



June 21, 2022

Michael S. Regan, Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Attn: Docket ID No. EPA-HQ-OAR-2021-0668

Re: *Proposed Rule – Federal Implementation Plan Addressing Regional Ozone Transport for the 2015 Ozone National Ambient Air Quality Standard*

Dear Administrator Regan:

The Ozone Transport Commission (OTC) is providing these comments on the U.S. Environmental Protection Agency’s (EPA’s) proposed *Federal Implementation Plan Addressing Regional Ozone Transport for the 2015 Ozone National Ambient Air Quality Standard* [87 Fed. Reg. 20036-20216 (April 6, 2022)] (hereinafter referred to as the “proposed FIP”). The OTC is a non-partisan multi-state organization created under the Clean Air Act (CAA) and led by the governors and their designated representatives from 12 states and the District of Columbia<sup>1</sup> to advise the EPA on addressing our shared ground-level ozone problem. Ozone pollution affects the health of more than 66 million people in the Ozone Transport Region (OTR), particularly the young, elderly, and persons with compromised health. Protecting public health and the environment from the harms of ozone pollution is at the core of the OTC’s work.

The OTC welcomes this proposed rule. We particularly welcome the positive steps the EPA is taking to constrain daily emissions of electric generating units (EGUs). Of equal importance is the EPA’s proposal to include a number of non-EGU source sectors, and to directly constrain individual non-EGU source emissions. We urge EPA to also include solid waste incinerators (referred to in these comments as “municipal waste combustors”) among the covered non-EGU sources.

The emission reductions in EPA’s proposed FIP will help to accelerate the point in time in which areas of the OTR can attain the 2015 ozone NAAQS. This will only occur, however, if the final rule fully incorporates all technologically feasible and cost-effective reductions from the covered sources as “expeditiously as practicable” to satisfy the requirements of the Clean Air Act. We provide below additional suggestions on ways the final rule can be strengthened to achieve this.

<sup>1</sup> The Washington, DC mayor designates its two OTC representatives.

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Connecticut

Delaware

District of Columbia

Maine

Maryland

Massachusetts

New Hampshire

New Jersey

New York

Pennsylvania

Rhode Island

Vermont

Virginia

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Paul J. Miller  
Executive Director

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## I. Overview

The EPA's proposed FIP seeks to align emission reductions from upwind sources with statutory attainment deadlines for downwind ozone nonattainment areas, in keeping with multiple court decisions. The OTC supports this and has previously asked that good neighbor state implementation plans (SIPs) and interstate transport rules align their associated pollution reductions with attainment deadlines in the Ozone Transport Region.<sup>2</sup>

The EPA uses a uniform threshold of 1% of the ozone NAAQS to establish linkages between upwind state emissions and downwind ozone nonattainment areas. The OTC supports this. Further, we agree with the direction the EPA is taking in quantifying "significant contributions" to downwind ozone nonattainment using higher marginal cost thresholds for installing controls. We recognize and appreciate the proposed FIP's intent to encourage the optimal running of installed controls on a daily basis, in addition to meeting an ozone season cap. In addition, the proposed FIP rightly goes beyond EGUs to include industrial (non-EGU) sources that emit large amounts of nitrogen oxides (NO<sub>x</sub>), the key precursor to ground-level ozone formation on a regional scale. Finally, the OTC encourages the EPA to include municipal waste combustors in the final FIP. A recent analysis by the OTC, as noted in the EPA's proposed FIP, indicates this source category can achieve large reductions in NO<sub>x</sub> emissions below the \$7,500/ton cost threshold used with the other non-EGU source sectors. The OTC presents additional commentary on specific elements of the proposal in the following sections.

## II. 4-Step Interstate Transport Framework

*Step 1: Identifying downwind receptors that are not expected to attain or maintain the ozone NAAQS*

### a. "No Water" Modeling Technique

The EPA uses the V2 emission inventory projection to 2023 and 2026 in its air quality modeling to determine which receptors are expected to attain the ozone NAAQS and which are not. Modeled future design values (or DVFs, the specific modeled metrics used for comparison with

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<sup>2</sup> See, e.g., OTC letter to EPA Administrator Michael Regan, March 12, 2021 (available at <https://otcair.org/upload/Documents/Correspondence/20210312-OTC-Welcome-Letter-Administrator-Regan.pdf>); OTC comments to EPA on *Proposed Rule – Revised Cross-State Air Pollution Rule Update for the 2008 Ozone NAAQS* (Revised CSAPR Update), Docket ID No. EPA-HQ-OAR-2020-0272, submitted December 14, 2020 (available at <https://otcair.org/upload/Documents/Correspondence/otc-comments-proposed-revised-csapr-update-20201214-signed.pdf>); OTC comments to EPA on *Proposed Determination Regarding Good Neighbor Obligations for the 2008 Ozone National Ambient Air Quality Standard* (CSAPR Close-Out), Docket ID No. EPA-HQ-OAR-2018-0225, submitted August 31, 2018 (available at [https://otcair.org/upload/Documents/Correspondence/OTC%20Comments%20with%20Tech%20Assesment%20on%20EPA%20Proposed%20CSAPR%20Close-Out%20\\_180831.pdf](https://otcair.org/upload/Documents/Correspondence/OTC%20Comments%20with%20Tech%20Assesment%20on%20EPA%20Proposed%20CSAPR%20Close-Out%20_180831.pdf)); OTC comments to EPA on *Proposed Rule – Cross State Air Pollution Rule Update for the 2008 Ozone NAAQS* (CSAPR Update), Docket ID No. EPA-HQ-OAR-2015-0500, submitted February 1, 2016 (available at <https://otcair.org/upload/Documents/Correspondence/Ozone%20Transport%20Commission-%202008%20CSAPR%20Update%20Comments.pdf>); OTC comments to EPA on *Proposed Rule – Federal Implementation Plans To Reduce Interstate Transport of Fine Particulate Matter and Ozone*, Docket ID No. EPA-HQ-OAR-2009-0491, submitted on October 1, 2010 (available at [https://otcair.org/upload/Documents/Correspondence/OTC%20Comments%20on%20EPA%20HQ%20OAR%202009%200491\\_with%20Appendix%20101001.pdf](https://otcair.org/upload/Documents/Correspondence/OTC%20Comments%20on%20EPA%20HQ%20OAR%202009%200491_with%20Appendix%20101001.pdf)).

the NAAQS) are calculated using a “no water” grid cell elimination technique. The OTC supports the use of a “no water” technique, and has developed its own version of this approach. The OTC would like to work with the EPA in this area, and requests that the Agency provide its evaluation of the no water technique used in this proposal.

*Step 2: Determining which upwind states contribute to these identified problems in amounts sufficient to “link” them to the downwind air quality problems*

a. Air Quality Modeling Metrics to Establish Linkages

The OTC supports the use of photochemical grid modeling as an important tool in assessing linkages between upwind emission sources and downwind ozone nonattainment and maintenance problem areas. The historical record of previous interstate transport rules (e.g., NOx SIP Call, CSAPR) demonstrates that the air quality models are directionally correct in projecting decreasing ozone levels from regional NOx control programs.

While the EPA’s modeling approach provides confidence in establishing linkages between upwind emissions and downwind ozone problems, the OTC has noted in past communications with the EPA that its methodology for determining if a linkage exists is conservative (i.e., less prone to establishing a linkage).<sup>3,4</sup> The EPA uses the average state contributions from the top ten modeled ozone days with 8-hour daily maximum averages above 60 ppb to establish significant contribution linkages. However, the form of the ozone NAAQS is the 3-year average of the 4<sup>th</sup> annual maximum daily 8-hour average. Assessing linkages based on average contributions across ten high ozone days can dilute upwind impacts on the days that are most relevant to a NAAQS violation. For example, the weather patterns conducive to high ozone transport on the four highest days may differ substantially from the conditions on other days within the ten days, resulting in the high upwind contributions on the worst days “washing out” in the average across all ten modeled days.

The OTC shared an example of an approach with the EPA in February 2022 where the top four state contributions during modeled high ozone days are averaged. In the example, the high ozone threshold started at the current NAAQS and iteratively decreased by 5 ppb as needed, until four high ozone days were included for calculation. The example was intended to reflect the form of the NAAQS while still accounting for variability by identifying important contributing states that might have been diluted in the averaging contributions in the EPA’s ten highest ozone days. By developing this example, the OTC believes the technique currently being used by EPA to identify contribution linkages to nonattainment and maintenance monitors can be improved. The

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<sup>3</sup> OTC letter to EPA OAR Assistant Administrator W. Wehrum with supporting technical analysis, January 23, 2019 (available at <https://otcair.org/upload/Documents/Correspondence/OTC-Good%20Neighbor%20State%20Implementation.pdf>).

<sup>4</sup> OTC comments to EPA on *Proposed Determination Regarding Good Neighbor Obligations for the 2008 Ozone National Ambient Air Quality Standard* (CSAPR Close-Out), Docket ID No. EPA-HQ-OAR-2018-0225, submitted August 31, 2018 (available at [https://otcair.org/upload/Documents/Correspondence/OTC%20Comments%20with%20Tech%20Assesment%20on%20EPA%20Proposed%20CSAPR%20Close-Out%20\\_180831.pdf](https://otcair.org/upload/Documents/Correspondence/OTC%20Comments%20with%20Tech%20Assesment%20on%20EPA%20Proposed%20CSAPR%20Close-Out%20_180831.pdf)).

OTC suggests using the existing EPA-State modeling collaborative group to review and assess potential contribution techniques for future application.

b. Use of 1% of NAAQS as the Linkage Criterion in Step 2

The OTC supports the EPA's proposal to continue using a uniform contribution linkage threshold of 1% of the NAAQS level in Step 2 of its interstate transport framework. This is a metric that the states of the OTC and the Lake Michigan Air Directors Consortium (LADCO) analyzed in great detail and collectively proposed to the EPA on September 2, 2009.<sup>5</sup> The OTC opposes an alternative linkage threshold of 1 part per billion (ppb) (or any other linkage metric above 1% of the NAAQS). To raise the linkage threshold to 1 ppb (or greater) in the face of increasingly stringent air quality health standards creates the counterintuitive result that upwind contributions have to be quantitatively larger in order to "contribute significantly" to nonattainment or maintenance problems under a more stringent NAAQS than with prior weaker standards. The OTC has previously raised concerns<sup>6</sup> with the EPA's 2018 memo<sup>7</sup> suggesting 1 ppb could be an alternative to the 1% of the NAAQS linkage threshold and supports the EPA rescinding the alternative.

In addition to use of the 1% linkage criterion relative to the ozone NAAQS, the OTC recommends that the EPA provide additional context on the extent of state-level upwind contributions to downwind ozone problems by providing a state's percent contribution based on the modeled concentration of anthropogenic emissions and anthropogenic emission totals within only the affected states (upwind and downwind). Specifically, modeled concentrations associated with background conditions, wildfires, and emissions in Canada and Mexico would be removed from the percent calculation. This framing of percent contribution would provide additional context for the impact the contributing state has on downwind monitors by only looking at the ozone precursors that can be controlled in the covered states. Framing contribution percentages in this manner would also put nonattainment areas and contributing states on more equal footing, as nonattainment areas can only reduce ozone precursors from the anthropogenic emissions they control.

*Step 3: Evaluating NO<sub>x</sub> reduction potential, cost, and downwind air quality improvements available at various mitigation technology breakpoints*

a. Installation and Effective Operation of Fossil Fuel Electric Generating Unit (EGU) NO<sub>x</sub> Controls on a Daily Basis

The OTC strongly supports the proposed FIP's requirement for emissions reductions commensurate with un- and under-controlled EGU steam units installing and effectively

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<sup>5</sup> OTC and LADCO joint letter to EPA on CAIR replacement rule, September 2, 2009 (available at [https://otcair.org/upload/Documents/Correspondence/Final%20Recommendation%20Letter\\_090902.pdf](https://otcair.org/upload/Documents/Correspondence/Final%20Recommendation%20Letter_090902.pdf)).

<sup>6</sup> OTC letter to EPA OAR Assistant Administrator W. Wehrum with supporting technical analysis, January 23, 2019 (available at <https://otcair.org/upload/Documents/Correspondence/OTC-Good%20Neighbor%20State%20Implementation.pdf>).

<sup>7</sup> EPA Memorandum, "Analysis of Contribution Thresholds for Use in Clean Air Act Section 110(a)(2)(D)(i)(I) Interstate Transport State Implementation Plan Submissions for the 2015 Ozone National Ambient Air Quality Standards" (August 31, 2018).

operating new state-of-the-art NO<sub>x</sub> controls on a daily basis. Emission reductions consistent with retrofitting coal steam units currently without selective catalytic reduction (SCR) technology are fundamental to addressing regional ozone problems, as is installation of modern controls on un- or under-controlled oil/gas EGUs. The OTC also supports the EPA's effort to incentivize the continuous operation and optimization of already installed SCR and selective non-catalytic reduction (SNCR) controls on coal and oil/gas steam EGUs. The need to continuously operate installed EGU NO<sub>x</sub> controls at an optimal level has been a long-standing issue for the OTC.<sup>8</sup> Furthermore, the OTC supports the EPA's proposed dynamic adjustments of state EGU NO<sub>x</sub> budgets in future years that would reflect the evolution of electricity generation within the covered states and ensure that the optimal running of installed pollution controls is maintained.

There typically is a financial cost associated with operation of the controls used to remove regulated pollutants from EGU emissions.<sup>9</sup> As a result, there is an economic incentive for EGUs to discontinue operating pollution controls absent an enforceable obligation to do so under a permit, regulation, or court order.<sup>10</sup> This has been borne out in the historical track record of EGUs participating in regional NO<sub>x</sub> programs that do not optimize their existing controls, or that shut them down altogether, during the ozone season. Examples include:

- A coal-fired power plant where a company spokesperson stated that, in 2015, it was much cheaper to buy allowances than run its already installed NO<sub>x</sub> controls.<sup>11</sup>
- An EGU for which the EPA noted that NO<sub>x</sub> emissions “*substantially increased* in 2019 compared to previous years” (emphasis in original) and that this was “likely due to the erosion of the existing incentive to optimize controls (*i.e.*, the ozone-season NO<sub>x</sub> allowance price has fallen so low that unit operators find it more economic to surrender additional allowances instead of continuing to operate pollution controls at an optimized level).”<sup>12</sup>
- Several coal-fired steam EGUs shut down SCR controls after the owner and operator purchased in advance a large reserve of NO<sub>x</sub> allowances that not only covered the excess emissions, but also covered an additional 3:1 surrender requirement for exceeding the state's applicable assurance levels in the 2020 and 2021 control periods under the CSAPR Group 2 trading program.<sup>13</sup>

In light of these historical examples, the EPA's steps to incentivize the optimal operation of installed NO<sub>x</sub> controls on a daily basis is welcome.

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<sup>8</sup> See, e.g., Statement from the Ozone Transport Commission Requesting the Use and Operation of Existing Control Devices Installed at Electric Generating Units, June 13, 2013 (available at [https://otcair.org/upload/Documents/Formal%20Actions/Statement EGUUs.pdf](https://otcair.org/upload/Documents/Formal%20Actions/Statement%20EGUs.pdf)).

<sup>9</sup> Examples of these costs are for the purchase of control reagents, parasitic energy load to run the controls, and additional operation and maintenance of the control equipment.

<sup>10</sup> McNevin, T.F., Recent increases in nitrogen oxide (NO<sub>x</sub>) emissions from coal-fired electric generating units equipped with selective catalytic reduction, 66 JAWMA 66-75 (2016), DOI: 10.1080/10962247.2015.1112317.

<sup>11</sup> O'Neill, J.M., *N.J. Air Quality Takes a Hit*, The Record (Bergen County, NJ), May 17, 2015 (quoting a company spokesperson, “[t]oday, the cost of using installed controls far exceeds the cost of obtaining allowances in the trading market.”).

<sup>12</sup> 86 Fed. Reg. 23054 (April 30, 2021), at 23089.

<sup>13</sup> 87 Fed. Reg. 20036 (April 6, 2022), at 20122-20123.



In addition to installing and optimally operating pollution controls, the OTC recommends that the EPA also require fossil fuel-fired EGUs capable of operating on multiple fuels (e.g., fuel switching between coal and natural gas) to use the fuel option during the ozone season that will achieve the lowest daily NO<sub>x</sub> emission rate. For example, if an EGU could achieve a lower daily NO<sub>x</sub> emission rate by switching to a different fuel than it would achieve by operating on another fuel even while running fully optimized NO<sub>x</sub> emission controls, it should be required to fuel switch.

b. Backstop Daily Emission Rate of 0.14 lb/mmBtu

The OTC commends the EPA for proposing a 24-hour daily limit for EGUs that is intended to better ensure units with installed NO<sub>x</sub> pollution controls run those controls at optimized levels. In tandem with a daily backstop limit, the OTC recommends that the EPA also impose a 0.08 lb NO<sub>x</sub>/mmBtu ozone season average rate to ensure that expected NO<sub>x</sub> reductions from the proposed rule are as close as possible to the modeled reductions the EPA uses for its state budget calculations. An ozone season average rate limit is consistent with the EPA's established methods. The EPA has identified the 0.08 lb/mmBtu seasonal emissions rate as consistent with an average rate for SCR optimization at existing units. A 0.08 lb/mmBtu seasonal rate provides flexibility by being an average over an entire ozone season. This allows for shorter term exceedances (especially from start-up/shut-down) to be offset by longer term operation below 0.08 lb/mmBtu.

The EPA recognizes that a seasonal rate reflects the average across a unit's range of varying daily rates reflecting different operation conditions, including some occasions when the SCR control may not be operating or may not be fully optimized. EPA has observed that emission control idling or non-operation has occurred in prior programs.<sup>14</sup> In order to discourage this, the EPA has proposed the daily backstop limit along with an increased allowance surrender ratio when the daily backstop rate is exceeded. An overall average ozone season rate limit would further complement these requirements.

The EPA uses the 0.08 lb/mmBtu seasonal average rate limit in its state emission budget calculations and engineering analytics for this proposed rulemaking<sup>15</sup> as this seasonal rate is considered to be reasonably achievable for coal-fired units equipped with SCRs that are optimally operated. The proposed FIP ozone season NO<sub>x</sub> caps are established by multiplying this reasonable rate by an EGU's average heat input. The EPA continuously refers to this as "optimizing" the SCR; however, the proposed FIP mass cap allows the unit operators to decide if they want to optimize the SCR or not, simply by operating less (meaning a lower amount of heat input or burning less coal) during an ozone season, albeit now subject to the proposed backstop daily emission rate of 0.14 lb/mmBtu. As an assurance that units capable of operating at lower NO<sub>x</sub> emission rates do not choose to run less optimally over extended periods in the space created below the backstop daily rate, a reasonable and further constraint can be established using the EPA-defined reasonable rate of 0.08 lb/mmBtu for the entire ozone season.

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<sup>14</sup> 87 Fed. Reg. 20036 (April 6, 2022), at 20056.

<sup>15</sup> See <https://www.epa.gov/system/files/documents/2022-03/proposal-appendix-a-proposed-rule-state-emission-budget-calculations-and-engineering-analytics.xls> (accessed May 9, 2022).

c. Require Public Reporting by EGUs When Exceeding the Backstop Daily Emission Rate

As the EPA notes in its proposed FIP, there have been instances in the past of EGU operators intentionally turning off or running less efficiently their installed pollution controls, presumably due to the easy availability of cheap excess NO<sub>x</sub> allowances. The OTC believes EPA's proposal to require an allowance surrender ratio when an EGU exceeds the backstop daily rate coupled with dynamically adjusting downward future state NO<sub>x</sub> budgets to reflect changes in the composition and utilization of the EGU fleet and recalibrating the quantity of banked allowances across control periods to not exceed 10.5% of the sum of the state emissions budgets can help mitigate this problem.

However, to shed light on unanticipated future events and to have a better understanding of the conditions under which an EGU exceeds the backstop rate, the OTC requests that the EPA include a public reporting requirement by the EGU operator when the backstop rate is exceeded. For example, Maryland includes a provision in its state regulations that if a covered EGU fails to meet its unit-specific 24-hour block average NO<sub>x</sub> rate, it must submit a report for each day above the rate. The report must include operational details during the excess emissions, identify any malfunctions or operator errors that caused the excess emissions, specify any dispatch requirements leading to unplanned operation above the unit's daily emission limit, describe all steps taken to reduce excess emissions, and provide other relevant information elements.<sup>16</sup> This report should be publicly available so that the OTC members and the public have a clear understanding of when and why an EGU would emit above its backstop rate.

d. Units Less Than or Equal to 25 MW

As EPA notes in the proposed FIP, its historical exemption of EGUs less than or equal to 25 MW (small EGUs) dates back to its 1993 Acid Rain permitting rule. The Acid Rain rule, however, looked primarily at sulfur dioxide (SO<sub>2</sub>) emissions, while also citing the "*de minimis*" nature of carbon dioxide (CO<sub>2</sub>) and NO<sub>x</sub> emissions. The OTC is concerned about the EPA's proposed continuance of exempting small EGUs from the proposed FIP. We note that there are about 24,800 MW of small EGU capacity in the states covered in the proposed FIP and the OTR states combined.<sup>17</sup> This is the equivalent capacity of 24 large 1000 MW powerplants. With increasing compliance costs for larger EGUs, as is warranted, the exemption is fostering a potential leakage problem by creating greater incentives to shift increasing generation shares across numerous smaller EGUs during the ozone season. This will be a particularly harmful outcome if the shifts occur on the highest ozone days.

The proposed FIP references programs more than 20 years out of date that raise the following issues:

1. The SO<sub>2</sub> impact from coal/oil sources and natural gas sources is very different. The NO<sub>x</sub> emissions are not nearly as different.

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<sup>16</sup> Md. Code Ann., Title 26 Dept. of Environment, Section 26.11.38.05 A(3) (2015).

<sup>17</sup> Based on U.S. Energy Information Administration data from "Form EIA-860 detailed data with previous form data (EIA-860A/860B)" at <https://www.eia.gov/electricity/data/eia860/>.

2. Regulatory burdens are much lower now due to advances in CEMS, internet access and computers, control technologies, etc.
3. Scientific knowledge about CO<sub>2</sub> has dramatically increased. CO<sub>2</sub> was not considered an air pollutant under the Clean Air Act in 1993 (nor for almost 15 years afterwards), whereas now it is a high priority pollutant.

The EPA cites several instances of EGUs exploiting weaknesses under previous transport rules with allowance trading programs. Under this proposed FIP, a \$7,500 per ton of NO<sub>x</sub> reduced cost threshold, a 10.5 % banked allowance limit, and a 3:1 surrender requirement for exceeding the 0.14 lb/MMBtu backstop daily rate will likely increase generation cost at regulated EGUs, resulting in a potentially significant shift in generation toward small EGUs. Many small EGUs, including non-coal EGUs, emit NO<sub>x</sub> at rates greater than the proposed 0.14 lb/MMBtu daily backstop rate. If allowance prices settle at \$7,500 per ton, the cost of each excess ton of NO<sub>x</sub> from coal, at the 3:1 surrender rate, will be \$22,500. This can be a strong incentive to shift at least some of the generation to cheaper unregulated and uncontrolled small EGUs. Therefore, we are concerned that the proposed FIP, without additional safeguards, can create significant new economic incentives for small, dirtier EGUs to operate more, increasing daily NO<sub>x</sub> emissions. In addition, the EPA should consider mapping the distribution of these small EGUs as they may be operating in Environmental Justice areas and emitting carbon monoxide, PM<sub>2.5</sub>, and volatile organic compounds into these communities in addition to NO<sub>x</sub>. To address this concern, the EPA should consider a standardized emission backstop for small EGUs and require all EGUs to surrender allowances for excess emissions above the backstop limit.

