



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	Hamilton Sundstrand Corporation
Address	One Hamilton Road, Windsor Locks, CT 06096
Equipment Location	One Hamilton Road, Windsor Locks, CT 06096
Equipment Description	Cogeneration Facility consisting of a 5.4 megawatt Solar Taurus Gas Turbine, a 31.27 MMBtu/hr Coen Standard Duct Burner and a Rentech Heat Recovery Steam Generator
Town-Permit Numbers	213-0115
Premises Number	0002
Stack Number	78
Collateral Conditions	PART VIII – Premises Wide Cap for NOx
Prior Permit Issue Dates	Original Permit - April 9, 2009 Revision - April 29, 2009 Minor Modification - December 1, 2011 Modification - April 9, 2013 Minor Modification - July 31, 2017 Revision - October 9, 2017 Minor Modification - November 20, 2017
Modification Issue Date	October 12, 2021
Expiration Date	None

Amy R. Babbidge
 for Betsey C. Wingfield
 Deputy Commissioner

October 12, 2021

 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

Hamilton Sundstrand will install and operate a 5.4 MW combined heat and power (CHP) generation facility at its Windsor Locks facility. The CHP consists of a Solar Taurus 60 combustion turbine with a natural gas fired 31.27 MMBtu/hr Coen Standard duct burner and a Rentech heat recovery steam generator (HRSG). Emissions from the facility will be controlled by a selective catalytic reduction (SCR) unit for NO_x control and an oxidation catalyst for CO control.

B. Equipment Design Specifications

Turbine:

1. Fuel Types: Natural gas, No. 2 oil (ULSD)
2. Maximum Fuel Firing Rates¹: 67,078 ft³/hr (natural gas); 420 gal/hr (ULSD)
3. Maximum Gross Heat Input (MMBTU/hr) ¹: 67.08 (natural gas); 58.82 (ULSD) ²

Duct Burner:

4. Fuel Types: Natural gas
5. Maximum Fuel Firing Rates¹: 31,270 ft³/hr (natural gas)
6. Maximum Gross Heat Input (MMBTU/hr) ¹: 31.27 @ 1,000 Btu/scf

¹ at ISO conditions: 59°F, 14.7 psia and 60% relative humidity

² at HHV of USLD of 140,037 Btu/gal

C. Control Equipment Design Specifications

1. Selective Catalytic Reduction (SCR)
 - a. Make and Model: Cormetech/Rentech or equivalent
 - b. Catalyst Type: Titania based ceramic honeycomb catalyst or equivalent
2. Oxidation Catalyst
 - a. Make and Model: Emerachem/Rentech or equivalent
 - b. Catalyst Type: Stainless steel monolith with alumina/platinum catalytic coating or equivalent

D. Stack Parameters

1. Minimum Stack Height (ft): 75
2. Minimum Stack Diameter (ft): 4
3. Minimum Exhaust Gas Flow Rate at 100% load (acfm): 54,444

4. Minimum Stack Exit Temperature at 100% load (°F): 260
5. Minimum Distance from Stack to Property Line (ft): 790

PART II. OPERATIONAL CONDITIONS

A. Equipment

Turbine:

1. Maximum Fuel Consumption over any Consecutive 12 Month Period: 587.6 MMft³ (natural gas), 420,000 gallons (ULSD)
2. Maximum Oil Sulfur Content (% by weight, dry basis): 0.0015

Duct Burner:

3. Maximum Fuel Consumption over any Consecutive 12 Month Period: 274 MMft³ (natural gas)

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. Criteria Pollutants

1. Short term emission limits

These short term emission limits do not apply during periods of startup and shutdown, unless otherwise noted.

a. Turbine operating on natural gas:

Pollutant	ppmvd @15% O₂	lb/MMBtu	lb/hr
PM ₁₀ /PM _{2.5}		0.017	1.11
SO ₂		0.0016	0.11
NO _x	2.5	0.011 ¹	0.74
VOC		7.77E-03	0.52
CO	10.0	0.027 ¹	1.80

b. Turbine operating on ULSD:

