

PHILIP M. SMALL Counselor at Law direct dial: 860-509-6575 psmall@brownrudnick.com CityPlace I 185 Asylum Street Hartford Connecticut 06103 tel 860.509.6500 fax 860.509.6501

April 27, 2007

VIA EMAIL AND OVERNIGHT DELIVERY

Daniel F. Caruso Chairman Connecticut Siting Council Ten Franklin Square New Britain, CT 06051

> RE: Petition No. 805 – Ansonia Generation LLC petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction, maintenance, and operation of a 58.4-MW combined heat and power natural gas-fired electric generating facility and transmission line tap located at 75 Liberty Street, Ansonia, Connecticut

Dear Chairman Caruso:

On behalf of Ansonia Generation LLC ("AnGen"), enclosed are an original and fifteen (15) copies of AnGen's responses to the Connecticut Siting Council's pre-hearing interrogatories issued on April 13, 2007.

Please contact me with any questions concerning this filing.

Very truly yours,

BROWN RUDNICK BERLACK ISRAELS LLP

Philip M. Small

Enclosures

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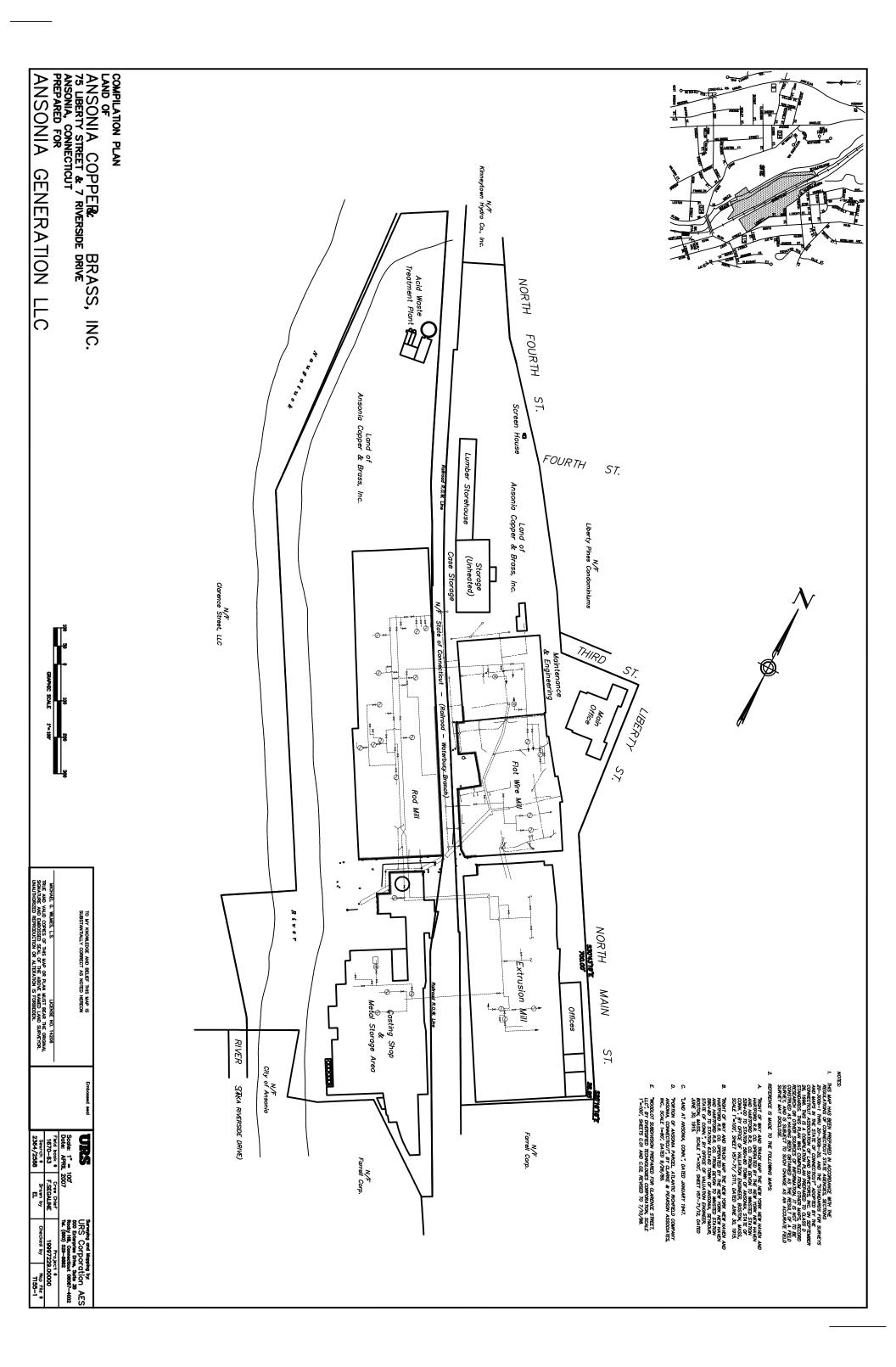
Ansonia Generation LLC Petition No. 805 Responsible Witness: Barry Baker/Douglas Roberts

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Q-CSC-1	Provide a detailed drawing of the Ansonia Copper & Brass property, with existing buildings shown.					
RESPONSE:	Please see the attached drawing entitled "Compilation Plan, Land of					

Ansonia Copper & Brass, Inc.," dated April 2007.



Ansonia Generation LLC Petition No. 805 Responsible Witness: Barry Baker/Douglas Roberts

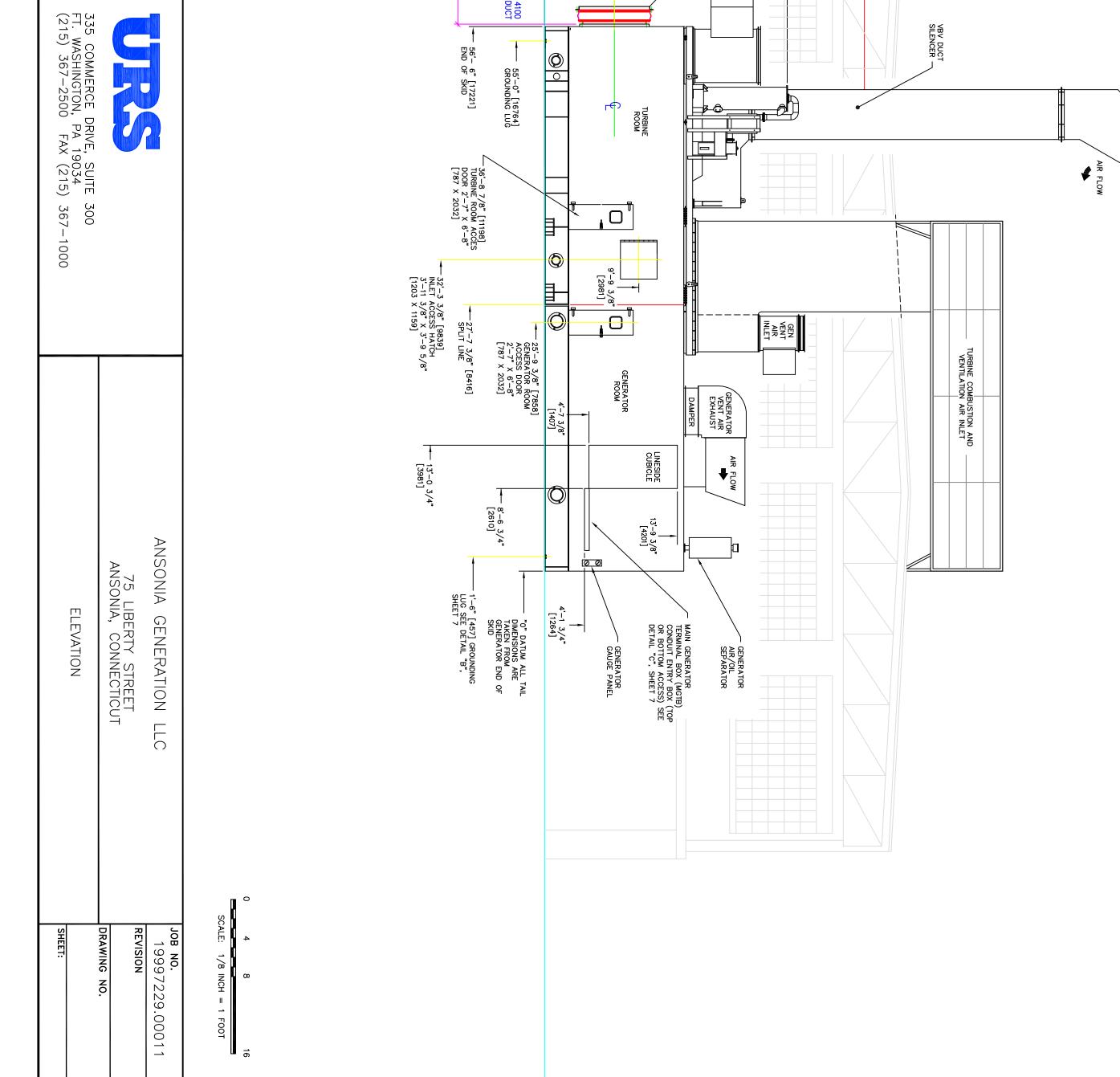
Connecticut Siting Council Pre-Hearing Interrogatories April 27, 2007

