



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

**BUREAU OF AIR MANAGEMENT
NEW SOURCE REVIEW PERMIT
TO CONSTRUCT AND OPERATE A STATIONARY SOURCE**

Issued pursuant to Title 22a of the Connecticut General Statutes (CGS) and Section 22a-174-3a of the Regulations of Connecticut State Agencies (RCSA).

Owner/Operator	CPV Towantic, LLC
Address	50 Braintree Hill Office Park, Suite 300 Braintree, MA 02184
Equipment Location	16 Woodruff Hill Road Oxford, CT
Equipment Description	350 bhp Diesel Fire Pump
Town-Permit Numbers	144-0027
Premises Number	14
Stack Number	11
Permit Issue Date	November 30, 2015
Expiration Date	None

/s/ Michael Sullivan
Michael Sullivan
Deputy Commissioner

November 30, 2015
Date

This permit specifies necessary terms and conditions for the operation of this equipment to comply with state and federal air quality standards. The Permittee shall at all times comply with the terms and conditions stated herein.

PART I. DESIGN SPECIFICATIONS

A. General Description

CPV Towantic LLC operates a 350 bhp 4-stroke lean-burn John Deere fire pump to provide emergency fire protection to the facility. The generator is not connected to the electrical grid and is only utilized as a fire pump pursuant to RCSA 22a-174-22. The unit is also subject to 40 CFR Part 60 Subpart IIII.

B. Equipment Design Specifications

1. Allowable Fuel Type: Ultra Low Sulfur Distillate (ULSD)
2. Maximum Fuel Firing Rate (gal/hr): 17.8
3. Maximum Gross Heat Input (MMBTU/hr): 2.45

C. Stack Parameters

1. Minimum Stack Height (ft): 17.5
2. Minimum Exhaust Gas Flow Rate at maximum firing rate (acfm): 1,877
3. Minimum Stack Exit Temperature at maximum firing rate (°F): 961
4. Minimum Distance from Stack to Property Line (ft): 275

PART II. OPERATIONAL CONDITIONS

A. Equipment

1. This equipment shall only fire Ultra Low Sulfur Diesel (ULSD)
2. Maximum Fuel Consumption over any Consecutive 12 Month Period: 5,330 gallons
3. Maximum Fuel Sulfur Content: 0.0015% by weight
4. The Permittee may operate this source for up to 300 hours per calendar year. Total engine hours of operation from this unit and the emergency engine, permit number 144-0026, shall not exceed 500 hours per calendar year.
5. The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations.
6. The Permittee shall operate and maintain this equipment and any monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown and malfunction.

B. For Emergency Use

1. This emission unit shall only operate in accordance with the definition of emergency engine as defined in RCSA Section 22a-174-22.
2. The Permittee shall not operate the subject engine for routine scheduled testing or maintenance during days when ambient ozone is forecasted by the commissioner to be “moderate unhealthy for sensitive groups” to “very unhealthy” anywhere in Connecticut.
 - a. Forecast Information

Official ambient ozone information can be obtained by calling:

- i. (860) 424-4167 Department’s Bureau of Air Management Monitoring Section
(Recorded Message Updated daily at 3:00 p.m.)
- ii. (860) 424-3027 Department’s Bureau of Air Management Monitoring Section
(For additional air quality information)

PART III. ALLOWABLE EMISSION LIMITS

The Permittee shall not cause or allow this equipment to exceed the emission limits stated herein at any time.

A. Short Term Emission Limits

1. Criteria Pollutants

Pollutant	lbs/hr	lb/MMBtu
PM	0.1	
PM _{10/2.5}	0.1	
SO ₂	0.0037	
NO _x	2.65	
VOC	0.07	
CO	0.64	
Pb	1.9E-06	
H ₂ SO ₄	2.8E-04	
CO ₂		163.6

C. Annual Emission Limits

Pollutant	tons per 12 consecutive months
PM	0.014
PM _{10/2.5}	0.014
SO ₂	6E-04
NO _x	0.4
VOC	0.01
CO	0.09
Pb	2.8E-07
H ₂ SO ₄	4E-05
CO ₂ e	60

D. Hazardous Air Pollutants

This equipment shall not cause an exceedance of the Maximum Allowable Stack Concentration (MASC) for any hazardous air pollutant (HAP) emitted and listed in RCSA Section 22a-174-29. [STATE ONLY REQUIREMENT]

E. Opacity

Opacity resulting from operation of this engine shall not exceed 10% during any six-minute block average or 40% reduced to a one-minute block average; as measured by 40 CFR 60, Appendix A, Reference Method 9.

F. Demonstration of compliance with the above emission limits may be met by calculating emissions based on emission factors from the following sources:

- *SO₂, H₂SO₄: Calculated from fuel sulfur content*
- *NO_x: EPA Certified Vendor emission factor.*
- *NO_x, PM_{10/2.5}, VOC, CO: EPA Certified Vendor Emissions Factor*
- *Pb: AP-42 Sec. 3.1*
- *CO₂: 40 CFR 98 Subpart C, Table C-1*
- *CO_{2e}: 40 CFR 98, Subpart C, Table C-2*

The commissioner may require other means (e.g. stack testing) to demonstrate compliance with the above emission limits, as allowed by state or federal statute, law or regulation.

PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS

A. Monitoring

1. The Permittee shall continuously monitor fuel consumption by this unit using a non-resettable totalizing fuel meter.
2. The Permittee shall monitor all hours that this unit is in operation.

B. Record Keeping

1. The Permittee shall keep records of monthly and consecutive 12 month fuel consumption. The consecutive 12 month fuel consumption shall be determined by adding the current month's fuel consumption to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of the previous month.
2. The Permittee shall keep records of the fuel certification for each delivery of fuel oil from a bulk petroleum provider or a copy of the current contract with the fuel supplier supplying the fuel used by the equipment that includes the applicable sulfur content of the fuel as a condition of each shipment. The shipping receipt or contract shall include the date of delivery, the name of the fuel supplier, type of fuel delivered, the percentage of sulfur in such fuel, by weight, dry basis, and the method used to determine the sulfur content of such fuel.

3. The Permittee shall calculate and record the monthly and consecutive 12 month PM₁₀, PM_{2.5}, SO₂, NO_x, VOC, CO, and CO_{2e} emissions in units of tons. The consecutive 12 month emissions shall be determined by adding (for each pollutant) the current month's emissions to that of the previous 11 months. Such records shall include a sample calculation for each pollutant. The Permittee shall make these calculations within 30 days of the end of the previous month.
4. The Permittee shall keep monthly and calendar year records of all hours of operation and fuel use for this unit.

Such records shall contain the following information:

- a. reason for operating;
 - b. date of event;
 - c. duration of event (minutes);
 - d. gallons of fuel combusted;
 - e. ozone level as forecasted for the day;
 - f. total engine hours of operation and total combined engine hours of operation with the emergency generator, permit number 144-0026.
5. The Permittee shall keep records of the inspection and maintenance for this engine. The records shall include:
 - a. the name of the person conducting the inspection or maintenance;
 - b. the date of the inspection or maintenance;
 - c. the results or actions taken.
 6. The Permittee shall comply with the applicable record keeping requirements of Section 22a-174-22(l).
 7. The Permittee shall keep records of the manufacturer's specifications and written recommendations.
 8. The Permittee shall keep all records required by this permit for a period of no less than five years and shall submit such records to the commissioner upon request.

C. Reporting

1. The Permittee shall comply with the applicable reporting requirements of Section 22a-174-22(l).
2. The Permittee shall comply with the reporting requirements in 40 CFR 60.4214
3. The Permittee shall notify the commissioner, in writing, of the date of commencement of construction and the date of initial startup of this equipment. Such written notifications shall be submitted no later than 30 days after the subject event.

PART V. SPECIAL REQUIREMENTS

- A.** The Permittee shall comply with all applicable sections of the following New Source Performance Standard(s) at all times.

Title 40 CFR Part 60, Subparts: IIII and A

Copies of the Code of Federal Regulations (CFR) are available online at the U.S. Government Printing Office website.

- B.** The Permittee shall not cause or permit the emission of any substance or combination of substances which creates or contributes to an odor beyond the property boundary of the premises that constitutes a nuisance as set forth in RCSA Section 22a-174-23. [STATE ONLY REQUIREMENT]

PART VI. ADDITIONAL TERMS AND CONDITIONS

- A.** This permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the regulated activity in compliance with all applicable requirements of any federal, municipal or other state agency. Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B.** Any representative of the DEEP may enter the Permittee's site in accordance with constitutional limitations at all reasonable times without prior notice, for the purposes of inspecting, monitoring and enforcing the terms and conditions of this permit and applicable state law.
- C.** This permit may be revoked, suspended, modified or transferred in accordance with applicable law.
- D.** This permit is subject to and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut and conveys no property rights in real estate or material, nor any exclusive privileges, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby. This permit shall neither create nor affect any rights of persons or municipalities who are not parties to this permit.
- E.** Any document, including any notice, which is required to be submitted to the commissioner under this permit shall be signed by a duly authorized representative of the Permittee and by the person who is responsible for actually preparing such document, each of whom shall certify in writing as follows: "I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under section 22a-175 of the Connecticut General Statutes, under section 53a-157b of the Connecticut General Statutes, and in accordance with any applicable statute."
- F.** Nothing in this permit shall affect the commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the Permittee by the commissioner.

- G.** Within 15 days of the date the Permittee becomes aware of a change in any information submitted to the commissioner under this permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the Permittee shall submit the correct or omitted information to the commissioner.
- H.** The date of submission to the commissioner of any document required by this permit shall be the date such document is received by the commissioner. The date of any notice by the commissioner under this permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three days after it is mailed by the commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" means calendar day. Any document or action which is required by this permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.
- I.** Any document required to be submitted to the commissioner under this permit shall, unless otherwise specified in writing by the commissioner, be directed to: Office of Director; Engineering & Enforcement Division; Bureau of Air Management; Department of Energy and Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.