Pollutant	ppmvd @15% O ₂	lb/MMBtu	lb/hr
PM ₁₀ /PM _{2.5}		0.019	1.11
SO ₂		1.52E-03	0.11
NO _x	9.6	0.042 ¹	2.49
VOC		0.039	2.29
CO	20.0	0.054 ¹	3.19
Pb		1.40E-05	8.24E-04

c. Turbine and Duct Burner operating on natural gas:

Pollutant	ppmvd @15% O ₂	lb/MMBtu	lb/hr
PM ₁₀ /PM _{2.5}		0.011	1.11
SO ₂		0.0016	0.161
NO _x	2.5	0.010 ¹	0.98
VOC		0.007	0.69
CO	10.0	0.026 ¹	2.60
Pb		1.88E-07	1.53E-05

¹ at ISO conditions: 59 °F, 14.7 psia and 60% relative humidity

d. For all Operating Scenarios:

Pollutant	ppmvd @15% O ₂
Ammonia	5.0

2. Startup and Shutdown Emission Limits

The Permittee shall minimize emissions during periods of startup and shutdown by the following work practices and time constraints. Start the ammonia injection as soon as minimum catalyst temperature is reached. The oxidation catalyst shall not be bypassed during startup or shutdown. The duration of startup shall not exceed 60 minutes for a hot start or a warm start, nor 240 minutes for a cold start.

- a. A “hot start” shall be defined as startup when the turbine has been down for less than 8 hours.
- b. A “warm start” shall be defined as startup when the turbine has been down for more than 8 hours, but less than 24 hours.
- c. A “cold start” shall be defined as startup when the turbine has been down for more than 24 hours. The duration of shutdown shall not exceed 60 minutes.

CO (startup/shutdown): Natural gas: 15.7/6.9 lb/event
 ULSD: 24.5/9.6 lb/event

NO_x (startup/shutdown): Natural gas: 0.8/0.4 lb/event
 ULSD : 1.7/0.8 lb/event

Emissions during these periods shall be counted towards the annual emission limits stated herein.

Annual Emission Limits

Pollutant	Tons per 12 consecutive months
PM ₁₀ /PM _{2.5}	4.86
SO ₂	0.71
NO _x	5.26
VOC	3.82
CO	11.39

B. 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]

C. Opacity

This equipment shall not exceed 10% opacity during any six minute block average as measured, if required by the commissioner, by 40 CFR 60, Appendix A, Reference Method 9.

D. Demonstration of compliance with the above emission limits may be met by calculating the emission rates using emission factors from the following sources:

- NO_x, CO, Ammonia: stack test data.
- PM-10/PM-2.5: 1.11 lb/hr (0.019 lb/MMBtu): Emission factors are from screening modeling recommendation approved by DEEP on August 5, 2011 (See evaluation for minor modification to Permit No. 213-0115-Application No. 201101730)
- SO₂, VOC, HAPs:
Turbine: Compilation of Air Pollutant Emission Factors, AP-42, fifth edition, Section 3.1, April 2000, or most recent revision, or equipment manufacturer data.
Duct Burner: Compilation of Air Pollutant Emission Factors, AP-42, fifth edition, Section 1.4, July 1998, or most recent revision, or equipment manufacturer data.

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 use individual non-resettable totalizing fuel metering devices or billing meters to continuously monitor fuel feed to the turbine and duct burner.
2. The Permittee shall continuously monitor and continuously record the SCR aqueous ammonia injection rate (lb/hr), operating temperature (°F) and pressure drop (inches of water) across the catalyst bed. The Permittee shall maintain these parameters within the ranges recommended by the manufacturer to achieve compliance with the emission limits in this permit.
3. The Permittee shall continuously monitor and continuously record the oxidation catalyst inlet temperature (°F). The Permittee shall maintain this parameter within the range recommended by the manufacturer to achieve compliance with the emission limits in this permit.
4. The Permittee shall inspect the SCR and oxidation catalysts once per year, at a minimum, or more frequently if recommended by manufacturer.

