



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

JUN 09 2010

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

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 (NO<sub>x</sub>) 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 NO<sub>x</sub> 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 NO<sub>x</sub> 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 NO<sub>x</sub> 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](mailto: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