#### e. Inclusion of non-EGU NO<sub>x</sub> Sources

The OTC strongly supports including non-EGUs within the final FIP and setting source-specific NO<sub>x</sub> emission rates for the covered source categories. Decreases in NO<sub>x</sub> emissions from EGU steam units covered under previous transport rules have shown the effectiveness of regional reductions. Due to those reductions, EGU emissions have become a relatively smaller portion of the regional NO<sub>x</sub> inventory in the eastern United States, although EGUs continue to be important sources of NO<sub>x</sub> emissions on high ozone pollution days. In past actions, the EPA has promulgated partial remedies to the interstate ozone transport problem, asserting that either time constraints or the need for additional information, or both, made it impractical to address potential non-EGU NO<sub>x</sub> emission reductions at the time of rulemaking.<sup>18</sup> The OTC has previously called upon the EPA to issue a full remedy in transport rules that “should consider all source categories and not be subject to lead-time restrictions, such as the 2017 implementation restriction [in CSAPR] used for the partial remedy that resulted in additional cost-effective control measures not being considered.”<sup>19</sup>

The OTC is pleased to now see that the EPA has included seven non-EGU industries in the proposed FIP. As the EPA cites multiple times in the proposed FIP, the OTC and many of its

<sup>18</sup> See, e.g., 81 Fed. Reg. 74504 (October 26, 2016), at 74521.

<sup>19</sup> OTC comments on Proposed Rule - Cross State Air Pollution Rule Update for the 2008 Ozone NAAQS, Docket ID No. EPA-HQ-OAR-2015-0500, submitted on February 1, 2016 (available at <https://otcair.org/upload/Documents/Correspondence/Ozone%20Transport%20Commission-%202008%20CSAPR%20Update%20Comments.pdf>).



members have developed model rules, RACT requirements, and individual permit conditions for a number of these source types that demonstrate the technical feasibility and cost effectiveness of reducing their NO<sub>x</sub> emissions under EPA's proposed FIP. The OTC further supports the EPA's proposal for a "a direct control approach with rate-based limits, production-based limits, and work practice standards" rather than incorporating these source categories into an allowance trading program. This is consistent with OTC's previous positions on the need for daily limits on EGUs to better ensure that reductions occur at the times most needed.

The OTC is in general agreement with the EPA's limits for non-EGU sources. However, the OTC has previously performed a regulatory and technical feasibility analysis, including emissions reduction estimates and control cost effectiveness, for existing natural gas fueled prime movers powering compressors used for pipeline transportation of natural gas. The OTC analysis supports NO<sub>x</sub> emissions limitations more stringent for these non-EGU sources than in the proposed FIP.<sup>20</sup> The OTC-recommended limits are in the range of 1.5-2.0 g/BHP-hour, depending on engine size, for natural gas fired 2-stroke lean engines associated with pipeline transportation of natural gas, while the EPA's proposed limit is 3.0 g/BHP-hour for these engine types. We encourage the EPA to consider the OTC's more stringent recommendation for the final FIP.

For cement and concrete product manufacturing, the OTC appreciates the EPA's recognition that cement kilns are a significant source of NO<sub>x</sub> emissions and supports the proposal's inclusion of cement kiln emission limits. The National Emissions Inventory (NEI) lists 421 cement kilns with actual 2019 NO<sub>x</sub> emissions of nearly 110,000 tons nationally. Recognizing that the actual reported emissions are but a fraction of these units' potential to emit, future cement kiln emissions could be much higher with the implementation of the Infrastructure Investment and Jobs Act,<sup>21</sup> which can be expected to increase demand for cement. The OTC agrees with the EPA regarding the conclusion that conversion from long wet kilns to preheater/precalciner installations is generally feasible and is a much more efficient and cost-effective means to reduce NO<sub>x</sub>. This process change should be encouraged. Furthermore, and as previously noted, the OTC supports a direct control approach for these non-EGU sources without an allowance trading program.

#### f. Municipal Solid Waste Units

Municipal solid waste units (referred to in the OTC's comments as municipal waste combustors, or MWCs) are significant sources of NO<sub>x</sub> and many of them are located in urban environmental justice areas (Figure 1). The OTC welcomes the EPA's request for comments on the potential inclusion of MWCs in the FIP. As the EPA notes in the proposed FIP, the OTC has recently assessed opportunities for additional NO<sub>x</sub> reductions from MWCs. NO<sub>x</sub> reduction technologies

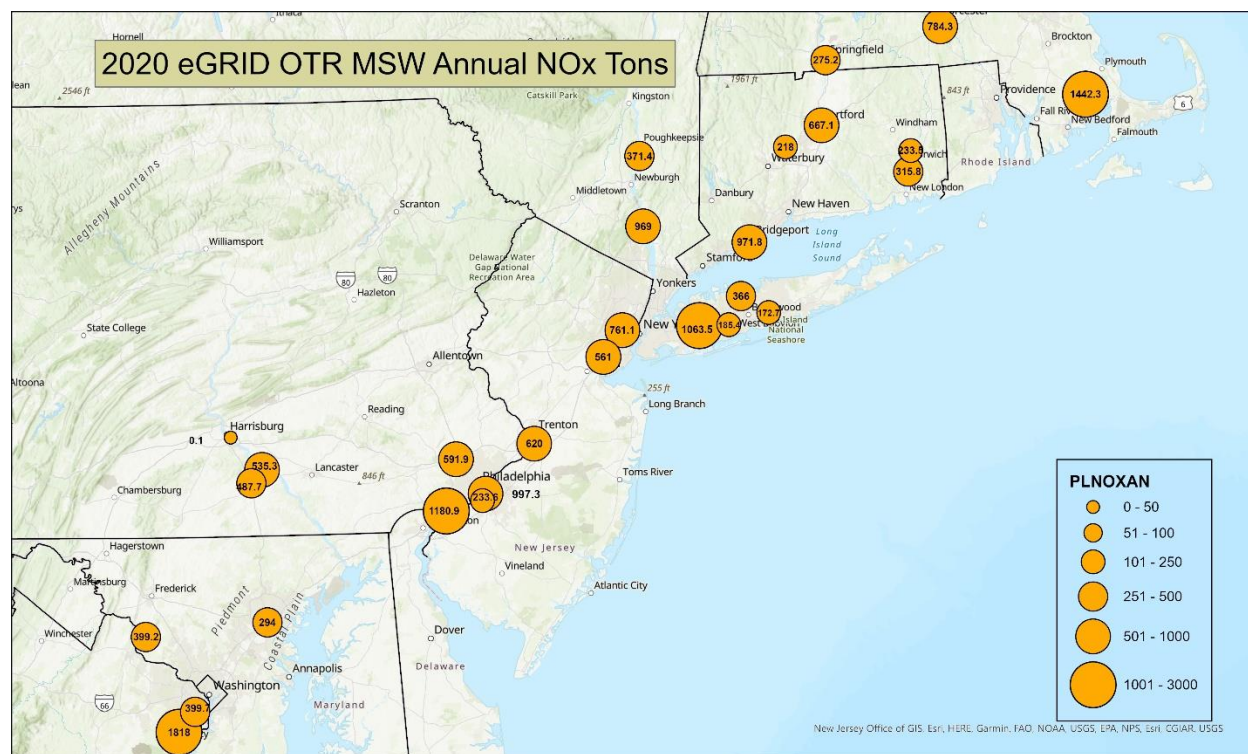
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<sup>20</sup> OTC, "OTC Regulatory and Technical Guideline for Control of Nitrogen Oxides (NO<sub>x</sub>) Emissions from Natural Gas Pipeline Compressor Fuel-Fired Prime Movers: Analysis of Technical Feasibility and Cost Effectiveness," May 14, 2019 (available at [https://otcair.org/upload/Documents/Reports/OTC\\_RegAndTechGuideline\\_NGPipelineCompressorPrimeMovers\\_TechFeasibility\\_CostEffectivenessAnalysis\\_Final\\_05142019.pdf](https://otcair.org/upload/Documents/Reports/OTC_RegAndTechGuideline_NGPipelineCompressorPrimeMovers_TechFeasibility_CostEffectivenessAnalysis_Final_05142019.pdf)).

<sup>21</sup> H.R. 3684 – Infrastructure Investment and Jobs Act, 117th Congress (2021-2022), <https://www.congress.gov/bill/117th-congress/house-bill/3684/text>.

applicable to MWCs have evolved over time, providing a greater selection of NOx reduction controls and strategies to cost-effectively reduce NOx emission rates in retrofit situations. Over the past two years, an OTC workgroup has been evaluating available information to help identify technically feasible and cost-effective NOx controls for MWCs. This “RACT type” evaluation of available NOx controls was intended to identify numerical presumptive NOx RACT emission rate limits that could be widely met across the various sizes and configurations of units in the MWC category. The OTC workgroup has now updated its initial assessment based on written stakeholder comments and additional input received during a series of three stakeholder webinars conducted by the OTC on the initial assessment, which were held in December 2021, January 2022, and March 2022.<sup>22</sup> The revised workgroup report is attached to these comments.

**Figure 1: 2020 Annual NOx Emissions of MWCs Located along the Urban Core of the OTR**



In its review, the OTC working group identified studies evaluating MWCs similar in design to the large MWCs in the OTR. These studies showed that NOx reductions could be achieved at a cost ranging from approximately \$2,900 per ton of NOx reduced to approximately \$6,200 per ton of NOx reduced. Note that this range of values is based on 2017 and 2019 dollars, and is roughly equivalent to a range of \$3,350 to \$6,870 per ton of NOx reduced in 2022 dollars. The entire cost range determined in the OTC MWC assessment falls below the EPA’s marginal cost threshold of

<sup>22</sup> For stakeholder comments and OTC responses, see “Comments from Ozone Transport Commission (OTC) Municipal Waste Combustor (MWC) Stakeholders and OTC Responses,” presented on March 8, 2022, OTC Online Municipal Waste Combustor Stakeholders’ Meeting (available at [https://otcair.org/upload/Documents/Meeting%20Materials/Stakeholder%20comments%20on%20MWC%20report%20and%20OTC%20responses%203\\_7\\_22.pdf](https://otcair.org/upload/Documents/Meeting%20Materials/Stakeholder%20comments%20on%20MWC%20report%20and%20OTC%20responses%203_7_22.pdf)).

\$7,500 per ton of NO<sub>x</sub> used for establishing retrofit requirements in the covered non-EGU source categories. Based on its assessment, the OTC recommends including NO<sub>x</sub> emissions limits for MWCs in the final FIP. The OTC is currently drafting a Memorandum of Understanding (MOU) to pursue additional NO<sub>x</sub> reductions from MWCs in the OTR. The draft MOU itself is non-prescriptive in order to maintain maximum flexibility for OTC jurisdictions and their regulated sources; however, the OTC working group's report shows that emission rate limits of 105 ppmvd on a 30-day averaging basis and 110 ppmvd on a 24-hour averaging basis are technologically achievable and economically feasible for many MWC configurations.

#### f. Contingency Measure Analysis

The OTC requests that EPA commit to reassess the FIP NO<sub>x</sub> reductions, analytical tools, and methodologies in the light of new air monitoring information at the end of every ozone season to ensure that anticipated reductions were sufficient for all monitored areas to make progress towards meeting the ozone standard by the applicable attainment date. If necessary, further reductions should be implemented in the next ozone season through a contingency measure mechanism.

### III. Summary

As mentioned in the overview section, the OTC welcomes this proposed rule. The OTC needs strong federal action if its member jurisdictions are to meet their ozone NAAQS attainment goals. The comments that the OTC has detailed in this letter are summarized in the bullets that follow:

- OTC would like to work with the EPA on the “no water” modeling technique and wishes to receive the analysis the Agency conducted to evaluate its no water method.
- The OTC encourages the EPA to consider upwind state-receptor linkage metrics that avoid diluting ozone transport impacts when including days not representative of conditions contributing to nonattainment and maintenance problems at downwind receptors.
- The OTC supports the 1% of the NAAQS linkage threshold and further supports rescinding an alternative of 1 ppb for establishing a linkage that was presented in the EPA's 2018 memo.<sup>23</sup> The OTC also requests that the EPA provide additional contextual information on the relative contributions of upwind state contributions to downwind ozone problems that focuses on the controllable part of the overall ozone burden experienced by the downwind state.
- The OTC supports dynamic adjustments to state NO<sub>x</sub> budgets and placing limits on banked allowances across control periods to reduce excess NO<sub>x</sub> allowances resulting from changes in future electricity generation that can diminish the incentive to turn off or run less efficiently installed EGU controls.

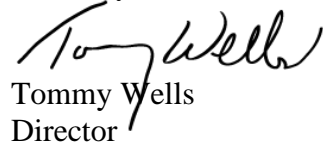
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<sup>23</sup> EPA Memorandum, “Analysis of Contribution Thresholds for Use in Clean Air Act Section 110(a)(2)(D)(i)(I) Interstate Transport State Implementation Plan Submissions for the 2015 Ozone National Ambient Air Quality Standards” (August 31, 2018).

- The proposed FIP's requirement for emissions reductions commensurate with un- and under-controlled EGU steam units installing and effectively operating state-of-the-art NOx controls on a daily basis is strongly supported by the OTC. The OTC would like a public reporting requirement applied to EGU operators when the backstop rate is exceeded so there is a better public understanding of what circumstances led to the excess emissions.
- The EPA should consider a standardized emission backstop for small EGUs less than or equal to 25 MW and require all EGUs to surrender allowances for excess emissions above the backstop limit.
- The inclusion of non-EGU NOx emissions sources is strongly supported by the OTC. However, the OTC recommends a slightly more stringent limit for 2-stroke lean burn engines associated with the transportation of pipeline natural gas. The OTC further recommends that MWCs be included in the final FIP. The OTC MWC workgroup's report shows that emission rate limits of 105 ppmvd on a 30-day averaging basis and 110 ppmvd on a 24-hour averaging basis are technologically achievable and economically feasible for many MWC configurations.
- The OTC requests that the EPA reassess after each ozone season the progress being achieved towards reaching attainment of the 2015 ozone NAAQS, and implement contingency measures if monitoring and emissions data indicate inadequate progress.

If you would like additional information on any of the OTC's work described in these comments, please contact Paul Miller, OTC Executive Director ([pmiller@nescalum.org](mailto:pmiller@nescalum.org)). Thank you for this proposal and your consideration of the OTC's views.

Sincerely,



Tommy Wells  
Director

Dept of Energy and Environment DC Government  
OTC Chair

cc: OTC Commissioners and Directors  
Tomás Carbonell, EPA OAR

# Attachment

OTC Municipal Waste Combustor Workgroup Report



# **Municipal Waste Combustor Workgroup Report**

Prepared by the Ozone Transport Commission Stationary and Area Sources Committee

Revised April 2022



## Contents

Introduction .....	4
Background .....	4
Method .....	5
Developing a state-by-state MWC Inventory .....	5
Developing an Emissions Inventory for the OTR MWCs .....	6
Conducting a Literature Review to Identify Additional NO <sub>x</sub> Control Technologies.....	6
Trinity Consultants Studies .....	7
Babcock Power Environmental .....	7
Other Resources.....	7
Small MWCs .....	7
Estimating Tons per Year of NO <sub>x</sub> that Could Be Reduced with Further Controls.....	8
Researching the Potential Costs of Further MWC NO <sub>x</sub> Controls.....	9
Findings .....	11
OTR MWC Inventory of Units and NO <sub>x</sub> Emissions .....	11
Technologies to Reduce NO <sub>x</sub> from MWCs in the OTR.....	12
Babcock Power Environmental Study .....	13
Implementation Examples of LN <sup>TM</sup> and ASNCR .....	15
Potential NO <sub>x</sub> Reductions Resulting from Installing Additional Control Technologies .....	17
Control Costs.....	18
Cost Estimate for a 24-Hour NO <sub>x</sub> Limit of 110 ppmvd using LN <sup>TM</sup> .....	20
Non-OTR MWCs .....	22
Policy Implications .....	23
Additional Research .....	23
Conclusions .....	23
Appendix A: OTR Large MWC Actual and Proposed Emissions .....	25
Appendix B: OTR Large MWC Characteristics .....	33
Appendix C: OTR Small MWCs .....	40
Appendix D: Non-OTR MWCs.....	41
Appendix E: Conversion of NO <sub>x</sub> Concentration to Mass .....	47
Appendix F: MWC Technology Descriptions .....	50
Appendix G: Method for Estimating Costs for Urea Consumption.....	66

## Acronyms

ASNCR	Advanced selective non-catalytic reduction
BACT	Best available control technology
CEM	Continuous emission monitor
CFD	Computational fluid dynamics
CFR	Code of federal regulations
EGU	Electric generating units
EIA	Energy Information Administration
EPA	U.S. Environmental Protection Agency
FGR	Flue gas recirculation
LN <sup>TM</sup>	Low NOx technology
MMbtu	Million British thermal units
MWC	Municipal waste combustors
NOx	Nitrogen oxides
NSR	Normalized stoichiometric ratio
OTC	Ozone Transport Commission
OTR	Ozone Transport Region
PM	Particulate matter
ppm	Parts per million
ppmvd	Parts per million dry volume
PTE	Potential to emit
RACT	Reasonably available control technology
RDF	Refuse derived fuel
SAS	Stationary and Area Sources Committee
SCR	Selective catalytic reduction
SNCR	Selective non-catalytic reduction
SOx	Sulfur oxides
VLN <sup>TM</sup>	Very low NOx technology

## Introduction

This report summarizes results from a municipal waste combustor (MWC) pilot project conducted by the Ozone Transport Commission (OTC) Stationary and Area Sources (SAS) Committee. The report provides an estimate of oxides of nitrogen (NOx) emissions from Ozone Transport Region (OTR) MWCs, identifies opportunities for additional NOx reductions from the units, and provides example costs for installing additional NOx controls on OTR MWCs. The report has five sections, including background information, an overview of methods used in the pilot study, findings, policy implications, and conclusions. There are seven appendices to the report, three of which detail emissions and operating characteristics of the approximately 100 MWCs in the OTR, one that provides information on MWCs outside of the OTR, two that provide calculations for converting NOx concentrations to mass emissions and costs for urea use, and one which describes MWC emission reduction technologies.

## Background

During the development of the 2020 Stationary and Area Sources Committee Charge, SAS Committee members identified a number of sectors, including MWCs, small electric generating units, and others, as significant sources of NOx emissions in the OTR. In the 2020 Charge, the SAS Committee prioritized MWCs for a pilot project as the first sector for evaluation. The pilot was intended to provide a template for evaluation of other sectors in the region. The SAS Committee formed an MWC workgroup to conduct an evaluation of MWCs in the region and the results of that effort are described in this report.

Waste incinerators are a common means of handling municipal trash and they provide a valuable solid waste disposal service to the communities they serve. However, their operation produces a variety of harmful pollutants, such as particles, nitrogen oxides, dioxin, lead, mercury, and greenhouse gases. The emissions released by the burning of trash contribute to ozone and adverse health impacts, especially for nearby communities that are often overburdened with environmental justice issues. Emissions from MWCs also affect the environment in areas downwind from the facilities. Many of these facilities operate with technology that is 30 to 40 years old. Urban areas are working to transition towards cleaner alternatives of waste management, such as anaerobic digestion or composting and recycling. In the interim, additional air pollution control technologies are available to bridge the gap and lessen the public health impacts from MWCs. Ensuring the use of modern pollution controls on MWCs will improve public health and assist states in achieving clean air goals.

In 2018, MWCs emitted approximately 22,000 tons of NOx in the OTR. Nine states in the OTR have MWCs and have established Reasonably Available Control Technology (RACT) regulatory or permit limits for the MWC NOx emissions. These states are Connecticut, Massachusetts, Maryland, Maine, New Hampshire, New Jersey, New York, Pennsylvania, and Virginia. Some OTC states have initiated a process to update NOx RACT for MWCs and this potentially provides an opportunity to strengthen emissions limits.

NOx reduction technologies applicable to MWCs have evolved over time, providing a greater selection of NOx reduction controls and strategies to cost effectively reduce NOx emission rates in retrofit situations. This SAS MWC workgroup effort included the evaluation of available information to help identify technically feasible and cost effective NOx controls for MWCs. This RACT type evaluation of available NOx controls is intended to identify numerical presumptive NOx RACT emission rate limits that could be widely met across the various sizes and configurations of the MWC category.

While it is believed that the proposed presumptive NOx RACT rate limits are generally attainable for many or most existing MWCs, it is understood that the proposed presumptive NOx RACT rate limits may not be attainable at every subject MWC. It is anticipated that the proposed presumptive NOx RACT rate limits will assist states in their conduct of case-by-case RACT determinations, considering the technological and economic circumstance for individual MWCs in their respective states.

Further, information developed in this work effort is intended to provide input to the OTC Modeling Committee. It is anticipated that the information will be used to help estimate the air quality impact of the existing OTR MWCs and any potential air quality benefit of adopting the presumptive NOx RACT limits.

## Method

The pilot study was directed by the members of the SAS MWC workgroup. The sub-sections that follow in this section describe each basic step of the analysis method. In brief, these steps consisted of:

- 1) Developing a state-by-state OTR MWC unit inventory;
- 2) Estimating tons of NOx emitted annually from each MWC;
- 3) Conducting a literature review to identify additional control technologies;
- 4) Estimating tons per year of NOx that could be reduced with further controls; and
- 5) Researching and estimating the potential costs of further MWC NOx controls.

### Developing a state-by-state MWC Inventory

In this step, MWC workgroup members compiled information in an Excel spreadsheet for each of the MWCs in their states. The information included the MWC unit ID, plant name, location, type of MWC, capacity (in tons of refuse processed per day), permit or RACT limits, existing control technology, and other information. In addition, using the federal definition, the workgroup segmented MWCs into “large” or “small” MWCs. A large unit has the capacity to process greater than 250 tons per day of refuse, and a small unit has the capacity to process 250 tons or less of refuse per day. Small units referred to in this report includes a “very small” category of MWCs defined in 40 CFR Part 60 as units that process less than 35 tons of refuse per day. MWCs were also categorized by technology type based on 40 CFR part 60 classifications.<sup>1</sup> The purpose of categorizing the MWCs was to identify characteristics of the MWCs that would either lend themselves to further emission controls or preclude further emission control. Appendix A provides NOx emissions for large MWCs and an estimate of potential reductions, Appendix B provides characteristics of the large MWCs, and Appendix C details characteristics of small MWCs in the OTR. The workgroup also identified non-OTR MWC electric generating units (EGUs) in the 48 contiguous states. The Results section provides an overview of findings, and Appendix D lists the MWCs outside of the OTR.

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<sup>1</sup> See The Energy Recovery Council, “2018 Directory of Waste to Energy Facilities” accessed at: <http://energyrecoverycouncil.org/wp-content/uploads/2019/10/ERC-2018-directory.pdf>.



## Developing an Emissions Inventory for the OTR MWCs

To develop inputs for the OTC Modeling Committee to use in air quality modeling, individual MWC permit limit NO<sub>x</sub> emission concentrations in parts per million (ppmvd) were collected.<sup>2</sup> These permit limits were used to estimate NO<sub>x</sub> mass emissions rates in pounds per million British thermal units (lb/MMBtu) using the provisions of 40 CFR Part 60 Appendix A Method 19 to convert from ppmvd to pounds per standard cubic foot (lb/scf). The workgroup subsequently used the provided F-factors to convert from lb/scf to lb/MMBtu. Method 19 provides conversion factors using F-factors for determining particulate matter (PM), sulfur dioxide (SO<sub>2</sub>), and NO<sub>x</sub> emission rates in mass per unit calorific value, i.e., lb/MMBtu.<sup>3</sup> Once inputs to the Method 19 calculation were gathered, the design capacity of the emission unit in MMBtu/hr was multiplied by the estimated lb/MMBtu emission rate to convert to a mass emission rate in pounds per hour (lb/hr).

