AIR POLLUTION CONTROL DISTRICT

WORKSHOP REPORT

NEW SOURCE PERFORMANCE STANDARDS (NSPS)
Proposed Amendments of SUBPART Db -
Industrial-Commercial-Institutional Steam-Generating Units

A workshop notice was mailed to all companies which may be affected by this proposal. Notices were also mailed to all Chambers of Commerce in San Diego County, all Economic Development Corporations, the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and other interested parties.

The workshop was held on April 15, 1993, and was attended by four persons. The workshop comments and District responses are as follows:

WORKSHOP COMMENT:

District Rule 62 currently specifies a fuel oil sulfur content limit of 0.5% by weight, the same as in proposed amended Subpart Db. Does this mean that the required sulfur content for San Diego County will not change as a result of these amendments?

DISTRICT RESPONSE:

Yes. The federal version of Subpart Db defines a fuel oil with 0.5% sulfur as "Very Low Sulfur Oil". The term in this proposal has been changed to "Low Sulfur Oil" to be consistent with statewide standards.

WORKSHOP COMMENT:

Will facilities using fuel oil which meets the 0.5 percent sulfur limit need to demonstrate compliance with this standard?

DISTRICT RESPONSE:

Yes. The rule provides for compliance demonstration by testing the fuel oil, or by retention of receipts from the fuel supplier certifying that the oil meets the sulfur standard.

WORKSHOP COMMENT:

In the past, our facility has specified in fuel requisitions that sulfur content be certified in the fuel receipts, but the suppliers have not complied with this request. Will the facility be held responsible if the supplier's fuel receipts are not certified?

DISTRICT RESPONSE:

Yes. The proposal requires that the facility demonstrate through receipts or fuel testing that the sulfur requirement is met. There is a large economic incentive for the industry to do this, as certified receipts are a simple and inexpensive alternative to fuel testing. Since Subpart Db applies nationwide, it is anticipated that the industry will comply with the certification requirements.

WORKSHOP COMMENT:

If fuel oil with certified receipts were to be analyzed by the District for compliance, and found to exceed the 0.5 percent sulfur limit, would the facility be responsible?

DISTRICT RESPONSE:

No. If the facility retains the certified fuel receipts in accordance with proposed Rule 260.49b Section (r), the facility will not be held responsible for the exceedance of the standard.

WORKSHOP COMMENT:

Does Subpart Db require quarterly reports?

DISTRICT RESPONSE:

Subpart Db currently requires quarterly reporting. The proposed amendments will reduce the quarterly reporting requirements for low-capacity factor steam-generating units using certain low-nitrogen fuels, and for facilities choosing to comply with the rule by obtaining certified fuel oil receipts.

WORKSHOP COMMENT:

Has there been a recent determination where District rules may be relaxed due to the negative impact on industry in the County?

DISTRICT RESPONSE:

No, there has been no such determination. However, a recent State law requires the District to consider socioeconomic impacts for new and amended rules which significantly affect air quality or emission limitations. This law is not applicable to New Source Performance Standards since federal regulations are already applicable nationwide.

EPA AND ARB COMMENTS

No comments were received from the EPA. The ARB reviewed the proposed amended Subpart Db and had no comments.

APCD/PC/jo
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