

Air Pollution Control Cost Manual: U.S. Environmental Protection Agency Public Notices Update to Fabric Filter Chapter



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The United States Environmental Protection Agency (“EPA”) published in the August 21st Federal Register a Notice of Availability that it is updating a chapter in its Air Pollution Control Cost Manual (“Manual”). See 89 Fed. Reg. 67633.

EPA is requesting comment on an update to the chapter addressing “fabric filters”. See Chapter 1, Section 6.

EPA’s Control Cost Manual is intended to provide guidance for the development of accurate and consistent cost for air pollution control devices.

The Manual focuses on point source and stationary area source air pollution controls for the following:

- Volatile organic compounds.
- Particulate Matter.
- Oxides of Nitrogen.
- Certain acid gasses.

The Manual is utilized by both government regulators and the regulated community.

Examples of its utilization include:

- EPA (estimating the cost of impacts of prospective rulemakings).
- Industry (estimating cost of air pollution controls that may be considered as BACT, BART, RACT).

In other words, the Manual can have some importance as it influences air pollution control and regulatory decisions by EPA, permitting authorities, and industry.

The Manual chapter (fabric filters) that is the subject of the update addresses control measure for Particulate Matter, which includes fine particulate (PM_{2.5}) emissions.

Fabric filters are sometimes denominated “baghouses”. The special filter media captures, collects, and separates dust and different-sized particles from the air. They utilize fabric filtration to remove particles from the contaminated gas stream by depositing the particles on fabric material.

In the Federal Register Notice of Availability, EPA poses several questions for which it is seeking input:

1. What is a reasonable and up-to-date estimate of equipment life (defined as design or operational life) for fabric filters—that is, an entire fabric filter system, not just the filter bags or cages?
2. Are the descriptions of and technical background on fabric filters complete, up to date, and accurate with regard to control of PM (including PM2.5)?
3. Is the applicability of fabric filters to various types of emissions sources complete, up to date, and accurate?
4. Are the estimates of PM (including PM2.5) removal or control efficiency for fabric filters accurate and up-to-date?
5. Is the information accurate on how fabric filters operate in tandem with control technologies such as dry sorbent injection (DSI) to reduce sulfur dioxide and activated carbon injection (ACI) to reduce mercury?
6. Are the capital cost correlations, factors, and equations for fabric filters applied to various types of emissions sources and industries accurate and up to date? Are the annual costs (such as operating and maintenance costs) for fabric filters applied to various types of emissions sources and industries accurate and up-to-date?
7. This revised Control Cost Manual chapter lists test methods used to measure the performance of fabric media. Is the list of test methods accurate and up-to-date?

A copy of the Federal Register Notice can be downloaded [here](#).