

**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	Sikorsky Aircraft Corporation
Address	6900 Main Street, Stratford, CT 06615
Equipment Location	6900 Main Street, Stratford, CT 06615
Equipment Description	Cogeneration Facility Consisting of a 10 Megawatt SOLAR Mars 100 Axial Gas Turbine, Cleaver Brooks Energy Recovery/Natcom Duct Burner and Cleaver Brooks Energy Recovery Heat Recovery Steam Generator
Town-Permit Numbers	178-0129
Premises Number	0005
Stack Number	49
Collateral Conditions	Part VIII – Premises Wide Cap for NOx Part IX – Premises Wide Cap for HAPs
Modification Issue Date	July 31, 2026
Prior Permit Issue Dates	March 3, 2009 (Original) August 19, 2011 (Minor Modification) November 20, 2012 (Minor Modification) January 11, 2014 (Revision) October 5, 2018 (Minor Modification) January 26, 2021 (Minor Modification) August 4, 2025 (Minor Modification)
Expiration Date	None

for 
Emma Cimino
Acting Commissioner

July 31, 2026

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

Sikorsky Aircraft Corporation operates a 10 MW combined heat and power (CHP) generation facility at its Stratford premises. The CHP consists of a SOLAR Mars 100 axial dry low NO_x, or lean premix, gas turbine with a 34.6 MMBtu/hr duct burner and a heat recovery steam generator (HRSG). The duct burner is not capable of being operated alone.

B. Equipment Design Specifications

1. Turbine
 - a. Make and Model: SOLAR Mars 100
 - b. Maximum Design Heat Input¹: 124.3 MMBtu/hr
 - c. Maximum Fuel Firing Rates¹: 121,882 ft³/hr
2. Duct Burner
 - a. Maximum Fuel Firing Rate¹: 33,925 ft³/hr
 - b. Maximum Gross Heat Input¹: 34.65 MMBtu/hr

¹ at ISO conditions: 59°F, 14.7 psia and 60 percent relative humidity.

C. Control Equipment Design Specifications

1. Selective Catalytic Reduction (SCR)
 - a. Make and Model: Umicore SCR DeNO_x catalyst DNX®-series DNX GT-201
(Installed Nov. 27-30, 2020) or equivalent
 - b. Catalyst Type: TiO₂ / V₂O₅ / WO₃
 - c. Pollutant Controlled: NO_x
 - d. Design Removal Efficiency: 90%
2. Low NO_x Burner Turbine: SoLoNO_x dry low NO_x Combustor
 - a. Pollutant Controlled: NO_x
3. Oxidation Catalyst
 - a. Make and Model: Emerachem or equivalent
 - b. Catalyst Type: Stainless steel monolith with alumina/platinum catalytic coating or equivalent
 - c. Pollutant Controlled: VOC
 - d. Control Efficiency: 85%

D. Stack Parameters

Minimum Stack Height (ft)	Minimum Stack Diameter (ft)	Minimum Exhaust Gas Flow Rate at 100% Load (acfm)	Minimum Stack Exit Temperature at 100% Load (°F)	Minimum Distance from Stack to Nearest Property Line (ft)
100	5.5	104,100	300	478

PART II. OPERATIONAL CONDITIONS

A. Equipment

1. Turbine
 - a. Fuel Type: Natural Gas
 - b. Maximum Fuel Consumption over any Consecutive 12 Month Period: 1,068 MMCF
 - c. Maximum Sulfur Content: 20.0 grains/100scf
2. Duct Burner
 - a. Fuel Type: Natural Gas
 - b. Maximum Fuel Consumption over any Consecutive 12 Month Period: 298 MMCF
 - c. Maximum Sulfur Content: 20.0 grains/100scf

PART III. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS

A. Monitoring

1. The Permittee shall use an individual non-resettable totalizing fuel metering device or a billing meter to continuously monitor the natural gas feed to the turbine and the natural gas feed to the duct burner.
2. The Permittee shall continuously monitor and continuously record the SCR aqueous ammonia injection rate (lb/hr), operating temperature (°F) and pressure drop (inches of water) across the catalyst bed. The Permittee shall maintain these parameters within the ranges recommended by the manufacturer to achieve compliance with the emission limits in this permit.
3. The Permittee shall continuously monitor and continuously record the oxidation catalyst inlet temperature (°F). The Permittee shall maintain this parameter within the range recommended by the manufacturer to achieve compliance with the emission limits in this permit.
4. The Permittee shall inspect the SCR and oxidation catalysts once per year, at a minimum, or more frequently if recommended by manufacturer.

