



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

OFFICE OF  
AIR AND RADIATION

Mr. Andrew D. Brennan  
Manager of Environmental Affairs  
Massachusetts Bay Transportation Authority  
10 Park Plaza  
Boston, MA 02116

Dear Mr. Brennan:

This letter is U.S. EPA's official response to Robin Patrick Daniels' letter of October 29, 1996 requesting, on your behalf, an applicability determination under the Acid Rain Program for Engine B located at the Massachusetts Bay Transportation Authority's South Boston Power Complex (the "Complex"). Your statement certifying this request was signed on October 3, 1997.

According to the description in the October 29, 1996 letter and in a followup letter from Ms. Daniels dated October 3, 1997, Engine B is one of two simple combustion turbines at the Complex that drives a single 69 MVA electric generator. The engine is owned and operated by the Massachusetts Bay Transportation Authority ("MBTA") and is used, along with other turbines at the site, to provide emergency power for the MBTA traction system and supply electricity to the New England Power Pool during periods of peak power demand. The engine first commenced operation in 1979 under different ownership and at a different site. Later, it was sold to MBTA, and installed at the Complex in 1994. The turbine, which is fueled by aviation kerosene, does not use auxiliary firing.

Based on the information above, Engine B is not subject to the requirements of the Acid Rain Program. Under 40 CFR 72.6(b)(1), a simple combustion turbine that commenced operation before November 15, 1990 is not an affected unit. Engine B is a simple combustion turbine that commenced operation in 1979. The fact that the turbine had a different owner when it commenced operation and was located at a different site is not relevant

under § 72.6(b)(1). A simple combustion turbine's unaffected-unit status would change if the turbine had been modified to add or use auxiliary firing. According to your description, such a modification has not taken place. Engine B, therefore remains an unaffected unit under the Acid Rain Program.

The determinations made in this letter are based on the representations made in Ms. Daniels' letters of October 29, 1996 and October 3, 1997 and your certifying statement dated October 3, 1997 and are made in reliance on the accuracy and completeness of those representations. The determination is appealable under 40 CFR part 78. If you have further questions regarding the Acid Rain Program, please contact Donna Deneen at (202) 233-9089.

Sincerely,

/s/ (October 27, 1997)

Brian J. McLean, Director  
Acid Rain Division

cc: James Belsky, Massachusetts DEP  
Ed Szunowski, Massachusetts DEP  
Ian Cohen, U.S. EPA Region I  
Robin Patrick Daniels, Rubin and Rudman LLP