

Bill Clary (MIRATECH)

From: MIRATECH Corporation [info@miratechcorp.com]
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To: Bill Clary (MIRATECH)
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MIRATECH Corporation Emissions Monitor *August 2009*



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June 3 Deadline Draws Comments on EPA's NESHAPS Standards for Reciprocating IC Engines

On 5 March 2009, EPA [published](#) a proposal regarding hazardous air pollutants (HAPs) that would affect owners and operators of existing stationary reciprocating internal combustion engines (RICE). There are 189 toxic chemicals on the Clean Air Act (CAA) list of HAPs. These are chemicals such as formaldehyde that are known or suspected carcinogens and have a high usage and emissions in a wide variety of industries.



EPA's proposal would establish national emissions standards for hazardous air pollutants (NESHAP) for the following:

- Existing stationary RICE with a site rating of less than or equal to 500 HP located at major sources of HAP
- Existing non-emergency compression ignition (CI) engines with a site rating greater than 500 HP located at major sources of HAP, and
- Existing stationary RICE of any power rating located at area sources of HAP.

Under the new proposal, numeric emissions limits would be set for existing stationary RICE at major sources. A single set of standards would apply during both normal operation and periods of start-up and malfunction. Existing stationary non-emergency diesel-fueled engines greater than 300 HP and with a displacement of less than 30 liters per cylinder located at major sources must use only diesel fuel meeting specific sulfur and cetane index or aromatic content requirements.

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For existing stationary RICE at area sources, owners and operators would be required to either meet numeric emissions standards or comply with management practices such as regular replacement of oil filters, spark plugs, and as necessary, hoses and belts.

The Agency is also proposing to amend existing HAP regulations for new and reconstructed RICE major sources to require that emissions standards under normal operating conditions also apply during periods of start-up and malfunction.

EPA extended its public comment period on its proposal to 3 June 2009 and has received numerous comments from the Natural Gas industry including comments from the [Interstate Natural Gas Association of America](#), the [Gas Compressor Association](#) and the [American Exploration and Production Council](#).

EPA Proposes Stringent Standards for Large U.S. Flagged Ships

On 1 July 2009 the Environmental Protection Agency (EPA) [announced](#) plans to create more stringent standards in order to reduce air pollution from U.S. - flagged large ships. EPA says its [proposed rule](#) would harmonize with international standards and lead to significant air quality improvements throughout the country.



EPA's proposal follows-up a key part of a strategy proposed last March by the United States and Canada to designate thousands of miles of the two countries' coasts as an [Emission Control Area](#) (ECA).

EPA is proposing to revise the Clean Air Act engine program to include two additional tiers of Nitrogen Oxide (NOx) standards for new Category 3 marine diesel engines installed on U.S. flagged ships. The proposed near-term Tier 2 standards for newly built engines would apply beginning in 2011 and would require more efficient use of current engine technologies, including engine timing, engine cooling, and advanced computer controls. The proposed long-term Tier 3 standards would apply beginning in 2016 and would require the use of high efficiency after treatment technology such as selective catalytic reduction to achieve NOx reductions 80 percent below the current levels.

In addition to the NOx emission limits, EPA is proposing standards for emissions of hydrocarbons and carbon monoxide from new Category 3 engines. EPA is not proposing to set a standard for Particulate Matter (PM) emissions for Category 3 engines. However, significant PM emissions benefits will be achieved through the ECA fuel sulfur requirements that will apply to ships that operate in areas that affect U.S. air quality. EPA is also proposing to require engine manufacturers to measure and report PM emissions.

Finally, EPA is proposing a change to the diesel fuel program that would forbid the production and sale of marine fuel oil above 1,000 ppm sulfur for use in the waters within a U.S. ECA and internal U.S. waters and allow for the production and sale of 1,000 ppm sulfur fuel for use in Category 3 marine vessels.