Because these MWC units run practically all the time except for routine maintenance, the workgroup assumed these units operate continuously and used a consistent estimate of hours of operation per year across all emission units. The assumption of nearly constant operating levels of the MWCs was confirmed by examination of Energy Information Administration (EIA) fuel consumption data indicating nearly constant month-to-month fuel consumption over a year's time. By converting lb/hr to tons per year, the workgroup was able to compare the actual tons of NO<sub>x</sub> emitted per year relative to the permitted levels by using the same formula but inserting the permitted emission concentration in ppmvd. Appendix E provides a detailed description of the method used.

In addition to estimating tons per year of NO<sub>x</sub> for air quality modeling, the estimated mass emissions were used by the MWC workgroup to develop an estimate of the potential tons of NO<sub>x</sub> that could be reduced with the application of additional emissions controls.

## Conducting a Literature Review to Identify Additional NO<sub>x</sub> Control Technologies

The MWC workgroup identified and reviewed a number of guidance documents and engineering analyses that evaluated the technical potential to reduce NO<sub>x</sub> emission from MWCs. Of particular interest to the workgroup were studies that evaluated NO<sub>x</sub> reductions from large MWCs with similar configurations to those in the OTR. A pair of studies conducted by Trinity Consultants for two Covanta facilities in Virginia were evaluated.<sup>4</sup> The studies used similar methodologies for both facilities. Another study conducted by Babcock Power Environmental for a Wheelabrator facility in Baltimore, Maryland was reviewed.<sup>5</sup> Like many large MWCs in the region, all three facilities use selective non-catalytic

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<sup>2</sup> Throughout this report, the term ppmvd is used in reference to NO<sub>x</sub> emissions concentrations. As background, ppm can be shown on a mass (ug/g, or ug/cubic meter) or volume (ul/l) basis. The unit "ppmvd" means that the concentration is on a volume basis. The ppmvd designation indicates that the associated values are on a dry basis (e.g., water vapor is not part of the sample), which provides consistency for comparing any two values, by ensuring that the value is corrected on a dry basis which eliminates the variability introduced by moisture content in the sample gas. This process is similar to correcting a measured value for O<sub>2</sub> content of the sample gas, such as x ppmvd @12% O<sub>2</sub>.

<sup>3</sup> EPA, "Method 19 - Sulfur Dioxide Removal and Particulate, Sulfur Dioxide and Nitrogen Oxides from Electric Utility Steam Generators," see: [Method 19 - Sulfur Dioxide Removal and Particulate, Sulfur Dioxide and Nitrogen Oxides from Electric Utility Steam Generators | Air Emission Measurement Center \(EMC\) | US EPA](#).

<sup>4</sup> Trinity Consultants, "Project Report Covanta Alexandria/Arlington, Inc., Reasonably Available Control Technology Determination for NO<sub>x</sub>," September 2017, and "Project Report Covanta Fairfax, Inc., Reasonably Available Control Technology Determination for NO<sub>x</sub>," September 2017.

<sup>5</sup> Babcock Power Environmental, "Waste to Energy NO<sub>x</sub> Feasibility Study," Prepared for: Wheelabrator Technologies Baltimore Waste to Energy Facility Baltimore, MD, February 20, 2020.

reduction (SNCR) as their baseline NO<sub>x</sub> control technology. A brief summary of these studies is provided below and more detail on the studies can be found in the Results section.

#### Trinity Consultants Studies

The Trinity Consultants studies evaluated two Covanta facilities, one in Alexandria/Arlington, VA and the other in Fairfax, VA, which are subject to RACT requirements for the 2008 ozone standard. Four technologies were evaluated for these MWCs: 1) optimized SNCR; 2) a proprietary low NO<sub>x</sub> combustion system (LN<sup>TM</sup>) developed by Covanta for certain MWC configurations owned by Covanta; 3) selective catalytic reduction (SCR); and 4) Very Low NO<sub>x</sub> (VLN)/SNCR combination.

#### Babcock Power Environmental

The Babcock Power Environmental Study was conducted for a Wheelabrator facility in Baltimore, Maryland. The purpose of this study was to provide a feasibility analysis for additional control of NO<sub>x</sub> emissions from the waste-to-energy facility. As with the Covanta facilities evaluated in the Trinity Consultants' studies, the Baltimore MWCs were equipped with SNCR systems. The study analyzed seven technologies: 1) advanced SNCR (ASNCR), 2) flue gas recirculation SNCR (FGR-SNCR), 3) FGR-ASNCR, 4) hybrid SNCR-SCR, 5) DeNO<sub>x</sub> catalytic filter bags, 6) optimized SNCR, and 7) tail end SCR systems. A technology vendor (Fuel Tech, Inc.) was hired to provide a more comprehensive analysis of SNCR and ASNCR system capabilities to augment Babcock Power Environmental's analysis.

Findings from the Trinity and Babcock Power studies are excerpted in the Results section of this report.

#### Other Resources

Additional papers, correspondence, and studies were evaluated for this report. They include:

- A North American Waste to Energy paper which evaluated the feasibility of a 100 ppmvd 24-hour NO<sub>x</sub> limit<sup>6</sup>
- Information from a Montgomery County Resource Recovery NO<sub>x</sub> optimization study<sup>7</sup>; and
- Recent stack test data from the Covanta Essex facility in New Jersey where LN<sup>TM</sup> technology was working in conjunction with a conventional SNCR system<sup>8</sup>

#### Small MWCs

No studies were found regarding the retrofit of NO<sub>x</sub> controls to small MWCs in the OTR, which are characterized by limited space for NO<sub>x</sub> reduction technology installation. One study from South Korea was reviewed by the MWC workgroup. The study discusses computational fluid dynamics (CFD) modeling and actual test data for the application of SNCR on a small (50 ton per day) MWC.<sup>9</sup> More information on the configuration of small MWCs and space limitations is provided in the following section.

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<sup>6</sup> White, M.; Goff, S.; Deduck, S.; Gohlke, O., "New Process for Achieving Very Low NO<sub>x</sub>," Proceedings of the 17<sup>th</sup> Annual North American Waste-to-Energy Conference, NAWTEC17, May 18-20, 2009.

<sup>7</sup> HDR, "Montgomery County Resource Recovery Facility NO<sub>x</sub> Optimization," May 18, 2016.

<sup>8</sup> Letter from the State of New Jersey to Michael Klein, dated March 14, 2019, in reference to Covanta Energy Group, Inc. Essex County Resource Recovery Facility – Newark Annual Stack Test Program.

<sup>9</sup> Nguyen, T.D.B., *et al.*, "Application of urea-based SNCR to a municipal incinerator: On-site test and CFD simulation," Chemical Engineering Journal 152 (2009) 36-43.

## Estimating Tons per Year of NO<sub>x</sub> that Could Be Reduced with Further Controls

Using the classifications of MWCs in the region (Part 60 classifications) and the results of engineering studies found in the literature, the MWC workgroup estimated the potential for additional NO<sub>x</sub> reductions at MWCs. As described in the literature review section above, several studies were identified and reviewed. The approach used in this estimation is described below.

### *Large MWCs:*

Most of the existing large MWCs in the OTR are equipped with SNCR, which was the baseline technology in both the Trinity and Babcock studies. Improvements to these units could include enhancing or modifying the existing SNCR system as installed with better monitoring or better spray nozzles. Another approach that was described in a Babcock study involved retrofitting the entire system. Additional approaches were described in detail in the Babcock study.

Using the OTR MWC inventory Excel worksheet, the workgroup applied two control levels to the large MWCs in the region: 130 ppmvd and 105 ppmvd. These two levels were both assumed to be 30-day averages. It is important to note that the Trinity studies used for this analysis assumed 24-hour averaging periods, but not a 30-day averaging period. The Babcock study assumed a 30-day averaging period, though the report also concluded that a 24-hour limit of 110-125 ppmvd could be met as well through the utilization of ASNCR. In addition, one unit in operation in the region at the Covanta Montgomery facility in Maryland which utilizes LN<sup>TM</sup> has a permit limit of 105 ppmvd for a 30-day rolling average.

The workgroup identified 105 ppmvd NO<sub>x</sub> on a 30-day averaging period as technically feasible for the large MWC units, based on the engineering analyses reviewed. The workgroup decided to use the same emission limit of 105 ppmvd over a 30-day average for nearly all large MWCs in the region, assuming that the control technologies evaluated in the studies can achieve this limit among nearly all large MWCs. This is the 30-day average value for ASNCR from the Babcock study. Like ASNCR, Covanta's Low NO<sub>x</sub> Technology is also able to meet a 30-day average of 105 ppmvd (e.g., the Covanta Montgomery facility in Maryland). This provides a consistent 30-day limit that is obtainable for the Covanta and Wheelabrator facilities. To the extent that the estimated emission reduction potential for some units is based on the permit limit values with 24-hour average periods, there is not a 1-to-1 comparison with the recommended limit of 105 ppmvd on a 30-day average unless the averaging time differences are accounted for.

In addition to researching the potential for a 30-day averaging period NO<sub>x</sub> limit, the workgroup evaluated the potential for a 24-hour averaging period NO<sub>x</sub> limit. The workgroup researched existing facilities permitted to a 110 ppmvd standard, read literature on technical feasibility and capital costs, and evaluated potential operating and maintenance costs associated with a more stringent 24-hour standard. Note that a 110 ppmvd @ 7% O<sub>2</sub>, 24-hr standard, if achieved by subject large OTR MWCs, would result in NO<sub>x</sub> reductions during ozone season days that may have a positive impact on air quality during ozone events. It is estimated that, relative to existing permit limits, compliance with a 110 ppmvd @ 7% O<sub>2</sub> 24-hr standard, and assuming a daily 90% capacity factor, at subject large OTR MWCs could result in an approximate 19 ton/day reduction in NO<sub>x</sub> emissions.

For both a 30-day and 24-hour NO<sub>x</sub> ppmvd averaging period, the workgroup researched and compiled implementation examples of MWCs that have been retrofitted with technologies to achieve the lower NO<sub>x</sub> limits.

#### *Excluded Large MWCs:*

There were existing large MWCs in the region that were also equipped with SNCR but were excluded from the estimation of further NO<sub>x</sub> reductions. The excluded units are the Wheelabrator Saugus units in Massachusetts. Due to the physical constraints of the two existing MWC units at this facility, the 105 ppmvd 30-day average NO<sub>x</sub> limit was not assumed to be achieved without major modifications of the existing MWCs. The Saugus MWCs are a vintage European design that incorporates a low profile “tail-end boiler” configuration with a single pass short waterwall furnace. The older tail end design and short furnace limits the ability to install additional cost effective NO<sub>x</sub> controls.

#### *Small MWCs*

Small MWCs located in the OTR tend to utilize rotary combustors or modular combustors of either the starved air or excess air configurations. While some small MWCs of these configurations incorporate some NO<sub>x</sub> control provision in their original design, little recent information was located discussing the technical or economic feasibility of retrofitting additional or more modern NO<sub>x</sub> controls on such units. The exception was the study conducted in South Korea (see footnote 9). For the MWC in the South Korean study, a NO<sub>x</sub> reduction of 70 percent was found to be feasible. This percentage reduction is similar to that found in the literature for large MWCs with the installation of ASNCR. The installation of DeNO<sub>x</sub> filter bags may be a technically feasible NO<sub>x</sub> reduction strategy for retrofit of small MWCs. But because the available information appears to indicate the use of the DeNO<sub>x</sub> filter bags may not be cost effective for larger installations, it was assumed that the economics would be no better for small capacity installations. Due to the limited number of small MWCs in the OTR and the sparsity of public information regarding the technological and economic feasibility of advanced controls, the MWC workgroup was unable to recommend NO<sub>x</sub> emission rate limitations more stringent than the values already permitted. However, the workgroup recommends that this category of sources not be forgotten as it is possible that additional reductions from this category may be found to be technically and economically feasible in the future as control options are introduced and improved.

The possibility of additional control for these small MWCs, as demonstrated in non-US applications, should be considered in the event additional sources of NO<sub>x</sub> reductions become necessary. Conducting additional research on small MWCs is a potential area for additional research since further review of the literature may yield more information on the potential to reduce emissions from these units. A list of these units is provided in Appendix C.

#### *Researching the Potential Costs of Further MWC NO<sub>x</sub> Controls*

The MWC workgroup relied on the Trinity and Babcock studies described above for example NO<sub>x</sub> control technology costs in this pilot study. In addition, the workgroup used costs found in an EPA document:

Chapter 2 - Cost Estimation: Concepts and Methodology<sup>10</sup> to fill in gaps in cost data. Last, the workgroup used information from EPA's NSR Guidance document to estimate urea consumption-related operating costs.<sup>11</sup>

The pair of studies by Trinity Consultants (described in previous sections) for the Covanta MWCs located in Alexandria/Arlington and Fairfax, VA were first evaluated. The Covanta facilities were equipped with SNCR at the time of the RACT analysis and costs were evaluated for adding three additional potential technologies: 1) the proprietary low NO<sub>x</sub> combustion system (LN<sup>TM</sup>) developed by Covanta for certain MWC configurations utilized in its own facilities; 2) selective catalytic reduction (SCR); and Very Low NO<sub>x</sub> (VLN)/SNCR combination.

In the analysis for the SCR costs, Covanta solicited bids from engineering, procurement, and construction companies to determine system costs. The SCR system included the SCR reactor; gas-to-gas recuperative heat exchanger; steam coil heater; reagent feed injection and mixing system; and all associated support steel, piping, and controls. The consultants were instructed to design the SCR to receive NO<sub>x</sub> at 90-180 ppmvd (24-hour average) and control it to 50 ppmvd (24-hour average). Direct and indirect annual operating costs were obtained from a BACT analysis of an MWC in West Palm Beach, Florida.<sup>12</sup>

Capital costs for installation of the LN<sup>TM</sup> process were estimated by examining each of the boilers at the facility and costs were developed on a per-boiler basis. The installation cost, which includes items such as fans, dampers, ducting, and process controls, was estimated based on actual expenses from another Covanta facility (Montgomery County, MD). The annual costs were scaled linearly from the Montgomery County project costs to the Covanta facilities in Virginia.

Total capital investment costs were provided in both Covanta studies, including direct costs (purchased equipment) and indirect costs (installation costs and lost production due to extended downtime for installation). Direct and indirect costs were also presented for annual operating costs.

The third study was the Babcock Power Environmental analysis conducted for the Wheelabrator facility in Baltimore. Capital and operating costs were evaluated for each technology. At the Baltimore facility, each of the three MWCs is equipped with SNCR. As mentioned above, the study analyzed advanced SNCR (ASNCR), FGR-SNCR that incorporates flue gas recirculation into the SNCR design, FGR-ASNCR, hybrid SNCR-SCR, DeNO<sub>x</sub> catalytic filter bags, and tail end SCR systems. Because Covanta's Low NO<sub>x</sub> combustion system is proprietary technology, it was not considered for the Wheelabrator facility in Baltimore. For each of these technologies, Babcock Power Environmental estimated costs for materials, equipment, and installation. A technology vendor (Fuel Tech, Inc.) was hired to provide a more comprehensive analysis of SNCR and Advanced SNCR (ASNCR) system capabilities to augment Babcock's analysis. In this study, annualized capital costs were not provided and so the MWC workgroup estimated

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<sup>10</sup> EPA, "Economic and Cost Analysis for Air Pollution Regulations," [Chapter 2 - Cost Estimation: Concepts and Methodology](#), last updated in February 2018.

<sup>11</sup> EPA NSR Guidance Document, 2019, <https://www.epa.gov/sites/production/files/2017-12/documents/sncrcostmanualchapter7thedition20162017revisions.pdf>.

<sup>12</sup> Florida Department of Environmental Protection "Written Notice of Intent to Issue a Permit," "Public Notice of Intent to Issue Air Permit," "Technical Evaluation and Preliminary Determination," "Draft Permit with Appendices" November 2010.



these costs from a formula in the EPA document: Chapter 2 - Cost Estimation: Concepts and Methodology (see footnote 10).

To estimate the costs per ton of NO<sub>x</sub> reduced assuming a 24-hour NO<sub>x</sub> limit, the workgroup relied on the Trinity and Babcock Power studies. The workgroup made some adjustments to these costs. First, the workgroup estimated tons of NO<sub>x</sub> reduced each year using the 110 ppmvd limit. Operating cost adjustments were made to account for the fact that the Trinity study evaluated a 90 ppmvd annual NO<sub>x</sub> limit and the workgroup was estimating costs for a 110 ppmvd 24-hour limit. To adjust operating costs, the workgroup estimated the difference in cost for urea between the 90 ppmvd NO<sub>x</sub> annual limit and a 110 ppmvd 24-hour averaging period. The cost for urea consumption for NO<sub>x</sub> removal was performed in two ways. First, the cost estimate on a per lb of NO<sub>x</sub> reduction was developed using information in the Wheelabrator Baltimore study. The differences between the optimized SNCR and advanced SNCR control options were evaluated. The second estimation method was based on simple chemical reaction estimates available in guidance from EPA, and urea cost values from the Wheelabrator Baltimore study. Details of the utilized estimation methodologies are found in Appendix G. Additional information on how costs were developed in the RACT studies that the MWC workgroup relied on is provided in the next section.

The MWC workgroup anticipates the control technologies, associated costs and emissions reduction capability found in the literature would apply to most of the MWCs throughout the OTR. However, additional analyses may be needed to further refine these estimates for specific MWCs.

## Findings

In this section, an inventory of MWC units and NO<sub>x</sub> emissions in tons per year, a summary of technologies to reduce NO<sub>x</sub> from MWCs, an estimate of the NO<sub>x</sub> emission reduction potential for OTR MWCs, and estimated costs for installing and operating additional technologies are provided.

### OTR MWC Inventory of Units and NO<sub>x</sub> Emissions

The inventory of MWC units in the OTR is summarized in Table 1. A total of 103 large and small units are operating in the nine OTR states with MWCs. In 2018, large units emitted over 21,000 tons of NO<sub>x</sub> annually and small units emitted approximately 900 tons of NO<sub>x</sub>. Missing from this analysis are a few MWCs in the region for which the MWC workgroup could not calculate annual NO<sub>x</sub> emissions. This is a minor portion of the inventory and could be estimated in a follow-on analysis.

**Table 1: Summary of OTR MWCs and NO<sub>x</sub> Emissions by State**

State	Number of Large Units	Number of Small Units	Annual Tons of NO <sub>x</sub> Emissions - Large Units (2018)	Annual Tons of NO <sub>x</sub> Emissions - Small Units (2018)
Connecticut	12	0	2,169	0
Maine	4	2	670	278
Maryland	6	0	1,435	0
Massachusetts	11	6	4,754	173
New Hampshire	2	0	344	0
New Jersey	11	0	2,044	0
New York	13	5	3,998	456

Pennsylvania	19	0	3,531	0
Virginia	7	0	2,276	0
<b>Total</b>	<b>90</b>	<b>13</b>	<b>21,221</b>	<b>906</b>

As can be seen from Table 1, large MWCs emit most of the NO<sub>x</sub> pollution from MWCs in the OTR. As mentioned above, information was found in the literature on additional NO<sub>x</sub> control technologies for the types of MWCs in the “large” category. For these reasons, the MWC workgroup focused its attention on technologies to reduce NO<sub>x</sub> emissions from large MWCs.

### Technologies to Reduce NO<sub>x</sub> from MWCs in the OTR

Information is provided below on the potential to reduce NO<sub>x</sub> emissions from MWCs in the OTR. First, excerpts from the Trinity Consultants’ report describing the technologies and the potential NO<sub>x</sub> reductions that can be achieved using each of the technologies on Covanta facilities are provided, followed by information from the Babcock Power study on a Wheelabrator facility. Additional information on the technologies is available in Appendix F.

#### *Covanta patented low NO<sub>x</sub> technology (LN™)*

Covanta has developed a proprietary low NO<sub>x</sub> combustion system that involves staging of combustion air. The system is a trademarked system and Covanta has received a patent for the technology. The Covanta LN™ is not applicable to all MWC configurations, including some that are owned or operated by Covanta, and its overall NO<sub>x</sub> reduction effectiveness may vary from unit to unit depending upon individual MWC characteristics.

Secondary air (also called overfire air) is injected through nozzles located in the furnace side walls immediately above the grate creating turbulent mixing to complete the combustion process. The Covanta LN™ process modifies the secondary air stream. A new series of air nozzles are installed higher in the furnace (tertiary air) and a portion of the secondary air is diverted to these new nozzles. The distribution of air between the primary, secondary, and tertiary streams is then controlled to yield the optimal gas composition and temperature to minimize NO<sub>x</sub> formation and control combustion. The tertiary air achieves complete coverage of the furnace cross-section to ensure good mixing with the combustion gases. Note that the total air flow to the MWC is not changed, only the distribution of air is changed. The LN™ combustion system works in concert with an optimized SNCR system to achieve lower NO<sub>x</sub> emissions. The LN™ process can be retrofitted to an existing unit, and Covanta has installed the LN™ process at approximately 20 units worldwide. The LN™ process can appreciably increase annual maintenance costs due to increased refractory wear and boiler fouling.

The Trinity report found that implementation of LN™ can reasonably achieve an annual NO<sub>x</sub> emission limit of 90 parts per million volume dry (ppmvd) (7% O<sub>2</sub>) and a daily NO<sub>x</sub> limit of 110 ppmvd (7% O<sub>2</sub>). LN™ is used in combination with SNCR and is thus presented considering usage of the combustion technology plus SNCR. (Note also that while the Covanta LN™ technology is highly effective on some MWC configurations, including the facility discussed in the Trinity report, it is not applicable to all MWC configurations operated by Covanta.)

### SCR

Trinity Consultants instructed its subcontractors to design a SCR system that included the SCR reactor; gas-to-gas recuperative heat exchanger; steam coil heater; reagent feed injection, and mixing system; and all associated support steel, piping, and controls. The consultants were instructed to design the SCR to receive NO<sub>x</sub> at 90-180 ppmvd (24-hour average) and control it to 50 ppmvd (24-hour average). The study concluded there are significant space considerations with SCR system installation which can be managed in a cost effective way in a new development, but which make retrofit installation very costly and complex. Specifically, the piping, wiring, supports, and other hardware require substantial space which may not be available in an existing facility.

### VLN Technology

The Very Low NO<sub>x</sub> (VLN) system employs a unique combustion air system design, which in addition to the conventional primary and secondary air systems, features an internal gas recirculation injection system. Recirculation of the flue gas reduces the need for combustion air for complete combustion in the furnace. The combination of the internal gas recirculation and reduced secondary air extends the combustion zone in the furnace, which in turn inhibits the formation of NO<sub>x</sub>. A NO<sub>x</sub> limit of 110 ppmvd NO<sub>x</sub> on a 24-hour average basis and 90 ppmvd on an annual basis was found to be feasible. The study concluded that VLN remains a viable technology for new MWC units but is not technically feasible for an existing unit.

### Babcock Power Environmental Study

The Babcock Power Environmental Study was conducted for a Wheelabrator facility in Baltimore, Maryland. The purpose of this study was to provide a feasibility analysis for additional control of NO<sub>x</sub> emissions from the waste-to-energy facility. The Baltimore MWCs were equipped with an SNCR system. Results from the analysis conducted for the study are provided below for each of the technologies evaluated.