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Q-CSC-2	Provide detailed drawings of the proposed equipment and other project components.
RESPONSE:	Please see the attached: (i) elevation drawing; (ii) floor plan layout drawing; and (iii) elevation front and rear views drawing.

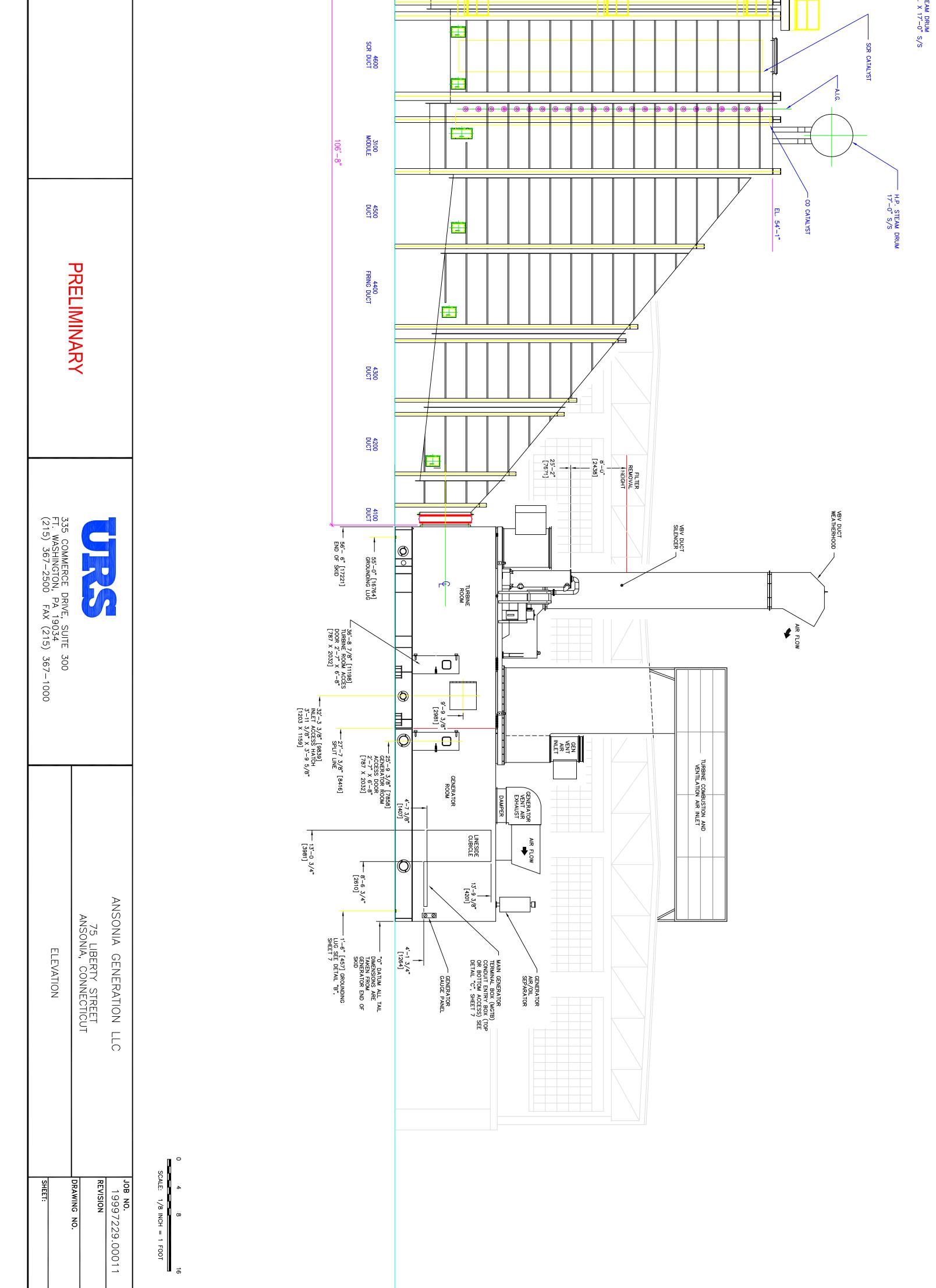
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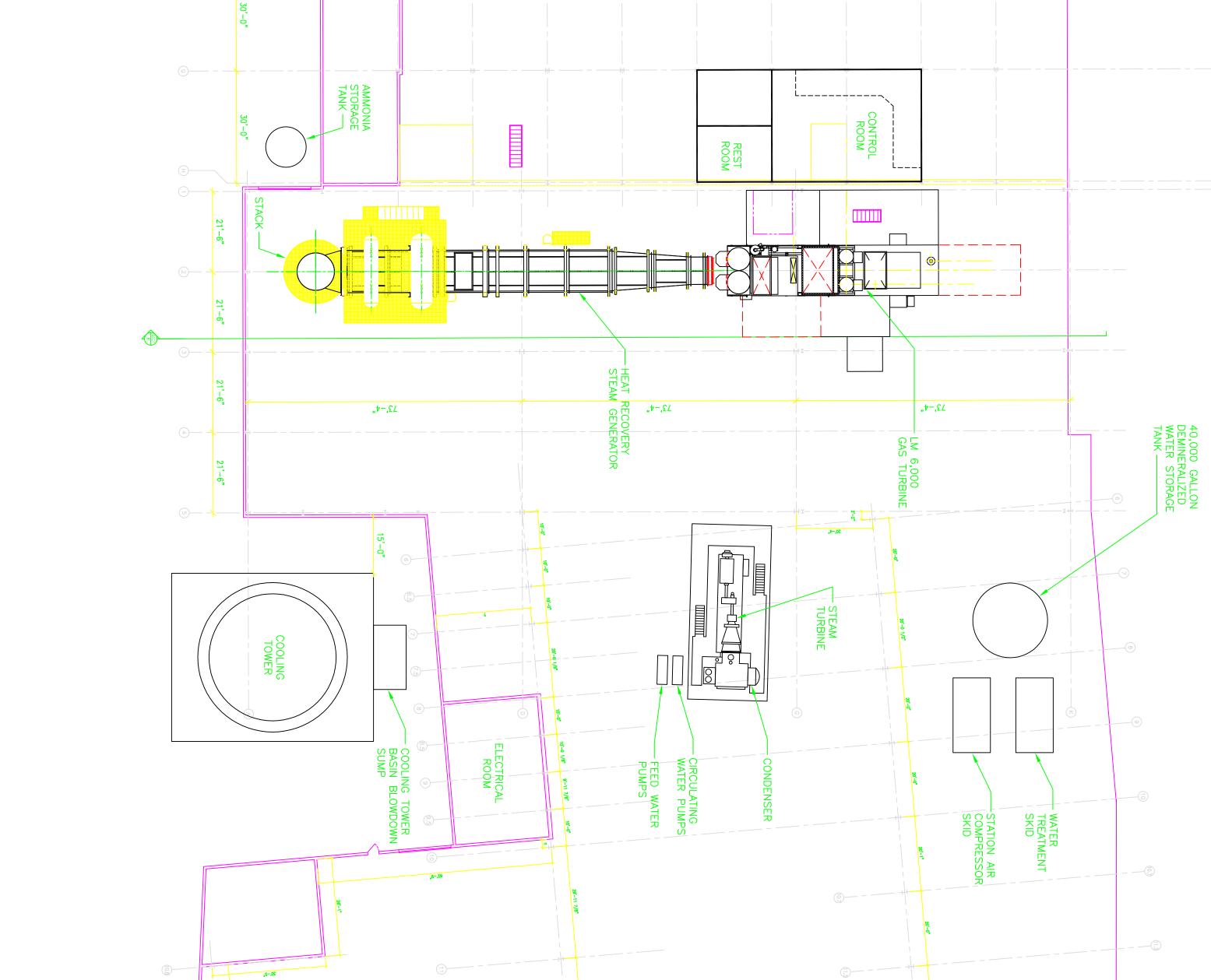


