



May 25, 2018

VIA ELECTRONIC TRANSMISSION: king.melanie@epa.gov

Melanie King
U.S. Environmental Protection Agency
Energy Strategies Group
Sector Policies and Programs Division
Office of Air Quality Planning and Standards

Re: Stationary Combustion Turbine NESHAP (40 CFR Part 63, Subpart YYYYY) Technology Review

Dear Melanie:

On behalf of the solid waste industry, the National Waste & Recycling Association (NWRA) and the Solid Waste Association of North America (SWANA) appreciates the opportunity to provide input on the Environmental Protection Agency's (EPA) technology review of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYYY). NWRA and SWANA represent companies, municipalities and professionals in the solid waste industry. NWRA is a not-for-profit trade association representing private solid waste and recycling collection, processing and management companies. SWANA is a professional education association in the solid waste management field with members from both the private and public sectors.

Our members have reviewed the list of landfill gas fueled turbines and have made modifications. Please see the first tab of the revised spreadsheet attached.

Based on our understanding, current turbine design and operation is largely similar to what was in place at the time of the original NESHAP YYYYY rulemaking. In particular, with respect to oxidation catalysts to turbines burning landfill gas, we do not believe that there are any oxidation catalysts that can be effectively deployed that will not be deactivated by the presence of siloxanes.

Given the lack of changes since the original rulemaking, we recommend that EPA consider delisting the source category of stationary combustion if risk assessment results show no risk within the margin of safety. NSPS standards remain in place to drive the reductions.

However, if risk assessment does not indicate delisting, then the standard should remain unchanged for this turbine subcategory given that a significant number of LFG turbines either no longer operate or are minor HAP sources. Because there are a limited number of LFG/digester fired turbines remaining on the list, there is no risk, and negligible to zero emission reductions would result from applying a new emission standard.

Based on the call on May 2, 2018, we understand that changes will be proposed to the startup, shutdown and malfunction requirements. We understand that LA County Sanitation District and Calabasas Landfills (DTE) have a 30-minute relief period from emission standards in their respective air basin permits. However, to provide for varying turbine operations across the nation, we request that EPA consider allowing a 60-minute relief period for start-up operations to provide sufficient time for operations to achieve stability.

NWRA and SWANA appreciate your consideration of our comments. We welcome further discussions with you to further discuss a workable emission standard for our subcategory if EPA is unable to delist the turbine category or retain the current requirements for our subcategory.

Should you have any questions about these comments, please call Anne Germain, Vice President of Technical and Regulatory Affairs for National Waste & Recycling Association, at 202-364-3724 or e-mail her at agermain@wasterecycling.org. You may also call Jesse Maxwell, Advocacy & eLearning Program Manager for SWANA, at 240-494-2237 or e-mail him at jmaxwell@swana.org.

Very truly yours,



Darrell K. Smith
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