

Introduction

This document provides instructions for reporting information on the stationary combustion turbines and hazardous air pollutant (HAP) emission control devices at your facility. The EPA is collecting this information under Clean Air Act (CAA) section 114 (42 U.S.C. 7414). The purpose of collecting this information is to gather data on the operating characteristics and HAP emission control devices for stationary combustion turbines to inform the EPA's decision-making process for regulation of these sources. All recipients must complete and submit the survey no later than 3 months after receipt of the survey.

Instructions for Completing the Process and HAP Emission Control Device Survey

This survey must be completed in the Microsoft Excel spreadsheet format that is provided. You must complete the "Facility Info" tab for each facility wholly owned by your company that has stationary combustion turbines and complete the "Turbine and APCD Info" and "Annual Operational Data" tabs for each stationary combustion turbine at those facilities. If the turbine has a HAP emission control device such as an oxidation catalyst, enter the required information for the device. You may elect to complete one spreadsheet for each facility or combine multiple facilities into one spreadsheet.

Facility Info Tab

The "Facility Info" tab requests information on each of your facilities with stationary combustion turbines, including a unique facility identifier, address, and contact information. For the facility representative, please provide contact information for an individual knowledgeable about the information provided in the survey response. The EPA will contact this representative if there are any question about the survey response.

Turbine and APCD Info Tab

The "Turbine and APCD Info" tab requests information on each stationary combustion turbine at each facility, including the turbine make and model, combustor design, fuel type, power rating, and construction date. Enter the facility identifier exactly as it appears on the "Facility Info" tab and enter a unique Turbine Unit ID for each stationary combustion turbine at that facility. Please enter the date that construction commenced according to the definitions for "commenced" and "construction" in 40 CFR 63.2. Indicate whether or not the turbine meets the definition of "emergency stationary combustion turbine" in 40 CFR part 63 subpart YYYY.

The tab also includes questions pertaining to control device and continuous parameter monitoring system (CPMS) costs associated with HAP emissions controls installed on the stationary combustion turbines. Capital costs for HAP emissions controls are requested, along with the base year for the capital cost estimate. Capital costs for CPMS are also requested if they are known. The operation and maintenance (O&M) costs for HAP air pollution control devices (APCDs) and CPMS are requested if they are known. As described in the EPA's Air Pollution Control Cost Manual:¹

¹<https://web.aacei.org/docs/default-source/rps/10s-90.pdf?sfvrsn=42>

Capital Cost means: (1) The present worth of a uniform series of periodic costs that continue for an indefinitely long time (hypothetically infinite). (2) The value at the purchase date of the asset of all expenditures to be made in reference to this asset over an indefinite period of time. This cost can also be regarded as the sum of capital which, if invested in a fund earning a stipulated interest rate, will be sufficient to provide for all payments required to maintain the asset in perpetual service.

Operating Cost means the expenses incurred during the normal operation of a facility, or component, including labor, materials, utilities, and other related costs. Includes all fuel, lubricants, and normally scheduled part changes to keep a subsystem, system, particular item, or entire project functioning. Operating costs may also include general building maintenance, cleaning services, taxes, and similar items.

Maintenance and Repair Cost means the total of labor, material, and other related costs incurred in conducting corrective and preventative maintenance and repair on a facility, on its systems and components, or on both. Maintenance does not usually include those items that cannot be expended within the year purchased. Such items must be considered as fixed capital.

The cost information is requested to inform the EPA of the costs of compliance with the Stationary Combustion Turbine NESHAP and to provide the basis for cost analysis surrounding future regulatory options.

Annual Operational Data Tab

The “Annual Operational Data” tab requests information on the hours of operation and heat input for the stationary combustion turbines at each facility for the last five calendar years (2016-2020). For each stationary combustion turbine, enter the facility identifier exactly as it appears on the “Facility Info” tab and enter the unique Turbine Unit ID exactly as it appears on the “Turbine and APCD Info” tab. Enter the total hours of operation in each calendar year. If the turbine operated on multiple fuels, enter the hours of operation for the primary fuel and secondary fuel(s) for each calendar year separately. Enter the total heat input in MMBtu/yr for each calendar year. If the turbine operated on multiple fuels, enter the heat input for the primary fuel and secondary fuel(s) for each calendar year separately.

How to Submit the Information

When you are ready to submit your data to the EPA, compile electronic copies of all **nonconfidential*** requested files (including files that do not contain any Confidential Business Information (CBI) as well as files that have been redacted to remove CBI) and email the files to the address shown in your section 114 cover letter. In order to avoid duplicate data and keep all data for a particular facility together, we request that you submit all of the data requested from your facility in the same email, if possible.

* **Please Note:** The EPA’s procedures for handling CBI are described in Enclosure 4 of the letter accompanying the section 114 request. If you claim that some of the information being submitted is CBI, **DO NOT** use the method described above to submit your CBI. You must create a

separate submission containing all files associated with this request (*i.e.*, all information claimed to be CBI and non-CBI portions combined). Clearly mark the materials submitted with the words “Confidential Business Information.” Send these files under separate cover **only** to Ms. Tiffany Purifoy at one of the CBI addresses shown in your section 114 cover letter.

For the security of your data, the EPA recommends sending your confidential files to the EPA’s CBI Office as described in Section 6 of Enclosure 4 of your section 114 cover letter. If you prefer to compile the materials onto a CD, DVD, or USB flash drive to mail to the CBI office, the EPA recommends sending it via **registered** U.S. Mail using **return receipt requested**, Federal Express, or other method for which someone must provide a signature upon receipt.