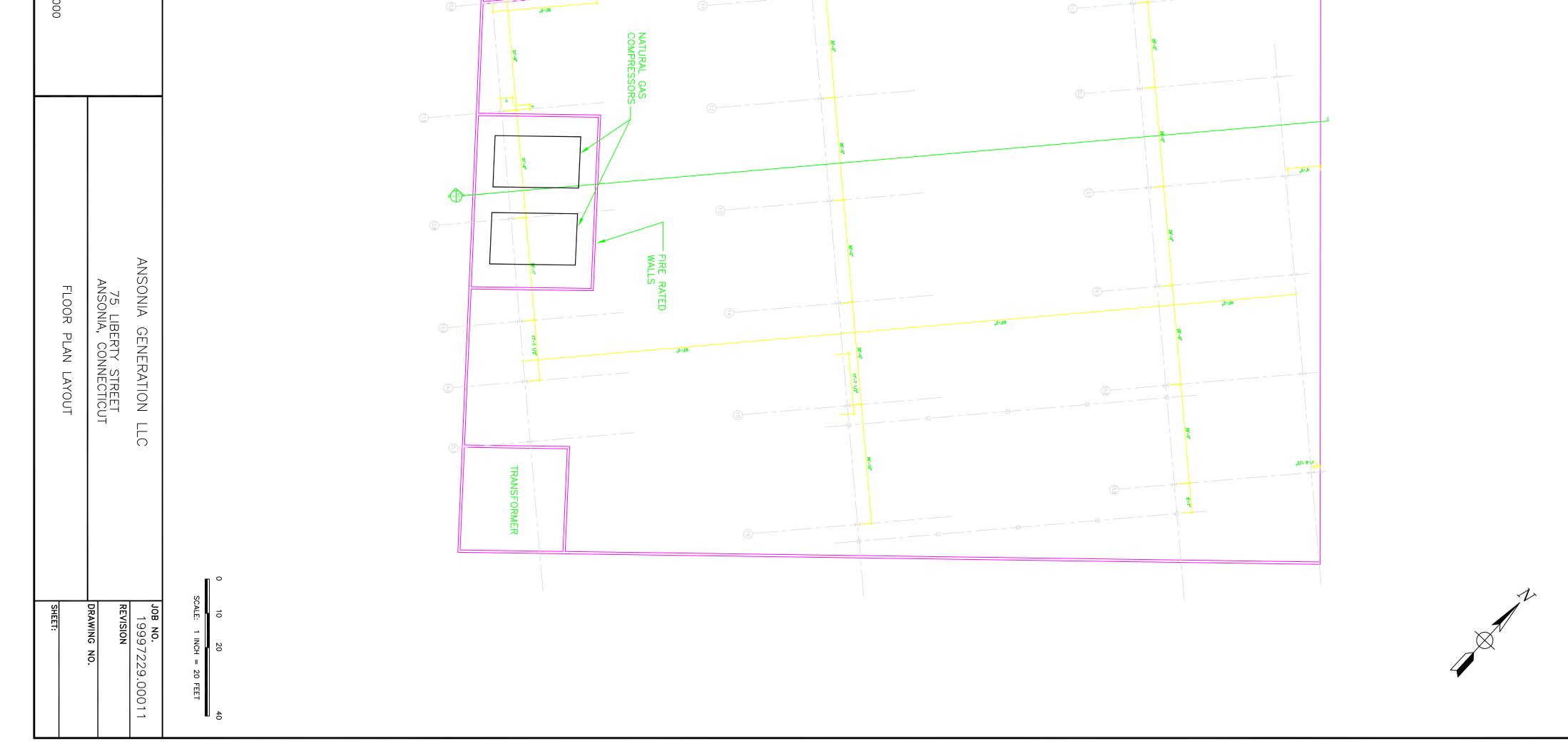
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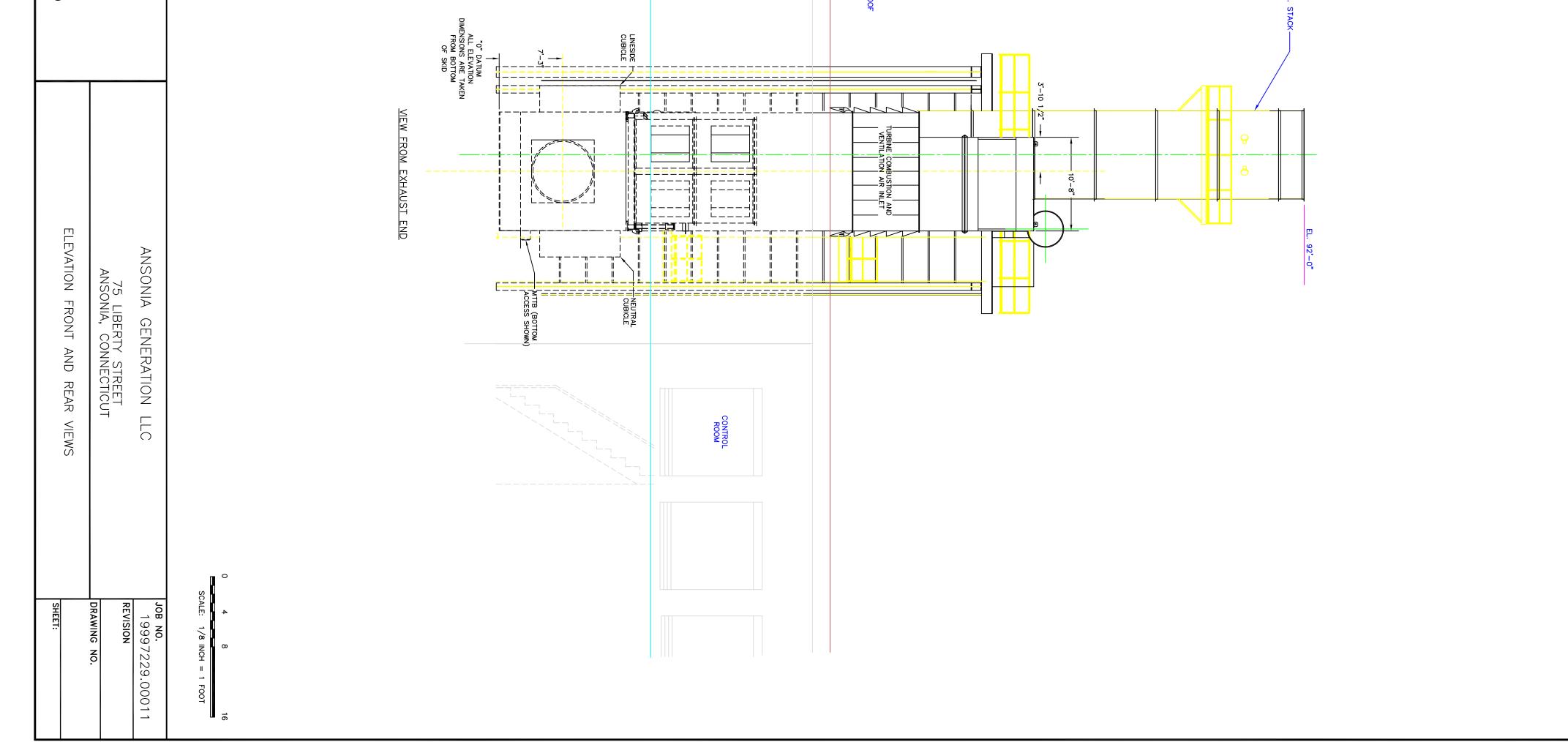