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 (for each fuel) 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 (1) the fuel certification for each delivery of fuel oil from a bulk petroleum provider; or (2) performing an analysis using the method found in ASTM D129, or alternatively D1266, D1552, D2622, D4294, or D5453; or (3) 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, and CO 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. Emissions during startup and shutdown shall be counted towards the annual emission limitation in Part III.A.3. of this permit.
5. The Permittee shall keep records of each delivery of aqueous ammonia. The records shall include the date of delivery, the name of the supplier, the quantity of aqueous ammonia delivered, and the percentage of ammonia in solution, by weight.
6. The Permittee shall keep records of the inspection and maintenance of the SCR and oxidation catalysts. The records shall include the name of the inspector, the date, the results or actions and the date the catalyst is replaced.

7. The Permittee shall keep records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the stationary gas turbine, duct burner or any malfunction of the air pollution control equipment. [40 CFR §60.7(b)]
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 notify the commissioner in writing of any malfunction of the stationary gas turbine/duct burner or the air pollution control equipment. The Permittee shall submit such notification within ten days of the malfunction. The notification shall include the following:
 - a. a description of the malfunction and a description of the circumstances surrounding the cause or likely cause of such malfunction, and
 - b. a description of all corrective actions and preventive measures taken and/or planned with respect to such malfunction and the dates of such actions and measures.

PART V. STACK EMISSION TEST REQUIREMENTS

- A. Stack emission testing shall be performed in accordance with the [Emission Test Guidelines](#) available on the DEEP website.
- B. Stack testing shall be required for the following pollutant(s):

<input type="checkbox"/> PM	<input type="checkbox"/> PM ₁₀	<input type="checkbox"/> PM _{2.5}	<input type="checkbox"/> SO ₂	<input checked="" type="checkbox"/> NO _x	<input checked="" type="checkbox"/> CO
<input type="checkbox"/> VOC	<input type="checkbox"/> Opacity	<input checked="" type="checkbox"/> Other (HAPs): <u>Ammonia</u>			
- C. For testing being conducted pursuant to 40 CFR Part 60, the test report shall be submitted within 180 days after the initial startup date or within 60 days after reaching maximum production rate. [40 CFR §60.8(a)]
- D. Recurrent stack testing for the above pollutants shall be conducted within five years from the date of the previous stack test.
- E. Stack test results shall be reported as follows: all pollutants in units of lb/hr, NO_x and CO in units of ppmvd at 15% O₂, ammonia in units of µg/m³ and ppmvd at 15% O₂.
- F. Annual/biennial stack testing for NO_x shall be performed to demonstrate compliance with the NO_x emission limits in accordance with 40 CFR §60.4400.
- G. Subject to Subsection V.H. below, stack testing shall be conducted for the following operating modes:
 1. Turbine on Natural Gas,
 2. Turbine on ULSD, and
 3. Turbine and Duct Burner on Natural Gas.

- H.** Stack testing for operating mode G(2) above (Turbine on ULSD) shall be deferred until such time as ULSD is combusted in the turbine. The permittee shall:
1. Notify the commissioner within 15 days of commencing operating mode G(2);
 2. Submit an ITT application to the commissioner within 30 days of commencing operating Mode G(2); and
 3. Perform stack testing for operating mode G(2) within 60 days of receipt of approval of the ITT application.

PART VI. OPERATION AND MAINTENANCE REQUIREMENTS

- A.** The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations.
- B.** The Permittee shall operate and maintain this stationary combustion turbine/duct burner, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.
- C.** The Permittee shall properly operate the control equipment at all times that this equipment is in operation and emitting air pollutants.
- D.** The Permittee shall keep records, when the turbine/duct burner is changed for routine maintenance, to include the following:
1. The date the turbine/duct burner was changed,
 2. The reason for the change,
 3. Documentation that the replacement turbine/duct burner is the same make and model number or equivalent,
 4. Documentation of all associated fixed capital costs, and
 5. Documentation showing that the replacement turbine/duct burner does not result in an increase in emissions, the emission of any new air pollutants, or increases in electrical output of the turbine.

