



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
AIR AND RADIATION

R.A. Irvin  
Duquense Light  
One Oxford Centre  
3301 Grant Street  
Pittsburgh, PA 15279

Dear Mr. Irvin:

The Acid Rain Division has received your request for an applicability determination for the Brunot Island Power Station units 2A, 2B, 3 and 4 under 40 CFR Part §72.6(c).

This letter represents EPA's official determination of applicability for Brunot Island Power Station units 2A, 2B, 3 and 4 which commenced commercial operation in 1973 and 1974 (ORISPL number 3096).

Based on your petition of August 2, 1993 (as amended October 19, 1994), the units at Brunot Island Station are unaffected by the requirements of the Acid Rain Program. The Brunot Island Station unit 4 is a waste heat recovery turbine and, therefore, not a "unit" as defined by the Acid Rain Program at 40 CFR 72.2. Brunot Island Station units 2A, 2B and 3 meet the criteria set forth at 40 CFR §72.6(b)(1) for unaffected simple combustion turbines. As you certified, units 2A, 2B, and 3, which serve turbine 4, have not utilized auxiliary firing since 1983. Thus, they meet the definition of "simple combustion turbine," as defined at 40 CFR §72.2. If the auxiliary firing system for turbine unit 4 commences firing, Brunot Island units 2A, 2B and 3 will become subject to the Acid Rain Program requirements, according to the Acid Rain Program requirements, according to §72.6(a)(3)(iii).

This determination is based solely on the representations made in your letter and attachments of August 2, 1993 (as amended October 19, 1994). According to 40 CFR 72.6(c)(5), this decision may be appealed under 40 CFR part 78. Under the requirement of 40 CFR §72.6(c), you are reequred to send copies of this letter to each owner or operator of the Brunot Island units. If you have further questions regarding the Acid Rain Program, please contact Kathy Barylski of my staff at (202)233-9074.

Sincerely,

/s/ (April 12, 1995)

Brian J. McLean, Director  
Acid Rain Division