

**BUREAU OF AIR MANAGEMENT
TITLE V OPERATING PERMIT**

Issued pursuant to Title 22a of the Connecticut General Statutes (CGS) and Section 22a-174-33 of the Regulations of Connecticut State Agencies (RCSA) and pursuant to the Code of Federal Regulations (CFR), Title 40, Part 70.

Title V Permit Number	043-0020-TV
Client/Sequence/Town/Premises Numbers	555/1/43/5
Date Issued	
Expiration Date	

Corporation:

Algonquin Gas Transmission LLC

Premises Location:

252 Shunpike Road, Cromwell, CT 06416

Name of Responsible Official and Title:

Vik Kohli, Vice President, Safety and Reliability

All the following attached pages, 2 through 52, are hereby incorporated by reference into this Title V permit.

Katherine S. Dykes
Commissioner

Date

TABLE OF CONTENTS

DRAFT PAGE

List of Abbreviations/Acronyms4
Section I. Premises Information/Description
A. Premises Information.....6
B. Premises Description.6
Section II. Emissions Units Information
A. Emissions Units Description - Table II.A.....7
B. Operating Scenario Identification8
C. Grouped Emissions Unit Description – Table II.C8
Section III. Applicable Requirements and Compliance Demonstration
A. Grouped Emissions Unit 19
B. Grouped Emissions Unit 220
C. Emission Unit 635
D. 40 CFR Part 60 Subpart OOOOa39
E. Premises-Wide General Requirements41
Section IV. Compliance Schedule - Table IV43
Section V. State Enforceable Terms and Conditions44
Section VI. Title V Requirements
A. Submittals to the Commissioner & Administrator.....46
B. Certifications [RCSA §22a-174-33(b)].....46
C. Signatory Responsibility [RCSA §22a-174-2a(a)]46
D. Additional Information [RCSA §§22a-174-33(j)(1)(X), -33(h)(2)].....47
E. Monitoring Reports [RCSA §22a-174-33(o)(1)]47
F. Premises Records [RCSA §22a-174-33(o)(2)]48
G. Progress Reports [RCSA §22a-174-33(q)(1)].....48
H. Compliance Certifications [RCSA §22a-174-33(q)(2)]49
I. Permit Deviation Notifications [RCSA §22a-174-33(p)]49
J. Permit Renewal [RCSA §22a-174-33(j)(1)(B)].....49
K. Operate in Compliance [RCSA §22a-174-33(j)(1)(C)]49
L. Compliance with Permit [RCSA §22a-174-33(j)(1)(G)]49
M. Inspection to Determine Compliance [RCSA §22a-174-33(j)(1)(M)].....50
N. Permit Availability.....50
O. Severability Clause [RCSA §22a-174-33(j)(1)(R)]50
P. Need to Halt or Reduce Activity [RCSA §22a-174-33(j)(1)(T)]50
Q. Permit Requirements [RCSA §22a-174-33(j)(1)(V)]50
R. Property Rights [RCSA §22a-174-33(j)(1)(W)]50
S. Alternative Operating Scenario Records [RCSA §22a-174-33(o)(3)].....50
T. Operational Flexibility and Off-Permit Changes [RCSA §22a-174-33(r)(2)]50
U. Information for Notification [RCSA §22a-174-33(r)(2)(A)]51
V. Transfers [RCSA §22a-174-2a(g)]51
W. Revocation [RCSA §22a-174-2a(h)]51
X. Reopening for Cause [RCSA §22a-174-33(s)]52
Y. Credible Evidence.....52

All conditions in Sections III, IV, and VI of this Title V permit are enforceable by both the Administrator and the commissioner unless otherwise specified. Applicable requirements and compliance demonstration are set forth in Section III of this Title V permit. The Administrator or any citizen of the United States may bring an action to enforce all permit terms or conditions or requirements contained in Sections III, IV, and VI of this Title V permit in accordance with the Clean Air Act, as amended.