PART VII. 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 KKKK and A

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

B. Premises Emissions Summary

1. On January 1st of each calendar year, if the potential emissions of NO_x and/or VOC from the premises are equal to or greater than 25 tons per year per pollutant, then for such pollutants, the Permittee shall:
 - a. Monitor NO_x and/or VOC emissions, as applicable, from the premises for such calendar year.
 - b. Calculate and record annual NO_x and/or VOC emissions, as applicable, from the premises for such calendar year, in units of tons. The Permittee shall make these calculations on or before February 1st of the following year with respect to the previous calendar year. Such records shall include sample calculations.
 - c. If actual NO_x and/or VOC emissions, as applicable, from the premises are equal to or greater than 25 tons for such calendar year, the Permittee shall submit to the commissioner, on or before March 1st of the following year, an annual emission summary with respect to the premises for the previous calendar year, Such summary shall be submitted on forms prescribed or provided by the commissioner.
2. A Permittee is exempt from Part VII.B.1 requirements of this permit if, on January 1st of the subject year, the premises was operating in accordance with any of the following:
 - a. A valid Title V permit issued pursuant to RCSA section 22a-174-33;
 - b. RCSA section 22a-174-33a; or
 - c. RCSA section 22a-174-33b

C. The Permittee shall operate this facility at all times in a manner so as not to violate or contribute significantly to the violation of any applicable state noise control regulations, as set forth in RCSA Sections 22a-69-1 through 22a-69-7.4. [STATE ONLY REQUIREMENT]

D. 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]

E. In the event that a malfunction causing either an emission exceedance or a parameter monitored out of recommended range is not corrected within three hours, the Permittee shall immediately institute shutdown of the turbine/duct burner.

PART VIII. PREMISES WIDE CAP FOR NOX

A. Premise-wide NO_x emissions shall not equal or exceed 40 tons in any 12 month consecutive period.

B. Monitoring Requirements

The Permittee shall monitor fuel consumption for each fuel burning emissions unit at the premises including any temporary units, excluding only mobile sources as defined in RCSA §22a-174-1, under one of the following options.

1. Fuel Meter:
 - a. Using an individual non-resettable fuel meter; or
 - b. Using a fuel meter that measures fuel supplied to a group of emissions units.

2. Hourly Meter:
 - a. Using an individual hourly meter; or
 - b. Using an hourly meter for a group of emissions units.
3. In the absence of fuel or hourly meters, temporary units may use purchase records or invoices.

C. Record Keeping Requirements

1. The Permittee shall make and maintain a current record (list) of all fuel burning equipment at the premises, excluding only mobile sources as defined in RCSA §22a-174-1. The list shall include both permanent and temporary emissions units, as defined in RCSA §22a-174-22e, at the premises. The list shall include, at a minimum, the following information for each fuel burning emissions unit:
 - a. A description; including make, model, location, and Emission Unit (EU) Number or other identification number;
 - b. The maximum rated capacity;
 - c. Identification of the fuel(s) used;
 - d. Monitoring method in accordance with Part VIII.B of this permit as well as the basis for such monitoring, i.e. New Source Review, Federal/State Regulation or Order number, where applicable;
 - e. Emission factor for NO_x and source of such factor; and
 - f. The construction or placement date of temporary units and removal date, as applicable.
2. For each unit, or group of emissions units identified in Part VIII.C.1 of this permit using an hour meter to track operating hours, the Permittee shall make and maintain records of the monthly operating hours (for each fuel type used, if applicable). The Permittee shall make these calculations within 30 days of the end of the previous month.
3. For each unit, or group of emissions units identified in Part VIII.C.1 of this permit using a fuel meter, the Permittee shall make and maintain records of monthly fuel consumption (for each fuel, if applicable). The Permittee shall make these calculations within 30 days of the end of the previous month.
4. The Permittee shall calculate and record the monthly and consecutive 12 month NO_x emissions for the premises. The consecutive 12 month NO_x emissions shall be determined by adding the current month's NO_x emissions to that of the previous 11 months for the premises. The Permittee shall make these calculations within 30 days of the end of the previous month.
5. The Permittee shall keep records of all purchase orders, invoices, emissions calculations methodology or other documents necessary to verify the records required by Part VIII of this permit.
6. The Permittee shall keep all records required by Part VIII this permit for a period of no less than five years and shall submit such records to the commissioner upon request.

PART IX. 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 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.