



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

**JUN - 2 1993**

4APT-AEB

Mr. Wayne C. Ondler  
Environmental Licensing Project Manager  
Florida Power & Light Company  
P.O. Box 088801  
North Palm Beach, Florida 33408-8801

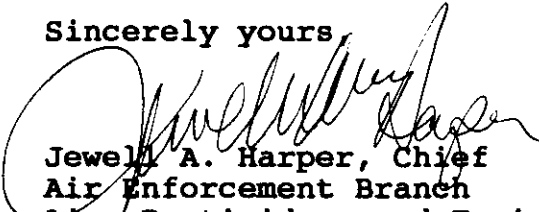
RE: FPL Martin Customized Fuel Monitoring Schedule

Dear Mr. Ondler:

This letter is in response to your request for approval of a customized fuel monitoring schedule at the Florida Power & Light-Martin site, as outlined to EPA Region IV in your correspondence dated April 28, 1993. We are presently reviewing the schedule for adherence to the requirements of 40 CFR Part 60, Subpart GG (Standards of Performance for Stationary Gas Turbines). Our comments regarding the proposal will be forwarded to the Florida Department of Environmental Regulation (DER). Since the Florida DER has been granted authority to implement 40 CFR Part 60, a final decision regarding the proposal will be provided to you by the DER.

If you have any questions or comments, please contact Mr. Scott Davis of my staff at (404) 347-5014.

Sincerely yours,

  
Jewell A. Harper, Chief  
Air Enforcement Branch  
Air, Pesticides, and Toxics  
Management Division

RECEIVED

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ENVIRONMENTAL AFFAIRS



April 28, 1993

FPL-JEN-EPA-170-93-18

Ms. Jewell A. Harper, Chief  
Air Enforcement Branch, Region IV  
Environmental Protection Agency  
345 Courtland Street, N.E.  
Atlanta, GA 30365

**RE: FPL Martin CG/CC Project  
PA89-27, PSD-FL-146  
Customized Fuel Monitoring Schedule**

Dear Ms. Harper:

The Martin CG/CC Project at the FPL Martin site has been permitted under the Power Plant Siting Act (Chp 403 Part II F.S.) and a corresponding PSD permit. These Units consist of 4 dual fuel fired "advanced" combustion turbines, with heat recovery steam generators (HRSG). The combustion turbines are subject to New Source Performance Standards (NSPS- 40 CFR 60, Subpart GG). 40 CFR 60.334(b) requires the owner/operator of any combustion turbine to monitor the sulfur and nitrogen content of the fuel as follows: 1) If the turbine fuel is supplied by a bulk storage tank then the sulfur and nitrogen content are to be determined whenever new fuel is transferred into the bulk storage tank and 2) If the turbine fuel is supplied without an intermediate bulk storage tank then daily monitoring of the sulfur and nitrogen content of the fuel is required. FPL has an intermediate bulk storage tank(s) for the light distillate oil and will test the sulfur and nitrogen content of the fuel oil as required by 40 CFR 60.334(b)(2).

Since the natural gas used by the combustion turbines does not pass through an intermediate bulk storage tank, FPL is hereby requesting a customized fuel monitoring schedule as allowed by 40 CFR 60.334(b)(2) for the Martin CG/CC Project. While firing natural gas, FPL requests the following customized fuel monitoring schedule which was developed based on an EPA guidance memorandum (Attachment A):

1. Monitoring of natural gas nitrogen content shall not be required in accordance with page 2 of the EPA guidance memorandum and the attached enclosure.

2. Sulfur Monitoring

a. Analysis for sulfur content of the natural gas shall be conducted using one of the EPA approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternate method. The reference methods are: ASTM D1072-80; ASTM D3031-81; ASTM D3245-81; and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2).

b. Effective on the commercial operation date of the CTs or the approval date of the customized fuel monitoring schedule which ever is later, sulfur monitoring shall be conducted twice a month for six months. If this monitoring shows little variability in the sulfur content and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters.

c. If the monitoring required by 2(b), above, of the sulfur content of the natural gas shows little variability and the calculated sulfur dioxide emissions, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333, sample analysis shall be conducted twice per year. This monitoring shall be conducted during the first and third quarter of each calendar year.

d. Should any sulfur analysis as required by items 2(b) or 2(c) above indicate noncompliance with 40 CFR 60.333, FPL will notify the Department of Environmental Regulation of such excess emission and the customized fuel monitoring schedule shall be reexamined. The sulfur content of the natural gas will be monitored weekly during the interim period while this monitoring schedule is being reexamined.

3. FPL will notify the Department of Environmental Regulation of any change in natural gas supply for reexamination of this monitoring schedule. A substantial change in natural gas quality (i.e. sulfur content varying greater than 10 grains/1000 cf gas) shall be considered as a change in natural gas supply. Sulfur content of the natural gas will be monitored weekly during the interim period when this monitoring schedule is being reexamined.

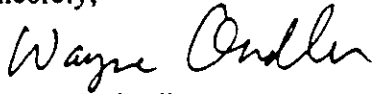
4. Records of sampling analysis and natural gas supply pertinent to this monitoring schedule shall be retained by FPL for a period of three years, and be available for inspection by appropriate regulatory personnel.

