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PS Form 3800, January 2001 See Reverse for Instructions	

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**1 Article Addressed to:**

Mr. Keith Goff  
 Air, Radiation Technology Branch  
 U.S. EPA - Region 4  
 Atlanta Federal Center  
 61 Forsyth Street, SW  
 Atlanta, Georgia 30303-8960

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 (Transfer from service label)

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BUREAU OF AIR REGULATION

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Dept. of Environmental Protection  
Division of Air Resources Mgt.  
Bureau of Air Regulation, NSR  
2600 Blair Stone Rd., MS 5505  
Tallahassee, FL 32399-2400





Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

March 22, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Keith Goff  
Air, Radiation Technology Branch  
U.S. EPA – Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

Re: Gulfstream Pipeline – Gas-Fired Natural Gas Fuel Heaters  
NSPS Subpart Dc Applicability

Dear Mr. Goff:

Last week, we discussed the applicability of NSPS Subpart Dc to the following proposed project:

Project: A proposed new project will consist of two, 10 MMBtu/hour gas-fired natural gas fuel heaters that will knock out moisture in the gas pipeline and heat up the natural gas prior to delivery to an adjacent power plant. The units are described as indirect fired heaters that use glycol as the heat transfer medium.

Question: Are these units subject to NSPS Subpart Dc as “steam generating units”?

The Subpart Dc definitions of “process heater” and “steam generating unit” follow.

“Process heater” means a device that is primarily used to heat a material (*natural gas*) to initiate or promote a chemical reaction (*combustion of natural gas*) in which the material (*natural gas*) participates as a reactant or catalyst. (*Emphasis added.*)

“Steam generating unit” means a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

Note that the term “heat transfer medium” is not relevant to the definition of “process heater”. The purpose of the fuel heaters is to raise the temperature of the pipeline natural gas to promote combustion in several gas turbines at the adjacent power plant. These units are best classified as “process heaters” and not “steam generating units” as defined in NSPS Subpart Dc. Therefore, they are not regulated by NSPS Subpart Dc.

I believe we are in agreement on this issue and I relayed our initial opinion to Gulfstream by phone. However, Gulfstream requested a written determination. Please consider this letter a request for a written determination regarding NSPS Subpart Dc applicability for the project described above. If you have any questions, please contact me at 850/921-9536.

Sincerely,

Jeffery F. Koerner, P.E.  
BAR - Air Permitting South  
Florida Department of Environmental Protection

cc: SED Office, FDEP

“More Protection, Less Process”

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