### Optimized SNCR

The study analyzed CFD model outputs and found that through adjustments to residence time, NO<sub>x</sub> emissions levels of 135 ppmvd @7% O<sub>2</sub> on a 24-hour block average and 130 ppmvd @7% O<sub>2</sub> on a 30-day rolling average are achievable.

### Advanced-SNCR (ASNCR)

The Babcock Power Environmental study evaluated optimized injector locations. It concluded this option is technically feasible with future CFD and chemical spray modeling where particular attention is paid to injector placement so that there is no risk of chemical impingement on the superheater and boiler surfaces. The study concluded that a reduction of 25 ppmvd @7% O<sub>2</sub> on a 30-day rolling average (i.e., 105 ppmvd) can be realized over the optimized existing SNCR. In discussing the potential retrofit of ASNCR, the report states “based on experience ... a 5% improvement in chemical coverage is feasible, leading to a target NO<sub>x</sub> of 110 ppmvd @7% O<sub>2</sub> on a 24-hour block average and 105 ppmvd @7% O<sub>2</sub> on a 30-day rolling average while the ammonia slip is kept at the 5 ppm range.”

ASNCR NO<sub>x</sub> control technology may be considered for retrofit on existing MWCs as either a new retrofit technology or a significant upgrade to an existing SNCR. ASNCR is like SNCR in that it utilizes the injection of reagents into the proper temperature zones of the furnace to reduce the flue gas NO<sub>x</sub> concentration. ASNCR designs may utilize advanced computer modeling techniques to specify SNCR

nozzle locations and elevations so that their operation may be optimized across varying furnace conditions. The primary difference between a well-designed SNCR and ASNCR system is that ASNCR would utilize advanced furnace temperature monitoring instrumentation to provide near real time operating furnace temperature profiles. This information allows the control system to modulate which ASNCR injectors are in operation and to automatically adjust the individual injector flow rate in order to optimize the overall NO<sub>x</sub> emission rate, including the reduction in magnitude of NO<sub>x</sub> spikes associated with the combustion of a heterogeneous fuel. This advanced system optimizes the NO<sub>x</sub> reduction chemical reaction across the furnace to achieve high levels of overall NO<sub>x</sub> reduction while maintaining low ammonia slip.

ASNCR is an effective NO<sub>x</sub> reduction technology capable of achieving a 70% reduction. Industry literature discusses that for most large MWC EGUs, uncontrolled NO<sub>x</sub> emission rates are in the range of 300 ppmvd to 350 ppmvd @7% O<sub>2</sub>. Based on these values, it would appear that a general range of NO<sub>x</sub> emissions utilizing ASNCR would be 90 ppmvd to 105 ppmvd.

The Babcock Power Environmental information suggests that ASNCR may be applicable to many MWCs as a retrofit technology, although furnace configuration or other factors could affect the NO<sub>x</sub> reduction potential.

#### *FGR-SNCR*

With this option, Flue Gas Recirculation is incorporated into the SNCR design. The FGR-SNCR option was evaluated using a boiler heat transfer model. In this option, a portion of the flue gas from combustion is recirculated from the fan inlet duct and re-injected back into the furnace through the over-fire air system. FGR is used to replace a portion of the secondary air flow. This reduces use of ambient air, and therefore provides additional NO<sub>x</sub> emission reduction by reducing O<sub>2</sub> concentration or excess ambient air and combustion temperature, while still maintaining the secondary air gas flow needed for mixing in the furnace.

#### *FGR-ASNCR*

It is also possible to combine the FGR technology with the ASNCR technology. The implementation of ASNCR by adding additional independent zones of injection and an acoustic pyrometer can provide additional NO<sub>x</sub> reduction while controlling the ammonia slip. The FGR-ASNCR system was evaluated using a boiler heat transfer model. The study concluded that FGR-ASNCR is technically feasible from both an arrangement and performance perspective with future CFD modeling.

#### *Hybrid SNCR-SCR*

The Hybrid SNCR-SCR option utilizes two treatment stages: a SNCR treatment stage followed by a SCR treatment stage. In a stand-alone SNCR application, the reducing agent is released at higher temperatures to minimize ammonia slip formation. In hybrid applications, the ammonia slip becomes the reducing agent over the catalyst. The hybrid system was not considered to be technically feasible for the Baltimore facility.

#### *DeNO<sub>x</sub> Catalytic Filter Bags*

DeNO<sub>x</sub> catalytic filter bags can be utilized with ammonia injection to reduce NO<sub>x</sub> in a similar fashion to traditional SCR catalyst. These combination bags remove both dust and gaseous compounds simultaneously. The DeNO<sub>x</sub> catalyst was not considered to be technically feasible at the Baltimore facility due to operating temperature requirements.

### *Tail end SCR Systems*

A tail end system positions the SCR downstream of all other air pollution control equipment installed on a unit. A major benefit of this installation location is that many of the flue gas constituents that would be damaging to the catalyst have been removed prior to the SCR reactor inlet. However, the installation location results in flue gas temperatures below the acceptable range for catalytic reduction, and the flue gas consequently must be reheated via natural gas or oil burners or steam coil heaters. Tail end SCR was not found to be technically feasible for a retrofit application in this study. While it is potentially technically feasible, it would require additional detailed evaluations to be performed to confirm feasibility for retrofits.

### *Implementation Examples of LN<sup>TM</sup> and ASNCR*

The Covanta LN<sup>TM</sup> technology was installed at the Montgomery County, Maryland facility in 2009 and has been operational since then. The Montgomery County Resource Recovery Facility in Maryland is currently operating under a NOx RACT requirement which limits NOx emissions to 140 ppmvd @7% O<sub>2</sub> for a 24-hour block average. In 2009 Covanta, under an Agreement with the Northeast Maryland Waste Disposal Authority and the County, completed work on the installation of Covanta's LN<sup>TM</sup> combustion system upgrade to the SNCR system. Operational data (since the May 1, 2019, NOx RACT effective date) at the facility demonstrate that the units on average are able to achieve a daily average of around 84 ppmvd @7% O<sub>2</sub>.

Maryland's NOx RACT also required a NOx 30-day rolling average emission rate of 105 ppmvd @7% O<sub>2</sub> to be met beginning on May 1, 2020. Since that time, the peak 24-hour average recorded has been on the order of 103 ppmvd @7% O<sub>2</sub>. The facility is capable, and further demonstrates, meeting a 110 ppmvd 24-hour limit. Information from a Montgomery County Resource Recovery NOx optimization study found that ammonia slip is below 5 ppm for all units with LN<sup>TM</sup> technology with SNCR and with NOx emissions of 66 ppm and higher.

The Covanta LN<sup>TM</sup> is being installed at Covanta Alexandria/Arlington, Virginia and Covanta Fairfax, Virginia. For Covanta Alexandria/Arlington, the permit requires the facility to install the low NOx combustion system on the first unit by the end of the 4th quarter of 2019, the second unit by the end of the 4th quarter of 2020, and the third unit by the end of the 4th quarter of 2021.<sup>13</sup> For Covanta Fairfax, the permit requires the facility to install the low NOx combustion system on the first unit by the end of the 2nd quarter of 2019, the second unit by the end of the 4th quarter of 2019, the third unit by the end of the 4th quarter of 2020, and the fourth unit by the end of the 4th quarter of 2021.<sup>14</sup> Thus, both facilities will be completely utilizing the low NOx technology by the start of 2022.

The Virginia Department of Environmental Quality has determined that Covanta's proprietary Low NOx technology is RACT for Covanta MWCs. The Virginia facilities are permitted to emit 110 ppmvd of NOx on a 24-hour average basis @7% O<sub>2</sub>, and 90 ppmvd of NOx on an annual average basis @7% O<sub>2</sub>.<sup>15</sup> In addition, the limits of 110 ppmvd @7% O<sub>2</sub> on a daily average and 90 ppmvd @7% O<sub>2</sub> on an annual

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<sup>13</sup> Permit issued by the Commonwealth of Virginia to operate a municipal solid waste combustor at Alexandria, Virginia, dated February 2019.

<sup>14</sup> Permit issued by the Commonwealth of Virginia to operate a municipal solid waste combustor at Fairfax, Virginia, dated February 2019.

<sup>15</sup> See footnotes 16 and 17 for sources.



average have been adopted into The Commonwealth of Virginia's SIP as RACT for the 2008 ozone NAAQS for both of these facilities.<sup>16</sup>

Table 2 lists details for facilities that have permitted NOx emission rate limits of 110 ppmvd @7% O<sub>2</sub>, 24-hour average. Public information indicates all have been retrofit with the proprietary Covanta Low NOx (LN™) modifications in conjunction with SNCR. The boiler/combustion units are of three different manufacturers and range in rating from 325 tons/hr to 750 tons/hr.

**Table 2: List of Facilities with Retrofit NOx Controls Permitted at 110 ppmvd 24-hour Average**

Plant Name	State	Combustor Manufacturer	Rating (tons/day)	NOx Control	Permit Short Term NOx Limit*, **	Permit Long Term NOx Limit*, ***
Covanta Alexandria/Arlington Energy	VA	Keeler/Dorr-Oliver	325	Covanta LN, SNCR	110	90
Covanta Alexandria/Arlington Energy	VA	Keeler/Dorr-Oliver	325	Covanta LN, SNCR	110	90
Covanta Alexandria/Arlington Energy	VA	Keeler/Dorr-Oliver	325	Covanta LN, SNCR	110	90
Covanta Fairfax Energy	VA	Ogden Martin	750	Covanta LN, SNCR	110	90
Covanta Fairfax Energy	VA	Ogden Martin	750	Covanta LN, SNCR	110	90
Covanta Fairfax Energy	VA	Ogden Martin	750	Covanta LN, SNCR	110	90
Covanta Fairfax Energy	VA	Ogden Martin	750	Covanta LN, SNCR	110	90
Hillsborough County Resource Recovery	FL	Riley w/Martin GMBH Grates	690	Covanta LN, SNCR, FGR	110	90

\* ppmvd @7% O<sub>2</sub>

\*\* permit short term limit averaging period is 24-hour

\*\*\* permit long term limit averaging period is annual

The information in Table 2 indicates that many of the Covanta run facilities, across a wide range of sizes and manufacturers, can be retrofitted with the proprietary Covanta LN™ technology and achieve significant NOx reductions. However, the workgroup understands that the Covanta LN™ technology is not applicable to all MWC configurations operated by Covanta and that not all of the MWCs converted to the Covanta LN™ technology may be able to achieve NOx reduction results similar to the table values. That a number of these units have been retrofitted with the LN™ technology and have been permitted

<sup>16</sup> Submittal to EPA Region III for a SIP revision by the Commonwealth of Virginia entitled, "Statement of Legal and Factual Basis, Covanta Alexandria/Arlington, Permit No. NRO-RACT 71895," February 2019 and "Statement of Legal and Factual Basis, Covanta Fairfax, Permit No. NRO-RACT 71920," February 2019.

at 110 ppmvd @7% O<sub>2</sub> 24-hr average supports a proposed 110 ppmvd 24-hr average presumptive NOx rate limit. Furthermore, data on Covanta Fairfax's website (<https://www.covanta.com/where-we-are/our-facilities/fairfax>) shows the facility is consistently able to achieve a daily average of around 90 ppmvd @7% O<sub>2</sub> for Units 2 and 4.

A number of additional facilities are retrofitted with LN<sup>TM</sup> but not permitted to 110 ppmvd. These include:

- The Montgomery County facility described previously.
- The Covanta Essex facility in New Jersey has achieved values around 100 ppmvd @7% O<sub>2</sub>.<sup>17</sup> This is based on recent stack test data.
- There is limited information available that technology similar to LN<sup>TM</sup> has been installed on a Covanta operated MWC in the mid-west that is said to be operating at 90 ppmvd @7% O<sub>2</sub> annual average (similar to the annual limits for the units that are now permitted at 110 ppmvd 24-hr). However, the publicly available information indicates that the unit is operating at the low NOx level by contract, not by permit limit.

A North American Waste to Energy paper discussing the retrofit potential of Covanta's proprietary VLN and LN technologies on an existing Covanta operated MWC found that a 100 ppmvd 24-hour limit is feasible. The paper provided an overview of a MWC development and demonstration project and provided NOx and ammonia (NH<sub>3</sub>) slip data. The paper discussed the extended operating experience that has been established on the system.

ASNCR technology is being installed at a Baltimore City, MD facility. The schedule for implementing the technology is as follows: permits must be in place by the end of 2021 for the three units, followed by construction in 2022, and the facilities must be on-line in 2023.

#### Potential NOx Reductions Resulting from Installing Additional Control Technologies

Using the methods described in previous sections, the MWC workgroup estimated that approximately 6,700 tons of NOx could be reduced in the OTR with a 105 ppmvd 30-day average NOx requirement for MWCs. The results are summarized in Table 3. The workgroup also evaluated a 130 ppmvd 30-day average NOx requirement. Not shown in the table, a 130 ppmvd 30-day average limit was estimated to reduce NOx by 3,300 tons per year.

**Table 3: Summary of Potential NOx Reductions from MWCs in the OTR**

Type of unit	2023 Projected NOx Emissions (tons/yr)	Potential 2023 NOx Reduction (tons/yr) Assuming 105 ppmvd	Percent Reduction from 2023 Projected NOx Emissions
Large MWC	22,992	6,742	29%
Small MWC	1,006	Not estimated	Not estimated
Total	23,998	6,742	28%

<sup>17</sup> Letter from the State of New Jersey to Michael Klein, dated March 14, 2019, in reference to Covanta Energy Group, Inc. Essex County Resource Recovery Facility – Newark Annual Stack Test Program.

An OTR-wide estimate of potential tons of NO<sub>x</sub> reduced assuming a 24-hour NO<sub>x</sub> limit of 110 ppmvd was not estimated in this study, however, tons of NO<sub>x</sub> reduced on an annual basis would be in the range of the reductions shown in column three of Table 3.

### Control Costs

As discussed in the Method section, the MWC workgroup researched studies to identify costs associated with the installation and operation of additional NO<sub>x</sub> control technologies on MWCs in the region. Three studies were found with detailed cost information for MWCs that are similar in configuration to a significant number of large MWCs in the region. The results of cost analyses from these studies are provided in this section.

Results from the Trinity Consultants analysis of installation of a proprietary Covanta Low NO<sub>x</sub> technology and SCR at Covanta facilities are shown in Table 4. Note that the cost estimate values included in the report, and copied below in Table 4, were based on year 2017 dollars. SCR was estimated to be very costly (\$31,000 per ton of NO<sub>x</sub> reduced), therefore the results for that technology are not presented here. The left column lists types of costs (such as capital or operating costs) and NO<sub>x</sub> emissions information for the Alexandria/Arlington VA facility. The middle column provides emission information for the baseline technology (SNCR). No costs are provided in this column since SNCR is already in operation at the facility. The right column provides costs associated with installing the Low NO<sub>x</sub> technology to the MWC and the resulting NO<sub>x</sub> emissions changes.

**Table 4: Cost of Installing Low NO<sub>x</sub> Technology on an MWC with SNCR (Alexandria/Arlington, VA)**

	<b>SNCR (Base)</b>	<b>Low NO<sub>x</sub></b>
Capital Costs (\$)	-	\$1,018,705
Annual Operating Costs (\$)	-	\$213,773
Annualized Capital Costs (\$)	-	\$116,533
Projected Lifetime (yr)	-	20
Interest Rates (%)	-	7%
Total Yearly Costs (\$)	-	\$330,306
Base Case NO <sub>x</sub> (ppmvd)*	180	180
Controlled NO <sub>x</sub> (ppmvd)	180	90
Estimated NO <sub>x</sub> Reduction (%)	0	50
NO <sub>x</sub> Emission (ton/yr)	165	82.5
Emission Reduction (ton/yr)	0	82.5
<b>Cost effectiveness (\$/ton)</b>	<b>\$0.00</b>	<b>\$4,004</b>

\*This is an "equivalent" NO<sub>x</sub> emissions rate, rather than a permit level.

The analysis shows that equipping the Covanta unit with Low NO<sub>x</sub> technology resulted in a 50 percent NO<sub>x</sub> reduction at a cost of approximately \$4,000 per ton of NO<sub>x</sub> reduced.

The row labeled "Base Case NO<sub>x</sub> (ppmvd)" shows the permit limit before installation of Covanta's Low NO<sub>x</sub> Technology and the "Controlled NO<sub>x</sub> (ppmvd)" is the new annual permit limit after installation of the Low NO<sub>x</sub> technology. The table shows that NO<sub>x</sub> emissions were reduced from 180 ppmvd to 90 ppmvd with the installation of the Low NO<sub>x</sub> technology.<sup>18</sup> The row labeled "NO<sub>x</sub> Emission (ton/yr)"

<sup>18</sup> Unless stated otherwise, all concentrations listed in this report assume 7% O<sub>2</sub>.

shows NOx emissions before and after installation of Covanta's Low NOx technology. The NOx emission reduction in tons per year is calculated to be 82.5 tons per year as shown in the next row. The "Cost effectiveness" value assumes that SNCR was already installed at the facility and thus assigns zero additional cost to the facility.

The total capital investment or "Capital Costs" includes direct and indirect costs. Direct costs are purchased equipment costs and indirect costs are costs associated with installation of equipment and lost revenue due to extended downtime for installation.

The study also estimated direct and indirect costs for annualized expenditures. Direct costs in this category include increased capital expenditures due to the Low NOx technology and increased annual expenses from operating the equipment. Indirect operating costs are annualized capital costs such as administrative charges plus capital recovery (loan interest). Note that control costs are facility-specific, so any costs specified here are examples only.

Table 5 shows a similar analysis for the Covanta Fairfax, Virginia facility. Note that the cost estimate values included in the report, and copied below in Table 5, were based on year 2017 dollars. In the Trinity Consultants analysis for the Fairfax facility, capital costs (\$1,564,242) were approximately 50 percent higher than for the Alexandria/Arlington facility. Operating costs (\$493,322) were 130 percent higher than those for the Alexandria/Arlington facility. The cost effectiveness (\$/ton of NOx reduced) for Fairfax was lower than in the Alexandria/Arlington MWC at \$2,888 per ton of NOx reduced. This is because the NOx emissions from the Fairfax MWC are considerably higher than in the example shown in Table 4. While both facilities realized a 50 percent reduction in NOx emissions from the installation of Low NOx technology, the MWC in Fairfax had a 230 ton annual NOx reduction while the Alexandria/Arlington facility realized an 83 ton NOx reduction annually for a capital cost that was 50 percent lower.

**Table 5: Cost of Installing Low NOx Technology on an MWC with SNCR (Fairfax, VA)**

	<b>SNCR (Base)</b>	<b>Low NOx</b>
Capital Costs (\$)	-	\$1,564,242
Annual Operating Costs (\$)	-	\$493,322
Annualized Capital Costs (\$)	-	\$178,938
Projected Lifetime (yr)	-	20
Interest Rates (%)	-	7%
Total Yearly Costs (\$)	-	\$672,260
Base Case NOx (ppmvd)	180	180
Controlled NOx (ppmvd)	180	90*
Estimated NOx Reduction Factor	0	0.5
Estimated NOx Reduction (%)	0	50
NOx Emission (ton/yr)	465.6	465.6
Projected Controlled NOx Emissions (ton/yr)	465.6	232.8
Emission Reduction (ton/yr)	0	232.8
<b>Cost effectiveness (\$/ton)</b>	<b>\$0.00</b>	<b>\$2,888</b>

\*annual average

### Cost Estimate for a 24-Hour NO<sub>x</sub> Limit of 110 ppmvd using LN<sup>TM</sup>

In this section, the workgroup's estimate of capital and operating costs for using LN technology to achieve a 24-hour NO<sub>x</sub> limit of 110 ppmvd is presented. Tables 6 and 7 show estimates for the cost of installing and operating LN<sup>TM</sup> at Covanta facilities. In the far-right columns in the tables, labeled "Low NO<sub>x</sub> Trinity Consultants Study," costs and cost effectiveness numbers are taken from the Trinity Consulting study of the Alexandria/Arlington and Fairfax, VA Covanta facilities. The analysis evaluated an annual limit of 90 ppmvd for the facilities. The third column labeled "Low NO<sub>x</sub> Workgroup" provides an estimate developed by the MWC workgroup of dollars per ton of NO<sub>x</sub> reduced assuming a 24-hour limit using the costs from the Trinity study.

**Table 6: Cost of Installing Low NO<sub>x</sub> Technology on an MWC with SNCR (Alexandria/Arlington, VA)**

	SNCR (Base) <sup>1</sup>	Low NO <sub>x</sub> – Workgroup <sup>2</sup>	Low NO <sub>x</sub> <sup>3</sup>
Capital Costs (\$)³	-	\$1,018,705	\$1,018,705
Cost Reduction for Assuming 110 ppmvd (\$)⁴		\$32,627	
Annual Operating Costs (\$)	-	\$181,146	\$213,773³
Annualized Capital Costs (\$)³	-	\$116,533	\$116,533
Projected Lifetime (yr)	-	20	20
Interest Rates (%)	-	7%	7%
Total Yearly Costs (\$)	-	\$297,679	\$330,306
Base Case NO <sub>x</sub> (ppmvd)⁵	180	180	180
Controlled NO <sub>x</sub> (ppmvd)⁶	180	110	90
Estimated NO <sub>x</sub> Reduction Factor	0.0	0.389	0.5
Estimated NO <sub>x</sub> Reduction (%)	0	38.89	50
NO <sub>x</sub> Emission (ton/yr)⁵	165	165	165
Projected Controlled NO <sub>x</sub> Emissions (tons/yr)	165	100.83	82.5
Emission Reduction (ton/yr)	0	64.17	82.5
<b>Cost effectiveness (\$/ton)⁷</b>	<b>\$0.00</b>	<b>\$4,639</b>	<b>\$4,004</b>

<sup>1</sup>SNCR was already installed at both facilities; assume \$0 additional cost to facilities

<sup>2</sup>The Workgroup's recommendation and cost estimate

<sup>3</sup>Based on Covanta's "Reasonably Available Control Technology Determination for NO<sub>x</sub>" for Covanta Alexandria/Arlington, VA

<sup>4</sup>Savings based on \$0.89 per pound of NO<sub>x</sub> reduced (from Babcock report for Wheelabrator Baltimore)

<sup>5</sup>NO<sub>x</sub> emissions before installation of Covanta's Low NO<sub>x</sub> Technology

<sup>6</sup>New annual permit limit (@7% O<sub>2</sub>)

<sup>7</sup> The Commonwealth of VA has determined that Low NO<sub>x</sub> Technology is RACT for the Alexandria and Arlington facilities

The O&M costs from the Trinity study assume use of reagent and other substances required to meet the 90 ppmvd annual average limit, as well as maintenance costs. Using these costs to calculate cost effectiveness values (\$/ton) for an assumed 110 ppmvd NO<sub>x</sub> 24-hour average limit could result in higher costs than would be incurred in actual use for the 110 ppmvd limit. This is because reagent and other substances required to meet the 90 ppmvd limit may be higher than that of O&M costs to achieve the 110 ppmvd 24-hour limit. Thus, using the method previously described, the workgroup adjusted the O&M costs, and this is reflected in the "Annual Operating Costs" row in Tables 6 and 7.

The workgroup's estimate of a 110 ppmvd 24-hour NOx limit cost effectiveness is \$4,639 per ton of NOx reduced. This is approximately \$600 per ton higher than the 90 ppmvd annual NOx limit in the Trinity study. The difference in cost effectiveness (in \$/ton of NOx removed) is primarily due to a lower estimated number of tons of NOx removed with the recommended NOx emission rate limit while assuming similar capital expenses associated with both rate limits. Note however that the estimated annual O&M expenses would be somewhat lower for the recommended 110 ppmvd limit primarily due to a reduction in reagent consumption.

