

REGISTRATION CERTIFICATE
EPAC-10 REV. 7-73



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



STACK NO. 00701000401

EQUIPMENT CLASSIFICATION			REGISTRATION NO.
<input checked="" type="checkbox"/> FUEL BURNING	<input type="checkbox"/> INCINERATOR	<input type="checkbox"/> PROCESS MFG.	00700007
FIRM NAME			DATE ISSUED
PFIZER INC. (CHEMICALS)			12/05/73
LOCATION OF EQUIPMENT (No. & Street, Town, Zip)			
EASTERN POINT ROAD		GROTON CONN	
COMMISSIONER OR HIS REPRESENTATIVE			

DEPARTMENT OF ENVIRONMENTAL PROTECTION



79 Elm Street • Hartford, CT 06106-5127

www.ct.gov/deep

Affirmative Action/Equal Opportunity Employer

John T. Dunne
Associate Director, Environmental
Pfizer Inc.
445 Eastern Point Road
Groton, CT 06340

RE: Modification of Registration Nos. 070-0007, 070-0008, 070-0009, 070-0010, and 070-0012 for Boilers 1 through 5 at Pfizer Inc. in Groton, CT

Dear Mr. Dunne:

The Commissioner of the Department of Energy and Environmental Protection (DEEP) may modify any license at the request of the licensee in accordance with Section 22a-3a-5(d) of the Regulations of Connecticut State Agencies (RCSA), and any other applicable law. Any modification at the request of the licensee shall comply with the requirements of RCSA Section 22a-3a-5(a).

As requested and supported in your letter dated September 17, 2012, the DEEP Bureau of Air Management Registrations for the above mentioned equipment are hereby modified unless within 30 days of issuance of this notice a request for hearing is filed. Such request shall conform with the provisions of RCSA Subsection 22a-3a-6(i). Registrations 070-0007 through 070-0010 covering boilers 1 through 4 have been modified to allow for the transition from the use of 0.3 % No. 6 fuel oil to 15ppm ultra low sulfur distillate (ULSD), while maintaining the option to burn natural gas in these boilers. Registration 070-0012 covering boiler #5 has been modified to reflect that boiler #5 has been converted from a dual-fuel boiler to a natural gas only boiler with a maximum heat input of 220 MMBtu/hr. The Department will update its emissions inventory to reflect these modifications.

This letter in no way grants immunity from legal action resulting from the failure of this source to remain in compliance with existing air pollution regulations, nor does it provide an exemption from compliance with future Federal, State or local laws.

If you have any questions concerning this notice, please contact Mr. Kevin J. O'Neil of my staff at (860) 424-4152.

11/1/12
Date


Macky McCleary
Deputy Commissioner

MM:kjo
cc: Chris Mulcahy, Air Technical Services
Robert Girard, Air Enforcement

Certified Mail

Pfizer Inc
445 Eastern Point Road MS9090-019
Groton, CT 06340



Pfizer Inc

Risk Management Services

BUREAU OF AIR MANAGEMENT
PERMIT SOURCE REVIEW / TITLE V

OCT 01 2012

September 17, 2012

Mr. Ric Pirolli
Assistant Director, Engineering
Bureau of Air Management
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

**Re: Modification of Boiler Registrations R-007, R-008, R-009, R-010 and R-012
Pfizer Inc, Groton, CT**

Dear Mr. Pirolli:

As noted in previous correspondences, the Pfizer Groton facility has been working on a number of projects to efficiently balance the energy supply (from on-site steam and electricity production) with the energy demands of the site, while minimizing the overall environmental impacts. One of the elements of this plan is the transition of fuel oil for Boilers #1 through #4 from the currently used 0.3% sulfur No. 6 residual fuel oil to 15 ppm sulfur ultra low sulfur diesel (ULSD) distillate fuel oil. Natural gas will continue to be a fuel for Boilers #1 through #4. The fuel oil transition is targeted to be completed late-2012, but there are some projects taking place that must be completed first, therefore, it is possible that No. 6 fuel oil could be used in 2013. A back up fuel oil is necessary during the fuel oil transition project in case of a natural gas curtailment or other interruptions of natural gas.

Boiler #5 has been switch to from a dual-fuel boiler to a natural gas only boiler when the fuel oil supply and burner components were removed from that unit. The work on Boiler #5 also included derating the maximum heat input from 400 MMBtu/hr to 220 MMBtu/hr.

All the changes presented above will not result in an increase of 15 tons per year of any pollutant, will not result in an increase of 10 tons per year of any one federal hazardous air pollutant and will not result in an increase of 25 tons per year of all federal hazardous air pollutants. Given the historical trends in the boiler fuel mix at the Groton facility, there is a strong likelihood that emissions will be reduced by this work.

Mr. Ric Pirolli
September 17, 2012

Modification of Boiler Registrations
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Therefore, Pfizer is requesting that the registrations for Boilers #1 through #5 be modified as follows:

Boilers #1 through #4 (R-007 through R-010, respectively) fuels will be

- Natural gas
- ULSD fuel oil
- No. 6 fuel oil (0.3% sulfur) on a temporary basis until the fuel oil transition project is complete, then removed upon notification by Pfizer

Boiler #5 (R-012) fuel will be

- Natural gas only, derated to 220 MMBtu/hr

In addition to these changes listed above that will be reflected in the site's Title V permit upon renewal, there will be other changes in the Title V associated with Boiler #5. This information is presented to document all the changes associated with Pfizer's boilers that will appear in the renewed Title V permit.

- Boiler 5 will no longer be a CAIR Unit (or post-CAIR Unit) due to the design capacity being less than 250 MMBtu/hr
- As a non-CAIR unit, RSCA 22a-174-22c or 22d will not apply
- Non-ozone season limit of 0.15 lb NO_x/MMBtu will not apply
- Boiler 5 NO_x emissions will be monitored in accordance with Part 60 requirements, instead of the Part 75
- Opacity monitoring per RSCA 22a-174-4(b) will not apply since liquid fuel capability has been removed and the design capacity is less than 250 MMBtu/hr

If you have any questions regarding this proposed fuel conversion, you may contact me at (860) 715-3862 or john.dunne@pfizer.com.

Sincerely,



John T. Dunne
Associate Director, Environmental