




**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	RTX Corporation, Pratt & Whitney Division
Address	1 Aircraft Road, Middletown, CT 06457
Equipment Location	1 Aircraft Road, Middletown, CT 06457
Equipment Description	Gas Turbine Drive Engine
Town-Permit Numbers	104-0027
Premises Number	0007
Stack Number	114
Modification Issue Date	December 6, 2023
Prior Permit Issue Date	Minor Modification: 05/03/2022 Revision: 04/10/1996 Original Permit: 12/21/1982
Expiration Date	None

for 
 Katherine S. Dykes
 Commissioner

December 6, 2023
 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

RTX Corporation, Pratt & Whitney Division operates a FT-4C free turbine industrial drive engine which is used to drive compressors to support test cell operation.

B. Equipment Design Specifications

1. Drive Engine/Free Turbine
 - a. Maximum Fuel Firing Rate (lb/hr): 18,400
 - b. Maximum Gross Heat Input (MMBTU/hr): 369.1

C. Stack Parameters

1. Minimum Stack Height (ft): 70
2. Minimum Exhaust Gas Flow Rate at 100% load (acfm): 307,000
3. Minimum Stack Exit Temperature at 100% load (°F): 700
4. Minimum Distance from Stack to Nearest Property Line (ft): 1,900

PART II. OPERATIONAL CONDITIONS

A. Equipment

1. Drive Engine/Free Turbine
 - a. Fuel Type: Jet A
 - b. Maximum Fuel Consumption over any Consecutive 12 Month Period (gal): 937,334
 - c. Maximum Distillate Fuel Oil Sulfur Content (% by weight, dry basis): 0.1%
 - d. Maximum Daily Hours of Operation: 14

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 and Non-Criteria Pollutants

Pollutant	lb/MMBtu	TPY
PM ₁₀	0.033	2.1
PM _{2.5}	0.033	2.1
SO ₂	0.1	6.3
NO _x	0.904	57.2
VOC	0.003	0.2
CO	0.057	3.6
Pb	1.4E-5	9.0E-4
Sulfuric Acid	1.8E-3	1.14E-1

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 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:

- *PM_{10/2.5}, NO_x, CO, VOC: Wood Group Pratt & Whitney Industrial Turbine Services, LLC, letter dated April 4, 2022*
- *SO₂: Calculated from sulfur content of fuel – 135(S) lb/1000 gal, where (S) is the maximum percent sulfur content by weight*
- *Pb: AP-42, fifth edition, Table 3.1-5, April 2000*
- *Sulfuric Acid: Calculated from sulfur content of fuel – 2.45(S) lb/1000 gal, where (S) is the maximum percent sulfur content by weight*
- *Jet A: 135,000 Btu/gal (HHV); Density – 6.73 lb/gal*

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

The Permittee shall use a non-resettable totalizing fuel metering device or billing meters to continuously monitor fuel feed to this source.

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 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 maintain records of the sulfur content of Jet A fuel combusted. A written certification or a written contract with a fuel supplier is sufficient to satisfy this requirement if the certification or contract identifies:
 - a. The name of the fuel seller;
 - b. The type of fuel purchased;
 - c. The sulfur content of the fuel purchased; and
 - d. The method used to determine the sulfur content of the fuel purchased.

3. The Permittee shall calculate and record the monthly and consecutive 12 month PM₁₀, PM_{2.5}, SO₂, NO_x, VOC, CO, Pb, and sulfuric acid emissions in units pounds or 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 keep records, when the drive engine is temporarily replaced with another drive engine for routine maintenance and repair, to include the following:
 - a. The dates of removal and reinstallation;
 - b. The reason for the temporary replacement;
 - c. Documentation that the replacement unit is the same make and model number as permitted in Part V.D of this permit; and
 - d. Documentation that the replacement unit does not result in an increase in emissions.
5. 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 exceedance of an operating parameter, and shall identify the cause or likely cause of such exceedance, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows:
 - a. For any hazardous air pollutant, no later than 24 hours after such exceedance commenced; and
 - b. For any other regulated air pollutant or operating parameter, no later than ten days after such exceedance commenced.
2. The Permittee shall notify the commissioner in writing of any malfunction of the drive engine/free turbine that results in an emission exceedance. 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. 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 equipment, 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 immediately institute shutdown of the drive engine/free turbine in the event a malfunction cannot be corrected within three hours.
- D.** During periods of routine maintenance or repair purposes, the Permittee may temporarily replace this unit with an identical or similar FT-4C model, including all sub-models, providing that the emissions rates are less than or equal to the emissions rates found in Part III of this permit.

PART VI. SPECIAL REQUIREMENTS

A. 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 pollutant(s), 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 a sample calculation(s).
 - 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 emissions 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 VI.A.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.

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 VII. 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 the 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; Enforcement Division; Bureau of Air Management; Department of Energy and Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.