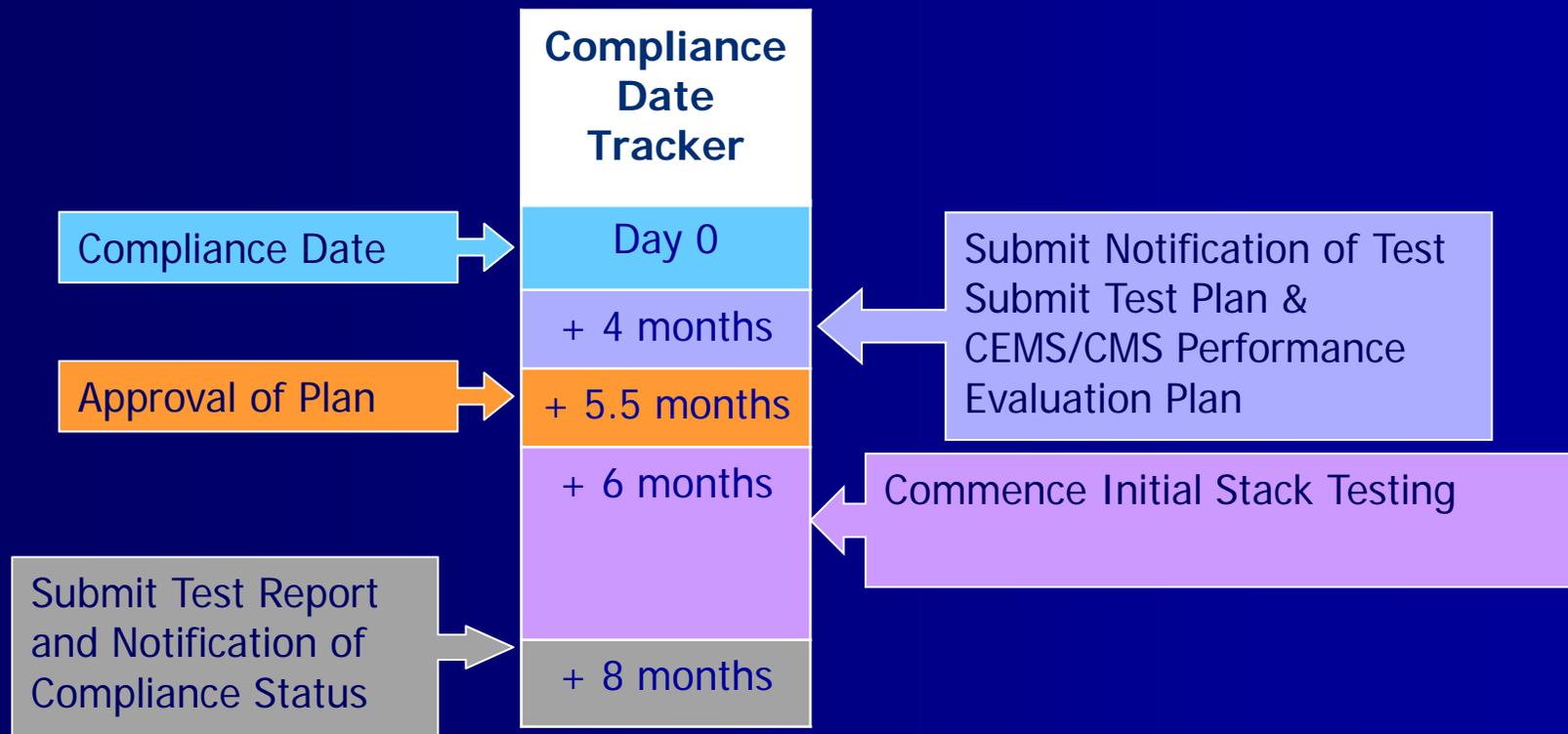
# New/Revised Implementation Challenges (con't)

- Develop/update plans:
  - O&M
  - Emissions and Opacity Monitoring
  - Affirmative Defense
- Deletion of SSM Plan (components move to O&M)
- Enhanced reporting, recordkeeping and notification requirements
  - More data, more testing, more plans

