## B. Significant Issues and Changes to the Proposed Guidelines

The most significant changes to the proposed guidelines are discussed below. Rationales for these changes as well as other changes not discussed below are provided in the promulgation BID (EPA-453/R-95-0136). Issues not discussed below include additional changes to GCP requirements, monitoring requirements, recordkeeping and reporting requirements, and compliance schedules.

1. Designated Facilities

Under the final guidelines, any medical, municipal, industrial manufacturing, or other type of waste combustion plant capable of combusting greater than 35 Mg/day MSW but actually combusting less than 10 Mg/ day of MSW is not a designated facility, as long as the plant submits an initial report and keeps certain records. This exemption was not included in the proposed guidelines. This exemption is identical to the exemption in the standards for new sources. Section IV.B.1 provides further discussion of the exemption.

Under the final guidelines, a cofired combustor is defined as a unit combusting a fuel feed stream 30 percent or less MSW, as measured on a calendar quarterly basis. At proposal, determination of status as a cofired combustor was measured on a daily basis. This change is identical to the change made in the standards. Refer to section IV.B.1 for further discussion on the change.

The initial reporting requirement in the proposed guidelines for MWC plants with combustion capacity greater than 25 Mg/day but less than or equal to 35 Mg/day is not included in the final guidelines. Both the proposed and final guidelines exempt plants with capacity less than 35 Mg/day. Also, an exemption for combustion of clean wood or clean wood products is included in the final guidelines. This exemption is identical to the exemption in the standards. Refer to section IV.B.1 for discussion of EPA's rationale for this exemption.

2. Emission Limits for MWC Metals, Acid Gases, Organics, and Nitrogen Oxides, and Ash Fugitive Emissions

For existing MWC's, the MACT floor levels and the emission limits for several pollutants have been revised since proposal. See the proposal preamble (59 FR 48228, September 20, 1994), the promulgation BID (EPA–453/ R–95–0136), and docket A–90–45 for additional details on the MACT floor analysis methodology and the selection of MACT.

Since proposal, the EPA revised the MACT floors for existing plants based on new permit information received and an updated inventory of operating MWC plants. This revision resulted in revised MACT floor levels for various pollutants for small and large MWC plants. The revised MACT floor pollutant levels for large plants have resulted in more stringent MACT emission limits for SO<sub>2</sub>, HCl, and Pb. In addition, the revised MACT floors and emission limits for NO<sub>X</sub> for large plants include emission levels based on combustor type. Revisions to the MACT floor that resulted in revisions to the selected MACT level of control for specific pollutants are discussed below

While the final emission limits are somewhat different from proposal, the limits can be achieved using the same control technologies that were the basis of the proposed emission limits. The technology bases for large and small plants are summarized in table 3.

a. *MWC Acid Gases.* Based on the new information and test data received after proposal and the revised MACT floor analysis, the EPA revised the MACT limits for SO<sub>2</sub> and HCl for the final guidelines for large plants.

The revised  $SO_2$  MACT floor for large plants is 31 ppmv. The final  $SO_2$ emission limit for large plants, which was set at the MACT floor level of 35 ppmv at proposal, is 31 ppmv because of the change in the MACT floor at promulgation.

The MACT-based SO<sub>2</sub> limit of 80 ppmv for small plants has not changed from proposal; however, the SO<sub>2</sub> MACT floor for small plants is revised to 98 ppmv. Because the revised floor is more stringent than the proposal floor (the floor at proposal was 118 ppmv), the EPA's conclusion that acid gas controls will be needed to achieve the floor remains the same. In addition, the EPA's conclusion that a lower emission rate of 80 ppmv is achievable at minimal cost also remains the same. Therefore, the final SO<sub>2</sub> emission limit for small plants remains at 80 ppmv.

The revised HCl MACT floor for large plants is 31 ppmv. The final HCl emission limit for large plants, which was set at the MACT floor level of 35 ppmv at proposal, is 31 ppmv because of the change in the MACT floor at promulgation.

b. *MWC Metals.* Based on the new information and test data received after proposal and the revised MACT floor analysis, the Pb limit for large plants was revised for the final guidelines. The proposed Pb MACT emission level for large plants was 0.50 mg/dscm; however, the revised Pb MACT floor emission level for large plants is 0.49

mg/dscm. Therefore, the final Pb emission limit for large plants has been revised to 0.49 mg/dscm.

c. MWC Organics. The dioxin/furan emission limits for large and small plants were revised since proposal. The MACT floor for dioxins/furans for MWC's at large plants is 126 ng/dscm total mass. As documented in the preambles to these proposed guidelines (59 FR 48228, September 20, 1994) and the promulgated subpart Ca guidelines (56 FR 5514, February 11, 1991), in combination with GCP, SD/ESP systems can achieve dioxin/furan total mass emissions of 60 ng/dscm and SD/FF systems can achieve dioxin/furan total mass emissions of 30 ng/dscm. Therefore, the MACT floor of 126 ng/ dscm can be achieved with either SD/ ESP or SD/FF systems.

When determining the final MACT standard (which may be more stringent than the MACT floor), section 129(a)(2) requires the Administrator to consider certain factors, including the cost of achieving the emission reduction. In the Administrator's judgment, it would be prohibitively expensive and unreasonable to require existing MWC's with ESP's that can meet a dioxin/furan emission limit of 60 ng/dscm to retrofit an SD/FF in order to achieve an additional 30 ng/dscm reduction in emissions. For example, at a typical 1,400 Mg/day MWC plant already equipped with an SD/ESP, the capital cost to remove the ESP and retrofit a new FF would be about \$14 million. This cost would be in addition to paying the remaining debt for a relatively new ESP (about \$5 million including interest payments) and would result in a relatively small increase in control device efficiency.

For the final rule, the Administrator considered several regulatory options more stringent than the MACT floor; however, because of this high pollution control device retrofit cost, the Administrator decided to set separate MACT limits for MWC's with ESP-based control systems and MWC's with nonESP-based control systems. For MWC's with ESP-based control systems, the EPA selected a MACT level of 60 ng/ dscm total mass, based on the performance of SD/ESP systems. For MWC's using or retrofitting nonESPbased control systems, the EPA selected a MACT level of 30 ng/dscm total mass, based on the performance of SD/FF systems. The number of MWC plants that will comply by using an SD/ESP will be limited (only about 10 percent of the MWC plants). The vast majority of MWC's are expected to use SD/FF systems to comply.