Status of EPA's Actions To Reconsider New Source Review Program

In late April 2009 the Environmental Protection Agency (EPA) [notified petitioners](#) of the Agency's intent to reconsider three rules promulgated during the Bush Administration under the New Source Review (NSR) Permitting Program. NSR requires stationary air pollution sources (such as coal-fired power plants) to install new pollution controls when they are modified or upgraded in ways that increase their pollution outputs.

In three separate NSR letters of April 24th EPA Administrator, Lisa Jackson, advised petitioners the EPA would consider rules regarding:



- Reasonable Possibility in Recordkeeping
- Inclusion of Fugitive Emissions
- Implementation of the NSR Program for Particulate Matter less than 2.5 Microns (PM2.5).

Reasonable Possibility

In December 2007 EPA's final "reasonable possibility" rule identified when a major source undergoing a physical change not triggering major NSR permitting requirements must keep records - as well as the recordkeeping and reporting requirements. On 20 February 2008, the State of New Jersey petitioned EPA to reconsider and stay the final rule. On 16 January 2009, EPA denied New Jersey's petition. On 11 March, New Jersey submitted a letter to EPA that repeated its request. In its [letter to the state of New Jersey](#) EPA says it now believes the issues raised by New Jersey warrant further public comment, however EPA decided not to stay the rule while reconsideration is underway. EPA will file a notice in the Federal Register requesting public comment.

Fugitive Emissions

Fugitive emissions are those that could not reasonably pass through a stack or chimney. In December 2008 EPA issued a final rule requiring that fugitive emissions be included in determining whether a physical or operation change results in a major modification only for sources in industries that were designated through an earlier rulemaking of the Clean Air Act. On 17 February 2009 EPA received a petition from the Natural Resources Defense Council (NRDC) asking EPA to reconsider the rule and convene a public notice-and-comment period after reconsideration.

EPA has notified NRDC by [letter](#) that it believes additional public comment is warranted and that NRDC's petition for reconsideration and stay should be granted. EPA will file a notice in the Federal Register requesting public comment.

PM 2.5 NSR Implementation

In July 2008 Earthjustice petitioned EPA on behalf of the Sierra Club and the Natural Resources Defense Council arguing that allowing plants to emit fine particles for a three-year transition period while the agency develops a better test method would allow dangerously high fine-particle soot emissions. On 16 January 2009 EPA denied the Earthjustice request. On 10 February 2009 the same petitioners submitted a second request. EPA is [granting](#) the February 10 petition and staying a grandfathering provision for three months pending reconsideration. On 1 June 2009 EPA published a [notice](#) in the Federal Register stating it has granted reconsideration and administrative stay of regulation for three months. On 16 July 2009 EPA [proposed](#) to extend its grandfather provision by nine months.

Court Rejects Bush Administration Air Pollution Waivers

On 10 July 2009 a federal appeals [court rejected](#) Bush administration rules that allowed major power plants and factories to emit uncontrolled pollution into the air in cities that already have severely polluted air. The U.S. Court of Appeals for the D.C. Circuit found the Environmental Protection Agency rules illegally let plants buy rights to pollute - sometimes from plants hundreds of miles away - instead of installing modern emission controls.

The court also invalidated parts of the rule that weakened pollution limits for major new or expanded factories and power plants in cities with unhealthy air.



Earthjustice filed the suit, representing the Natural Resources Defense Council (NRDC). The states of New Jersey, New York and Connecticut also joined in part of the challenge.

The case grew out of an air pollution trading program aimed at reducing pollution that travels between states. The overturned EPA rule allowed power plants in already polluted communities to avoid installing controls by buying pollution credits from another plant that could be hundreds of miles away. Earthjustice argued that the waiver violated the Clean Air Act. Twenty-two states are members of this interstate program, and most of them contain areas that are already non-attainment areas. These include cities like Chicago, Pittsburgh, Baltimore, New York and Philadelphia.

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