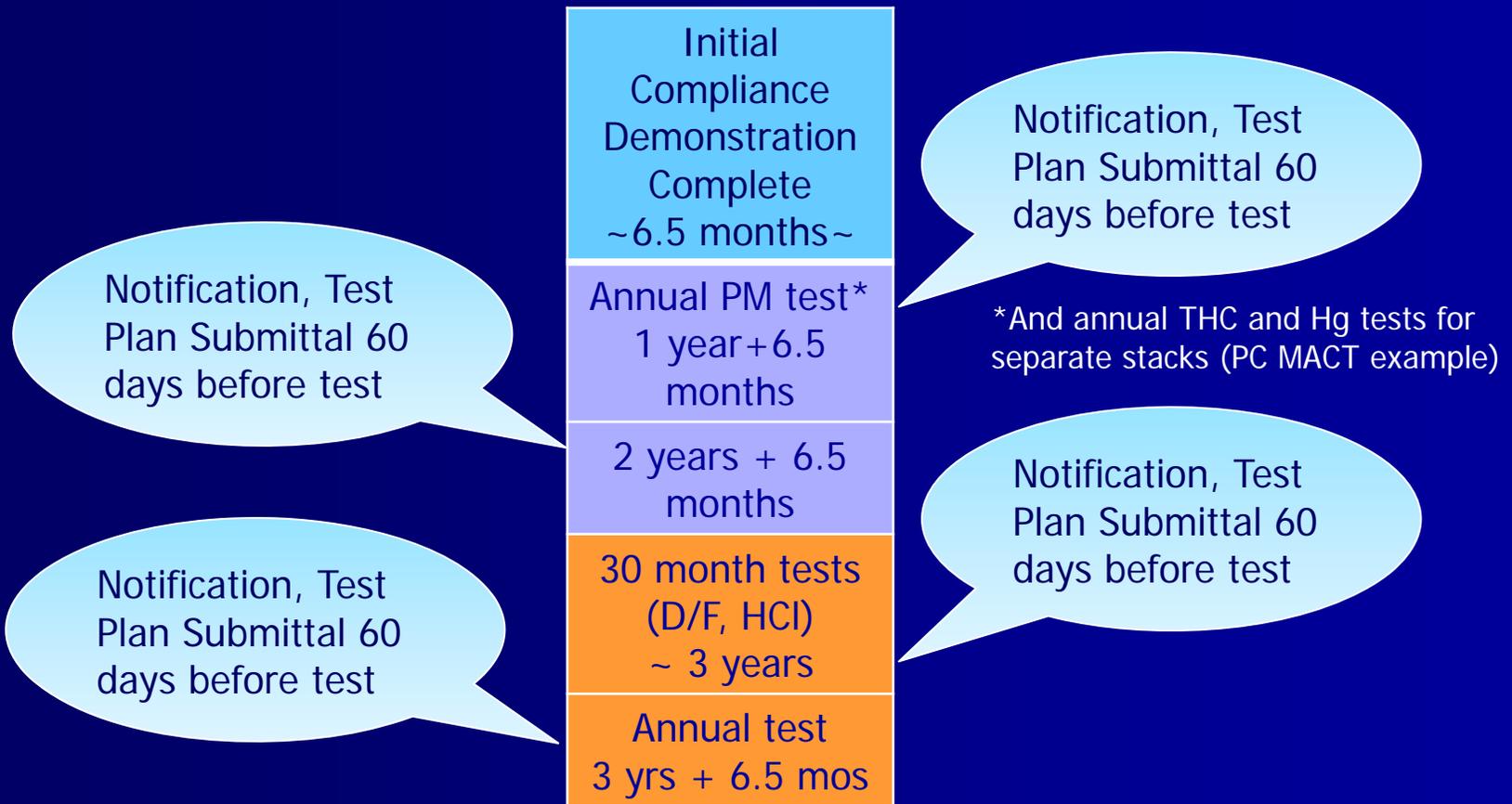
# Performance Testing Schedule: CEMS Initial Compliance Demonstration



# Performance Testing: Stack Test Initial Compliance Demonstration



# Performance Testing: Routine Compliance Test Frequency (Example)



Note: performance retest for exceedance within 30 /60/90 days for various pollutants

# Action Items to Prepare for Future Compliance Structure

- Develop timeline/actions/manpower needs
- Install equipment/shakedown
- Schedule testing crews and resources
- Update permits
- Update recordkeeping/reporting approach, and DAHS system, if necessary
- Watch for rule changes!
- Plan carefully for NSPS qualifying modification
- Conduct compliance verification review
- Employee training on new systems/ requirements

# Summary



Job Security for Environment Folks!

Keep dreaming about  
a peaceful vacation . . .

