From: Knipping, Eladio <eknipping@epri.com>
Sent: Wednesday, April 15, 2020 4:44 PM
To: Hutson, Nick <Hutson.Nick@epa.gov>; King, Melanie <King.Melanie@epa.gov>; Honda, Gregory <honda.gregory@epa.gov>
Cc: Carcieri, Stephanie, <Stephanie.Carcieri@aecom.com>; Kaplan, Mary <Mary.Kaplan@aecom.com>
Subject: FW: Response to EPA Feedback on EPRI CT Reports

Hello Greg, Nick, and Melanie,

Thank you for taking the time to discuss some of your thoughts on the studies that EPRI conducted for stationary combustion turbines subject to the NESHAP (40 CFR Part 63 Subpart YYYY). We have summarized the four discussion points for EPA's consideration:

1) EPA Discussion Point: Emissions estimates based on emission factors and fuel usage are fine; however, EPA would like additional information to corroborate these estimated emissions with actual emissions measurements, where possible.

Response: A detailed measurement campaign is out the scope for this study. EPRI used the best data that are currently available. EPRI will expand on the uncertainty of these emissions methods and the appropriateness for use in the current study.

2) EPA Discussion Point: Regarding arsenic emissions from oil-fired turbines, there are relatively few fuel analysis measurements included in the study. In addition, EPA would like EPRI to provide more detail regarding the methods used for the fuel measurements, calibration data, etc., including information on determination of non-detects.

Response: EPRI will contact the companies that submitted fuel analysis data in order to obtain the detailed fuel analysis reports that summarize the test methods, raw data, and number of tests used to support the fuel analyses submitted to EPA.

3) EPA Discussion Point: An acute multiplier value of 2 was used for two facilities, Salinas River Cogeneration and Sargent Canyon Cogeneration, when scaling long-term emissions to determine acute human health risk. This was based on the hours of operation for the Salinas and Sargent turbines, which were 8,198 and 8,736 hours, respectively. EPA stated that the lower acute multiplier may not consider emissions variability during startup and non-steady state operations and would like to see additional justification for this acute multiplier.

Response: EPRI will expand upon the justification to use the acute multiplier of 2 for these facilities.

4) EPA Discussion Point: EPA compiled a list of approximately 100 turbines at 20 facilities that could potentially be subject to the NESHAP (Subpart YYYY) and were not included in EPA's residual risk assessment nor EPRI's stationary combustion turbine study. If these turbines are subject to the NESHAP, they should be included in EPRI's study.

Response: EPRI will review this list of turbines once EPA publishes it to the NESHAP website to determine if additional units need to be added to our analysis.

Please let us know if we characterized everything correctly and if you have any additional questions or feedback on the above responses.

Hope you are all doing well and staying safe.

Thanks,
Eladio

Eladio M. Knipping, Ph.D.
Program Manager, Air Quality & Multimedia Sciences
Electric Power Research Institute
1325 G St NW Suite 530, Washington, DC 20005
Tel: 202.293.6343 | Cell: 650.799.7088
Email: eknipping@epri.com