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Ansonia Generation LLC Petition No. 805 Responsible Witness: Raymond L. McGee

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Q-CSC-3	Would all existing equipment in the Flat Wire Mill building be removed for the installation of the proposed project?
DEGRONGE	

RESPONSE: Yes. The existing equipment will be relocated and re-used, sold to third parties, or scrapped.

Ansonia Generation LLC Petition No. 805 Responsible Witness: Nedal Deeb Connecticut Siting Council Pre-Hearing Interrogatories April 27, 2007

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Q-CSC-4	What is the total length of	f the proposed transmission	line tap?

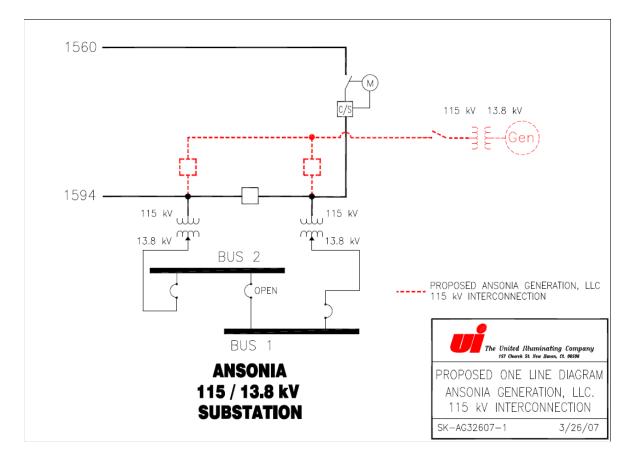
RESPONSE: The proposed transmission line tap is approximately 1,540 feet in length.

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Q-CSC-5 How many 115-kV lines will be installed for the proposed project?

RESPONSE: There will be one 115-kV line installed for the proposed project. The following schematic shows the one 115-kV line (in red and/or dashed) and the proposed transmission line tap at UI's Ansonia 115/13.8-kV Substation.



Ansonia Generation LLC Petition No. 805 Responsible Witness: Raymond L. McGee

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- Q-CSC-6 Did AnGen receive any comments from the Town of Ansonia or state or federal officials?
- **RESPONSE:** AnGen appeared before the City of Ansonia Planning and Zoning Commission on Monday, April 23, to discuss location approval for AnGen's facility. The primary concerns of the Commission were noise, air pollution, and visual impacts.

As to air emissions, the Commission suggested that a higher stack might be appropriate to mitigate local air impacts, despite the increased visual impact. The Commission also inquired about the plume from the facility's cooling tower.

As to noise, AnGen assured the Commission that it would meet all applicable state and local requirements, as well as taking additional reasonable steps to mitigate noise from the facility where appropriate. In addition, a neighboring resident attended and expressed concerns about noise. AnGen also committed to conduct pre- and postconstruction/operation noise monitoring.

The Commission also asked whether it would be preferable for the facility to discharge its wastewater directly to the Naugatuck River, rather than to the City's wastewater treatment facility.

AnGen committed to keep the City abreast of the progress of the facility, provide final drawings to the City engineer, provide information about ammonia storage for the selective catalytic reduction, and attend a meeting with the water pollution control authority on May 2 to discuss the facility's water discharge.

Attached is an article regarding AnGen's appearance before the Commission published in the *Connecticut Post Online* on April 23, 2007, entitled "P&Z holds electric generator plan Q&A."

In addition, over the past several months, AnGen's discussions regarding the proposed facility have included U.S. Representative Rosa DeLauro, the offices of U.S. Senators Christopher Dodd and Joseph Lieberman, Ansonia Mayor John Della Volpe, and State Representative Linda Gentile

P&Z holds electric generator plan Q&A

MELVIN MASON <u>mmason@ctpost.com</u> Connecticut Post Online

Article Last Updated:04/23/2007 11:00:41 PM EDT

ANSONIA — The Planning and Zoning Commission asked questions Monday evening about noise and emissions that may come from an electric generating facility being built by Ansonia Copper and Brass.

Officials from Ansonia Generation LLC met with the P&Z commission during a special session to lay out their plans to build a 58megawatt energy and steam facility on the ACB facility on Liberty Street.

Ansonia Copper & Brass and Sasco River Advisors LLC, in Southport, want to build the facility to help ACB save money on electrical costs. They have applied to the Connecticut Siting Council for a declaratory ruling that no certificate for environmental compatibility and public need is necessary for the facility. The facility would also need approval from the state Department of Environmental Protection.

Raymond McGee, president of Ansonia Copper and Brass, said a turbine would be placed inside of an 80,000-square-foot building on the campus.

P&Z chairman Bart Flaherty had the majority of the questions for McGee and others in the Ansonia Generation group. He worried about emissions that would come from the generator and how it could affect residents living near the ACB campus.

"What I want is the best available emissions standards," Flaherty said. "There's a difference between meeting and exceeding the regulations."

McGee said the generator would not produce a lot of noise off the ACB campus and that he would make all efforts to exceed state standards for emissions and noise, including investigating whether it might be better to increase the height of a smokestack, which is proposed at 92 feet. That's something Flaherty was happy to hear. "I appreciate your promise to exceed the state regulations. Ansonia Copper & Brass has always been a great neighbor," he said.