Table 7 provides a similar calculation using the Fairfax, VA Covanta cost evaluation from the Trinity study.

**Table 7: Cost of Installing Low NOx Technology on an MWC with SNCR (Fairfax, VA)**

	<b>SNCR (Base)<sup>1</sup></b>	<b>Low NOx – Workgroup<sup>2</sup></b>	<b>Low NOx<sup>3</sup></b>
Capital Costs (\$) <sup>3</sup>	-	\$1,564,242	\$1,564,242
Cost Reduction for Assuming 110 ppmvd (\$) <sup>4</sup>		\$92,079	
Annual Operating Costs (\$)	-	\$401,243	\$493,322 <sup>3</sup>
Annualized Capital Costs (\$) <sup>3</sup>	-	\$178,938	\$178,938
Projected Lifetime (yr)	-	20	20
Interest Rates (%)	-	7%	7%
Total Yearly Costs (\$)	-	\$580,181	\$672,260
Base Case NOx (ppmvd) <sup>5</sup>	180	180	180
Controlled NOx (ppmvd) <sup>6</sup>	180	110	90
Estimated NOx Reduction Factor	0.0	0.389	0.5
Estimated NOx Reduction (%)	0	38.89	50
NOx Emission (ton/yr) <sup>5</sup>	465.6	465.6	465.6
Projected Controlled NOx Emissions (tons/yr)	465.6	284.53	232.8
Emission Reduction (ton/yr)	0	181.07	232.8
<b>Cost effectiveness (\$/ton) <sup>7</sup></b>	<b>\$0.00</b>	<b>\$3,204</b>	<b>\$2,888</b>

<sup>1</sup> SNCR was already installed at both facilities; assume \$0 additional cost to facilities.

<sup>2</sup> The Workgroup's recommendation and cost estimate.

<sup>3</sup> Based on Covanta's "Reasonably Available Control Technology Determination for NOx" for Covanta Alexandria/Arlington, VA.

<sup>4</sup> Savings based on \$0.89 per pound of NOx reduced (from Babcock report for Wheelabrator Baltimore).

<sup>5</sup> NOx emissions before installation of Covanta's Low NOx Technology.

<sup>6</sup> New annual permit limit (@7% O<sub>2</sub>).

<sup>7</sup> The Commonwealth of VA has determined that Low NOx Technology is RACT for the Alexandria and Arlington facilities.

The cost per ton of NOx reduced in the 110 ppmvd 24-hour limit case (third column) is \$3,204. The method used to develop this estimate is the same as used in Table 6 for the Covanta Alexandria/Arlington facility.

As mentioned previously, the Babcock Power Environmental study for Wheelabrator evaluated four technologies: optimized SNCR, ASNCR, FGR-SNCR, and FGR-ASNCR. The baseline technology in this Wheelabrator facility was SNCR. Costs for converting this Wheelabrator facility to the different technology configurations are provided in Table 8.

The capital costs and annual operating costs shown in Table 8 were taken from the Babcock study for the Wheelabrator Baltimore facility. Note that the cost estimate values included in the report, and copied below in Table 8, were based on year 2019 dollars. "Interest Rates" and "Projected Lifetime" are based on Covanta's NOx RACT Analysis in Virginia for Covanta Fairfax and Covanta Alexandria/Arlington. "Current NOx Emissions" are based on 2023 estimates for NOx emissions from Wheelabrator Baltimore.

**Table 8: Costs for Converting a Wheelabrator MWC with SNCR to Lower NOx Technology Configurations**

	<b>Optimized SNCR</b>	<b>ASNCR</b>	<b>FGR-SNCR</b>	<b>FGR-ASNCR</b>
Capital Costs (\$)¹	\$85,200	\$8,665,162	\$5,829,591	\$12,993,524
Annual Operating Costs (\$)	\$695,000	\$995,000	\$815,000	\$1,035,000
Annualized Capital Costs (\$)	\$8,042	\$817,930	\$550,272	\$1,226,497
Projected Lifetime (yr)	20	20	20	20
Interest Rates (%)	7%	7%	7%	7%
Total Yearly Costs (\$)	\$703,042	\$1,812,9300	\$1,365,272	\$2,261,497
Base Case NOx (ppmvd)	150	150	150	150
Controlled NOx (ppmvd)	135	110	120	105
Estimated NOx Reduction Factor	0.100	0.267	0.20	0.30
Estimated NOx Reduction (%)	10.000	26.7	20	30
Current NOx Emission (tons/yr)	1,104	1,104	1,104	1,104
Projected Controlled NOx Emissions (tons/yr)	993.38	809.42	883.01	772.63
Emission Reduction (tons/yr)	110.38	294.34	220.75	331.13
<b>Cost effectiveness (\$/ton)</b>	<b>\$6,370</b>	<b>\$6,159</b>	<b>\$6,185</b>	<b>\$6,830</b>

In Table 8, the "Base Case NOx" 24-hour permit limit is 150 ppmvd and the "Controlled NOx" limits for technologies are based on 24-hour block averages from Babcock Power Environmental study for Wheelabrator Baltimore.

### Cost Summary

Costs evaluated for additional NOx controls ranged from \$2,888 to \$6,159 per ton of NOx reduced, depending on the technology and averaging period considered. While the costs presented in this section may be generally representative of the costs of upgrading other MWCs in the region with additional technology, further analysis would be required to determine an estimate for specific units. Nonetheless, the workgroup believes the costs reported in this section represent a reasonable estimate for further reducing NOx emissions from MWCs in the OTR.

### Non-OTR MWCs

Available public data indicate there are 63 MWC EGU units in non-OTR contiguous states. Most of these 63 non-OTR MWCs would be categorized as large MWCs. The majority of these MWC EGUs are located in Florida (33 units), and the state with the next highest number of MWCs is Minnesota (nine units). Of the 63 non-OTR MWC EGUs, 12 are located in states linked to OTR state air quality. Permit NOx emission rate limits for these non-OTR MWCs (including those in linked states) are predominately within the



range of the existing limits for OTR MWCs. While the non-OTR states were not contacted to obtain additional information from regulatory personnel most familiar with the non-OTR MWC, the publicly available information appeared to indicate that the range of configuration and operating characteristics of these non-OTR MWCs were not dissimilar from the range of OTR MWCs. This suggests that these non-OTR MWCs would have emission reduction potentials, on an average MWC unit basis, similar to those estimated for the OTR MWC units. To date, the workgroup has not quantified the emission reduction potential associated with the non-OTR MWCs, but may do so in the future as time and resources allow, as indicated in the section on Additional Research. However, that NO<sub>x</sub> emission reductions appear to be technically and economically feasible from this class of sources in upwind states should not be forgotten if more detailed analysis of upwind source impact is undertaken. See Additional Research (below) for recommendations on additional actions. OTC estimates the 2018 potential to emit from non-OTR MWCs was 20,506 tons of NO<sub>x</sub> per year, indicating that non-OTR MWC and OTR MWC NO<sub>x</sub> emissions each comprise approximately half of total U.S. MWC NO<sub>x</sub> emissions. See Appendix D for additional detail.

### Policy Implications

This pilot study of MWCs in the OTR finds a NO<sub>x</sub> limit of 105 ppmvd (30-day average) could be achieved with the technologies described in this report in a cost effective manner. In addition, the pilot concludes almost all large MWC facilities can be held to a 110 ppmvd @7% O<sub>2</sub> 24-hour NO<sub>x</sub> limit. The estimated range of cost-effective NO<sub>x</sub> controls associated with these presumptive limits are in line with a range of values some states have already considered RACT. Thus, states that are updating RACT or NO<sub>x</sub> permit limits for MWCs in the OTR should consider increasing the stringency of those emissions limits. At the federal level, the workgroup recommends SAS initiate a conversation with EPA on the introduction of similar requirements nationwide.

### Additional Research

The Workgroup identified several areas for potential additional research. These are as follows:

- Conduct further research to determine whether any controls can be used on small MWCs. Since the workgroup had limited time to conduct its analysis, the group prioritized large MWCs. Some additional research could yield recommendations for these small units.
- Evaluate how peak day emissions could be reduced with either a 30-day averaging limit or a 24-hour limit.
- Research the potential for additional NO<sub>x</sub> reductions from non-OTR MWCs.
- Initiate a dialogue with EPA on establishing nationwide MWC standards similar to the ones recommended in this pilot and to the extent possible conduct additional research to support this goal.

### Conclusions

MWCs in the OTR are a significant source of NO<sub>x</sub> emissions: in 2018, MWCs in the region emitted over 22,000 tons of NO<sub>x</sub>. Significant annual NO<sub>x</sub> reductions could be achieved from MWCs in the OTR using several different technologies, or combinations of technologies, as described in this report. The MWC workgroup concludes that a NO<sub>x</sub> control level of 105 ppmvd on a 30-day average basis and a 110 ppmvd on a 24-hour averaging period are likely achievable for most large MWCs in the region and could be viewed as presumptive NO<sub>x</sub> RACT limits to assist states in the conduct of case-by-case RACT evaluations. This conclusion is based on a review of publicly available information and engineering studies of similar

MWCs in the OTR. Based on a projected 2023 NOx inventory for the large MWCs in the region of approximately 23,000 tons, NOx emissions from MWCs could be reduced by approximately 6,700 tons annually with additional controls achieving a 105 ppmvd level on a 30-day average. Approximately 3,000 tons of NOx could be reduced with a permit limit of 130 ppmvd on a 30-day average. Studies evaluating MWCs similar in design to the large MWCs in the OTR found NOx reductions could be achieved at a cost ranging from approximately \$2,900 per ton reduced to approximately \$6,200 per ton of NOx reduced. (Note that this range of values is roughly equivalent to a range of \$3,350 per ton of NOx reduced to \$6,870 per ton of NOx reduced, in 2022 dollars.)

## Appendix A: OTR Large MWC Actual and Proposed Emissions

Facility Name	State	Projected 2023 NOx Emissions (tons/yr)	Permit NOx Limit (ppmvd)*	130 ppmvd control level estimated NOx reduction (%)	130 ppmvd control level estimated NOx reduction (ton/yr)	105 ppmvd estimated control level NOx reduction (%)	105 ppmvd control level NOx estimated reduction (ton/yr)	2023 projected NOx (ton/yr) at 130 ppmvd	2023 projected NOx (ton/yr) at 105 ppmvd
Covanta Bristol Energy	CT	97	120	130 ppmvd is higher than permit	0	0	-12	97	84
Covanta Bristol Energy	CT	113	150	-13%	-15	-30%	-34	98	79
Covanta Southeastern Connecticut Company	CT	167	150	-13%	-22	-30%	-50	144	117
Covanta Southeastern Connecticut Company	CT	171	150	-13%	-23	-30%	-51	148	120
MIRA	CT	260	146	-11%	-28	-28%	-73	231	187
MIRA	CT	134	146	-11%	-15	-28%	-38	119	96
MIRA	CT	276	146	-11%	-30	-28%	-78	246	199
Wheelabrator Bridgeport	CT	301	150	-13%	-40	-30%	-90	261	211
Wheelabrator Bridgeport	CT	305	150	-13%	-41	-30%	-91	264	213
Wheelabrator Bridgeport	CT	310	150	-13%	-41	-30%	-93	269	217
Wheelabrator Lisbon	CT	117	150	-13%	-16	-30%	-35	101	82
Wheelabrator Lisbon	CT	126	150	-13%	-17	-30%	-38	109	88
Covanta Haverhill	MA	553	150	-13%	-74	-30%	-166	479	387
Covanta Haverhill	MA	586	150	-13%	-78	-30%	-176	508	410
SEMASS Resource Recovery	MA	426	146	-11%	-47	-28%	-120	379	306

Facility Name	State	Projected 2023 NOx Emissions (tons/yr)	Permit NOx Limit (ppmvd)*	130 ppmvd control level estimated NOx reduction (%)	130 ppmvd control level estimated NOx reduction (ton/yr)	105 ppmvd estimated control level NOx reduction (%)	105 ppmvd control level NOx estimated reduction (ton/yr)	2023 projected NOx (ton/yr) at 130 ppmvd	2023 projected NOx (ton/yr) at 105 ppmvd
SEMASS Resource Recovery	MA	486	146	-11%	-53	-28%	-136	432	349
SEMASS Resource Recovery	MA	498	146	-11%	-55	-28%	-140	443	358
Wheelabrator Millbury Facility	MA	500	150	-13%	-67	-30%	-150	433	350
Wheelabrator Millbury Facility	MA	472	150	-13%	-63	-30%	-142	409	331
Wheelabrator North Andover	MA	417	150	-13%	-56	-30%	-125	361	292
Wheelabrator North Andover	MA	447	150	-13%	-60	-30%	-134	387	313
Wheelabrator Saugus	MA	405	150	--	--	--	--	405	405
Wheelabrator Saugus	MA	388	150	--	--	--	--	388	388
Montgomery County Resource Recovery	MD	147	140	-7%	-11	-25%	-37	137	110
Montgomery County Resource Recovery	MD	147	140	-7%	-11	-25%	-37	137	110
Montgomery County Resource Recovery	MD	147	140	-7%	-11	-25%	-37	137	110
Wheelabrator Baltimore Refuse	MD	367	150	-13%	-49	-30%	-110	318	257
Wheelabrator Baltimore Refuse	MD	367	150	-13%	-49	-30%	-110	318	257
Wheelabrator Baltimore Refuse	MD	367	150	-13%	-49	-30%	-110	318	257

Facility Name	State	Projected 2023 NOx emissions (ton/yr)	Permit NOx limit (ppmvd)*	130 ppmvd control level estimated NOx reduction (%)	130 ppmvd control level estimated NOx reduction (ton/yr)	105 ppmvd estimated control level NOx reduction (%)	105 ppmvd control level NOx estimated reduction (ton/yr)	2023 projected NOx (ton/yr) at 130 ppmvd	2023 projected NOx (ton/yr) at 105 ppmvd
Penobscot Energy Recovery	ME	69.12	230	-43%	-30	-54%	-38	39	32
Penobscot Energy Recovery	ME	103.32	230	-43%	-45	-54%	-56	58	47
Ecomaine	ME	231.9	180	-28%	-64	-42%	-97	167	135
Ecomaine	ME	250.35	180	-28%	-70	-42%	-104	181	146
Wheelabrator Concord Facility	NH	218.09	205	-37%	-80	-49%	-106	138	112
Wheelabrator Concord Facility	NH	205.45	205	-37%	-75	-49%	-100	130	105
Camden Resource Recovery Facility	NJ	84.75	150	-13%	-11	-30%	-25	73	59
Camden Resource Recovery Facility	NJ	110.62	150	-13%	-15	-30%	-33	96	77
Camden Resource Recovery Facility	NJ	112.13	150	-13%	-15	-30%	-34	97	78
Covanta Essex Company	NJ	226.26	150	-13%	-30	-30%	-68	196	158
Covanta Essex Company	NJ	260.01	150	-13%	-35	-30%	-78	225	182
Covanta Essex Company	NJ	300.78	150	-13%	-40	-30%	-90	261	211
Union County Resource Recovery	NJ	204.55	150	-13%	-27	-30%	-61	177	143

Facility Name	State	Projected 2023 NOx emissions (ton/yr)	Permit NOx limit (ppmvd)*	130 ppmvd control level estimated NOx reduction (%)	130 ppmvd control level estimated NOx reduction (ton/yr)	105 ppmvd estimated control level NOx reduction (%)	105 ppmvd control level NOx estimated reduction (ton/yr)	2023 projected NOx (ton/yr) at 130 ppmvd	2023 projected NOx (ton/yr) at 105 ppmvd
Union County Resource Recovery	NJ	209.09	150	-13%	-28	-30%	-63	181	146
Union County Resource Recovery	NJ	216.8	150	-13%	-29	-30%	-65	188	152
Wheelabrator Gloucester LP	NJ	137.78	150	-13%	-18	-30%	-41	119	96
Wheelabrator Gloucester LP	NJ	126.77	150	-13%	-17	-30%	-38	110	89
Covanta Babylon Inc	NY	110.79	150	-13%	-15	-30%	-33	96	78
Covanta Babylon Inc	NY	111.78	150	-13%	-15	-30%	-34	97	78
Covanta Hempstead	NY	357.31	150	-13.3%	-48	30%	-107	310	250
Covanta Hempstead	NY	380.28	150	13.3%	-51	30%	-114	330	266
Covanta Hempstead	NY	465.8	150	13.3%	-62	30%	-140	404	326
Covanta Niagara I, LLC	NY	341.73	150	-13%	-46	-30%	-103	296	239
Covanta Niagara I, LLC	NY	378.41	150	-13%	-50	-30%	-114	328	265
Huntington Resource Recovery	NY	443 for all 3 units	150	-13%	-16	-30%	-35	101	82
Huntington Resource Recovery	NY	443 for all 3 units	150	-13%	-15	-30%	-35	101	81
Huntington Resource Recovery	NY	443 for all 3 units	150	-13%	-15	-30%	-34	98	79
Onondaga County Resource Recovery	NY	684.18	150	-13%	-91	-30%	-205	593	479

Facility Name	State	Projected 2023 NOx emissions (ton/yr)	Permit NOx limit (ppmvd)*	130 ppmvd control level estimated NOx reduction (%)	130 ppmvd control level estimated NOx reduction (ton/yr)	105 ppmvd estimated control level NOx reduction (%)	105 ppmvd control level NOx estimated reduction (ton/yr)	2023 projected NOx (ton/yr) at 130 ppmvd	2023 projected NOx (ton/yr) at 105 ppmvd
Onondaga County Resource Recovery	NY		150	-13%	0	-30%	0		0
Onondaga County Resource Recovery	NY		150	-13%	0	-30%	0		0
Wheelabrator Hudson Falls	NY	145.81	150	-13%	-19	-30%	-44	126	102
Wheelabrator Hudson Falls	NY	153	150	-13%	-20	-30%	-46	133	107
Wheelabrator Westchester	NY	411.93	150	-13%	-55	-30%	-124	357	288
Wheelabrator Westchester	NY	417.23	150	-13%	-56	-30%	-125	362	292
Wheelabrator Westchester	NY	459.57	150	-13%	-61	-30%	-138	398	322
Covanta Delaware Valley	PA	228.29	180	-28%	-63	-42%	-95	165	133
Covanta Delaware Valley	PA	240.23	180	-28%	-67	-42%	-100	173	140
Covanta Delaware Valley	PA	247.59	180	-28%	-69	-42%	-103	179	144
Covanta Delaware Valley	PA	253.87	180	-28%	-71	-42%	-106	183	148
Covanta Delaware Valley	PA	274.62	180	-28%	-76	-42%	-114	198	160
Covanta Delaware Valley	PA	275.95	180	-28%	-77	-42%	-115	199	161



Facility Name	State	Projected 2023 NOx emissions (ton/yr)	Permit NOx limit (ppmvd)*	130 ppmvd control level estimated NOx reduction (%)	130 ppmvd control level estimated NOx reduction (ton/yr)	105 ppmvd estimated control level NOx reduction (%)	105 ppmvd control level NOx estimated reduction (ton/yr)	2023 projected NOx (ton/yr) at 130 ppmvd	2023 projected NOx (ton/yr) at 105 ppmvd
Covanta Plymouth Renewable Energy	PA	440.65	180	-28%	-122	-42%	-184	318	257
Covanta Plymouth Renewable Energy	PA	445.72	180	-28%	-124	-42%	-186	322	260
Harrisburg Facility	PA	83.74	135	-4%	-3	-22%	-19	81	65
Harrisburg Facility	PA	84.22	135	-4%	-3	-22%	-19	81	66
Harrisburg Facility	PA	84.58	135	-4%	-3	-22%	-19	81	66
Lancaster County Resource Recovery	PA	231.02	180	-28%	-64	-42%	-96	167	135
Lancaster County Resource Recovery	PA	232.04	180	-28%	-64	-42%	-97	168	135
Lancaster County Resource Recovery	PA	233.49	180	-28%	-65	-42%	-97	169	136
Wheelabrator Falls	PA	430.12	150	-13%	-57	-30%	-129	373	301
Wheelabrator Falls	PA	451.76	150	-13%	-60	-30%	-136	392	316
York County Resource Recovery	PA	187.75	135	-4%	-7	-22%	-42	181	146
York County Resource Recovery	PA	206.45	135	-4%	-8	-22%	-46	199	161
York County Resource Recovery	PA	207.17	135	-4%	-8	-22%	-46	199	161
Covanta Alexandria/Arlington Energy	VA	75	110	130 ppmvd is higher		-5%	-3	75	72

Facility Name	State	Projected 2023 NOx emissions (ton/yr)	Permit NOx limit (ppmvd)*	130 ppmvd control level estimated NOx reduction (%)	130 ppmvd control level estimated NOx reduction (ton/yr)	105 ppmvd estimated control level NOx reduction (%)	105 ppmvd control level NOx estimated reduction (ton/yr)	2023 projected NOx (ton/yr) at 130 ppmvd	2023 projected NOx (ton/yr) at 105 ppmvd
				than permit					
Covanta Alexandria/Arlington Energy	VA	77	110	130 ppmvd is higher than permit		-5%	-4	77	74
Covanta Alexandria/Arlington Energy	VA	75	110	130 ppmvd is higher than permit		-5%	-3	75	72
Covanta Fairfax Energy	VA	250	110	130 ppmvd is higher than permit		-5%	-11	250	239
Covanta Fairfax Energy	VA	250	110	130 ppmvd is higher than permit		-5%	-11	250	239
Covanta Fairfax Energy	VA	250	110	130 ppmvd is higher		-5%	-11	250	239

Facility Name	State	Projected 2023 NOx emissions (ton/yr)	Permit NOx limit (ppmvd)*	130 ppmvd control level estimated NOx reduction (%)	130 ppmvd control level estimated NOx reduction (ton/yr)	105 ppmvd estimated control level NOx reduction (%)	105 ppmvd control level NOx estimated reduction (ton/yr)	2023 projected NOx (ton/yr) at 130 ppmvd	2023 projected NOx (ton/yr) at 105 ppmvd
				than permit					
Covanta Fairfax Energy	VA	250	110	130 ppmvd is higher than permit		-5%	-11	250	239
<b>Total</b>		<b>22,992</b>			<b>(3,293)</b>		<b>(6,742)</b>	<b>19,699</b>	<b>16,250</b>

\* The majority of these limits reflect 7% O<sub>2</sub>.

