

Question 23.10

Topic: Certified Fuel Flowmeter -- Emergency Fuel Exemption

Question: Our plant generally burns only natural gas but also has the capability to burn oil. Section 2.1.4.3 of Appendix D has an option for emergency fuels which does not require the use of a certified fuel flowmeter. How is this monitoring option implemented?

Answer: First, the fuel must qualify as an emergency fuel as described in Appendix D, Section 2.1.4.3. This means accepting a permit restriction which limits the use of the fuel to emergency situations in which the primary fuel is not available. EPA considers the following circumstances to be emergency situations:

- (1) if the supplier of the primary fuel cannot provide that fuel (e.g., gas curtailment); and
- (2) if the primary fuel handling system is inoperable and is being repaired.

Note that the permit restriction may also contain provisions which allow the unit to combust the emergency fuel for short test periods as a normal maintenance practice to verify that the unit is capable of combusting the emergency fuel.

If the necessary permit restriction is in place, then, according to Section 2.1.4.3 of Appendix D, the use of a certified fuel flowmeter is not required when the emergency fuel is combusted, and the maximum rated hourly heat input may be used for emissions reporting.

References: Appendix D, Section 2.1.4.3

History: First published in October 1999 Revised Manual; revised in 2013 Manual