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

JUN 24 2002

OFFICE OF
AIR AND RADIATION

Mr. James Landreth
Vice President Fossil/Hydro Generation
Designated Representative
South Carolina Electric & Gas Company
111 Research Drive
Columbia, SC 29203

Re: Petition for Alternative Method for Sulfur Analysis for Fuel Oil for Hagood and Urquhart Units

Dear Mr. Landreth:

EPA has reviewed your March 28, 2002 petition under §75.66 (a) requesting use of a method other than those referenced under Section 2.2.5 of Appendix D of the Part 75 regulations for analyzing the sulfur content in fuel oil. The alternative method would be used to analyze fuel oil samples at the following units at South Carolina Electric & Gas Company (SCE&G) facilities: Hagood (ORIS 3285) Unit HAG4 and Urquhart (ORIS 3295) Units URQ4, URQ5, and URQ6. As discussed below, EPA approves the petition.

Background

Eligible sources choosing to use Appendix D are required to analyze fuel oil samples periodically throughout the year. Four testing methods are identified in the rule as being acceptable for use in meeting this requirement. See 40 CFR Part 75, Appendix D, Sections 2.2.4 and 2.2.5. SCE&G petitioned EPA to use an alternate method, ASTM 5453-00e "Standard Test Method for Determination of Total Sulfur in Light Hydrocarbons, Motor Fuels and Oils by Ultraviolet Fluorescence," in lieu of the methods specified in Section 2.2.5 of Appendix D.

The four SCE&G units use pipeline natural gas as a primary fuel. Diesel grade fuel oil is used at these units as a back-up fuel. SCE&G requests the use of the alternative method because the company has the equipment required by the alternative method in its laboratory. The company does not have the equipment to conduct the analyses as specified in the Appendix D methods and would therefore have to contract the testing to an outside laboratory. This would increase the cost and delay completion of the analysis process.

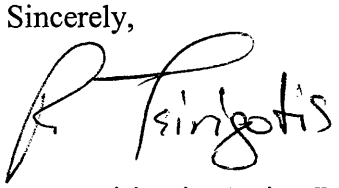
EPA's Determination

In considering SCE&G's request for the use of an alternative method, the Agency considered a number of factors. Most importantly, it was necessary to determine whether the proposed alternative would offer at least the equivalent levels of precision, reliability, accessibility, and timeliness. In making this determination, consideration was given to detection limits, potential interference from other compounds likely to be present, adequacy of the quality assurance procedures, availability, reproducibility, and recovery.

When used as a method to test diesel grade fuel oil, ASTM D5453-00e should produce at least equivalent performance with respect to the above mentioned criteria when applied to the fuel sampling required in Section 2.2.5 of Appendix D of Part 75. Consequently, the Agency approves the use of this method for this application in the context of Appendix D of the regulations.

EPA's determination relies on the accuracy and completeness of the information in the March 28, 2002 petition and supplementary material, and is appealable under Part 78 of the Acid Rain regulations. If you have further questions or concerns about this matter, please contact Beth Murray at (202) 564-1247 or murray.beth@epa.gov.

Sincerely,



Peter Tsirigotis, Acting Director
Clean Air Markets Division

cc: Mr. Wilson "Lynn" Haynes, EPA Region IV
Mr. Thomas Lathan, SCDHEC
Mr. Robert Burns, SCE&G