## Appendix B: OTR Large MWC Characteristics

Plant Name	State	County	Manufacturer	Est Daily PTE (tons)	Amended Unit Type, based on part 60 classifications, ERC directory & permits	Tons MSW/day	Permit NOx Control
Covanta Bristol Energy	CT	Hartford	Zurn	0.332	Mass burn waterwall	358	SNCR
Covanta Bristol Energy	CT	Hartford	Zurn	0.414	Mass burn waterwall	358	SNCR
Covanta Southeastern Connecticut Company	CT	New London	Deutsche Babcock Anlagen	0.444	Mass burn waterwall	344.5	SNCR
Covanta Southeastern Connecticut Company	CT	New London	Deutsche Babcock Anlagen	0.444	Mass burn waterwall	344.5	SNCR
MIRA	CT	Hartford	CE	0.981	Refuse-derived fuel combustor	675.6 RDF; 236.4 coal	SNCR
MIRA	CT	Hartford	CE	0.981	Refuse-derived fuel combustor	675.6 RDF; 236.4 coal	SNCR
MIRA	CT	Hartford	CE	0.981	Refuse-derived fuel combustor	675.6 RDF; 236.4 coal	SNCR
Wheelabrator Bridgeport	CT	Fairfield	B&W	1.005	Mass burn waterwall	750	SNCR
Wheelabrator Bridgeport	CT	Fairfield	B&W	1.005	Mass burn waterwall	750	SNCR
Wheelabrator Bridgeport	CT	Fairfield	B&W	1.005	Mass burn waterwall	750	SNCR
Wheelabrator Lisbon	CT	New London	B&W	0.377	Mass burn waterwall	281.4	SNCR
Wheelabrator Lisbon	CT	New London	B&W	0.377	Mass burn waterwall	281.4	SNCR

<b>Plant Name</b>	<b>State</b>	<b>County</b>	<b>Manufacturer</b>	<b>Est Daily PTE (tons)</b>	<b>Amended Unit Type, based on part 60 classifications, ERC directory &amp; permits</b>	<b>Tons MSW/day</b>	<b>Permit NOx Control</b>
Covanta Haverhill	MA	Essex	Ogden Martin	1.180	Mass burn waterwall	825	SNCR
Covanta Haverhill	MA	Essex	Ogden Martin	1.180	Mass burn waterwall	825	SNCR
SEMASS Resource Recovery	MA	Plymouth	Riley Stoker	1.190	Refuse-derived fuel combustor	995	
SEMASS Resource Recovery	MA	Plymouth	Riley Stoker	1.190	Refuse-derived fuel combustor	995	
SEMASS Resource Recovery	MA	Plymouth	Riley Stoker	1.129	Refuse-derived fuel combustor	995	SNCR
Wheelabrator Millbury Facility	MA	Worcester	B&W	0.999	Mass burn waterwall	864	SNCR
Wheelabrator Millbury Facility	MA	Worcester	B&W	0.999	Mass burn waterwall	864	SNCR
Wheelabrator North Andover	MA	Essex	Riley Stoker	0.892	Mass burn waterwall	750	SNCR
Wheelabrator North Andover	MA	Essex	Riley Stoker	0.892	Mass burn waterwall	750	SNCR
Wheelabrator Saugus	MA	Essex	Von Roll	1.005	Mass burn waterwall	750	SNCR
Wheelabrator Saugus	MA	Essex	Von Roll	1.005	Mass burn waterwall	750	SNCR
Montgomery County Resource Recovery	MD	Montgomery	Martin	0.794	Mass burn waterwall	600	LoNOx Mod & SNCR
Montgomery County Resource Recovery	MD	Montgomery	Martin	0.794	Mass burn waterwall	600	LoNOx Mod & SNCR
Montgomery County Resource Recovery	MD	Montgomery	Martin	0.794	Mass burn waterwall	600	LoNOx Mod & SNCR
Wheelabrator Baltimore Refuse	MD	Baltimore City	Wheelabrator Frye	1.005	Mass burn waterwall	750	SNCR - Optimized
Wheelabrator Baltimore Refuse	MD	Baltimore City	Wheelabrator Frye	1.005	Mass burn waterwall	750	SNCR - Optimized

<b>Plant Name</b>	<b>State</b>	<b>County</b>	<b>Manufacturer</b>	<b>Est Daily PTE (tons)</b>	<b>Amended Unit Type, based on part 60 classifications, ERC directory &amp; permits</b>	<b>Tons MSW/day</b>	<b>Permit NOx Control</b>
Wheelabrator Baltimore Refuse	MD	Baltimore City	Wheelabrator Frye	1.005	Mass burn waterwall	750	SNCR - Optimized
Penobscot Energy Recovery	ME	Penobscot		0.854	Refuse-derived fuel combustor	360.5	
Penobscot Energy Recovery	ME	Penobscot		0.854	Refuse-derived fuel combustor	360.5	
Comaine	ME	Cumberland	Steinmüller	0.453	Mass burn waterwall	275	SNCR
Regional Waste Systems	ME	Cumberland	Steinmüller	0.453	Mass burn waterwall	275	SNCR
Wheelabrator Concord Facility	NH	Merrimack	B&W	0.456	Mass burn waterwall	287.5	SNCR
Wheelabrator Concord Facility	NH	Merrimack	B&W	0.456	Mass burn waterwall	287.5	SNCR
Camden Resource Recovery Facility	NJ	Camden		0.478	Mass burn waterwall	350	SNCR
Camden Resource Recovery Facility	NJ	Camden		0.478	Mass burn waterwall	350	SNCR
Camden Resource Recovery Facility	NJ	Camden		0.478	Mass burn waterwall	350	SNCR
Covanta Essex Company	NJ	Essex	Foster Wheeler	1.308	Mass burn waterwall	933	SNCR and Low NOx
Covanta Essex Company	NJ	Essex	Foster Wheeler	1.308	Mass burn waterwall	933	SNCR and Low NOx
Covanta Essex Company	NJ	Essex	Foster Wheeler	1.308	Mass burn waterwall	933	SNCR and Low NOx
Union County Resource Recovery	NJ	Union		0.667	Mass burn waterwall	480	SNCR and Low NOx
Union County Resource Recovery	NJ	Union		0.667	Mass burn waterwall	480	SNCR and Low NOx

<b>Plant Name</b>	<b>State</b>	<b>County</b>	<b>Manufacturer</b>	<b>Est Daily PTE (tons)</b>	<b>Amended Unit Type, based on part 60 classifications, ERC directory &amp; permits</b>	<b>Tons MSW/day</b>	<b>Permit NOx Control</b>
Union County Resource Recovery	NJ	Union		0.667	Mass burn waterwall	480	SNCR and Low NOx
Wheelabrator Gloucester LP	NJ	Gloucester		0.334	Mass burn waterwall	287.5	SNCR
Wheelabrator Gloucester LP	NJ	Gloucester		0.334	Mass burn waterwall	287.5	SNCR
Covanta Babylon Inc	NY	Suffolk		0.453	Mass burn waterwall	375	SNCR
Covanta Babylon Inc	NY	Suffolk		0.453	Mass burn waterwall	375	SNCR
Covanta Hempstead	NY	Nassau	Deutsche Babcock Anlagen	1.748	Mass burn waterwall	890	SNCR
Covanta Hempstead	NY	Nassau	Deutsche Babcock Anlagen	1.748	Mass burn waterwall	890	SNCR
Covanta Hempstead	NY	Nassau	Deutsche Babcock Anlagen	1.748	Mass burn waterwall	890	SNCR
Covanta Niagara I, LLC	NY	Niagara	Deutsche Babcock Anlagen	1.683	Mass burn waterwall	1125	SNCR
Covanta Niagara I, LLC	NY	Niagara	Deutsche Babcock Anlagen	1.683	Mass burn waterwall	1125	SNCR
Huntington Resource Recovery	NY	Suffolk			Mass burn waterwall	250	SNCR
Huntington Resource Recovery	NY	Suffolk			Mass burn waterwall	250	SNCR
Huntington Resource Recovery	NY	Suffolk			Mass burn waterwall	250	SNCR



<b>Plant Name</b>	<b>State</b>	<b>County</b>	<b>Manufacturer</b>	<b>Est Daily PTE (tons)</b>	<b>Amended Unit Type, based on part 60 classifications, ERC directory &amp; permits</b>	<b>Tons MSW/day</b>	<b>Permit NOx Control</b>
Onondaga County Resource Recovery	NY	Onondaga		0.680	Mass burn waterwall	330	SNCR
Onondaga County Resource Recovery	NY	Onondaga		0.680	Mass burn waterwall	330	SNCR
Onondaga County Resource Recovery	NY	Onondaga		0.680	Mass burn waterwall	330	SNCR
Wheelabrator Hudson Falls	NY	Washington			Mass burn waterwall	275	
Wheelabrator Hudson Falls	NY	Washington			Mass burn waterwall	275	
Wheelabrator Westchester	NY	Westchester		1.233	Mass burn waterwall	750	SNCR
Wheelabrator Westchester	NY	Westchester		1.233	Mass burn waterwall	750	SNCR
Wheelabrator Westchester	NY	Westchester		1.233	Mass burn waterwall	750	SNCR
Covanta Delaware Valley	PA	Delaware	Westinghouse O-Connor	0.665	Mass burn rotary waterwall	449	
Covanta Delaware Valley	PA	Delaware	Westinghouse O-Connor	0.665	Mass burn rotary waterwall	449	
Covanta Delaware Valley	PA	Delaware	Westinghouse O-Connor	0.665	Mass burn rotary waterwall	449	
Covanta Delaware Valley	PA	Delaware	Westinghouse O-Connor	0.665	Mass burn rotary waterwall	449	
Covanta Delaware Valley	PA	Delaware	Westinghouse O-Connor	0.665	Mass burn rotary waterwall	449	
Covanta Delaware Valley	PA	Delaware	Westinghouse O-Connor	0.665	Mass burn rotary waterwall	449	
Covanta Plymouth Renewable Energy	PA	Montgomery		0.965	Mass burn waterwall	608	SNCR

Plant Name	State	County	Manufacturer	Est Daily PTE (tons)	Amended Unit Type, based on part 60 classifications, ERC directory & permits	Tons MSW/day	Permit NOx Control
Covanta Plymouth Renewable Energy	PA	Montgomery		0.965	Mass burn waterwall	608	SNCR
Harrisburg Facility	PA	Dauphin		0.322	Mass burn waterwall	266	SNCR
Harrisburg Facility	PA	Dauphin		0.322	Mass burn waterwall	266	SNCR
Harrisburg Facility	PA	Dauphin		0.322	Mass burn waterwall	266	SNCR
Lancaster County Resource Recovery	PA	Lancaster		0.619	Mass burn waterwall	400	SNCR
Lancaster County Resource Recovery	PA	Lancaster		0.619	Mass burn waterwall	400	SNCR
Lancaster County Resource Recovery	PA	Lancaster		0.619	Mass burn waterwall	400	SNCR
Wheelabrator Falls	PA	Bucks		1.005	Mass burn waterwall	800	SNCR
Wheelabrator Falls	PA	Bucks		1.005	Mass burn waterwall	800	SNCR
York County Resource Recovery	PA	York	Deltak Blr w/O'Connor Rot Comb	0.468	Mass burn waterwall	449	
York County Resource Recovery	PA	York	Deltak Blr w/O'Connor Rot Comb	0.468	Mass burn waterwall	449	
York County Resource Recovery	PA	York	Deltak Blr w/O'Connor Rot Comb	0.468	Mass burn waterwall	449	
Covanta Alexandria/Arlington Energy	VA	Alexandria City	Keeler/Dorr-Oliver	0.276	Mass burn waterwall	325	
Covanta Alexandria/Arlington Energy	VA	Alexandria City	Keeler/Dorr-Oliver	0.276	Mass burn waterwall	325	

<b>Plant Name</b>	<b>State</b>	<b>County</b>	<b>Manufacturer</b>	<b>Est Daily PTE (tons)</b>	<b>Amended Unit Type, based on part 60 classifications, ERC directory &amp; permits</b>	<b>Tons MSW/day</b>	<b>Permit NOx Control</b>
Covanta Alexandria/Arlington Energy	VA	Alexandria City	Keeler/Dorr- Oliver	0.276	Mass burn waterwall	325	
Covanta Fairfax Energy	VA	Fairfax	Ogden Martin	0.780	Mass burn waterwall	750	SNCR
Covanta Fairfax Energy	VA	Fairfax	Ogden Martin	0.780	Mass burn waterwall	750	SNCR
Covanta Fairfax Energy	VA	Fairfax	Ogden Martin	0.780		750	SNCR
Covanta Fairfax Energy	VA	Fairfax	Ogden Martin	0.780		750	SNCR

## Appendix C: OTR Small MWCs

Plant Name	State	Permit NOx Limit ppmvd (24-hour limit)	Unit Type (Part 60 classifications)	Tons MSW/day	2023 Projected NOx Emissions (ton/yr)
Pioneer Valley Resource Recovery	MA	167	Modular Excess Air	136	40.91
Pioneer Valley Resource Recovery	MA	167	Modular Excess Air	136	45.41
Pioneer Valley Resource Recovery	MA	167	Modular Excess Air	136	40.51
Pittsfield Resource Recovery Facility	MA	192	Modular Excess Air	120	17.9
Pittsfield Resource Recovery Facility	MA	192	Modular Excess Air	120	18.8
Pittsfield Resource Recovery Facility	MA	192	Modular Excess Air	120	18.97
MMWAC Resource Recovery Facility	ME	315	Mass burn rotary waterwall*	125	211.28
MMWAC Resource Recovery Facility	ME	315	Mass burn rotary waterwall*	125	202.71
Dutchess Cnty Resource Recovery Facility	NY	170	Mass burn rotary waterwall	228	Missing
Dutchess Cnty Resource Recovery Facility	NY	170	Mass burn rotary waterwall	228	Missing
MacArthur Waste to Energy Facility	NY	170	Mass burn rotary waterwall	242.5	Missing
MacArthur Waste to Energy Facility	NY	170	Mass burn rotary waterwall	242.5	Missing
Oswego County Energy Recovery	NY		Modular starved air	50	199.79

## Appendix D: Non-OTR MWCs

State	Configuration	Rating (tons/day)	NOx Control	Permit NOx Limit 1*	Est NOx Rate*** (lb/MMBTU)	Estimated Annual PTE (tons NOx/year)
CA	Mass burn waterwall	400	Ammonia Injection	165	0.2835	438.0
CA	Mass burn waterwall	400	Ammonia Injection	165	0.2835	438.0
CA	Mass burn waterwall w/reciprocating grate		SNCR	205	0.3522	148.9
CA	Mass burn waterwall w/reciprocating grate		SNCR	205	0.3522	148.9
CA	Mass burn waterwall w/reciprocating grate		SNCR	205	0.3522	148.9
FL	Mass burn rotary waterwall	255		170	0.2921	122.3
FL	Mass burn rotary waterwall	255		170	0.2921	122.3
FL	Mass burn waterwall	250	SNCR	205	0.3522	160.4

State	Configuration	Rating (tons/day)	NOx Control	Permit NOx Limit 1*	Est NOx Rate*** (lb/MMBTU)	Estimated Annual PTE (tons NOx/year)
FL	Mass burn waterwall	250	SNCR	205	0.3522	160.4
FL	Mass burn waterwall	460	SNCR	205	0.3522	266.1
FL	Mass burn waterwall	460	SNCR	205	0.3522	266.1
FL	Mass burn waterwall	460	SNCR	205	0.3522	266.1
FL	Mass burn waterwall	690	Covanta LN™, SNCR, FGR	110	0.1890	238.0
FL	Mass burn waterwall	660	SNCR	180	0.3093	372.5
FL	Mass burn waterwall	660	SNCR	180	0.3093	372.5
FL	Mass burn waterwall	660	SNCR & FGR	150	0.2577	310.4
FL	Mass burn waterwall	288	SNCR	205	0.3522	185.1
FL	Mass burn waterwall	288	SNCR	205	0.3522	185.1
FL	Mass burn waterwall	288	SNCR	205	0.3522	185.1

State	Configuration	Rating (tons/day)	NOx Control	Permit NOx Limit 1*	Est NOx Rate*** (lb/MMBTU)	Estimated Annual PTE (tons NOx/year)
FL	Mass burn waterwall	288	SNCR	205	0.3522	185.1
FL	RDF Spreader Stoker	648	SNCR	250	0.4295	568.9
FL	RDF Spreader Stoker	648	SNCR	250	0.4295	568.9
FL	RDF Spreader Stoker	648	SNCR	250	0.4295	568.9
FL	RDF Spreader Stoker	648	SNCR	250	0.4295	568.9
FL	RDF	900	SNCR	250	0.4295	804.3
FL	RDF	900	SNCR	250	0.4295	804.3
FL	Stoker Mass Burn waterwall	1000	SCR	50	0.0859	172.3
FL	Stoker Mass Burn waterwall	1000	SCR	50	0.0859	172.3
FL	Stoker Mass Burn waterwall	1000	SCR	50	0.0859	172.3
FL	Mass burn waterwall	350	SNCR	205	0.3522	216.0



State	Configuration	Rating (tons/day)	NOx Control	Permit NOx Limit 1*	Est NOx Rate*** (lb/MMBTU)	Estimated Annual PTE (tons NOx/year)
FL	Mass burn waterwall	350	SNCR	205	0.3522	216.0
FL	Mass burn waterwall	350	SNCR	205	0.3522	216.0
FL	Mass burn waterwall	1050	SNCR	205	0.3522	675.7
FL	Mass burn waterwall	1050	SNCR	205	0.3522	675.7
FL	Mass burn waterwall	1050	SNCR	205	0.3522	675.7
FL	Mass burn waterwall	836	SNCR	205	0.3522	499.2
FL	Mass burn waterwall	836	SNCR	205	0.3522	499.2
FL	Mass burn waterwall	836	SNCR	205	0.3522	499.2
IN	Mass burn waterwall	726	SNCR	205	0.3522	513.4
IN	Mass burn waterwall	726	SNCR	205	0.3522	513.4
IN	Mass burn waterwall	726	SNCR	205	0.3522	513.4

State	Configuration	Rating (tons/day)	NOx Control	Permit NOx Limit 1*	Est NOx Rate*** (lb/MMBTU)	Estimated Annual PTE (tons NOx/year)
MI	Mass burn waterwall	312.5	SNCR	205	0.3522	192.8
MI	Mass burn waterwall	312.5	SNCR	205	0.3522	192.8
MN	Mass burn waterwall	606	Ammonia Injection	205	0.3522	405.0
MN	Mass burn waterwall	606	Ammonia Injection	205	0.3522	405.0
MN	Stoker mass burn waterwall	100		500	0.8590	175.0
MN	Stoker mass burn waterwall	200	SNCR	150	0.2577	101.4
MN	Stoker mass burn waterwall	100		500	0.8590	175.0
MN	Starved air modular	48		500	0.8590	67.7
MN	Starved air modular	48		500	0.8590	67.7
MN	RDF air swept, traveling grate	393.6		250	0.4295	338.6
MN	RDF air swept, traveling grate	393.6		250	0.4295	338.6

State	Configuration	Rating (tons/day)	NOx Control	Permit NOx Limit 1*	Est NOx Rate*** (lb/MMBTU)	Estimated Annual PTE (tons NOx/year)
OK	Mass burn waterwall	375	SNCR	205	0.3522	216.9
OK	Mass burn waterwall	375	SNCR	205	0.3522	216.9
OK	Mass burn waterwall	375	SNCR & Tertiary Air	205	0.3522	216.9
OR	Mass burn waterwall	275	SNCR	200	0.3436	161.0
OR	Mass burn waterwall	275	SNCR	200	0.3436	161.0
VA	RDF Spreader Stoker	593		250	0.4295	445.9
VA	RDF Spreader Stoker	593		250	0.4295	445.9
VA	RDF Spreader Stoker	593		250	0.4295	445.9
VA	RDF Spreader Stoker	593		250	0.4295	445.9
WA**	Mass burn waterwall	475		165	0.2835	227.6
WA**	Mass burn waterwall	475		165	0.2835	227.6

State	Configuration	Rating (tons/day)	NOx Control	Permit NOx Limit 1*	Est NOx Rate*** (lb/MMBTU)	Estimated Annual PTE (tons NOx/year)
total						20,506

\* ppmvd @12% CO<sub>2</sub>.

\*\* 8-hour average, all others are 24-hour average.

\*\*\* From permit NOx rate and EPA Method 19.

## Appendix E: Conversion of NOx Concentration to Mass

Below is an example of the calculation for conversion of NOx from concentration in ppm to lb/MMBtu and then ultimately from lb/MMBtu to lb/hr.

### 9.3 OTHER CEMS/CERMS CALCULATIONS

#### 9.3.1 Calculation of Emissions in lb/MMBtu

Pollutant emission in units of lb/MMBtu are calculated as follows (see 40 CFR 60 Appendix A, Reference Method 19):

$$E = C_d * R * F_d * \left[ \frac{20.9}{(20.9 - \%O_{2d})} \right]$$

Where:

- E = Pollutant emission rate in pounds of pollutant per million Btu (lb/MMBtu).
- C<sub>d</sub> = Average pollutant concentration (ppm SO<sub>2</sub>, NO<sub>x</sub> or CO) recorded by the CEM Data Logger Subsystem, dry and calibration corrected, for a given hour.
- R = Conversion factor - ppm to lb/scf (SO<sub>2</sub> = 1.660E<sup>-7</sup>, NO<sub>x</sub> = 1.194E<sup>-7</sup>, CO = 7.267E<sup>-8</sup>).
- F<sub>d</sub> = O<sub>2</sub> based F-factor (9570 dscf/MMBtu).
- %O<sub>2d</sub> = Average diluent concentration (% O<sub>2</sub>) recorded by the CEM data logger subsystem, for a given hour, dry and calibration corrected.

In addition to the above example, more detail on the conversion calculations are provided below. In this example, an MWC with a NO<sub>x</sub> concentration emission limit of 150 ppm, and design capacity of 382 MMBtu/hr is used:

$$\text{lb/MMBtu} = (1.37 \times 10^{-6} / (460 + T_s)) \times \text{MWp} \times \text{F-factor} / \text{MMBtu} \times 20.9 / (20.9 - \% \text{Oxygen}) \times (\text{ppm})$$

Where  $T_s = 68$ :  $T_s$  = stack gas T

MWp = Molecular weight (of NO<sub>x</sub>)

MWp NO<sub>x</sub> = 46

F-factor/MMBtu = 9570 for municipal solid waste in Appendix A EPA test method 19

%Oxygen = 7

$$0.00000137 / 528 \times 46 \times 9570 \times (20.9 / 13.9) \times 150 = 0.257 \text{ lb/MMBtu}$$

$$0.257 \text{ lb/MMBtu} \times 382 \text{ MMBtu/hr} = 98.2 \text{ lb/hr NO}_x$$

$$98.2 \text{ lb/hr} \times 24 \text{ hr/day} \times 1 \text{ ton}/2,000 \text{ lb} = 1.2 \text{ tons per day (tons per summer day)}$$

$T_s$  = stack gas T

$T_2$  = standard T (32F)

1 mole = 22.4 L

$$\text{ug}/\text{m}^3 = (\text{moles of pollutant} / 10^6 \text{ moles}) \times (460 + T_2) / (460 + T_s)$$

$$\text{ug}/\text{m}^3 = 44.64 \times \text{MWp} \times (460 + T_2) / (460 + T_s) \text{ for 1 ppm}$$

$$\text{ug}/\text{m}^3 = (21,962.88 \times \text{MWp}) / (460 + T_s) \times (\text{ppm}) \text{ for more than 1 ppm}$$

$$\text{lb}/\text{ft}^3 = (21,962.88 / 460 + T_s) \times \text{MWp} \times (\text{m}^3 / 35.31 \text{ ft}^3) \times (\text{g} / 10^6 \text{ ug}) \times (\text{lb} / 454 \text{ g}) \text{ for 1 ppm}$$

$\text{lb/ft}^3 = 1.37 \cdot 10^{-6} \cdot \text{MWp} / (460 + T_s) \cdot (\text{ppm})$  for more than 1 ppm

$T_d = \text{default } T = 68 \text{ degrees F}$

Rankin scale where (degrees F + 460 = degrees Rankin) which is used in thermodynamics

$\text{lb/MMBtu} = (1.37 \cdot 10^{-6} / 460 + T_d) \cdot \text{MWp} \cdot \text{F-factor} / \text{MMBtu} \cdot 20.9 / (20.9 - \% \text{Oxygen})$  for 1 ppm

$\text{lb/MMBtu} = (1.37 \cdot 10^{-6} / 460 + T_s) \cdot \text{MWp} \cdot \text{F-factor} / \text{MMBtu} \cdot 20.9 / (20.9 - \% \text{Oxygen}) \cdot (\text{ppm})$  for more than 1 ppm

## Appendix F: MWC Technology Descriptions

Municipal waste combustors are intended to reduce the volume of municipal solid waste through combustion of that solid waste. Municipal solid waste is a fuel that tends to be a heterogeneous mixture of heavy and light materials of various combustibility. Most MWCs are designed to recover some of the heat generated from the MSW combustion process through heat absorption by radiant and convective water-cooled and steam-cooled tubing surfaces. MWCs may incorporate the steam generator within the MWC as an integral component, or the steam generator is a separate entity acting as a waste heat recovery device attached to the MWC. There are many designs and configurations of MWC units, often depending upon the intended volume of MSW throughput, characteristics of the design “municipal waste fuel”, and the experience and preferences of the owner/operator and engineering/design organization.