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 keep records of a current valid purchase contract, tariff sheet, or transportation contract which demonstrates the maximum total sulfur content of the natural gas burned in the combustion turbine.
3. The Permittee shall calculate and record the monthly and consecutive 12 month PM_{2.5}, PM₁₀, SO₂, NO_x, CO, and VOC emissions in units of tons. Such records should clearly indicate if the turbine is operating with or without the duct burner.

4. 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.
5. The Permittee shall keep records of the inspection and maintenance of the SCR and oxidation catalysts. The records shall include the name of the person, the date, the results or actions and the date the catalyst is replaced.
6. The Permittee shall keep records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the stationary gas turbine, duct burner or any malfunction of the air pollution control equipment. [40 CFR §60.7(b)]
7. 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 malfunction of the stationary gas turbine, duct burner, the air pollution control equipment or the continuous monitoring system. The Permittee shall submit such notification within 10 days of the malfunction. The notification shall include the following:
 - i. a description of the malfunction and a description of the circumstances surrounding the cause or likely cause of such malfunction; and
 - ii. 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.
2. The Permittee shall notify the commissioner, in writing, of the date of completion of the proposed modification in Application No. 202608065. The required written notification shall be submitted to DEEP.CACU@ct.gov, DEEP.SEM@ct.gov and DEEP.BAM.AirPermits@ct.gov no later than 30 days after the subject event.

PART IV. OPERATION AND MAINTENANCE REQUIREMENTS

- A.** The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations. The Permittee shall operate and maintain this stationary combustion turbine, duct burner, 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. [40 CFR §60.4333(a)]
- B.** The Permittee shall properly operate the control equipment at all times that this turbine/duct burner is in operation and emitting air pollutants.
- C.** The Permittee shall keep records, when the turbine/duct burner is changed for routine maintenance, to include the following:
 1. The date the turbine/duct burner was changed;
 2. The reason for the change;

3. Documentation that the replacement turbine/duct burner is the same make and model number;
4. Documentation of all associated fixed capital costs; and
5. Documentation showing that the replacement turbine/duct burner does not result in an increase in emissions, the emission of any new air pollutants, or increases in electrical output of the turbine.

PART V. ALLOWABLE EMISSION LIMITS

The Permittee shall not cause or allow this equipment to exceed the emission limits stated herein at any time.

A. Short Term Emission Limits

These short term emission limits do not apply during periods of startup and shutdown, unless otherwise noted.

1. Criteria Pollutants

a. Turbine Operating without Duct Burner

Pollutant	lb/hr	ppmvd @ 15% O ₂ ¹	lb/MMBtu
PM ₁₀ / PM _{2.5}	2.61		0.021
SO ₂	0.08		6.58E-04
NO _x	1.37	2.5	0.011
VOC	0.97		7.7E-03
CO	2.50	7.5	0.02

b. Turbine Operating with Duct Burner

Pollutant	lb/hr	ppmvd @ 15% O ₂ ¹	lb/MMBtu
PM ₁₀ / PM _{2.5}	2.87		0.028
SO ₂	0.10		1.25E-03
NO _x	1.71	2.5	0.021
VOC	1.15		1.32E-02
CO	2.93	7.5	0.032

¹ at ISO conditions: 59°F, 14.7 psia and 60 percent relative humidity.

2. Non-Criteria Pollutants

Pollutant	ppmvd @ 15% O ₂ ¹
Ammonia	5.0

¹ at ISO conditions: 59°F, 14.7 psia and 60 percent relative humidity.

B. Startup and Shutdown Emission Limits

1. The Permittee shall minimize emissions during periods of startup and shutdown by the following work practices and time constraints. Start the ammonia injection as soon as minimum catalyst temperature is reached. The oxidation catalyst shall not be bypassed during startup or shutdown.
2. The duration of startup shall not exceed 60 minutes for a hot start or a warm start, nor 240 minutes for a cold start.
3. A hot start shall be defined as startup when the turbine has been down for less than 8 hours.
4. A warm start shall be defined as startup when the turbine has been down for more than 8 hours.
5. A cold start shall be defined as startup when the turbine has been down for more than 24 hours.
6. The duration of shutdown shall not exceed 60 minutes. Emissions during these periods shall be counted towards the annual emission limits stated herein.

