



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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BUREAU OF AIR REGULATION

Ms. Trina Vielhauer
Chief
Bureau of Air Regulation
Division of Air Resources Management
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399

Dear Ms. Vielhauer:

We have received a December 5, 2002, letter from Florida Power & Light Company requesting a determination concerning the applicability of New Source Performance Standards (NSPS) Subpart Dc - "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units." The request relates to the applicability of the standard to fuel heaters for Unit No. 8 at the Martin Power Plant and Unit No. 3 at the Manatee Power Plant. Based on our review of Subpart Dc and the information submitted to us, we have determined that the fuel heaters are not subject to Subpart Dc.

As indicated in §60.40c(a), the affected facility to which Subpart Dc applies is a steam generating unit. A "steam generating unit" is defined in §60.41c as a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. The definition also indicates that the term does not include process heaters. A "process heater" is defined in the standard as a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst. A "heat transfer medium" is defined in the standard as any material that is used to transfer heat from one point to another point.

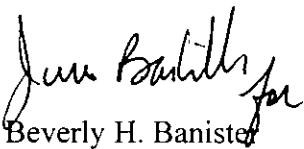
The fuel heaters which are proposed by Florida Power & Light have a heat input rate of approximately 24 million British thermal units (Btu) per hour and combust natural gas as a fuel. The heat from the combustion is used to raise the temperature of natural gas flowing through tubes. After being heated, the natural gas is routed to combustion turbines for use as fuel. Florida Power & Light has indicated that natural gas will be heated prior to being combusted in the turbines to ensure that the dry low-Nitrogen Oxides (NO_x) combustion system used in the turbines operates properly.

As indicated in the definitions provided in Subpart Dc, a heat transfer medium must transfer heat from one point to another point in order for a combustion unit to be considered a steam generating unit affected facility. The only material which could be considered a heat

transfer medium in the fuel heaters described by Florida Power & Light would be the natural gas which is being heated. However, the natural gas is not being heated for the purpose of transferring heat from one point to another. Since the natural gas is being heated prior to its use as a fuel, it is considered to be a reactant in a chemical reaction (i.e., combustion). As such, the fuel heaters would be considered process heaters. Since process heaters are exempt from regulation under Subpart Dc, the fuel heaters proposed by Florida Power & Light are not affected facilities.

This determination has been provided with assistance from the United States Environmental Protection Agency's Office of Enforcement and Compliance Assurance (OECA). If there are any questions regarding this letter, please contact Keith Goff of the EPA Region 4 staff at (404) 562-9137.

Sincerely,

A handwritten signature in black ink, appearing to read "Beverly H. Banister".

Beverly H. Banister
Director
Air, Pesticides, and Toxics
Management Division

cc: Greg Fried, OECA