P&Z consultant Oswald Inglese asked about the generator's vulnerability to terrorism. McGee added that while he couldn't promise a "terror-proof" facility, it would be secured at all hours.

Flaherty also asked if the facility could shut down on hot days to reduce possible air quality impacts. Ted Verrill, president of Sasco River, said that likely wouldn't happen because more energy will be needed on warm days because of demands on the system.

"I can't pledge to shut it down," Verrill said.

Energy generated by the ACB project would power that plant and the rest would go into the state's power grid. The project may cost about \$75 million to complete, Verrill said, but it should save the company and other consumers money by providing more energy to the southern end of the state.

The siting council will host a hearing on ACB's request on May 9 in Ansonia. The company will also report its plans to the city's Water Pollution Control Authority.

The company will host an open house on the generator plan today at 6 p.m. at the ACB complex on Liberty Street.

Close Window Send To Printer

Ansonia Generation LLC Petition No. 805 Responsible Witness: Raymond L. McGee

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- Q-CSC-7 When did AnGen provide opportunity for local residents and businesses to meet with AnGen officials to discuss the facility, as stated on page 11 of the petition? What were the comments and results of that meeting?
- **RESPONSE:** AnGen held two "open house" meetings at the site on April 23 and April 24, 2007 to allow interested parties to discuss the facility. AnGen provided notice of the meetings by: (i) erecting a sign at the corner of Liberty and Third Streets at the facility site on April 16, 2007; and (ii) distributing flyers to neighboring residences and businesses on April 18, 2007. Copies of the text of the sign, a photo of the sign, and the flyer are attached.

Approximately five interested persons attended the April 24 meeting, including the Chairman of the City of Ansonia Planning and Zoning Board, a representative of the neighboring condominium association and news reporters. AnGen discussed the proposed facility with the attendees and displayed drawings of the proposed facility (substantially in the form of the drawings attached to Q-CSC-2). Commenters were interested in the amount of property taxes AnGen would pay to the City and the extent to which the proposed facility would be visible off-site. In addition, commenters were interested in whether the proposed AnGen facility stack could be made higher.

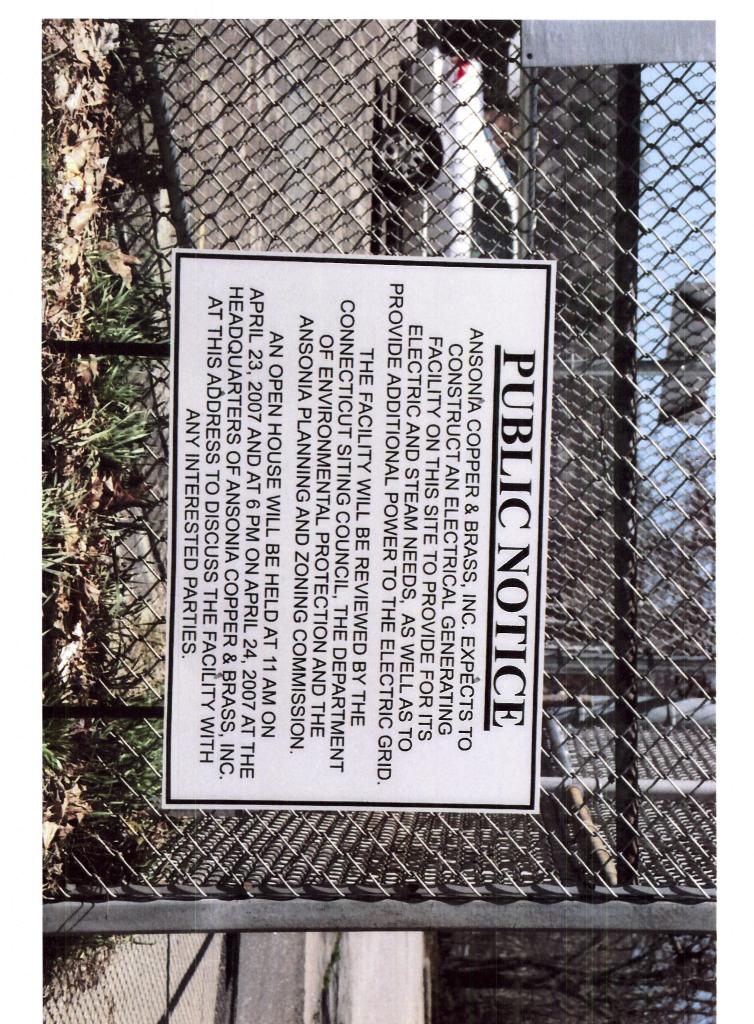
Attached is an article regarding AnGen's open house published in the *New Haven Register* on April 25, 2007, entitled "Ansonia generator plans outlined."

PUBLIC NOTICE

ANSONIA COPPER & BRASS, INC. EXPECTS TO CONSTRUCT AN ELECTRICAL GENERATING FACILITY ON THIS SITE TO PROVIDE FOR ITS ELECTRIC AND STEAM NEEDS, AS WELL AS TO PROVIDE ADDITIONAL POWER TO THE ELECTRICAL GRID.

THE FACILITY WILL BE REVIEWED BY THE CONNECTICUT SITING COUNCIL, THE DEPARTMENT OF ENVIRONMENTAL PROTECTION AND THE ANSONIA PLANNING AND ZONING COMMISSION.

AN OPEN HOUSE WILL BE HELD AT 11 AM ON APRIL 23, 2007 AND AT 6 PM ON APRIL 24, 2007 AT THE HEADQUARTERS OF ANSONIA COPPER & BRASS, INC. AT THIS ADDRESS TO DISCUSS THE FACILITY WITH ANY INTERESTED PARTIES.





April 16, 2007

Dear Neighbors,

I am writing to inform you of a very important and exciting development at Ansonia Copper & Brass, Inc. – the installation of a new electrical generation facility! The facility will generate steam and electricity, with all of the steam and a portion of the electricity used on site.

The facility will be fueled by clean-burning natural gas. In addition, the facility will utilize noisedampening technology and be housed predominantly within existing buildings. There will be minor protrusions of the facility through the roofline of these buildings and any new power lines required will follow the existing lines and towers to the Ansonia substation across the Naugatuck River. Given these constraints, the new facility should have little, if any, impact on the environment and the neighborhood.

We are currently in the process of securing the approval of the Connecticut Siting Council, the Department of Environmental Protection and the Ansonia Planning and Zoning Commission.

This new facility is very important to Ansonia Copper & Brass, Inc.'s long-term viability, given the need to better control the high electricity and steam costs of our manufacturing business. Furthermore, when this facility comes on-line in 2008, we may be able to expand our existing operations, as well as attract new manufacturing or commercial operations to our site. In addition to maintaining current jobs at Ansonia Copper & Brass, Inc., the new generating facility, our potential expansion and new operations should add significantly to employment, local merchant revenue and tax revenue for the local community.

If you have further questions about the new electric generating facility, we will be having an open house at Ansonia Copper & Brass, Inc., 75 Liberty Street, on April 23, at 11 AM and on April 24, at 6 PM.

Very truly yours,

Raymond L. McGee, President

NewHavenRegister.com

04/25/2007

Ansonia generator plans outlined

Elizabeth Benton , Register Staff

ANSONIA — Ansonia Copper & Brass President Ray McGee shed more light on a planned \$75 million power generator Tuesday night, promising the project at the Liberty Street plant would increase the company's taxes to the city by \$1.8 million.

