

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

RULE 64 - SULFUR CONTENT OF FUELS

(Adopted 5/23/72, Revised 6/17/80, 9/9/80, 7/5/83, 6/14/94, 4/13/99)

A. Applicability

This rule is applicable to any person who burns fuels containing sulfur compounds from any source whatsoever.

B. Requirements

1. No person shall burn at any time gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel (788 ppmv), calculated as hydrogen sulfide at standard conditions.
2. No person shall burn at any time any liquid fuel, unless the emissions from the combustion of such fuel are reduced to a level less than the emissions which would occur from the uncontrolled combustion of liquid fuels with a sulfur content of 0.5 percent, by weight.

C. Exemptions

1. The provisions of this Rule shall not apply to:
 - a. The use of fuels where the gaseous products of combustion are used as raw materials for other processes.
 - b. The use of liquid fuel to propel or test any vehicle, aircraft, missile, locomotive, boat or ship.
 - c. The burning of sewage treatment plant waste gases provided that any supplemental fuel used complies with this rule.
 - d. Any flare gas combustion, where no useful energy is produced and which is subject to Rule 54, Sulfur Compounds.
2. The monitoring/recordkeeping requirements of Subsection D shall not apply to the storage, transfer or use of the following fuels:
 - a. Public Utilities Commission-regulated natural gas
 - b. Propane
 - c. Butane
 - d. ARB-quality reformulated gasoline
 - e. ARB-certified diesel fuel

Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.

D. Monitoring/Recordkeeping

The monitoring/recordkeeping requirements in Subsections D.2, D.3, D.4, and D.5 become effective April 13, 2000.

1. Landfill Gas/Oilfield Gas (Initial Sampling): Unless historical measurements of hydrogen sulfide from landfill or oilfield gaseous fuels have been performed within the previous three years and are reported in writing to the District, any person combusting landfill or oilfield gas shall have the sulfur content of fuel analyzed by no later than May 13, 1999. Any person operating a new stationary source shall have the sulfur content of the fuel analyzed within 30 days after initial operation.
2. Landfill Gas/Oilfield Gas (Annual Sampling): Any person combusting landfill or oilfield gas shall have the sulfur content of the fuel analyzed at least annually.
3. Landfill Gas/Oilfield Gas (Quarterly Sampling): Monitoring of sulfur content of landfill or oilfield gaseous fuel by the operator or by his/her designee shall be at least quarterly if any of the following conditions apply:
 - a. Any sulfur measurement exceeds 394 ppmv, calculated as hydrogen sulfide at standard conditions.
 - b. A stationary source is new.
 - c. A source has not reported historical measurements of hydrogen sulfide of the landfill or oilfield gaseous fuel performed within the previous three years in writing to the District for a stationary source.
4. Notwithstanding the requirements of Subsection D.3, an operator may have the sulfur content of the fuel monitored annually instead of quarterly by satisfying the following provisions:
 - a. During four consecutive calendar quarters, each sulfur content measurement shall not exceed 394 ppmv, calculated as hydrogen sulfide at standard conditions, and
 - b. Submit a written request to the District for a reduction in monitoring frequency. This request shall contain backup documentation including inspection reports that document the above provision. Requests for a reduction in monitoring frequency are not effective until written approval by the APCO is received by the operator.

5. Liquid Fuels: For each liquid fuel delivery, the person combusting the fuel shall obtain documents certifying compliance with VCAPCD Rule 64, or the person shall test the sulfur content of a representative sample of the fuel using a test method from Subsection E.2. Certification may be provided once for each purchase lot, if records are kept of the purchase lot number of each delivery.
6. All records of fuel sulfur content and any records to substantiate an exemption pursuant to Subsection C.2 shall be retained for a minimum of five years, and shall be made available to District personnel upon request.

E. Test Methods

1. The sulfur content of gaseous fuels shall be determined by South Coast AQMD Method 307-94 - Determination of Sulfur in a Gaseous Matrix, or by ASTM D1072-90 (1994), Standard Test Method for Total Sulfur in Fuel Gases.

Alternatively, operators may use the colorimetric method ASTM D 4810-88 (Reapproved 1994) or the ASTM D4084-94 (Lead Acetate Reaction Rate Method) when measuring the sulfur content of landfill or oilfield gaseous fuels and may assume that the hydrogen sulfide content of the fuel gas adequately represents the total sulfur content. However, if the sulfur content as measured by ASTM D4810-88 or ASTM D4084-94 equals or exceeds 200 ppmv, then **only** SCAQMD Method 307-94 or ASTM D1072-90 shall be used to determine compliance.

The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis may be used subject to the verification of the dilution ratio.

Operators may use the colorimetric method ASTM D 4810-88 (Reapproved 1994) for the measurement of the sulfur content of gaseous fuels other than landfill or oilfield gas only if written approval has been granted by the District and by US EPA.

2. The sulfur content of liquid fuels shall be determined by ASTM Method D4294-98 or D2622-98. For liquid fuels, operators of electric power generation units may use the sampling and analysis methods prescribed in Code of Federal Regulations 40CFR75 Appendix D.2.2.

F. Definitions

1. "ARB Certified Diesel Fuel": Any fuel that is commonly or commercially known, sold or represented as diesel fuel No.1-D or No.2-D, pursuant to the specifications in ASTM D975-96, and is subject to California Code of Regulations, Title 13, Sections 2281 and 2282.
2. "Landfill Gas": Any gas derived through the decomposition of organic waste deposited in a solid waste disposal site, from the evolution of volatile species in the waste, or from chemical reactions of substances in the waste.
3. "Natural Gas": Natural gas is a gaseous fuel purchased or transported under a Federal Energy Regulatory Commission or a California Public Utility Commission jurisdictional tariff.

G. Violations

The failure of a person to meet any requirement of this rule, including monitoring and recordkeeping requirements, shall constitute a violation of this rule. If the results from using SCAQMD Method 307-94 indicate a violation of this rule, then it is a violation of this rule regardless of any conflicting results that may be obtained using ASTM D 4810-88 or ASTM D4084-94.