LIST OF ABBREVIATIONS/ACRONYMS

DRAFT

<i>Abbreviation/Acronym</i>	<i>Description</i>
°F	Degree Fahrenheit
ASC	Actual Stack Concentration
bhp	Break Horse Power
CFR	Code of Federal Regulations
CGS	Connecticut General Statutes
CH ₄	Methane
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CO _{2e}	Carbon Dioxide Equivalents
EU	Emissions Unit
EPA	Environmental Protection Agency
ERC	Emission Reduction Credit
FLER	Full Load Emission Rate
g	Grams
gr	Grams
GEU	Grouped Emissions Unit
GHG	Green House Gases
HAP	Hazardous Air Pollutant
Hp	Horse power
hr	Hour
lb	Pound
LDAR	Leak Detection and Repair
MASC	Maximum Allowable Stack Concentration
MMBtu	Million British Thermal Units
MMscf	Million square cubic feet
N ₂ O	Nitrogen Oxide
NO _x	Nitrogen Oxides
NSR	New Source Review
O ₂	Oxygen
OGI	Optical Gas Imaging
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 microns
PM _{2.5}	Particulate Matter less than 2.5 microns
Ppm	Parts per million
ppmvd	Parts per million, volumetric basis dry
RACT	Reasonable Available Control Technology

LIST OF ABBREVIATIONS/ACRONYMS, continued

DRAFT

Abbreviation/Acronym

Description

RCSA	Regulations of Connecticut State Agencies
RICE	Reciprocating Internal Combustion Engines
scf	Standard Cubic Feet
SIC	Standard Industrial Classification Code
SO ₂	Sulfur Dioxide
SO _x	Sulfur Oxides
STD	Standard
VOC	Volatile Organic Compound

Section I: Premises Information/Description

DRAFT

A. PREMISES INFORMATION

Nature of Business: Transport natural gas via pipeline
Primary SIC: 4922

Facility Contact and Mailing Address: Ms. Susann Brown
Energy Center Five
915 N Eldridge Parkway, Suite 1100
Houston, TX 77079

Telephone Number: (908) 821-1825

B. PREMISES DESCRIPTION

Algonquin Gas Transmission, LLC (Algonquin) transports natural gas via underground pipelines from New Jersey through southern New England to eastern Massachusetts or in reverse. At several points along the pipeline, the natural gas must be recompressed to ensure that it continues to move along the pipeline and can be delivered to customers at serviceable pressures. The natural gas is compressed at the Cromwell Compressor Station by one electric motor driven compressor and five natural gas fired turbine driven centrifugal compressors. The natural gas used to fuel the gas fired units comes from Algonquin's pipeline. The Cromwell Compressor Station is one of three Algonquin compressor stations located in Connecticut.

The facility consists of the following natural gas fired combustion turbines:

- Two 4,700 hp Solar Centaur 40-T4702 turbines
- One 6,130 hp Solar Centaur 50-6102 turbine
- One 7,700 hp Solar Taurus 60-7802 turbine
- One 15,900 hp Solar Mars 100-16002 turbine

Ancillary equipment includes a natural gas fired emergency generator. In addition, there are three natural gas fired fuel gas heaters, several natural gas fired space heaters, sources of gas releases, piping component fugitives, a parts washer and storage tanks subject to premises-wide applicable requirements. The facility is not a major source of Hazardous Air Pollutants (HAPs).

The Cromwell Compressor Station is a Title V source located in a severe ozone non-attainment area as defined in RCSA §22a-174-1. The Cromwell Compressor Station exceeds the major source threshold for NO_x, VOC and CO.

Section II: Emissions Units Information

DRAFT

A. EMISSIONS UNITS DESCRIPTION

Emissions units are set forth in Table II.A. It is not intended to incorporate by reference these NSR Permits, Orders, Registrations, or Regulations into this Title V permit.

