

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: May 5, 1980

SUBJECT: Boilout under PSD

FROM: Director Division of Stationary Source Enforcement

TO: Jan Geiselman, Director Air & Hazardous Materials Division, Region II

This is in response to a request made by Randy Stein of your staff in an April 30, 1980 phone conversation with Richard Biondi of my staff, in which it was determined that boilout is not considered commencement of operation under PSD. This is consistent with the approach taken under NSPS regarding boilout. (See attached.)

Boilout is the first firing of a steam generator to remove any grease and other deposits from interior boiler surfaces. It is usually done with a caustic solution at reduced temperatures and pressures (compared to normal operating conditions.) Boilout also facilitates the slow curing necessary to condition refractory material. Thus, boilout constitutes a construction activity rather than commencement of operation for production.

Should you have any further questions regarding this issue, please contact Richard Biondi at FTS 755-2564.

Edward E. Reich

Attachment

cc: Randy Stein

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: September 25, 1978

SUBJECT: NSPS Steam Generator (D) Startup date

FROM: Peter J. Culver, P.E. Legal Branch, Enforcement Division

TO: File (3526.6)

The Iowa Department of Environmental Quality (DEQ) requested that EPA determine whether "boil-out" of a NSPS affected coal fired steam generator constitutes "startup" as defined in 40 CFR 60.2(o). I spoke with Rich Biondi and Craig Cobert of DSSE on September 22, 1978, regarding this.

Their deliberations resulted in agreement with the particular NSPS affected facility. That is, "boil-out" should be considered as part of source construction, not source startup under Section 60.2(o). The rationale is that the source is not commencing operation for production, nor is it using the fuel which will be used in normal operation; even though these are not considerations in 40 CFR 60.2(o).

cc: DSSE, Attention: John Rasnic, Chief Compliance Monitoring Branch
Michael J. Sanderson, Enforcement Division
P.A. Burrell, Enforcement Division
Henry F. Rompage, Enforcement Division