Mr. John Schaffer, Vice President, Operations  
Constellation Energy  
611 Commerce, Suite 3109  
Nashville, TN 37203

Dear Mr. Schaffer:

This letter is in response to your letter of May 19, 2010, concerning a proposal by Constellation Energy to use a predictive emission monitoring system (PEMS) to demonstrate the compliance of its boilers with the nitrogen oxides (NOx) requirements of 40 CFR 60, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units). The affected boilers are located at Fiberweb, Inc. in Old Hickory, Tennessee.

Subpart Db requires that initial NOx compliance be demonstrated over 30 successive days using a continuous emission monitoring system (CEMS). After the compliance test, 40 CFR 60.48b(g)(2) allows a facility to opt to monitor its steam generating unit’s operating conditions and predict NOx emission rates in place of using the CEMS. This option is contingent upon the unit having a heat input capacity of 250 million Btu/hour or less and an annual capacity factor greater than 10 percent for its residual oil (having a nitrogen content of 0.30 weight percent or less), natural gas, distillate oil, or any mixture of these fuels.

You are proposing to use a PEMS as an alternative to the NOx CEMS for the initial 30-day compliance test. The PEMS would be validated using Performance Specification 16 (PS-16) of Appendix B to Part 60. A copy of the PEMS protocol was included in the request.

Your proposal is acceptable and your proposed PEMS may be used as an alternative to a CEMS for the initial 30-day compliance test provided the requirements of PS-16 are met and the PEMS input sensors are operated in their established ranges over the 30-day test period. Since this alternative is applicable to other similar facilities in this source category, we will be posting this letter on our website at http://www.epa.gov/ttn/emc/approalt.html for use by other interested parties.
If you have further questions on this matter, please call Foston Curtis at (919) 541-1063, or you may e-mail him at curtis.foston@epa.gov.

Sincerely,

Conniesue B. Oldham, Ph.D., Group Leader
Measurement Technology Group

cc: Foston Curtis (E143-02)
John Finke, Metro Public Health Dept – Nashville/Davidson County
David McNeal, Region 4
Jeryl Stewart, TN DEQ