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit/ Grouped Emissions Unit	Emissions Unit Description	Control Unit Description	Permit, Order, Registration, or Regulation Number
EU-6	1,175 bhp Natural Gas Fired Waukesha VGF48GL Emergency Generator Construction Date: October 2015	None	RCSA §22a-174-3b(e) RCSA §22a-174-22e 40 CFR Part 60 Subpart JJJJ
EU-7	4,700 hp Natural Gas Fired Solar Centaur 40-T4702 Turbine Construction Date: November 15, 1982	SoLoNOx (Dry Low NOx combustor)	Permit No. 043-0005 RCSA §22a-174-22e 40 CFR Part 60 Subpart GG
EU-8	4,700 hp Natural Gas Fired Solar Centaur 40-T4702 Turbine Construction Date: November 15, 1982	SoLoNOx (Dry Low NOx combustor)	Permit No. 043-0006 RCSA §22a-174-22e 40 CFR Part 60 Subpart GG
EU-9	15,900 hp Natural Gas Fired Solar Mars 100-16002 Turbine Construction Date: June 2015	SoLoNOx (Dry Low NOx combustor) Oxidation Catalyst	Permit No. 043-0031 RCSA §22a-174-22e 40 CFR Part 60 Subpart KKKK
EU-10	7,700 hp Natural Gas Fired Solar Taurus 60-7802 Turbine Construction Date: May 2019	SoLoNOx (Dry Low NOx combustor) Oxidation Catalyst	Permit No. 043-0036 RCSA §22a-174-22e 40 CFR Part 60 Subpart KKKK
EU-11	6,130 hp Natural Gas Fired Solar Centaur 50-6102 Turbine Construction Date: May 2019	SoLoNOx (Dry Low NOx combustor) Oxidation Catalyst	Permit No. 043-0036 RCSA §22a-174-22e 40 CFR Part 60 Subpart KKKK

Section II: Emissions Units Information

DRAFT

B. OPERATING SCENARIO IDENTIFICATION

The Permittee shall be allowed to operate under the following Standard Operating Scenarios (SOS) without notifying the commissioner, provided that such operations are explicitly provided for and described below in this section. There are no Alternate Operating Scenarios for the premises.

Natural gas fired turbines: The standard use of the turbines is to compress natural gas.

Emergency generator: The standard use of the emergency generator is to provide emergency power for operations at the facility in case of utility power outage, brownout, maintenance or other emergency.

C. GROUPED EMISSIONS UNITS DESCRIPTION

TABLE II.C: GROUPED EMISSIONS UNITS DESCRIPTION	
Grouped Emissions Units (GEU)	Grouped Emissions Unit Description
GEU-1	EU-7, EU-8: Two Solar Natural Gas Turbines
GEU-2	EU-9, EU-10 and EU-11: Three Solar Natural Gas Turbines

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

The following contains summaries of applicable regulations and compliance demonstration for each identified Emissions Unit and Operating Scenario, regulated by this Title V permit.

A. GROUPED EMISSIONS UNIT 1 (GEU-1): Two Solar Turbines

- EU-7: Solar Centaur 40-T4702 Natural Gas Turbine (Permit No. 043-0005)
- EU-8: Solar Centaur 40-T4702 Natural Gas Turbine (Permit No. 043-0006)
- Subject to RCSA §22a-174-22e
- Subject to 40 CFR Part 60 Subpart GG

1. Fuel Type, Fuel Consumption and Fuel Sulfur Content

a. Limitation or Restriction

- i. Fuel Type: Natural Gas [Permit Nos. 043-0005 and 043-0006]
- ii. Maximum Fuel Consumption for each turbine over any Consecutive 12 Months Period: 411 MMscf [Permit Nos. 043-0005 and 043-0006]
- iii. Maximum Natural Gas Sulfur Content: 20.0 grains/100 scf [Permit Nos. 043-0005 and 043-0006]

b. Monitoring and Testing Requirements

The Permittee shall use gas metering devices to continuously monitor fuel fed to each turbine. [Permit No. 043-0005 and 043-0006]

c. Record Keeping Requirements

- i. The Permittee shall keep records of monthly and consecutive 12 month fuel consumption in units of standard cubic feet for each turbine. 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. [Permit Nos. 043-0005 and 043-0006]
- ii. 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 turbines. [Permit Nos. 043-0005 and 043-0006]
- iii. The Permittee shall keep all records for a period of no less than five years and shall submit such records to the commissioner upon request. [Permit Nos. 043-0005 and 043-0006]

d. Reporting Requirements

- i. The Permittee shall notify the commissioner in writing of a deviation from an operational parameter no later than ten days after such exceedance commenced. [RCSA §22a-174-33(j)(1)(X)]

The deviation notification shall include the following:

- (A) A description of the circumstances surrounding the cause or likely cause of such deviation.