The majority of the OTR MWCs can be generalized into three major categories based on their individual municipal solid waste combustion process characteristics. One type of MWC is often referred to as mass burn, where the MSW is combusted in an as-received condition with only the removal of large objects prior to its introduction to the MWC. Most mass burn MWCs are essentially steam generators with MSW as the primary fuel.

The second type of MWC utilizes refuse derived fuel (RDF), a type of municipal solid waste produced by processing municipal solid waste through shredding and size classification to produce low-density fluff RDF (in the OTR), densified RDF or pelletized RDF. The majority of RDF MWCs are essentially steam generators using RDF as the primary fuel.

The third type of MWC is sometimes referred to as a modular MWCs. These units are mass burn (unprepared MSW, other than removal of large objects). However, modular MWCs are generally smaller units that are shop-built rather than field-erected and utilize two combustion chambers. There are generally two types of modular controlled air MWCs, one that utilizes sub-stoichiometric air combustion conditions in the primary chamber (modular starved air MWC) and the other that utilizes excess air combustion conditions in the primary chamber (modular excess air MWC). This type of MWC generally features a secondary combustion chamber with supplemental fuel burners and combustion air supply. The modular MWC combustor does not generally incorporate heat recovery in the combustion chambers themselves, but in many cases the flue gases from the modular MWC are exhausted to a heat recovery steam generator for energy recovery.

## Mass Burn MWCs

In the OTR, there are two major sub-categories of mass burn MWCs: mass burn waterwall MWCs and rotary waterwall MWCs.

- Mass Burn Waterwall MWCs

Mass burn waterwall MWCs have lower furnace primary combustion zones made of waterwall tubes for heat transfer in the combustion zone. For mass burn water wall MWCs, the MSW fuel is typically loaded into charging hoppers and fed to hydraulic rams that push the MSW fuel onto the stoker grate in the furnace for combustion. Most stokers utilize a reciprocating grate action, utilizing either forward or reverse acting grate movement, which moves the combusting MSW fuel across the furnace to allow time for drying and complete combustion. Generally, there will be a large volume of fuel at the front end of the grate that burns down to a small amount of ash at the back of the grate. The grate may have a slightly downward angle from fuel introduction to the ash drop off to help move the MSW fuel through the furnace. The reciprocating action of the grates also tends agitate the MSW fuel, generally causing the MSW fuel to roll and mix. This agitation helps ensure all of the MSW fuel is exposed to the high temperatures in the bed of combusting MSW fuel and helps provide contact with combustion air, resulting in more complete combustion of the MSW fuel as it travels across the furnace. Combustion ash that does not leave the stoker grate as fly ash is dropped off at the end of the stoker through a discharge chute for disposal or further processing.

Mass burn waterwall MWCs may also incorporate auxiliary fuel burners to help bring the MWCs to temperature to begin combustion of the MSW fuel, to supplement the heat input necessary to attain the steam generator output rating with varying MSW fuel quality, or to ensure sufficient flue gas temperatures are attained for proper emissions control.

Combustion air is generally introduced to the combustion zone utilizing pressurized air as underfire (primary) air or overfire (secondary) air. At least one proprietary design, however, splits the overfire air into two distinct zones, effectively creating three combustion air introduction zones.

Underfire air is introduced under the stoker grate, sometimes through a series of plenums that allow for the amount of underfire air introduced to various portions of the grate area to be controlled to enhance combustion based on MSW fuel characteristics. The underfire air travels from the plenums to the combustion zone through holes in the grate to assure good distribution across the grate. Underfire air systems are generally designed to be able to provide up to 70% of the total combustion air requirement, with typical underfire air operating requirements utilizing 50% to 60% of the total combustion air.

Overfire air is introduced into the furnace above the grate level through multiple ports in the furnace walls. The primary purpose of the overfire air is to provide the amount of air necessary to mix the furnace gasses leaving the grate combustion zone and provide the oxygen required to complete the combustion process. Proper control of the overfire air may also be utilized to provide some control of



the NO<sub>x</sub> emission rate leaving the high temperature zone of the furnace. The amount of overfire air is typically 40% to 50% of the total required combustion air and is somewhat dependent upon MSW fuel quality and NO<sub>x</sub> emission control requirements.

- **Rotary Waterwall MWCs**

A rotary waterwall MWC utilizes a water cooled, tilted, rotating cylindrical combustion chamber. The MSW fuel is typically loaded into charging hoppers and fed to hydraulic rams that push the MSW fuel into the slowly rotating combustion chamber. The rotation of the tilted cylindrical combustion chamber causes the MSW fuel to tumble and advance the length of the cylindrical combustion chamber, ensuring all of the MSW fuel is exposed to high temperatures and combustion air for a sufficient amount of time for drying and complete combustion of the MSW fuel. Combustion ash that does not leave the rotary burner as fly ash is dropped off at the end of the rotary burner through a discharge chute for disposal or further processing.

Rotary burner MWCs may also incorporate auxiliary fuel burners to help bring the MWCs to temperature to begin combustion of the MSW fuel, to supplement the heat input necessary to attain the steam generator output rating with varying MSW fuel quality, or to ensure sufficient flue gas temperatures are attained for proper emissions control.

Combustion air for rotary burner MWCs is introduced to the rotating combustion chamber by a pressurized plenum surrounding the rotating combustion chamber. The combustion air enters the rotating combustion chamber through the walls of the chamber, generally through spaces between waterwall tubes. Underfire air is introduced at the bottom of the rotating combustion chamber and through the bed of combusting MSW. Overfire air is introduced into the rotating combustion chamber over the bed of combusting MSW. Dampers are utilized to proportion the total air flow and control the overfire air/underfire air split. Because the waterwall tubes form the floor of the combustion zone and effectively remove heat from that surface, peak combustion temperatures may tend to be lower than experienced with other MWC designs, helping reduce the NO<sub>x</sub> emissions relative to those other MWC designs. Also, as the watercooled surfaces require lower amounts of initial combustion zone excess air for cooling of combustor components, lower amounts of total excess air may be required for many rotary burner MWCs compared to some other MWC designs. The reduced excess air requirements may also help to reduce base NO<sub>x</sub> emissions relative to other MWC designs.

## **RDF MWCs**

In contrast to mass burn MWCs, RDF MWCs employ a more complex feeder/spreader system and different combustion bed characteristics. The prepared RDF is ram fed to a feeder hopper, where a conveying device further mixes and fluffs the RDF into a more uniform density as it transports the RDF to fuel/air spreader spouts. Multiple fuel/air spreader spouts located across the furnace and above the stoker grate distribute the RDF evenly across the width of a traveling grate, while the air pressure may be continuously varied to help provide a more uniform fuel bed over the depth of the grate. The traveling grate typically travels from the rear of the furnace to the front in the direction of the fuel distribution. Combustion of the RDF takes place in suspension for the lower density fraction and on the stoker grate for the higher density fraction. The underfire combustion

air passing through the traveling grate provides some agitation to the fuel bed to help ensure all the RDF is exposed to high temperatures and sufficient combustion air to ensure more complete combustion as it travels across the furnace. Like the mass burn combustion system, ash from the combustion process that does not leave the grate as fly ash will be dropped off at the end of the stoker through a discharge chute for disposal or further processing.

For RDF burning MWCs, combustion air is generally introduced to the combustion zone utilizing pressurized air as underfire (primary) air or overfire (secondary) air.

Underfire air (sometimes referred to as undergrate air) is introduced under the stoke grate. The underfire air is generally introduced into the steam generator through a single undergrate plenum and relies on enough pressure drop to supply combustion air evenly through all portions of the grate. Underfire air systems are generally designed to be able to provide up to 70% of the total combustion air requirement, with typical underfire air operating requirements utilizing 50% to 60% of the total combustion air.

Overfire air is introduced into the furnace above the grate level through multiple ports in the furnace walls. The primary purpose of the overfire air is to provide enough air to mix the furnace gasses leaving the grate combustion zone to provide the oxygen required to complete the combustion process. Proper control of the overfire air may provide some control of the NO<sub>x</sub> emission rate leaving the high temperature zone of the furnace. The amount of overfire air is typically 40% to 50% of the total required combustion air, being somewhat dependent upon the RDF fuel quality and NO<sub>x</sub> emission control requirements.

The fuel/air spreaders generally require approximately 5% of the total air flow requirement at any given load to properly distribute the RDF fuel in the furnace over the grate.

RDF MWCs may also incorporate auxiliary fuel burners to help bring the MWCs to temperature to begin combustion of the RDF, to supplement the heat input necessary to attain the steam generator output rating with varying RDF quality, or to ensure sufficient flue gas temperatures are attained for proper emissions control.

### **Modular MWCs**

Modular MWCs are generally of smaller capacity than mass burn and RDF MWCs and utilize two combustion zones rather than one. The MSW fuel is typically introduced to the MWC without preparation other than removing large objects. MSW fuel is dropped into a chute and is pushed by rams into the first, or primary, combustion chamber and on to a reciprocating grate(s) or moving hearth. Instead of traveling grates or hearths, some modular MWCs may utilize a series of stepped rams to move the combusting MSW fuel across the combustion chamber. The MSW fuel is dried and combusted as it travels across the primary combustion chamber, and any ash not leaving the primary chamber as fly ash is dropped off at the end of the primary combustion chamber into a discharge chute for disposal or further processing.

The combustion zones of modular MWCs generally do not incorporate any heat recovery water or steam walls. Instead, the combustion zones generally consist of refractory lined walls. Heat recovery, if any, occurs in a heat recovery steam generator that is connected to the exhaust of the secondary combustion chamber. The distribution of combustion air is the primary distinction between the designs of modular starved air MWCs and modular excess air MWCs.

Combustion air for modular starved air MWCs is proportioned to provide combustion air to the primary combustion chamber and to the secondary combustion zone, with the amount of air supplied to the primary combustion chamber controlled such that combustion in the primary chamber is sub-stoichiometric (i.e., less oxygen than is necessary to achieve complete combustion). This results in flue gases exiting the primary chamber with high levels of combustibles. The flue gases enter the secondary chamber, where additional air (secondary air) is injected to complete the combustion process. The relatively high amount of secondary air injection also provides a high amount of turbulence to ensure mixing with the combustible portions of the primary combustion chamber flue gases. One of the intended results of the primary chamber sub-stoichiometric combustion is reduced air/flue gas velocity causing less turbulence in the combustion bed, less flue gas particulate carried out from the primary chamber, and lower peak combustion temperatures. However, the modular starved air MWC may reasonably be expected to have higher levels of unburned fuel than other types of MWCs.

Combustion air for modular excess air MWCs is also proportioned between the primary and secondary combustion chambers, but the amount of combustion air supplied to the primary chamber is proportioned to provide combustion conditions at greater than stoichiometric conditions (i.e., more oxygen than is necessary to achieve complete combustion). This may lead to higher levels of particulate carry-out from the primary combustion chamber and a higher degree of MSW fuel burnout.

Modular air MWCs may also incorporate auxiliary fuel burners to help the MWC operate with varying MSW fuel characteristics or to ensure appropriate flue gas temperatures are attained for proper emissions control.

## **MWC Retrofit NOx Control Technologies**

MWCs are intended to combust a municipal waste fuel that tends to be a heterogeneous mixture of heavy and light materials of variable combustibility. Both fuel and thermal NOx is generated by the combustion process, with some limited degree of control possible through variation of the primary/secondary air ratio. The variation in MWC unit design and fuel quality leads to a range of expected uncontrolled NOx emissions, sometimes given as a range of 250 ppmvd @7% O<sub>2</sub> to 300 ppmvd @7% O<sub>2</sub>. There are several NOx control options that can be retrofitted to existing MWCs, with applicability and effectiveness dependent upon unit configuration. Not all NOx reduction technologies are applicable to all MWC configurations, and not all technologies are reasonably feasible from an economic standpoint even if they are technologically feasible. Assessments of individual MWCs are necessary to evaluate the technical and economic feasibility of any NOx reduction technology for that MWC. However, the following information provides a limited indication of general applicability and cost effectiveness of various control equipment types.

## **Combustion Air Control**

For the purposes of this document, combustion air control technology for NO<sub>x</sub> control on MWCs means utilization of low excess air operation or staged combustion, either separately or in combination. For low excess air operation, the overall amount of combustion air in the system is reduced generally through reduction of both underfire and overfire air. For staged combustion, the amount of underfire air is reduced to reduce the air available during the initial stages of combustion, while the amount of overfire air is increased to provide enough air to complete the combustion process. The generally high excess air requirements needed to achieve complete combustion of the non-homogenous MSW fuel provides only limited ability to attain NO<sub>x</sub> reductions through excess air reduction while still maintaining acceptable MSW fuel burnout, although some NO<sub>x</sub> rate reduction may be possible at some MWCs. By design, the majority of MWCs incorporate some level of control to proportion underfire and overfire air to optimize combustion quality with NO<sub>x</sub> generation rate so this technology is more of an operational tuning control technology. However, modifications to existing plant components or system upgrades may be necessary at some facilities to optimize combustion air control for NO<sub>x</sub> reduction. Industry information indicates that combustion air optimization for NO<sub>x</sub> control has the potential to reduce NO<sub>x</sub> emission rates by up to 10% while still maintaining acceptable fuel burnout on many MWCs. Because this “technology” control is already part of most OTR MWCs, it is assumed that optimizing combustion air control is already part of good operating practices. But it should not be overlooked that combustion air control or staging modifications may have potential NO<sub>x</sub> reduction capabilities at some facilities and may prove to be an important component in a NO<sub>x</sub> reduction strategy incorporating multiple control components.

## **Selective Non-Catalytic Reduction**

Selective non-catalytic reduction (SNCR) is a retrofit-capable NO<sub>x</sub> control technology that is widely utilized for existing MWC units, including those located in the OTR. For SNCR, reagents (urea or ammonia) are injected into the MWC furnace at locations in the proper temperature range to drive chemical reactions between the reagents and NO<sub>x</sub>, resulting in the nitrogen in NO<sub>x</sub> being reduced to elemental nitrogen (N<sub>2</sub>) and water vapor. SNCR systems generally include reagent storage facilities, supply of demineralized water, electric power supply, pumps, mixing components, a heated structure to protect the pump skid and mixing/flow control components from colder ambient temperatures, pressurized air supply, pipes and tubing, flow control valves, a control system, communication with steam generator control and instrumentation systems, and penetrations into the steam generator at the proper locations to install SNCR injection nozzles. The effectiveness of NO<sub>x</sub> control using SNCR will be a function of the MWC’s characteristics (such as furnace configuration, combustion excess air requirements, flue gas temperature gradients, etc.) to attain the proper orientation and location of SNCR injector nozzles and the ability to achieve proper reagent atomization and sufficient time for reagent contact and mixing with the flue gas in the proper temperature range. SNCR effectiveness will also be affected by the ability to consistently introduce the appropriate amount of reagents across the MWC’s load range and in reaction to changes in MSW fuel characteristics. Literature suggests that SNCR is a technologically feasible NO<sub>x</sub> control system applicable to many MWCs.

Existing MWC SNCR installations include both urea and ammonia-based systems. Information provided by EPA indicates that for those facilities, the group of MWCs utilizing ammonia for the reagent had a higher average NO<sub>x</sub> reduction effectiveness than the group of MWCs utilizing urea

as the reagent, but that the top of the range of NO<sub>x</sub> reduction effectiveness was higher for the MWCs utilizing urea as reagent than for the MWCs using ammonia for the reagent. Many factors other than reagent type can influence the NO<sub>x</sub> reduction effectiveness of any particular SNCR installation, so these values may not be conclusive. There is also some consideration that the use of urea reagents may produce higher levels of nitrous oxide (N<sub>2</sub>O), a greenhouse gas, than the use of ammonia reagents. Nitrous oxide emissions will depend on the reagent feed rate and the flue gas temperature where the reduction is taking place, with higher levels on nitrous oxide emissions correlating to increased NO<sub>x</sub> reductions. The EPA indicated that there are commercially available, proprietary additives that can reduce nitrous oxide formation. The impact of the choice which reagent is most appropriate for any given MWC retrofit would be highly unit specific and it is assumed would be part of any state's case by case RACT determination.

The use of properly designed and well-tuned SNCR technology has been demonstrated to achieve approximate 40% to 50% reductions in NO<sub>x</sub> emission rates with low ammonia slip values at many facilities, including retrofit applications. Compliance with 150 ppmvd @7% O<sub>2</sub> 24-hr average NO<sub>x</sub> emission rate limitations has been demonstrated at many OTR MWC facilities utilizing SNCR as the primary NO<sub>x</sub> control.

Some historic non-OTR NO<sub>x</sub> RACT evaluations and cost effectiveness estimates have been identified in EPA's RACT/BACT/LAER Clearinghouse regarding the use of SNCR on MWC units. Two are described below.

- The Lee County Waste to Energy facility (Florida) indicated an estimated cost effectiveness of \$2,000/ton (approximately \$2,880/ton in 2020 dollars) of NO<sub>x</sub> reduced utilizing SNCR for control on a 660 ton/day MWC. The permit NO<sub>x</sub> rate limits were 110 ppmvd 12-month average and 150 ppmvd 24-hour average.
- The Hillsborough County Resource Recovery facility (Florida) indicated an estimated cost effectiveness of \$1,000/ton (approximately \$1,500/ton in 2020 dollars) of NO<sub>x</sub> reduced utilizing SNCR for control on a 600 ton/day MWC. The permit NO<sub>x</sub> rate limits were 90 ppmvd 12-month average and 110 ppmvd 24-hour average.

Some historic industry information suggests a very wide range of NO<sub>x</sub> reduction cost effectiveness values as a function of the size (input capacity) of MWCs. This information suggests that estimated cost effectiveness values may range from approximately \$7,400/ton for small MWCs (100 ton/day and smaller) to approximately \$1,900/ton for large MWCs (750 ton/day and larger), based on a 50% NO<sub>x</sub> reduction and 80% annual capacity factor. Variations in capacity factor, required level of NO<sub>x</sub> reduction, and other factors would shift the estimated cost effectiveness range. As portions of SNCR can be shared among multiple MWCs at a single facility (reagent preparation, reagent storage, demineralized water supply, pumping/forwarding skids, etc.), the per MWC NO<sub>x</sub> reduction estimated cost at a multi-MWC facility may be lower.

### **Flue Gas Recirculation**

Flue gas recirculation (FGR) technology can be a stand-alone NO<sub>x</sub> reduction technology, but as SNCR is already being utilized for many OTR MWCs, for this discussion it will be assumed that a retrofit FGR system would be utilized in combination with the continued use of existing SNCR

technology. The equipment and function of the existing SNCR portion of this option is assumed to be unchanged from that of properly tuned existing SNCR technology.

FGR helps reduce NO<sub>x</sub> emission rates by slightly reducing the average oxygen content in the combustion zone and also by reducing the peak temperatures in the combustion zone. An FGR retrofit would generally require the installation new ductwork, fan, control dampers and damper operators, electric power supply, flue gas injection/mixing nozzles, system controls, and integration with the steam generator controls and instrumentation. Retrofit FGR would generally be designed to extract a portion of the flue gases from ductwork downstream of the steam generator convective passes. Utilizing a fan, the extracted flue gases would be mixed with the secondary air prior to introduction into the combustion zone. As indicated above, by diluting the secondary air with the flue gases, the average amount of excess air available for combustion and average flame temperature are reduced resulting in lower levels of NO<sub>x</sub> formation. The amount of gas recirculated would be controlled to ensure complete combustion of the MSW fuel.

FGR is listed as an installed equipment at a couple of MWC facilities in the OTR. FGR is potentially a technically feasible retrofit technology for many MWCs. An exception might be a modular MWC not incorporating any heat recovery as that would hamper the ability to reduce flue gas temperatures to a range useful for recirculation to the combustion zone.

Babcock Power Environmental prepared an analysis for potential installation of FGR-SNCR at the Wheelabrator Baltimore MWC facility, which includes three MWCs each with a rating of 625 ton/day. The evaluation predicted the ability to maintain a 120 ppmvd @7% O<sub>2</sub> 24-hr NO<sub>x</sub> rate limit and a 115 ppmvd @7% O<sub>2</sub> 30-day NO<sub>x</sub> rate limit with ammonia slip of approximately 5 ppmvd.

A cost effectiveness estimate was performed using the data provided in the Babcock Power document. Using the cost assumptions for this particular facility (as discussed in the Babcock Power document with a 20-year control life with 6% interest rate), the incremental cost effectiveness was estimated at \$3,470/ton of NO<sub>x</sub> reduced. There could be a significant range in estimated cost effectiveness due to MWC input capacity (and the need for the corresponding difference in amount of recirculated gas). For similar types of MWCs, the range of sizes would require the same level of engineering and design, and the same type of components (potentially varying in size), therefore many of the associated costs are similar. Because the ton/year of NO<sub>x</sub> mass reduction would vary with the input range of the MWCs, this could lead to a large range in the estimated cost effectiveness. Using the Babcock and Wilcox Wheelabrator Baltimore evaluation as a base input, the estimated FGR cost effectiveness could range from approximately \$3,200/ton to \$11,000/ton.

### **Advanced SNCR**

Advanced SNCR (ASNCR) NO<sub>x</sub> control technology may be considered for retrofit on existing MWCs as either a new retrofit technology or a significant upgrade to an existing SNCR. ASNCR is like SNCR in that it utilizes the injection of reagents into the proper temperature zones of the furnace to reduce the flue gas NO<sub>x</sub> concentration. Both SNCR and ASNCR designs may utilize advanced computer modeling techniques to specify SNCR nozzle locations and elevations so that their operation may be optimized across varying furnace conditions. The primary difference

between a well-designed SNCR and ASNCR system is that ASNCR would utilize advanced furnace temperature monitoring instrumentation to provide near real time operating furnace temperature profiles. This information allows the control system to modulate which ASNCR injectors are in operation and to automatically adjust the individual injector flow rate in order to optimize the overall NO<sub>x</sub> emission rate. This advanced system optimizes the NO<sub>x</sub> reduction chemical reaction across the furnace to achieve high levels of overall NO<sub>x</sub> reduction while maintaining low ammonia slip. Further, the ASNCR system utilizing near real time control would tend to reduce the magnitude of emission spikes associated with the combustion of a heterogeneous fuel, helping achieve a lower average emission rate over any particular averaging period.

Babcock and Wilcox (B&W) prepared an analysis for the Wheelabrator Baltimore facility that included the potential use of ASNCR technology for NO<sub>x</sub> control. The B&W information suggests that ASNCR may be applicable to many MWCs as a retrofit technology, although furnace configuration or other factors could affect the NO<sub>x</sub> reduction potential.

Babcock Power prepared an analysis for potential installation of ASNCR at the Wheelabrator Baltimore MWC facility. The evaluation predicted the ability to maintain a 110-125 ppmvd @7% O<sub>2</sub> 24-hr NO<sub>x</sub> rate limit and a 105-110 ppmvd @7% O<sub>2</sub> 30-day NO<sub>x</sub> rate limit with ammonia slip of approximately 5 ppmvd.

