

FPL  
ENVIRONMENTAL SERVICES DEPARTMENT  
PO BOX 14000  
JUNO BEACH, FLORIDA 33408

DATE: November 25, 1997

SEND TO: <sup>Tom Bruce</sup>  
NAME: Scott Sheplak Re: FPEL Martin Plant

copy to: Subject De "canned conditions"  
COMPANY: FDEP

FAX NUMBER: 850 922 6979

PHONE NUMBER: \_\_\_\_\_

FROM: RICH PIPER

PHONE NUMBER: (561) 691- 7058

FAX NUMBER: (561) 691- 7070

NUMBER OF PAGES (INCLUDING COVER SHEET): 3

COMMENTS/INSTRUCTIONS:

Scott - This relates to item 3 of my email to you last week.

Rich



The U.S.D. Environmental Protection Agency - Region III (EPA) has reviewed your letter, dated February 12, 1991, concerning the requirements of 40 C.F.R. Part 60, Subpart Dc as it applies to small gas and/or distillate oil-fired boilers. Federal comments were requested concerning the intent of Section 60.48c(g) which requires owners/operators to keep daily records of fuel usage and to maintain these records. This Region's comments are provided in the following paragraphs.

Region III does not believe that the requirements of Subpart Dc are either overly burdensome or resource intensive as they apply to gas or oil-fired boilers. Virginia's permit boilerplate, for small boilers that fit the definition of an affected facility under Dc, should require these small boilers to comply with all applicable Sections of this NSPS regulation.

Your letter states that the end usage and rationale [behind Section 60.48c(g)] for small units burning gas or distillate oil is not clean. Subpart Dc does not regulate small boilers that only combust natural gas as fuel. Only oil, coal, and wood-fired units are regulated. This information, as well as the rest of the content of this letter, has already been transmitted to Mr. Thomas Creasy during a conference call on February 20, 1991. Also, daily records of fuel usage (coal, oil, wood, etc.) will be quite beneficial to a Company in the future if it ever intends to get involved in allowance trading under the Acid Rain Title of the new Clean Air Act Amendments. We don't feel that the requirement for daily recordkeeping and the maintenance of these records is unjust but rather that these requirements are necessary for proper boiler operation.

If you compare the original requirements of the proposed Dc rule with the final rulemaking requirements, the final rule has been made much less stringent. Originally, for oil firing, a stack test was required for SO<sub>2</sub> emissions along with a fuel sampling and analysis program. However, now if a Company combusts only oil with a sulfur weight percentage of 0.5 or less, the Company can certify compliance through fuel supplier certificates-no stack test is necessary. Also, all the requirements for NO<sub>x</sub> have been deleted as they would have applied to distillate oil and natural gas-fired units. Although units that fire oil have no particulate matter emission limit, they do have to meet a 20% opacity standard if they have a greater than 30 MBTU/hr design capacity per Section 60.43c(c). If residual oil-fired units are subject to this opacity limit, an opacity monitor is required per Section 60.47c(a). These conditions are not nearly as burdensome as those originally proposed at the beginning of the rulemaking process.

Finally, if a source believes that it simply must get some relief from the Dc conditions for whatever reason, it can petition EPA- Region III in writing for a variance from the recordkeeping requirement. However, their argument would have to be very well supported.

If you should have any comments or further questions regarding this matter, do not hesitate to contact me at (215) 597-8554.

Sincerely,  
(signed)  
James W. Hagedorn  
Enforcement Program Section  
U. S. E.P.A. - Region III

cc: Thomas Creasy  
VDAPC  
Bernard Turlinski, EPA