C. Annual Emission Limits

Pollutant	tons per 12 consecutive months
PM ₁₀ / PM _{2.5}	12.6
SO ₂	0.45
NO _x	7.5
VOC	5.0
CO	12.8

D. 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]

E. 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.

F. Demonstration of compliance with the above emission limits may be met by calculating the emission rates using emission factors from the following sources:

1. NO_x: stack test data.
2. CO, Ammonia: Stack test data.
3. PM₁₀/PM_{2.5}, SO_x, VOC, HAPs: Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Section 3.1, April 2000, or most recent revision, and equipment manufacturer data (turbine) and Section 1.4, July 1998, or most recent revision, and equipment manufacturer data (duct burner).
4. Cold, hot and warm startup and shutdown:

Natural Gas:

CO: startup: 13.75 lbs/event
shutdown: 1.61 lbs/event

NOx: startup: 6.22 lbs/event
shutdown: 0.50 lbs/event

- G.** 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 VI. STACK EMISSION TEST REQUIREMENTS

- A.** Stack emission testing shall be performed in accordance with the [Emission Test Guidelines](#) available on the DEEP website.
- B.** The maximum rated capacity of the turbine may be corrected for the ambient temperature at the time of stack testing using the following equations:

The achievable maximum firing rates are dependent on actual ambient temperatures as expressed by the following equations provided by the manufacturer, at fuel low heating value (LHV):

$$\text{Natural Gas (MMBtu/hr)} = -6.00145\text{E-}04 \cdot T^2 - 2.17845\text{E-}01 \cdot T + 126.99$$

where T is in degree Fahrenheit (°F).

Natural Gas	
Temperature (°F)	MRC (LHV) (MMBtu/hr)
-40	134.7
-20	131.1
0	127.0
10	124.8
20	122.4
30	119.9
40	117.3
50	114.6
60	111.8
70	108.8

- C. The Permittee shall conduct stack testing for NO_x, CO and Ammonia within 180 days of the completion of the proposed modification in Application No. 202608065. The Permittee shall submit test results within 60 days after completion of testing.
- D. Annual stack testing shall be conducted to demonstrate compliance with the NO_x emission limits in accordance with 40 CFR §60.4400. If the NO_x emission result from the performance test is less than or equal to 75% of the NO_x emission limits of 25 ppmvd @ 15% O₂ when firing natural gas (Table 1 of 40 CFR Part 60 Subpart KKKK), the frequency of subsequent performance tests may be reduced to once every two years and as allowed by 40 CFR §60.4340 (14 (annual)/26 (biennial) months since last test).
- E. Recurrent stack testing for NO_x, CO and ammonia shall be conducted within five years from the date of the previous stack test to demonstrate compliance with their respective limits.
- F. Stack test results shall be reported as follows: all pollutants in units of lb/hr, NO_x and CO in units of ppmvd at 15% O₂, ammonia in units of µg/m³ and ppmvd at 15% O₂. All values will be reported in ISO Conditions (59°F, 14.7 psia and 60 percent relative humidity)

PART VII. SPECIAL REQUIREMENTS

- A. The Permittee shall comply with all applicable sections of the following New Source Performance Standard at all times.

Title 40 CFR Part 60, Subparts KKKK and A.

- B. STATE ONLY REQUIREMENT: 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 §§22a-69-1 through 22a-69-7.4.
- C. In the event a malfunction cannot be corrected within three hours, the Permittee shall immediately institute shutdown of the turbine.

D. 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 VII.D.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

PART VIII. PREMISES WIDE CAP FOR NO_x

- A.** NO_x emissions for the premises shall not be equal to or exceed 25 tons over any consecutive 12 month period.

B. Monitoring Requirements

The Permittee shall monitor fuel consumption for each fuel burning emissions unit at the premises, excluding mobile sources as defined in RCSA §22a-174-1 and insignificant sources listed in RCSA §22a-174-33, under one of the following options:

1. Fuel Meter:
 - a. Using an individual non-resettable fuel meter; or
 - b. Using a fuel meter that measures fuel supplied to a group of emissions units.
2. Hourly Meter:
 - a. Using an individual hourly meter; or
 - b. Using an hourly meter for a group of emissions units.
3. In the absence of fuel or hourly meters, rental units may use purchase records or invoices.