A cost effectiveness estimate was performed for retrofit of ASNCR control using the data provided in the Babcock Power document. Using the cost assumptions for this particular facility (as discussed in the Babcock Power document and assuming a 20-year control life with 6% interest rate), the incremental cost effectiveness was estimated at \$3,883/ton of NO<sub>x</sub> reduced.

Some industry information indicates that while it is likely that most MWCs could successfully retrofit ASNCR and expect NO<sub>x</sub> reductions, its ability to achieve significant amounts of NO<sub>x</sub> reduction in small MWCs is limited due to the reduced space and contact time. These factors are influenced by individual unit design. An insufficient amount of information is available to provide an estimate of the range of cost effectiveness for small MWCs.

Another control option combines ASNCR with FGR. The equipment and function of the ASNCR portion of this option is identical to that of the ASNCR-only technology described above. The FGR part would be identical to the above FGR discussion, where a portion of the flue gases is extracted downstream of the convective passes of the steam generator and those flue gases are injected into the secondary air system using an FGR fan. By diluting the secondary air with flue gases, the average amount of excess air available for combustion is reduced and the average flame temperature is reduced, resulting in lower levels of NO<sub>x</sub> formation. The lower levels of NO<sub>x</sub> formed are further reduced by the reaction of the flue gas NO<sub>x</sub> with the ASNCR reagents, which are enhanced by the high flow rate of the secondary air and recirculated flue gas mixture.

Babcock Power Environmental prepared an analysis for potential installation of FGR-SNCR at the Wheelabrator Baltimore MWC facility. The evaluation predicted the ability to maintain a 105 ppmvd @7% O<sub>2</sub> 24-hr NO<sub>x</sub> rate limit and a 100 ppmvd @7% O<sub>2</sub> 30-day NO<sub>x</sub> rate limit with ammonia slip of approximately 5 ppmvd.

A cost effectiveness estimate for the combined ASNCR and FGR technologies was performed using the data provided in the Babcock Power document. Using the cost assumptions for this particular facility (as discussed in the Babcock Power document with a 20-year control life with 6% interest rate), the incremental cost effectiveness was estimated at \$4,695/ton of NOx reduced.

### **Covanta Proprietary Low-NOx**

The Covanta Low-NOx (LN<sup>TM</sup>) is a proprietary NOx reduction technology that is more of a system of related control techniques rather than a single component control technology. The LN<sup>TM</sup> process modifies the combustion process by diverting a portion of the secondary air and injecting it (tertiary air) at a higher elevation in the furnace. The distribution of combustion air between the primary, secondary, and tertiary levels is controlled to optimize combustion control and reduce NOx emissions by providing additional fuel/air staging for NOx control while still providing enough air for complete combustion. The installation of the LN<sup>TM</sup> system on a combustion unit already incorporating SNCR may require modifications to the SNCR system to optimize the combined NOx reduction effect of the LN and SNCR technologies. Covanta's website indicates that the propriety LNTM technology has already been installed on many of the MWCs operated by Covanta, with plans to install it on many more. The proprietary aspects of this technology suggest it is unlikely that it can be installed on non-Covanta MWCs.<sup>19</sup>

In addition to the modification of the combustion air systems and potential modification of an existing SNCR system (or installation of a new SNCR system if none existing) as part of an MWC Covanta LN<sup>TM</sup> retrofit, the Covanta LN<sup>TM</sup> may require additional modifications to other areas of the combustion zone and related components. Not all existing MWC designs or configurations may be able to incorporate all or any of the components related to the Covanta LN<sup>TM</sup>, and the NOx reduction results may also tend to vary somewhat between units that can accept all of the Covanta LN<sup>TM</sup> components.

The Covanta LNTM technology was permitted as RACT for retrofit installation and operation in conjunction with SNCR at the Covanta Fairfax facility in Virginia. The permit NOx emission limits are 110 ppmvd @7% O<sub>2</sub> 24-hr, and 90 ppmvd @7% O<sub>2</sub> annual. Prior to the LNTM retrofit, the facility's MWCs typically operated with NOx emission rate set-points ranging from 160 ppmvd to 180 ppmvd (dependent upon furnace conditions) in compliance with the permitted 205 ppmvd emission rate limits. Information provided in the RACT analysis for Covanta Fairfax indicated that at that time, the Covanta LNTM technology had been installed in approximately 20 units. The calculated incremental cost effectiveness for Covanta Fairfax was \$2,888/ton of NOx removed.

The Covanta LNTM technology was also permitted as RACT for retrofit installation and operation in conjunction with SNCR at the Covanta Alexandria/Arlington facility in Virginia. The permit NOx emission limits are 110 ppmvd @7% O<sub>2</sub> 24-hr, and 90 ppmvd @7% O<sub>2</sub> annually. Prior to LNTM retrofit, the facility's MWCs typically operated with NOx emission rate set-points ranging from 160 ppmvd to 180 ppmvd (dependent upon

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<sup>19</sup> See footnote 3 for reference.



furnace conditions) in compliance with permitted 205 ppmvd emission rate limits. The calculated incremental cost effectiveness for Covanta Alexandria/Arlington was \$4,005/ton of NO<sub>x</sub> removed.

The proprietary Covanta LNTM technology with SNCR technology has been in operation on the Montgomery County Resource Recovery unit in Maryland for several years. A recent study was performed at the request of MDE to address the potential for any additional NO<sub>x</sub> rate reduction capability that could be considered RACT. The evaluation noted that the facility has been able to typically control its average 24-hour NO<sub>x</sub> rate to less than 100 ppm, but that there are some periodic spikes in excess of those values caused by process variations that are outside operator control. The document concludes that an emissions limitation of 140 ppmvd @7% O<sub>2</sub>, 24-hr average, is reasonable and can be met with good ammonia slip control.<sup>20</sup>

Covanta Bristol in Connecticut has incorporated the proprietary Covanta LNTM technology on one of its combustion units and has been permitted with a 120 ppmvd @7% O<sub>2</sub> NO<sub>x</sub>, 24-hr average, emission rate limit.

### **Selective Catalytic Reduction**

Selective catalytic reduction (SCR) is a retrofit-capable NO<sub>x</sub> reduction technology where ammonia is injected into the flue gases ahead of a catalyst. In the proper temperature range, the nitrogen in the flue gas NO<sub>x</sub> is reduced to elemental nitrogen by the catalyst. Incorporation of SCR on an existing unit requires installation of a catalyst module in the flue gas ductwork, the installation of an ammonia storage and injection piping and control system, instrumentation, and coordination with steam generator controls to ensure the appropriate amount of ammonia is injected into the flue gas ahead of the catalyst. Since the temperature of the flue gases downstream of the steam generator convective passes may be too low to facilitate chemical reaction in the catalyst, most MWC units also require a means of reheating the flue gas to acceptable levels. This could be accomplished through installation of burners or other heat exchangers in the ductwork ahead of the catalyst module. In some installations, it may also be necessary to upgrade the existing induced draft fan(s) to overcome the draft loss through the catalyst. While this technology is applicable and effective to most MWCs, the space availability and configuration of a given facility may make it infeasible. SCR is also very costly from a capital expense standpoint, and more so in retrofit application, which may render it economically infeasible for retrofit for many existing MWCs. However, the control capability and adaptability of the SCR technology may make it desirable in certain applications.

Babcock Power prepared an analysis for potential installation of SCR at the Wheelabrator Baltimore MWC facility. While the analysis did not provide a site-specific prediction for the achievable NO<sub>x</sub> emission rate, the evaluation discussed BACT rates for a new MWC facility that incorporated SCR. The discussed NO<sub>x</sub> emission rates were 50 ppmvd @7% O<sub>2</sub> 24-hr NO<sub>x</sub> rate limit and 45 ppmvd @7% O<sub>2</sub> 30-day NO<sub>x</sub> rate limit, with ammonia slip of approximately 10 ppmvd.

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<sup>20</sup> See footnote 4.

A cost effectiveness estimate was performed using the data provided in the Babcock Power document. Using the cost assumptions for the Wheelabrator Baltimore facility (as discussed in the Babcock Power document with a 20-year control life with 6% interest rate), the incremental cost effectiveness was estimated from \$10,296/ton to \$12,779/ton of NO<sub>x</sub> reduced, depending upon which flue gas reheating mechanism was chosen.

The RACT evaluation for the Covanta Alexandria/Arlington facility addressed the potential for installing SCR at that site. This evaluation also cited the same new MWC facility SCR installation as Babcock Power did in their Wheelabrator Baltimore facility evaluation, along with the 50 ppmvd @7% O<sub>2</sub> 24-hr NO<sub>x</sub> rate limit and 45 ppmvd @7% O<sub>2</sub> 30-day NO<sub>x</sub> rate limit. The Covanta Alexandria/Arlington evaluation estimated a cost effectiveness of \$31,445/ton of NO<sub>x</sub> removed.

The RACT evaluation for the Covanta Fairfax facility addressed the potential for installing SCR at that site. This evaluation also cited the same new MWC facility SCR installation as Babcock Power used in their Wheelabrator Baltimore facility evaluation, along with the 50 ppmvd @7% O<sub>2</sub> 24-hr NO<sub>x</sub> rate limit and 45 ppmvd @7% O<sub>2</sub> 30-day NO<sub>x</sub> rate limit. The Covanta Fairfax evaluation estimated a cost effectiveness of \$15,898/ton of NO<sub>x</sub> removed.

For Florida's Palm Beach Renewable Energy Facility, which was a new MWC facility, the use of SCR and a 50 ppmvd @7% O<sub>2</sub> NO<sub>x</sub> (24-hr average) emission rate were considered BACT when the facility was permitted in 2010.

### **DeNO<sub>x</sub> Catalytic Filter Bags**

DeNO<sub>x</sub> catalytic filter bags are a product of Gore and are designed to provide both particulate filtration and NO<sub>x</sub> reduction. The DeNO<sub>x</sub> filter bags are similar in appearance to the bags utilized for flue gas particulate removal in baghouses, except each bag consists of both a membrane for particulate removal and a PTFE based catalytic felt for NO<sub>x</sub> and NH<sub>3</sub> reduction. In some instances, DeNO<sub>x</sub> bags can be made to be direct installation replacements for conventional bags in existing particular baghouses.

For retrofit installations where the combustion units already utilize SNCR for NO<sub>x</sub> control, the existing SNCR system can be operated at higher NSR levels to provide ammonia slip in the combustion flue gasses in order to provide the necessary reagent for catalytic reduction in the filter bags.

No publicly available information was found that discussed an existing installation in the US utilizing the DeNO<sub>x</sub> catalytic filter bags. However, information was found regarding the retrofit installation of these catalytic filter bags at MWC units located in European countries. That information indicated that addition NO<sub>x</sub> reductions of up to 60% were achieved on MWCs that were already reasonably well controlled with combustion air controls and SNCR. It should be noted that these subject European MWCs were all small units (less than 250 ton/day rating). No cost information was found for these European installations to enable any assessment of the cost effectiveness for the DeNO<sub>x</sub> catalytic filter bags.

Some cost information was available regarding DeNOx catalytic filter bag installation through a cost effectiveness evaluation performed by San Joaquin Valley Unified Air Pollution Control District. The cost evaluation was for two mass burn waterwall MWCs at a single facility using a 4% rate of return, 10-year equipment life, and a projected 60 ppmvd @ 12% CO<sub>2</sub> NO<sub>x</sub> emission rate limit (roughly equivalent to 63 ppmvd @ 7% O<sub>2</sub>). The projected NO<sub>x</sub> emission rate limit was compared to the then-existing limit of 165 ppmvd @ 12% O<sub>2</sub>. The cost evaluation presented an estimated annualized capital cost of only about one sixth of the cost for full SCR, but presented an annualized O&M cost that was more than 3 times the annualized O&M cost of full SCR. The evaluation noted that much of the high annualized O&M cost was due to the need to remove high sulfur content components (such as drywall) from the waste fuel stream, as the DeNOx filter bags are susceptible to fouling at high levels of SO<sub>x</sub>. The San Joaquin evaluation estimated a cost effectiveness in excess of \$88,000/ton (2020 \$) of NO<sub>x</sub> removed. This estimated cost value may be lower in retrofit to a facility that has waste fuel quality restrictions or already includes sulfur emission controls.

The above-mentioned NO<sub>x</sub> control technologies are commercially available and represent a number of choices available to MWC owner/operators and state agencies in the consideration of RACT controls for NO<sub>x</sub> emissions from MWCs. From a technology standpoint, some technologies may not be technically feasible or provide significant reductions in retrofit due to the design or specific conditions of some individual MWCs. Similarly, individual unit design or operating conditions may cause a technically feasible NO<sub>x</sub> control to be economically infeasible for any specific MWC. The RACT analysis protocol of specific states would dictate whether any technically feasible NO<sub>x</sub> control technology, or group of NO<sub>x</sub> control technologies, could be considered RACT from a cost effectiveness standpoint for and specific MWC unit. For most retrofit considerations, the cost effectiveness estimates for the SCR and DENOx filter bag technology options appear to identify them as not cost-effective from a RACT standpoint. However, the workgroup felt it would be helpful to provide states with some general guidance concerning the relative cost effectiveness of all of the available NO<sub>x</sub> control technologies.

Additionally, the workgroup recognizes that MWC capacity ratings may have a significant impact on the estimated cost effectiveness of any given MWC retrofit NO<sub>x</sub> control technology. Some of the issues contributing to this are that design/engineering/modeling costs do not decrease substantially with smaller size, installation may be more difficult with smaller footprint facility and more compact combustors, and less room/time for reagent residence in the proper temperature zone for reaction. Information from EPA shows that generally the estimated magnitude of the cost effectiveness for a given retrofit NO<sub>x</sub> control technology increases (becomes less cost-effective) from higher rating units to lower rating units. Based on the EPA information, the relative cost effectiveness of several specific MWC retrofit NO<sub>x</sub> control technologies between several MWC capacity ratings are shown in the following table. For the data in the table, the estimated retrofit cost effectiveness for a 750 ton/day capacity MWC is assumed as the base with the cost effectiveness increases for the small sizes shown as percentage increases above the base.

MWC Combustor Rating (tons/day)	SCR Control Relative Cost Effectiveness	ASNCR Control Relative Cost Effectiveness	SNCR Control Relative Cost Effectiveness
750	100	100	100
400	123	149	131
100	245	463	328

The only cost effectiveness information associated with potential NO<sub>x</sub> reduction technologies that provides the consistency of same design and same operating characteristics for direct comparison is presented in the Babcock Power NO<sub>x</sub> control evaluation for the Wheelabrator Baltimore facility. The evaluation provided estimated costs and NO<sub>x</sub> control capability of several NO<sub>x</sub> reduction technologies, allowing a reasonable comparison of the impact of the control technologies. The incremental cost effectiveness values in the below table were estimated from the data provided in the Babcock Power document, by assuming a 20-year control life with 6% interest rate, and the cost effectiveness estimates were performed using the 2019 values identified in the Babcock Power report. Note that the baseline comparison for this estimate is compliance with a 150 ppmvd @7% O<sub>2</sub> 24-hr average NO<sub>x</sub> emission rate.

### Estimated NO<sub>x</sub> Control Cost effectiveness

Estimates based on Babcock Power Wheelabrator Baltimore Study

Control Technology	Estimated Achievable 24-hr Avg NO <sub>x</sub> Rate (ppmvd @7%O <sub>2</sub> )	Estimated Cost Effectiveness (\$/ton)
Estimate Base	150	NA
Optimize Existing SNCR	135	6941
FGR & Existing SNCR	120	3470
ASNCR	110	3883
FGR & ASNCR	105	4695
SCR	50	12779



The above information suggests that for this facility with these NO<sub>x</sub> control technologies, the most cost effective options are FGR&SNCR, FGR&ASNCR, and ASNCR. The associated controlled NO<sub>x</sub> emission rates are between 105 ppmvd @7% O<sub>2</sub> and 120 ppmvd @7% O<sub>2</sub>, 24-hr average. The range of NO<sub>x</sub> control estimated cost effectiveness is \$3,470/ton to \$4,695/ton.

These indications are somewhat in agreement with the RACT analysis conducted by Virginia and Covanta for the Covanta Fairfax and Covanta Alexandria/Arlington facilities. For these Covanta facilities, RACT was selected as Covanta's proprietary LNTM technology and SNCR with predicted NO<sub>x</sub> emission rate values of 110 ppmvd @7% O<sub>2</sub>, 24-hr average. The analysis indicated a NO<sub>x</sub> control cost effectiveness of \$2,888/ton for Covanta Fairfax and \$4,005/ton for Covanta Alexandria/Arlington. These values are comparable to the range of controlled NO<sub>x</sub> rate and cost effectiveness estimated for the Wheelabrator Baltimore facility. While cost effectiveness values would vary across MWCs, the control technologies would likely maintain the same relative cost effectiveness positioning.

While any revised RACT is unit-specific based on technical and economic feasibility of marketed control technologies, the limited information above suggests that a revised NO<sub>x</sub> RACT rate of between 105 ppmvd @7% O<sub>2</sub> and 120 ppmvd @7% O<sub>2</sub>, 24-hr average, may be a reasonably achievable target emission rate for many MWCs. The limited information also suggests that NO<sub>x</sub> reduction cost effectiveness values of \$3,000/ton to \$5,000/ton may be reasonably representative of the range of related costs to achieve a revised NO<sub>x</sub> RACT emission rate. Within this cost range, several NO<sub>x</sub> reduction technologies may be available for consideration to comply with a revised RACT for MWCs.

## Appendix G: Method for Estimating Costs for Urea Consumption

The cost estimation for urea consumption for NO<sub>x</sub> removal was performed in two ways. First, the cost estimate on a per lb of NO<sub>x</sub> reduction was performed using information presented in the Wheelabrator Baltimore study and specifically the differences between the optimized SNCR and advanced SNCR control options. Using this Wheelabrator Baltimore study information, the incremental NO<sub>x</sub> reduction cost effectiveness was estimated to be \$0.89 per pound of NO<sub>x</sub> reduced. The second estimation method was based on simple chemical reaction estimates, high efficiency NSR guidance from EPA, and urea cost values from the Wheelabrator Baltimore study. Using this second estimation methodology, the cost effectiveness was estimated to be \$1.01 per pound of NO<sub>x</sub> reduced. Details of the utilized estimation methodologies are included below.

Using the estimated cost effectiveness values and the mass reduction values shown in the workgroup summary document, the estimated annual O&M cost reductions for the two facilities are shown in the following table:

Facility	Workgroup Paper Identified Change In NO <sub>x</sub> Mass Reduction (tons/yr)	Workgroup Paper Existing Estimated O&M Cost (\$/yr)	Estimated O&M Cost Reduction Due To Urea Consumption Based On Wheelabrator Baltimore Study (\$/yr)	Estimated O&M Cost Reduction Due To Urea Consumption Based On Chemistry/EPA NSR (\$/yr)
Alexandria/Arlington	18.33	213773	32627	37027
Fairfax	51.73	493322	92079	104495

As can be seen in the cost per pound of NO<sub>x</sub> reduction estimates, there is a \$0.12/lb difference between the two methodologies. One possible explanation is that in reality there is no need to have an NSR as high as 2.0 (as was assumed for the chemistry-based estimate) to achieve the target 110 ppmvd @7% O<sub>2</sub> limit when there is improved reagent furnace penetration and mixing with ASNCR. The workgroup has used the Wheelabrator study information for adjusting the estimated O&M costs for the workgroup document.

### Incremental Cost Estimation for Urea Consumption Using Wheelabrator Baltimore Study\*

From EPA Method 19, eq 19-1:  $E = CdFd (20.9/(20.9 - \%O_2))$

where: E = pollutant emission rate lb/MMBTU

Cd = pollutant sample concentration dry basis lb/scf

Fd = fuel specific factor volume of dry combustion products per fuel heat content 9570 dscf/MMBTU for municipal waste

Incremental NOx rate reduction: From 135 ppmvd limit to 110 ppmvd limit = 25 ppmvd Cd NOx = 25 ppmvd x  $(1.194 \times 10^{-7} \text{ (lb/ft}^3\text{)/ppm})$  =  $29.9 \times 10^{-7} \text{ lb/ft}^3$

$$E = (29.9 \times 10^{-7} \text{ lb/ft}^3)(9570 \text{ dscf/MMBTU})(20.9/(20.9 - 7)) = 0.0430 \text{ lb/MMBTU}$$

Incremental annual NOx mass reduction:  $0.0430 \text{ lb/MMBTU} \times 3 \text{ boilers} \times 325 \text{ MMBTU/hr/boiler} \times 8760 \text{ hr/yr} \times 0.92 \text{ availability} = 337882 \text{ lb/yr}$  168.9 tons/yr

Annual average change in cost per incremental reduction =  $(995,000\$/\text{yr} - 695,000\$/\text{yr}) / (337,882 \text{ lb/yr}) = 0.8879 \text{ \$/lb}$  or 1776.20 \$/ton

\*Ref: WASTE TO ENERGY NOX FEASIBILITY STUDY; PREPARED FOR: WHEELABRATOR TECHNOLOGIES BALTIMORE WASTE TO ENERGY FACILITY BALTIMORE, MARYLAND; BPE PROJECT NO.: 100825; BPE DOCUMENT NO.: 100825-0908400100; FINAL REVISION FEBRUARY 20, 2020

\*Study operating assumptions: Three Stirling boilers of 750 tpd capacity each (municipal solid waste at 5200 BTU/lb) ~ 325 MMBTU/hr/boiler

92% annual operating factor

Urea mixture cost \$1.19/gal, 50% urea by weight

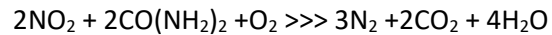
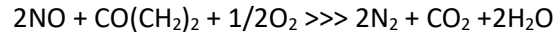
\*Study Control Option – Optimize Existing SNCR - 135 ppmvd 24-hr avg @7% O<sub>2</sub>, estimated annual urea consumption cost ~ \$695,000/yr, estimated urea consumption 72 gal/hr



\*Study Control Option – Advanced SNCR - 110 ppmvd 24-hr avg @7% O<sub>2</sub>, estimated urea consumption cost ~ \$995,000/yr, estimated urea consumption 105 gal/hr

#### **Incremental Cost Estimation Using Basics**

Assumption NO<sub>x</sub> – 95% NO, 5% NO<sub>2</sub>



Est mix MW (95% NO, 5% NO<sub>2</sub>) >>> 30.8 lb

Est urea requirement (per lb/mole NO<sub>x</sub>) >>> 31.54 lb (theoretical NSR)

Theoretical NSR for urea/NO<sub>x</sub> = 0.5

Hi-efficiency removal operating NSR for urea/NO<sub>x</sub> - 2.0 (ref Fig 1.7, <https://www.epa.gov/sites/production/files/2017-12/documents/sncrcostmanualchapter7thedition20162017revisions.pdf> )

Est required urea for high efficiency NSR=2 (per lb/mole of NO<sub>x</sub>) >>> 126.16 lb urea / 30.8 lb NO<sub>x</sub> = 4.09 lb

Weight of 50% by weight water/urea – 9.57 lb/gal urea = 4.79 lb urea/lb mixture

Urea/water mixture consumption @ 2.0 NSR – 4.09 lb urea / (4.79 lb urea/gal mixture) = 0.85 gal urea/lb NO<sub>x</sub> removed

Est water/urea mixture cost range (@ 1.19\$/gal from Wheelabrator Baltimore report, 2020 value) 0.85 gal/lb NO<sub>x</sub> x \$1.19/gal = \$1.01/lb NO<sub>x</sub> removed