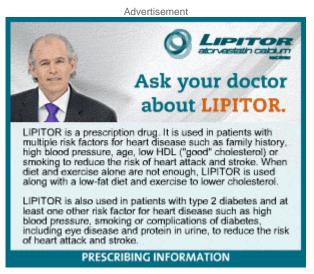
The company is already the city's second-largest taxpayer, paying around \$200,000 a year, McGee said.

McGee said he hopes to start building the 60-megawatt power generator in mid-August or September, and complete construction within 12 months.

Ten to 12 megawatts of power would be used at the plant itself, and the remaining power would be sold to utility companies. The power would be distributed to Ansonia and down through Fairfield County, helping reduce a 1,600-megawatt per hour power shortage in the state, McGee said.

The plans have already received approval from the state Department of Public Utility Control, but the state Siting Council still must sign off on the project. The council will hold a public hearing on the project from 3 to 7 p.m. May 9 at City Hall.

Planning and Zoning Commission Chairman Bart Flaherty and three people who said they lived nearby attended Tuesday's gathering at the plant. The meeting was the second of two held this week on the plans for the generator, but no one attended Monday's meeting, McGee said.



Flaherty said prior to Tuesday's meeting that he did not think the Siting Council had local concerns in mind, rather the larger issue of reducing the power shortage.

"I have concerns that it will be intrusive to the downtown area," Flaherty said of the generator. He said he would like to see safety and pollution requirements exceeded, not just met, noting high levels of asthma already affecting area people.

"(McGee) said he wanted to make this a world-class facility and go that extra mile. Intentions are always good, but when investors get involved, good intentions don't always translate into actions," he said.

McGee said Tuesday he was "committed to do what is right and proper for this town."

"My objective is to make this a showcase," he said.

The generator itself is expected to take up 10,000 square feet inside a 180,000-square-foot building. There will be a 92-foot-high exhaust stack connected to the generator, about 50 feet shorter than a stack already at the plant.

McGee said the generator is "the most advanced gas-powered turbine generator they make."

Ansonia Copper & Brass laid off 76 employees earlier this month, and McGee said Tuesday that money generated from the new plant could allow the company to rehire some workers. The prospect of an on-site generator has also made vacant property at the plant complex more attractive to businesses, McGee said.

While a signed letter of intent from motor-scooter company Eurospeed has lapsed, McGee said three large database companies are now interested in the property.

Elizabeth Benton can be reached at 789-5714 or ebenton@nhregister.com.

Ansonia Generation LLC Petition No. 805 Responsible Witness: Barry Baker/Douglas Roberts

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- Q-CSC-8 Has AnGen confirmed with the Connecticut Department of Environmental Protection that there are no known threatened or endangered animal or plant species or significant habitats (as stated on page 14 of the petition)? If so please submit correspondence.
- **RESPONSE:** AnGen has sent letters requesting endangered animal or plant species review to both the Connecticut Department of Environmental Protection ("DEP") and the U.S. Fish and Wildlife Service ("USFWS") (copies attached). AnGen received the attached response from USFWS, dated April 20, 2007, confirming that "no federally-listed or proposed, threatened or endangered species or critical habitat under the jurisdiction of the [USFWS] are known to occur in the project area(s)." AnGen anticipates receiving a similar response from the DEP prior to the May 9 hearing and will file that response with the Siting Council.



March 23, 2007

Wildlife Division Bureau of Natural Resources Connecticut Department of Environmental Protection 79 Elm Street, 6th Floor Hartford, CT 06106-5127

Dear Sir or Madam:

I am writing to request written confirmation from the Bureau of Natural Resources regarding the absence of state listed threatened and endangered species, species of special concern and habitats of special value in the vicinity of our project site. A review of the agency's Natural Diversity Database Map (State and Federal Listed Species and Significant Natural Communities) for Ansonia, Connecticut, updated December 2006, indicated the absence of listed species/communities in the vicinity of the site.

The project site is located on zoned industrial land on the eastern bank of the Naugatuck River in Ansonia, New Haven County. A gas-fired power plant is being proposed for construction reusing existing industrial space. A transmission line will extend likely above ground to an existing substation on the west side of the Naugatuck River.

Attached to this letter are a topographic map that specifies the location of the project site, a more detailed proposed site map and a copy of the Ansonia Natural Diversity Database map.

If you have any questions, please do not hesitate to contact me at 215-367-2472.

Regards,

utrant

Katie Eberhart Ecologist

Attachments

URS Corporation 335 Commerce Drive, Suite 300 Fort Washington, PA 19034-2623 Tel: 215.367.2500 Fax: 215.367.1000



March 23, 2007

United States Fish and Wildlife Service 70 Commercial Street, Suite 300 Concord, NH 03301-5087

Dear Sir or Madam:

I am writing to request a search of the natural history database for information regarding the presence of federally listed threatened, endangered or rare species, species of special concern and habitats of special value for a site in Ansonia, Connecticut. The project site is located on zoned industrial land on the eastern bank of the Naugatuck River. A gasfired power plant is being proposed for construction on the Naugatuck River reusing existing industrial space. A transmission line will extend likely above ground to an existing substation on the west side of the Naugatuck River.

The site is located in Ansonia, New Haven County, Connecticut. Attached to this letter are a topographic map outlining the project location and a more detailed proposed site map.

If you have any questions, please do not hesitate to contact me at 215-367-2472.