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

(B) A description of all corrective actions and preventive measures taken and/or planned with respect to such deviation and the dates of such actions and measures.

(C) The Quantity of excess emissions occurring at that event.

(D) The duration of the event.

2. PM, PM₁₀, SO_x, NO_x, VOC and CO

a. Limitation or Restriction

i. Definitions: [Permit Nos. 043-0005 and 043-0006]

(A) Low load/speed operation shall be defined as periods of operation of the turbine with SoLoNO_x disabled, excluding startup/shutdown, low temperature events, and malfunctions.

(B) Low temperature event shall be defined as operation of the turbine when the inlet air temperature is below 0°F.

(C) Malfunction shall be defined as any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment or a process to operate in accordance with the allowable limits in Section III.A.2 of this permit. Failures that were caused in part by poor maintenance or careless operation are not malfunctions.

(D) Shutdown event shall be defined as the initial lowering of turbine fuel combustion rate beginning once SoLoNO_x is inactive and ending at the point which the fuel combustion process has stopped.

(E) Startup event shall be defined as the period of time from initiation of fuel combustion until SoLoNO_x is enabled and active.

(F) Steady-state operation shall be defined as operation of the turbine when SoLoNO_x is enabled and active and ambient temperatures are above 0°F.

(G) Transient event shall be defined as any infrequent or unplanned operation of the turbine outside of manufacturer warranty conditions with SoLoNO_x enabled but inactive, not including startup/shutdown, low load/speed operation, or low temperature events.

ii. The Permittee shall operate and maintain each turbine in accordance with the manufacturer's specifications and written recommendations. [Permit Nos. 043-0005 and 043-0006]

iii. The Permittee shall operate and maintain each turbine and air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown and malfunction. [Permit Nos. 043-0005 and 043-0006]

iv. The Permittee shall properly operate the control equipment at all times that the turbines are in operation and emitting air pollutants. [Permit Nos. 043-0005 and 043-0006]

v. The Permittee shall not cause or allow each turbine to exceed the emission limits stated herein at any time, as determined in accordance with the applicable averaging periods defined in Section III.A.2 of this Title V permit or as specified in an approved stack test protocol.

An exceedance of the emission limits due to an emergency, malfunction or cleaning shall not be

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

deemed a “Federally Permitted Release,” as that term is used in 42 U.S.C. §601.10).
[Permit Nos. 043-0005 and 043-0006]

(A) Allowable Short Term Emission Limits: These short-term emission limits do not apply during periods of startup and shutdown, unless otherwise noted. [Permit Nos. 043-0005 and 043-0006]

(1) For Turbine Inlet Temperatures above 0°F

(a) PM/PM₁₀: 0.33 lb/hr

(b) SO_x: 0.18 lb/hr

(c) NO_x: 7.78 lb/hr, 0.15 lb/MMBtu, 40.0 ppmvd@15% O₂

(d) CO: 5.64 lb/hr

(e) VOC: 0.32 lb/hr

(2) Demonstration of Compliance with the above emission limits shall be met by calculating the emission rates using the most recent approved stack test results for that pollutant, or if unavailable, emission factors from the following sources:

(a) PM/PM₁₀: AP42 Table 3.1-2a, dated 4/00

(b) SO_x: AP42 Table 3.1-2a, dated 4/00

(c) NO_x: Most recent approved stack test

(d) CO: Manufacturer’s data

(e) VOC: AP42 Table 3.1-2a, dated 4/00, adjusted with manufacturer’s data

(B) Allowable Short Term Emissions During Low Temperature Events: These short-term emission limits do not apply during periods of startup and shutdown, unless otherwise noted.