5. FPL will obtain the sulfur content of the natural gas from Florida Gas Transmission Company at its Brooker Lab.

Data from natural gas at the Brooker Lab site is considered representative of the sulfur content of the natural gas at the Martin site since there is no additional entry point for sulfur or other elements/compounds which may affect the quality of the natural gas. The data presented in Attachment B is based upon representative samples of natural gas taken by Florida Gas Transmission.

If you or your staff have any question about this request please call Dan MacDougall at (407) 625-7661.

Sincerely,



Wayne C. Ondler  
Environmental Licensing Project Manager  
Florida Power & Light Company

cc: Doug Neeley-EPA/Atlanta  
Clair Fancy-DER/TAL  
H. S. Oven-DER/TAL  
Tom Title-DER/WPB



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

AUG 14 1987

OFFICE OF  
AIR AND CLIMATE

## MEMORANDUM

SUBJECT: Authority for Approval of Custom Fuel Monitoring  
Schedules Under NSPS Subpart GG

FROM: John B. Rasnia, Chief *John B. Rasnia*  
Compliance Monitoring Branch

TO: Air Compliance Branch Chiefs  
Regions IX, III, IV, V, VI and IX

Air Programs Branch Chiefs  
Regions I-X

The NSPS for Stationary Gas Turbines (Subpart GG) at 40 CFR 60.334(b)(2) allows for the development of custom fuel monitoring schedules as an alternative to daily monitoring of the sulfur and nitrogen content of fuel fired in the turbines. Regional Offices have been forwarding custom fuel monitoring schedules to the Stationary Source Compliance Division (SSCD) for consideration since it was understood that authority for approval of these schedules was not delegated to the Regions. However, in consultation with the Emission Standards and Engineering Division, it has been determined that the Regional Offices do have the authority to approve Subpart GG custom fuel monitoring schedules. Therefore it is no longer necessary to forward these requests to Headquarters for approval.

Over the past few years, SSCD has issued over twenty custom schedules for sources using pipeline quality natural gas. In order to maintain national consistency, we recommend that any schedules Regional Offices issue for natural gas be no less stringent than the following: sulfur monitoring should

be bimonthly, followed by quarterly, then semiannual, given at least six months of data demonstrating little variability in sulfur content and compliance with (60.13) at each monitoring frequency; nitrogen monitoring can be waived for pipeline quality natural gas, since there is no fuel-bound nitrogen and since the free nitrogen does not contribute appreciably to NO<sub>x</sub> emissions. Please see the attached sample custom schedule for details. Given the increasing trend in the use of pipeline quality natural gas, we are investigating the possibility of expanding Support CD to allow for less frequent sulfur monitoring and a waiver of nitrogen monitoring requirements where natural gas is used.

Where sources using oil request custom fuel monitoring schedules, Regional Offices are encouraged to contact SSCD for consultation on the appropriate fuel monitoring schedule. However, Regions are not required to send the request itself to SSCD for approval.

If you have any questions, please contact Sally M. Farrell at RTS 382-2873.

**Attachment**

cc: John Cronshaw  
George Walsh  
Robert Ajax  
Earl Sale

Conditions for Custom Fuel Sampling Schedule for Stationary Gas Turbines

1. Monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel fired in the gas turbine.
2. Sulfur Monitoring
  - a. Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The reference methods are: ASTM D1072-80; ASTM D3031-81; ASTM D3246-81; and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2).
  - b. Effective the date of this custom schedule, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters.
  - c. If after the monitoring required in item 2(b) above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calendar year.
  - d. Should any sulfur analysis as required in items 2(b) or 2(c) above indicate noncompliance with 40 CFR 60.333, the owner or operator shall notify the State Air Control Board of such excess emissions and the custom schedule shall be re-examined by the Environmental Protection Agency. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
3. If there is a change in fuel supply, the owner or operator must notify the state of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
4. Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of three years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

## ATTACHMENT B

## Sulfur Content of Natural Gas

Date	Sulfur Content (gr/1000 cf)
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02/06/90	3.0
02/13/90	0.5
02/20/90	3.5
02/27/90	4.5
03/06/90	4.5
03/13/90	3.0
03/20/90	3.5
03/27/90	3.5
04/03/90	6.0
04/10/90	2.5
04/17/90	4.0
04/24/90	3.0
05/01/90	4.0
05/08/90	2.5
05/15/90	2.0
06/05/90	4.5
06/12/90	4.0
06/19/90	7.0
06/26/90	4.5
07/03/90	5.5
07/10/90	3.5
07/17/90	4.5
07/30/90	3.0
08/07/90	5.0
08/14/90	4.5
08/21/90	4.0
08/28/90	7.0
09/04/90	5.5
09/11/90	4.0
09/18/90	4.5
09/25/90	4.0
10/02/90	4.5
10/09/90	4.5
10/16/90	7.0
10/28/90	8.0

<b>Average</b>	<b>4.3</b>
<b>Maximum</b>	<b>8.0</b>
<b>Minimum</b>	<b>0.5</b>

Source: Florida Gas Transmission Company, 1990