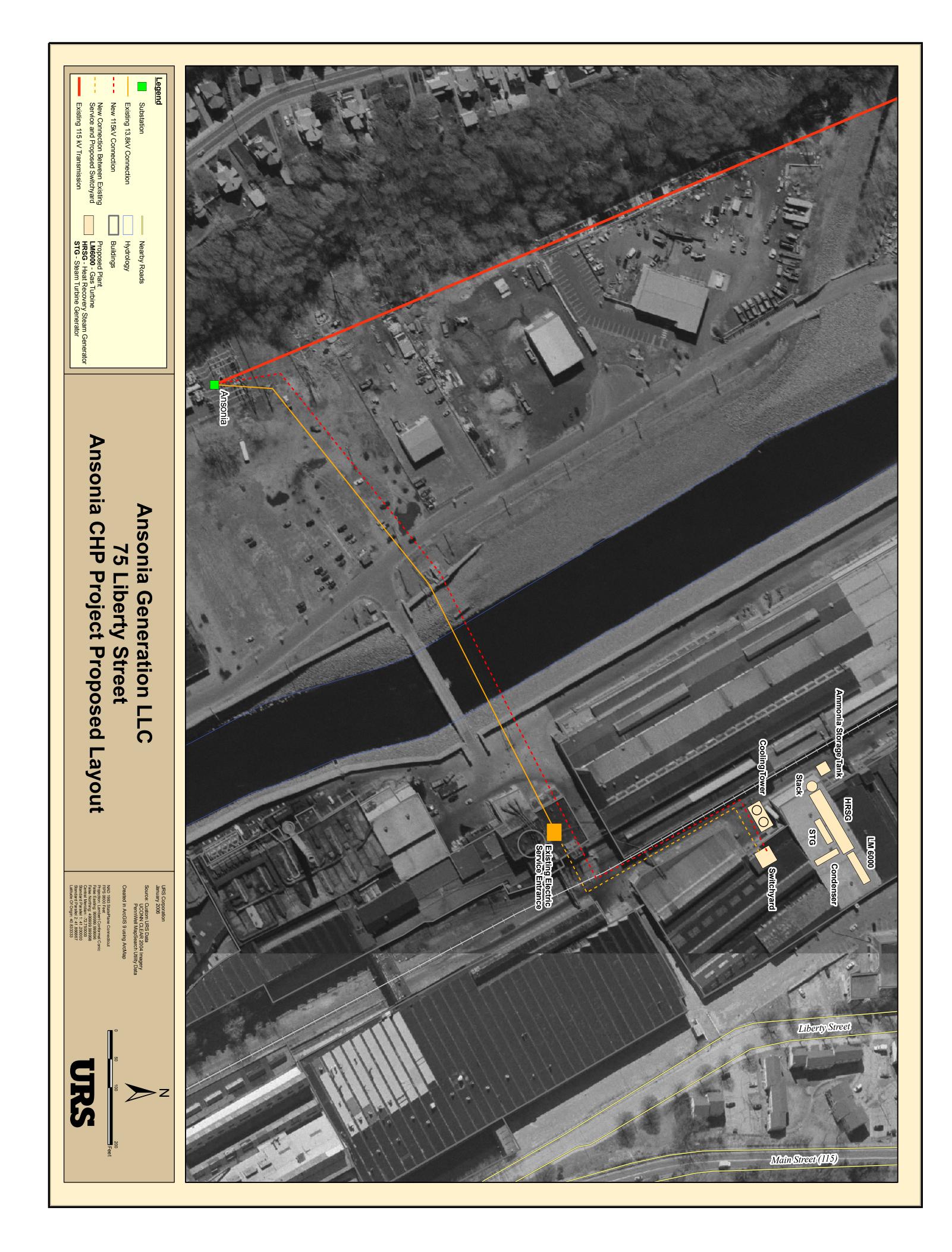
Regards,

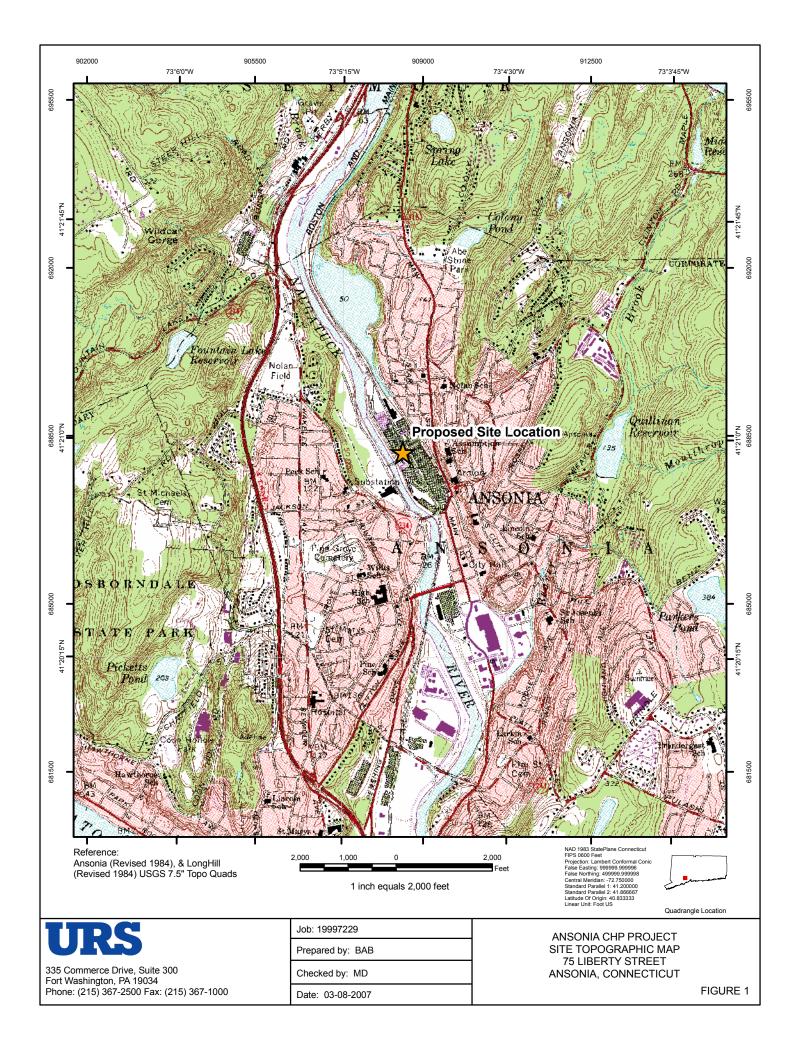
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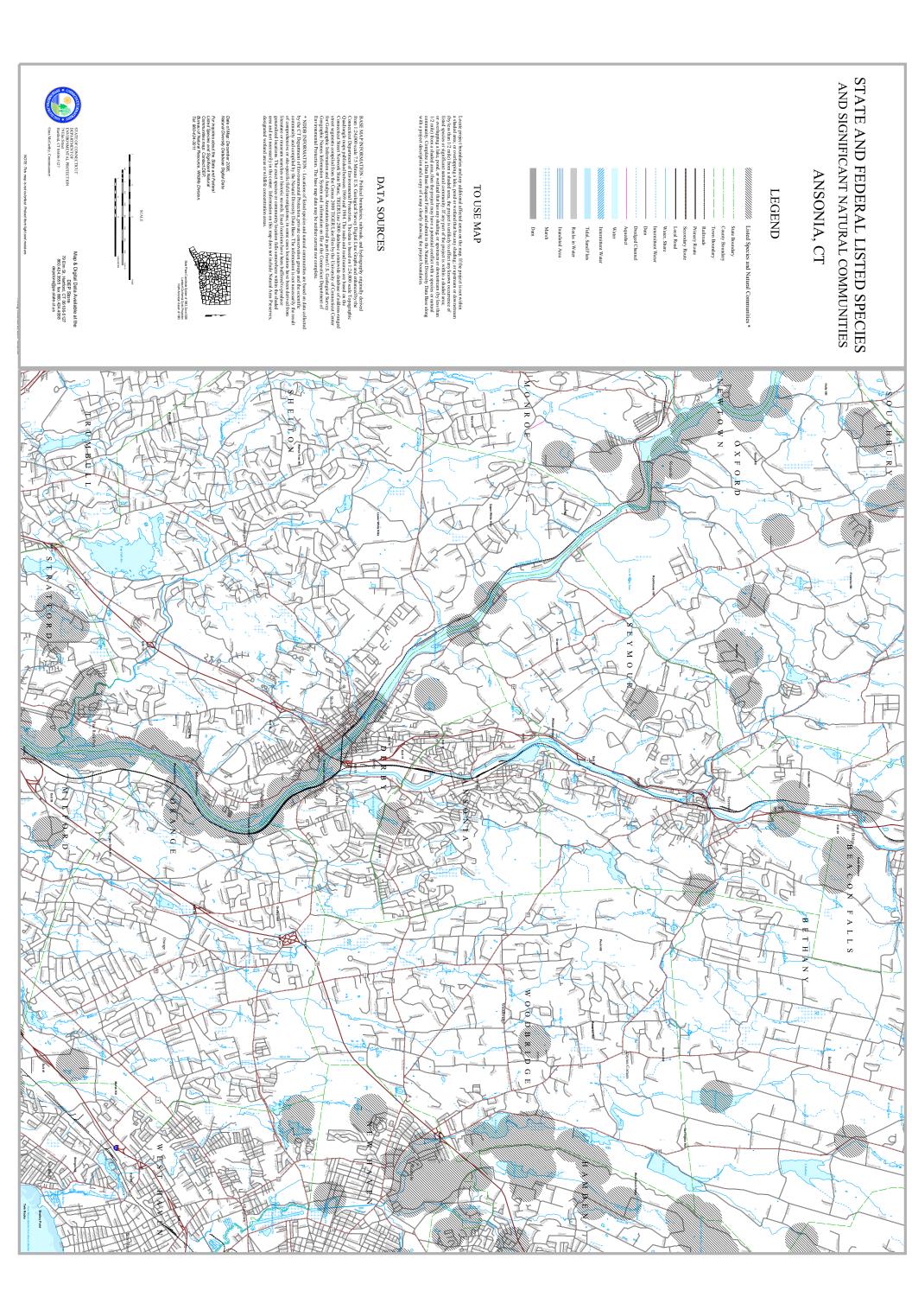
Katie Eberhart Ecologist

