#### **MODIFIED**

on August 8, 2023 by Christina Kielczewska

## REGISTRATION CERTIFICATE EPAC-10 REV. 7-73



## STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



STACK NO. 00701000511

EQUIPMENT CLASSIFICATION  FUEL BURNING INCINERATOR	PROCESS MFG.	AIR POLLUTION CONTROL	REGISTRATION NO. 0070074
FIRM NAME ELECTRIC BOAT DIVISION			12/05/73
LOCATION OF EQUIPMENT (No. & Street, Town, Zip) EASTERN POINT ROAD	GROTON	CONN 06340	
COMMISSIONER OR HIS REPRESENTATIVE			

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEPARTMENT OF ENVIRONMENTAL PROTECTION

# REGISTRATION CERTIFICATE EPAC-10 REV. 7-73



# Electric Bout Corp



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ENGINEER: WES DI	ATE: 6/12/7/	AIR POLLUTION CONTROL	DATE ISSUED 12/05/7
FOUIPMENT CLASSIFICATION INCINERATOR	MFG.		12703
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#### MEMORANDUM

DATE: May 23, 2023

TO: Tracy Babbidge, Acting Deputy Commissioner

Paul Farrell, Acting Bureau Chief

FROM: Christina Kielczewska, APCE

Lakiesha S. Christopher, Supervising APCE

Jaimeson Sinclair, Director

SUBJECT: Modification of Registration No(s). 070-0057-R and 070-0074-R for two boilers located

at Electric Boat Corporation in Groton

#### **DISCUSSION:**

Electric Boat Corporation (EBC) submitted a request to modify Registration No(s). 070-0057-R for a 200 BHP Superior Fire Tube Boiler (North Yard Boiler #1, EU-19) and 070-0074-R for a 250 BHP Superior fire tube boiler (South Yard Boiler #2, EU-23) in a letter dated February 15, 2022. The changes requested, which occurred in or around 1995 and involved conversions from No.4 fuel oil to natural gas for North Yard Boiler #1 and to natural gas and No. 2 fuel oil for South Yard Boiler #2, are exempt from permitting under the provisions of RCSA Sections 22a-174-3a(a)(2)(A)(iii) and (iv):

Registration No. 070-0057-R, 200 BHP Superior Fire Tube Boiler (North Yard Boiler #1)

	Current	Modified
Fuel	No. 4 Fuel	Natural Gas
Annual Usage	170,000 gal	428,000 ccf
Maximum Firing Rate/Heat	55 gal/hr	8400 cf/hr
Input	7.99 MMBtu/hr	8.7 MMBtu/hr
Type of Oil Burner	Rotary Cup	N/A
Burner Manufacturer	Superior Combustion Industries	Superior Combustion, Inc.
Burner Model No.	BRgH-6	AB-LN-200-GAA4
Breaching Gas Temperature	480°F	350°F
Fuel Supplier	Hess Oil Co.	Eversource
Burner Equipment: Oil Heaters	Present	N/A
Oil Temperature Before Injection	110 °F	N/A
Stack Height	40 ft	50 ft

Registration No. 070-0074-R, 250 BHP Superior Fire Tube Boiler (South Yard Boiler #2)

	Current	Modified
Fuel	No. 4 Fuel	Natural Gas, No. 2 Fuel Oil
Annual Usage	460,000 gal	Natural Gas: 535,000 ccf
		No. 2 Fuel Oil: 383,000 gal
Maximum Firing Rate	71 gal/hr	Natural Gas: 10500 cf/hr

		No. 2 Fuel Oil: 75.2 gal/hr
Maximum Heat Input	10.5 MMBtu/hr	Natural Gas: 10.9 MMBtu/hr
		No. 2 Fuel Oil: 10.4 MMBtu/hr
Type of Oil Burner	Rotary Cup	No.2 Fuel Oil: Air Atomizer
Burner Manufacturer	Superior Combustion Industries,	Superior Combustion, Inc.
	Inc.	
Burner Model No.	BRgH-6	AB-LN-250-GAA4
Breaching Gas Temperature	480°F	350°F
Fuel Oil Sulfur Content	0.48%	0.015%
Fuel Oil Ash Content	0.03%	0%
Seasonal Use	Jan-Jan	Sept-May
Fuel Supplier	Hess Oil Co.	No.2 Fuel Oil: Saveway Petroleum
		Natural Gas: Eversource
Burner Equipment: Oil Heaters	Present	None
Oil Temperature Before Injection	110-190 °F	N/A
Operating Hours	Not Specified	5760 hours

#### Note:

- ft3/hr ratings were calculated using 1040 Btu/ft3
- gal/hr ratings were calculated using 138,300 Btu/gal

Neither the fuel conversions, the updated burners, nor any other updated operating parameters or equipment specifications for each boiler in the table above increase actual emissions of any individual air pollutant by fifteen (15) tons or more per year. Additionally, neither boiler as modified has potential emissions greater than 15 tons per year of any regulated air pollutant.