[RCSA §22a-174-33(j)(1)(H)]

(1) For Turbine Inlet Temperature Between -20 °F and 0 °F

(a) PM/PM₁₀: 0.35 lb/hr

(b) SO_x: 0.18 lb/hr

(c) NO_x: 22.83 lb/hr

(d) CO: 17.38 lb/hr

(e) VOC: 0.73 lb/hr

(f) PM/PM₁₀, SO_x, NO_x, CO, VOC: Emission factors were calculated using Solar information and best engineering judgement.

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

(2) For Turbine Inlet Temperatures Below -20 °F

(a) PM/PM₁₀: 0.35 lb/hr

(b) SO_x: 0.18 lb/hr

(c) NO_x: 22.83 lb/hr

(d) CO: 17.38 lb/hr

(e) VOC: 1.09 lb/hr

(f) PM/PM₁₀, SO_x, NO_x, CO, VOC: Emission factors were calculated using Solar information and best engineering judgement.

(C) Allowable Short Term Emissions During Transient Events and Low Load/Speed Operation. These short-term emission limits do not apply during periods of startup and shutdown, unless otherwise noted. [RCSA §22a-174-33(j)(1)(H)]

(1) Low load/speed operation:

(a) The duration of an event shall not exceed 30 minutes.

(b) The Permittee shall not exceed 20 hours of low load/speed operation over any 12 consecutive month period for each turbine.

(2) NO_x: 0.38 lb/minute

(3) CO: 0.02 lb/minute

(4) VOC: 0.29 lb/minute

(5) NO_x, CO, VOC: The transient event and low load/speed operation emission factors were calculated based on, not directly from, information provided by Solar, Product Information Letter 167 (PIL167) – Revision 6 (December 1, 2016) for full load operation at ambient temperature less than or equal to -20 °F, and best engineering judgement.

(D) Allowable Short Term Emissions During Startup and Shutdown (at all temperatures)

(1) Startup and shutdown events:

(a) The duration of a startup event shall not exceed 10 minutes for a hot, warm or cold startup.

(b) The duration of a shutdown event shall not exceed 10 minutes.

(2) Startup Emissions

(a) NO_x: 0.78 lb/event

(b) CO: 76.7 lb/event

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

(3) Shutdown Emissions

(a) NO_x: 0.37 lb/event

(b) CO: 33.6 lb/event

(4) NO_x, VOC: Emission factors were calculated using Solar information and best engineering judgement.

(E) Annual Emission Limits

(1) PM/PM₁₀: 1.40 tons per 12 consecutive months

(2) SO_x: 0.8 tons per 12 consecutive months

(3) NO_x: 31.7 tons per 12 consecutive months

(4) CO: 22.9 tons per 12 consecutive months

(5) VOC: 1.5 tons per 12 consecutive months

b. Monitoring and Testing Requirements

i. The Permittee shall monitor the status of the SoLoNO_x operation at all times.

[Permit Nos. 043-0005 and 043-0006]

ii. The Permittee shall monitor all startup/shutdown, malfunction, low load/speed operation and transient events. [Permit Nos. 043-0005 and 043-0006]

iii. The Permittee shall continuously monitor the turbine inlet air temperature. [Permit Nos. 043-0005 and 043-0006]

iv. Recurrent stack testing for NO_x shall be performed within five years from the previous stack test to demonstrate compliance with the limits in Permit Nos. 043-0005 and 043-0006. [Permit Nos. 043-0005 and 043-0006]

v. The maximum rated capacity of the turbine may be corrected for the ambient temperature at the time of stack testing using Equation 1 below. [Permit No. 043-0005 and 043-0006]

Note: The equation is applicable at temperatures between 0 °F and 100 °F

Equation 1:

$$Y: -0.0007X^2 - 0.0549X + 51.97$$

Where Y= Heat Input (MMBtu/hr)