C. Record Keeping Requirements

1. The Permittee shall make and keep a current record of all fuel burning equipment at the premises, excluding mobile sources as defined in RCSA §22a-174-1 and insignificant sources listed in RCSA §22a-174-33. The record shall include both permanent and temporary emissions units, as defined in RCSA §22a-174-22e, at the premises. The record shall include, at a minimum, the following information for each fuel burning emissions unit:
 - a. A description; including: make, model, location, and Emission Unit (EU) Number or other identification number;
 - b. The maximum rated capacity;
 - c. Identification of the fuel(s) used;
 - d. Monitoring method in accordance with Part VIII.B of this permit as well as the basis, i.e. New Source Review, Federal/State Regulation or Order number, where applicable;
 - e. Emission factor for NO_x and source of such factor; and
 - f. The construction or placement date of temporary units and removal date, as applicable.
2. For each emissions unit, or group of emissions units identified in Part VIII.C.1 of this permit as using a fuel meter to monitor fuel consumption: The Permittee shall make and keep records of monthly and consecutive 12 month fuel consumption (for each fuel, if applicable). 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.
3. For each emissions unit, or group of emissions units identified in Part VIII.C.1 of this permit as using an hourly meter to monitor hours of operation: The Permittee shall make and keep records of monthly and consecutive 12 month hours of operation. The consecutive 12 month hours of operation shall be determined by adding the current month's hours of operation to that of the previous 11 months. The Permittee shall make these calculations within 30 days

of the end of the previous month.

4. For each emissions unit, or group of emission units identified in Part VIII.C.1 of this permit as using purchase records or invoices: The Permittee shall make and keep records of monthly and consecutive 12 month fuel consumption. The Permittee shall make and keep records of monthly and consecutive 12 month fuel consumption (for each fuel, if applicable). 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.
5. The Permittee shall calculate and record the monthly and consecutive 12 month NO_x emissions for the premises. The consecutive 12 month NO_x emissions shall be determined by adding the current month's NO_x emissions to that of the previous 11 months for the premises. The Permittee shall make these calculations within 30 days of the end of the previous month.
6. The Permittee shall keep records of all purchase orders, invoices, emissions calculations methodology or other documents necessary to verify the records required by Part VIII of this permit.
7. 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 IX. PREMISES WIDE CAP FOR HAZARDOUS AIR POLLUTANTS (HAPs)

A. Limitations and Restrictions

1. The Permittee shall not cause or allow the emissions of HAPs from the premises during any consecutive 12 month period to be equal to or exceed the following:
 - a. For any single HAP: 8 tons;
 - b. For any combination of HAPs: 20 tons.
2. Emission Units Operating Under New Source Review permits
Any emission units operating under a New Source Review permit shall comply with the requirements of the most recent issued permit for that emission unit.
3. Emission Units Operating Under RCSA §22a-174-3b
Any emission unit operating under RCSA §22a-174-3b shall comply with the requirements prescribed in this Regulation that are applicable to the emission unit.
4. The Permittee shall calculate actual emissions using data from the following sources. The source used shall be selected in the following order, based on availability:
 - a. CEM,
 - b. Data supplied by the manufacturer of the emission unit,
 - c. Material balance,
 - d. Compilation of Air Pollutant Emission Factors (AP-42),
 - e. AIRS Facility Subsystem Emission, or
 - f. The Emission Inventory Improvement Program (EIIP).

B. Monitoring Requirements

1. The Permittee shall monitor emissions from sources of HAPs by use of record keeping in

accordance with Part IX.C of this permit.

2. The Permittee shall monitor fuel consumption or hours of operation from fuel burning equipment as follows:
 - a. Fuel consumption through a dedicated non-resettable fuel flow meter or a common billing meter
 - b. Hours of operation through a dedicated non-resettable hour meter.

C. Record Keeping Requirements

1. The Permittee shall make and keep records of HAPs actual emissions from each emission unit at the premises. Such records shall include the following:
 - a. A description of the emission unit,
 - b. Maximum rated capacity, if applicable,
 - c. Installation and removal date of emission unit (or estimation if unknown),
 - d. A log for each month for each emission unit that shall include, as applicable:
 - i. Identification of the fuel(s), solvents, coatings, raw materials, or other such materials used,
 - ii. The total amount of fuels, solvents, coatings, raw materials, or other such materials used,
 - iii. Hours of operation during each month, as necessary, to calculate emissions,
 - iv. Emission factor used for emission calculations and source of such factor,
 - v. All purchase order, invoices, Material Safety Data Sheets, test results or other documents necessary to verify information and calculations in the monthly log, and
 - vi. Calculations of actual emissions.
2. The Permittee shall make and keep records of the monthly and consecutive 12 month HAPs actual emissions for the premises. The consecutive 12 month HAPs emissions shall be determined by adding the current month's HAPs emissions to that of the previous 11 months.
3. 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.

D. Reporting Requirements

1. The Permittee shall notify the commissioner in writing of any exceedance of a HAP emission limitation. The Permittee 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 HAP, no later than 24 hours after such exceedance commenced.

PART X. 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.