The most recent stack testing for NOx for the two units, conducted March 15-17th, 2022 and accepted by the Source Emissions Monitoring Group, included the use of the updated fuels and maximum rated heat capacities. Field enforcement was contacted and deemed an inspection of the source is not necessary for these registration modifications at this time.

Modifications of registrations issued pursuant to the former RCSA §22a-174-2 have been done in the past (US Army Stratford Army Engine, 2008; Sikorsky Aircraft Corporation, 2012 and 2017; Allnex USA Inc., 2016) pursuant to the Rules of Practice and a process derived from discussions between the Engineering and Enforcement Sections and the Attorney General's office.

The compliance record was reviewed in accordance with the Environmental Compliance History Policy. Agency records, including the SIMS Enforcement database, were reviewed for information to evaluate the applicant's compliance history and the relevance of such history to the revocation being sought. Additionally, a review of air program compliance was requested from the Enforcement Section and that response forms a part of this record.

#### RECOMMENDATION:

Based on the information submitted by the applicant, this engineering evaluation and the compliance history review, it is recommended that Registration No(s). 070-0057-R and 070-0074-R be modified as requested.

/s/Christina Kielczewska	06/27/2023
Christina Kielczewska, APCE II	Date
REVIEW:	
Lakiesha Christopher	6/28/2023
Lakiesha S. Christopher, Supervising APCE	Date
0.	07/05/2022
Jaimeson Sinclair, Director	07/05/2023 Date
Janneson Sincian, Director	Date



Mr. Michael Sinko Sr. Manager, Environmental Resources Electric Boat Corporation 75 Eastern Point Road Groton, CT 06340 msinko@gdeb.com

RE: Modification of Registration No(s). 070-0057-R and 070-0074-R for two boilers located at Electric Boat Corporation in Groton

Dear Mr. Sinko:

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 February 15, 2022, the DEEP Bureau of Air Management Registration(s) 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 Section 22a-3a-6(i). The registration(s) have been modified as follows:

Registration No. 070-0057-R, 200 BHP Superior Fire Tube Boiler (North Yard Boiler #1)

	Current	Modified
Fuel	No. 4 Fuel	Natural Gas
Annual Usage	170,000 gal	428,000 ccf
Maximum Firing Rate/Heat	55 gal/hr	8400 cf/hr
Input	7.99 MMBtu/hr	8.7 MMBtu/hr
Type of Oil Burner	Rotary Cup	N/A
Burner Manufacturer	Superior Combustion Industries	Superior Combustion, Inc.
Burner Model No.	BRgH-6	AB-LN-200-GAA4
Breaching Gas Temperature	480°F	350°F
Fuel Supplier	Hess Oil Co.	Eversource
Burner Equipment: Oil Heaters	Present	N/A
Oil Temperature Before Injection	110 °F	N/A
Stack Height	40 ft	50 ft

Registration No. 070-0074-R, 250 BHP Superior Fire Tube Boiler (South Yard Boiler #2)

	Current	Modified
Fuel	No. 4 Fuel	Natural Gas, No. 2 Fuel Oil
Annual Usage	460,000 gal	Natural Gas: 535,000 ccf

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Burner Manufacturer	Superior Combustion Industries,	Superior Combustion, Inc.
	Inc.	
Burner Model No.	BRgH-6	AB-LN-250-GAA4
Breaching Gas Temperature	480°F	350°F
Fuel Oil Sulfur Content	0.48%	0.015%
Fuel Oil Ash Content	0.03%	0%
Seasonal Use	Jan-Jan	Sept-May
Fuel Supplier	Hess Oil Co.	No.2 Fuel Oil: Saveway Petroleum
		Natural Gas: Eversource
Burner Equipment: Oil Heaters	Present	None
Oil Temperature Before Injection	110-190 °F	N/A
Operating Hours	Not Specified	5760 hours

#### Note:

- ft3/hr ratings were calculated using 1040 Btu/ft3
- gal/hr ratings were calculated using 138,300 Btu/gal

The DEEP will update its emissions inventory to reflect these modifications.

This letter in no way grants immunity from legal action resulting from the failure of these sources 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 Ms. Christina Kielczewska of my staff at Christina. Kielczewska@ct.gov or 860-424-3923.

August 8, 2023
Date

Tracy . Babbidge, Esq. Acting Deputy Commissioner

cc: Richard Rodrigue, Air Engineering Keith Hill, Air Enforcement

David Kurtz, Electric Boat Corporation; <a href="mailto:dkurtz@gdeb.com">dkurtz@gdeb.com</a>

Sent Via Electronic Mail