

## **EPA Comments for Proposed Title V Permit Renewal Evaluation for Covanta Stanislaus, Facility ID N-2073, Project # N-1071604**

### **Comment 1:**

Pages 23-24 of the Districts evaluation states that unit N-2073-2-2 is exempt from 40 CFR part 63 subpart ZZZZ because it is an existing CI RICE located at an area source of HAP. The District cites 64.6590(b)(3) to justify the exemption. It appears the District used an outdated version of Subpart ZZZZ, as the requirements summarized are not those currently found in Subpart ZZZZ. Existing industrial CI RICE located at an area source of HAP are subject to the requirements of in Table 2d and the operating limitations in Table 1b and Table 2b (all tables listed in Subpart ZZZZ) that apply. Please review these requirements and reevaluate the engines compliance with 40 CFR part 63 subpart ZZZZ.

### **Comment 2:**

Pages 25-26 of the Districts evaluation states that unit N-2073-1 is exempt from CAM for CO, NO<sub>x</sub>, and SO<sub>2</sub> because the unit is equipped with CEMS for these pollutants. CAM does not apply to any of the CO limits because there are no add on-controls for CO. There are add-on controls for NO<sub>x</sub> and SO<sub>2</sub>. The NO<sub>x</sub> limits in Conditions 21, 30, and 31 and the SO<sub>2</sub> limits in Conditions 22, 23, 32, and 33 take several forms including ppm @ 12% CO<sub>2</sub>, pounds per hour, and tons per year. In addition, there are alternative control efficiency (percent reduction) standards for SO<sub>2</sub>. NO<sub>x</sub> and SO<sub>2</sub> CEMS only measure concentrations in ppm. The TSD should explain how the CO<sub>2</sub> CEMS and exhaust gas flow monitors are used to demonstrate compliance with all NO<sub>x</sub> and SO<sub>2</sub> limits and whether the alternative control efficiency standard for SO<sub>2</sub> can be monitored and if they need to be monitored.

If the alternative control efficiency standards for SO<sub>2</sub> may be necessary to demonstrate compliance with SO<sub>2</sub> limits, the CAM plan would need to address operational parameters of the lime injection system or a second SO<sub>2</sub> monitor (and flow meter) should be installed upstream of the injection point.

### **Comment 3:**

Page 26 of the Districts evaluation states that for unit N-2073-1 the only HAPs that could be subject to CAM are particulate HAPs because the baghouse is the only control device that controls HAPs. However, Conditions 49 and 50 subject the unit to acid gas (HF and HCl) standards and the unit is equipped with a lime slurry injection system to control these emissions. Please revise the evaluation to address the applicability of CAM to HF and HCl.

### **Comment 4:**

Pages 26-31 of the Districts evaluation states that unit N-2073-1 is subject to CAM for particulate matter and that the unit, which is controlled by a baghouse has a post-control PTE for PM<sub>10</sub> above the major source threshold. The proposed CAM plan consists of a COMS and a pressure differential gauge. This is not acceptable for a source with post control emissions greater than the major source threshold, which requires monitoring every 15 minutes. EPA has determined for similar baghouses that CAM is an air leak detection system or a continuous PM<sub>10</sub> emission monitor. A bag leak detection system is the preferred monitoring system for a major source baghouse because opacity and pressure differential monitoring can only detect catastrophic failure of the baghouse. In addition, the permit does not contain parameter monitoring ranges as required by the CAM rule (40 CFR 64.4(a)). See Conditions 112-116.

Since this unit is not currently equipped with either of these devices, the equipment does not satisfy the Part 64 CAM requirements. The Title V permit must be revised to include a compliance schedule for the source to install, calibrate and operate either of the two monitoring devices. The correlation range or conditions would then need to also be incorporated into the Title V permit.