## **Question 2.2**

**Topic:** Use of Default SO<sub>2</sub> Value

**Question:** A solid fuel-fired (e.g., wood, coal, or refuse) unit with certified SO<sub>2</sub> and

flow monitoring systems occasionally fires gaseous fuel. According to § 75.11(e)(3)(iii), the DAHS must automatically substitute a 2.0 ppm default for hours when: (a) the unit is combusting gaseous fuel that meets the definition of "very low sulfur fuel" in § 72.2; and (b) the measured SO<sub>2</sub> concentration reading is less than 2.0 ppm. Does EPA require me to demonstrate that my gaseous fuel qualifies as very low sulfur fuel before I

use the 2.0 ppm default value?

**Answer:** No demonstration is required. The definition of very low sulfur fuel in

§ 72.2 includes the following: "pipeline natural gas" (as defined in § 72.2), "natural gas" (as defined in § 72.2), and any other gaseous fuel which has 20 grains or less of total sulfur. If, based on a knowledge of the composition of the gaseous fuel being combusted (e.g., from contract specifications or historical fuel sampling information), you believe the fuel

qualifies as very low sulfur fuel, report the 2.0 ppm default SO<sub>2</sub> concentration for gas-fired hours when the bias-adjusted SO<sub>2</sub>

concentration is less than 2.0 ppm.

**References:** § 72.2, § 75.11(e)(3)(iii)

**History:** First published in March 2000, Update #12; revised in 2013 Manual