Attachment

URS Corporation 335 Commerce Drive, Suite 300 Fort Washington, PA 19034-2623 Tel: 215.367.2500 Fax: 215.367.1000









United States Department of the Interior

FISH AND WILDLIFE SERVICE

New England Field Office 70 Commercial Street, Suite 300 Concord, New Hampshire 03301-5087



April 20, 2007

Reference:

Project Gas-fired power plant, transmission line

<u>Location</u> Ansonia, CT

Katie Eberhart URS Corporation 335 Commerce Drive, Suite 300 Fort Washington, PA 19034-2623

Dear Ms. Eberhart:

This responds to your recent correspondence requesting information on the presence of federallylisted and/or proposed endangered or threatened species in relation to the proposed activity(ies) referenced above.

Based on information currently available to us, no federally-listed or proposed, threatened or endangered species or critical habitat under the jurisdiction of the U.S. Fish and Wildlife Service are known to occur in the project area(s). Preparation of a Biological Assessment or further consultation with us under Section 7 of the Endangered Species Act is not required.

This concludes our review of listed species and critical habitat in the project location(s) and environs referenced above. No further Endangered Species Act coordination of this type is necessary for a period of one year from the date of this letter, unless additional information on listed or proposed species becomes available.

Thank you for your coordination. Please contact us at 603-223-2541 if we can be of further assistance.

Sincerely yours,

Anthony P. Tur Endangered Species Specialist New England Field Office

Ansonia Generation LLC Petition No. 805 Responsible Witness: Barry Baker/Douglas Roberts

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Q-CSC-9 Has AnGen confirmed with the Connecticut Historical Commission that there are no known areas of historic or prehistoric significance (as stated on page 14 of the petition)? If so please submit correspondence.
RESPONSE: Mr. David Poirier, a staff archaeologist at the Connecticut State Historic Preservation Office conducted a site walkover and review of the Ansonia Copper & Brass facility on Tuesday, April 17, 2007. An email from Mr. Poirier, dated April 19, 2007, is attached, in which Mr. Poirier: (i) writes that a "no adverse effect" determination is expected to be signed and posted during the week of April 23, 2007, and (ii) requests that AnGen implement three mitigative measures set forth in the attached email, each of which AnGen has agreed to complete. AnGen will provide the Council with a copy of Mr. Poirier's "no adverse effect" determination.

To Zana_Wolf@URSCorp.com

04/19/2007 08:23 AM

cc

Subject Ansonia cogeneration facility

----- Forwarded by Zana Wolf/Burlington/URSCorp on 04/19/2007 08:32 AM -----

Zana,

SHPO has drafted a "no adverse effect" determination which will be signed & posted early next week. SHPO's comments are conditional upon the professional implementation of the below-noted mitigative measures.

Dave Poirier

Staff Archaeologist

Conn. SHPO

Mitigative measures:

 o Prior to adaptive use-related activities, Ansonia Generation LLC and/or URS Corporation shall document Ansonia Copper & Brass to the professional standards of the State Historic Preservation Office.
 Documentation shall consist of narrative text, photographs and/or highquality digital images, an index of photographs, and a photographic site plan. Photographic coverage should include exterior and interior perspectives and pertinent details including extant machinery, production lines and work spaces. Final documentation shall be provided to the State Historic Preservation Office for permanent archiving and public accessibility.

o Ansonia Generation LLC and/or URS Corporation shall provide, if available, copies of any published corporate history, the production/process book, and the equipment/machinery auction catalog for Ansonia Copper & Brass the State Historic Preservation Office

o Ansonia Generation LLC and/or URS Corporation shall prepare and submit a brief history and description of Ansonia Copper & Brass, including project-related information, photographs and maps, to the *Society for Industrial Archeology New England Chapters Newsletter*.

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- **Q-CSC-10** What are the hourly and annual National Ambient Air Quality Standard thresholds for each of the pollutants listed in Table 1?
- **RESPONSE:** Prevention of Significant Deterioration (PSD) review (40 CFR 52.21) is a federally mandated program that applies to new major sources of regulated pollutants and major modifications to existing sources. PSD review is a pollutant specific review that applies only to those pollutants for which a project is considered major and the project area is designated as attainment or unclassified.

PSD applies only to "major" new sources or "major" modifications to an existing "major" source. The PSD regulations define a "major" stationary source as either one of the 28 source categories identified in 40 CFR 52.21 which has a potential to emit 100 tons or more per year of any regulated pollutant, or any other stationary source which has the potential to emit 250 tons or more per year of a regulated pollutant. One of the listed 28 categories is "fossil fuel-fired steam electric plants". Because the Project will incorporate a steam cycle, it is one of the 28 source categories; therefore, PSD applicability is triggered at 100 tons per year (tpy) potential emission level of any PSD pollutant.

Potential to emit (PTE) is determined on an annual basis after the application of pollution control equipment or any other federally enforceable restrictions. The PTE includes emissions from all sources at the facility and for listed source categories such as the proposed project, fugitive emissions. Project annual emissions of all criteria pollutants is less than 100 tpy, therefore, the Project is not subject to PSD review.

For a new major source (i.e., a new project with a PTE for any regulated pollutant greater than the 100/250 tpy threshold) or a modification to an existing major source, the EPA has identified a set of significant emission rate thresholds. Any pollutant with a net emissions increase greater than these thresholds is also subject to PSD review.

The PSD significant emission rate thresholds are provided in Table 1. Table 1 also compares the Project's annual PTE to the PSD significant emission rate thresholds. As shown in Table 1 below, the Project's PTE is less than the 100 tpy applicability threshold for new sources and also less than the significant emission rate thresholds for each PSD regulated pollutant.

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Air Pollutant	PSD Significant Emission Levels (tpy)	Proposed Project PTE (tpy)
Carbon Monoxide	100	16.2
Nitrogen Oxides (as an ozone precursor)	25	18.8
Nitrogen Oxides (NOx National Ambient Air Quality Standard)	40	18.8
Sulfur Dioxide	40	4.8
Particulate Matter	25	20.6
PM10	15	20.6
Volatile Organic Compounds	25	3.5
Hydrogen Sulfide (H2S)	10	NA
Total Reduced Sulfur (including H2S)	10	NA
Reduced Sulfur Compounds (including H2S)	10	NA
Sulfuric Acid Mist	7	2.2
Fluorides	3	NA
Lead	0.6	< 0.1
Mercury	0.1	NA
Municipal Waste Combustor Organics (measured as total tetra-through octa-chlorinated dibenzo-p- dioxins and dibenzofurans)	3.5 x 10-6	NA
Municipal Waste Combustor Metals (Measured as particulate matter)	15	NA
Municipal Waste Combustor Acid Gases (Measured as sulfur dioxide and hydrogen chloride)	40	NA

Table 1: PSD Significant Emission Rates