



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).

<b>Owner/Operator</b>	Middletown Power LLC
<b>Address</b>	P.O. Box 1001, Middletown, CT 06457
<b>Equipment Location</b>	1866 River Road Middletown, CT 06457
<b>Equipment Description</b>	Babcock and Wilcox Auxiliary Boiler (Unit 4A)
<b>Town-Permit Numbers</b>	104-0002
<b>Premises Number</b>	024
<b>Stack Number</b>	5
<b>Prior Permit Issue Dates</b>	1/16/2018 (Minor Modification) 09/27/2012 (Minor Modification) 06/21/1996 (Revision) 03/05/1982 (Construction & Operating Permit)
<b>Modification Issue Date</b>	July 23, 2020
<b>Expiration Date</b>	None

*Tracy R. Babbidge*

for Betsey C. Wingfield  
Deputy Commissioner

*7/23/2020*

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**

Unit 4A is a Babcock and Wilcox auxiliary steam boiler which provides steam for the electrical generating boiler warm-up and plant heating. This unit is capable of firing ultra-low sulfur distillate (ULSD) fuel oil and natural gas on an interruptible basis. This unit is located within the main power plant building and shares a stack with Unit 4 (NSR Permit No.104-0003).

### **B. Equipment Design Specifications**

1. Fuel Types: Natural Gas; ULSD fuel oil
2. Maximum Fuel Firing Rates: 873 gal/hr (oil); 90,196 ft<sup>3</sup>/hr (gas), based on daily block average
3. Maximum Gross Heat Input (MMBtu/hr): 117 (oil); 92 (gas), (daily block average)

### **C. Control Equipment Design Specifications**

1. Flue Gas Recirculation/Low NO<sub>x</sub> Burner
  - a. Make and Model: Todd Variflame
  - b. Guaranteed NO<sub>x</sub> Emission Rate (lb/MMBtu): 0.15 (oil); 0.10 (gas)

### **D. Stack Parameters**

1. Minimum Stack Height (ft): 498
2. Minimum Exhaust Gas Flow Rate (acfm): 72,160
3. Minimum Stack Exit Temperature (°F): 615
4. Minimum Distance from Stack to Property Line (ft): 140

## **PART II. OPERATIONAL CONDITIONS**

### **A. Equipment**

1. Maximum Fuel Consumption over any Consecutive 12 Month Period: 3,874,374 gallons (oil); 790,116,960 ft<sup>3</sup> (gas)
2. Maximum Fuel Sulfur Content (% by weight): 0.0015 (oil)

**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. ULSD Fuel Oil

Pollutant	lb/MMBtu	tpy
PM <sub>10</sub>	0.025	6.4
PM <sub>2.5</sub>	0.025	6.4
SO <sub>2</sub>	1.6 E-03	0.4
NO <sub>x</sub>	0.15*	38.9
VOC	8.5 E-03	2.2
CO	0.064	16.6
Pb	8.98 E-06	2.33E-3

2. Natural Gas

Pollutant	lb/MMBtu	tpy
PM <sub>10</sub>	7.4 E-03	3.0
PM <sub>2.5</sub>	7.4 E-03	3.0
SO <sub>2</sub>	5.4 E-04	0.24
NO <sub>x</sub>	0.10*	40.3
VOC	5.3 E-03	2.2
CO	8.1 E-02	33.2

\*Note: Daily Block Average

3. Maximum Worst Case Emissions: Emission limits are combined worst case for each pollutant using either natural gas or ULSD fuel oil or a combination thereof:

Pollutant	tpy
PM <sub>10</sub>	7.9
PM <sub>2.5</sub>	7.9
SO <sub>2</sub>	0.51
NO <sub>x</sub>	58.8
VOC	3.3
CO	33.2
Pb	2.33E-3

**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 20% opacity during any six minute block average as measured by 40 CFR Part 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:**

- *SO<sub>2</sub>: Fuel sulfur content based on a HHV of 134,000 Btu/gal*
- *CO, NO<sub>x</sub>: Most recent stack test data*
- *PM<sub>2.5/10</sub>, VOC: Manufacturer's data, AP-42 or other appropriate emissions factor*
- *Opacity: COMS 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 AND RECORD KEEPING REQUIREMENTS**

**A. Monitoring**

1. The Permittee shall comply with the COM requirements as set forth in RCSA Section 22a-174-4.

<b>Pollutant/Operational Parameter</b>	<b>Averaging Time</b>	<b>Limit</b>
Opacity	six minute block	20%

2. For each fuel, the Permittee shall continuously monitor fuel consumption using a totalizing fuel meter and a daily block average.
3. The Permittee shall continuously monitor the opacity using the COMS.
4. The Permittee shall perform inspections of the control devices as recommended by the manufacturer.
5. The Permittee shall comply with the applicable monitoring requirements pursuant to RCSA Sections 22a-174-22 and 22a-174-22e.

**B. Record Keeping**

1. The Permittee shall keep records of monthly and consecutive 12 month fuel consumption, for each fuel. 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 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 this 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  $PM_{10}$ ,  $PM_{2.5}$ ,  $SO_2$ ,  $NO_x$ , VOC, CO, and Lead 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 make and keep records of all maintenance activities performed on combustion or pollution control components, to include the following:
  - a. The date of the maintenance activity;
  - b. The reason for the maintenance;
  - c. Documentation that the replacement parts do not result in an increase in emissions, the emissions of any new pollutants, or an increase in unit capacity.
5. The Permittee shall keep records of the fuel flow rate using a daily block average.
6. The Permittee shall keep records of opacity. Records shall include the dates and times of all opacity exceedances and the operating conditions at the time of the exceedance.
7. The Permittee shall comply with the applicable record keeping requirements of RCSA Sections 22a-174-22 and 22a-174-22e.
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.

#### **PART V. STACK EMISSION TEST REQUIREMENTS**

Stack emission testing shall be performed in accordance with the [Emission Test Guidelines](#) available on the DEEP website.

Recurring stack testing shall be required for the following pollutant:  $NO_x$

Recurrent stack testing for  $NO_x$  shall be conducted within five years from the date of the previous stack test.

Stack test results shall be reported as follows: all pollutants in units of lb/hr and lb/MMBtu.

#### **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 properly operate the control equipment at all times that this equipment is in operation and emitting air pollutants.

## **PART VII. SPECIAL REQUIREMENTS**

- A.** The Permittee shall comply with all applicable sections of the following National Emission Standards for Hazardous Air Pollutants at all times.

Title 40 CFR Part 63 Subparts DDDDD 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]
- 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]

## **PART VIII. 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.