X = Ambient Air Temperature (°F)

vi. The Permittee shall perform inspections of the turbine, air pollution control equipment and monitoring equipment in accordance with manufacturer's specification and written recommendation. [Permit Nos. 043-0005 and 043-0006]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

c. Record Keeping Requirements

- i. The Permittee shall calculate and record the monthly and consecutive 12 month PM, PM₁₀, SO_x, NO_x, VOC and CO emissions, including startup and shutdown, in units of 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
[Permit Nos. 043-0005 and 043-0006]

- ii. The Permittee shall keep on site a record of the vendor guaranteed emission rate for NO_x, CO and VOC at inlet air temperature greater than 0°F. [Permit Nos. 043-0005 and 043-0006]
- iii. The Permittee shall make and keep records of turbine inlet air temperature on a no less frequent basis than hourly while the turbine is operating during the months in which low ambient temperatures are within the realm of reasonability (October, November, December, January, February and March). The Permittee may utilize ambient temperature monitoring data recorded at the nearest observing station which collects National Weather Service (NWS) data for data substitution purposes should the monitoring and recording system which is integral to the turbine malfunction.
[Permit Nos. 043-0005 and 043-0006]
- iv. The Permittee shall make and keep records of the date and hours of operation when the turbine inlet air temperature is greater than -20 °F and below or equal to 0 °F. Such records shall contain the following information: [Permit Nos. 043-0005 and 043-0006]

(A) date and time of the event;

(B) duration of the event, and

(C) total emissions emitted (lb) during the event.

These Emissions shall be counted towards the annual emissions limits in Section III.A.2.a of this Title V permit.

- v. The Permittee shall make and keep records of the date and hours of operation when the turbine inlet air temperature is below -20 °F. Such records shall contain the following information:
[Permit Nos. 043-0005 and 043-0006]

(A) date and time of the event;

(B) duration of the event, and

(C) total emissions emitted (lb) during the event.

These Emissions shall be counted towards the annual emissions limits in Section III.A.2 of this Title V permit.

- vi. The Permittee shall keep records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the stationary gas turbine; or any malfunction of the air pollution control equipment [40 CFR §60.7(b)]. Such records shall contain the following information:
[Permit Nos. 043-0005 and 043-0006]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- (A) type of event (startup, shutdown, or malfunction);
- (B) equipment affected;
- (C) date of event;
- (D) duration of event (minutes);
- (E) fuel being used during event; and
- (F) total NO_x and CO emissions emitted (lb) during the event.

These Emissions shall be counted towards the annual emissions limits in Section III.A.2.a of this Title V permit.

- vii. The Permittee shall make and keep records indicating the instances when the SoLoNO_x is disabled while the turbine is in operation, not including startup/shutdown, low load/speed operation, or low temperature events. Such records shall include: [Permit Nos. 043-0005 and 043-0006]

- (A) The date and time the SoLoNO_x is disabled;
- (B) The duration the SoLoNO_x is disabled; and
- (C) The reason and corrective action taken.

- viii. The Permittee shall make and keep records of all transient events and low load/speed operation. Such records shall include, but not be limited to the following: [Permit Nos. 043-0005 and 043-0006]

- (A) date and time of the event;
- (B) duration of the event, and
- (C) identification of transient event or low load/speed operation, if such event caused a shutdown of the turbine.

These Emissions shall be counted towards the annual emissions limits in Section III.A.2.a of this Title V permit.

- ix. The Permittee shall make and keep records of all exceedances of any operating parameter. Such records shall include: [Permit Nos. 043-0005 and 043-0006]

- (A) the date and time of the exceedance;
- (B) a detailed description of the exceedance;
- (C) the duration of the exceedance; and
- (D) reason and corrective action taken.

- x. The Permittee shall keep records of stack testing results. [Permit Nos. 043-0005 and 043-0006]

- xi. The Permittee shall keep records of manufacturer's information for the SoLoNO_x.

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

[Permit Nos. 043-0005 and 043-0006]

- xii. 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. [Permit Nos. 043-0005 and 043-0006]

d. Reporting Requirements

- i. The Permittee shall submit annual emission inventory statements as requested by the commissioner. [Permit Nos. 043-0005 and 043-0006]
- ii. The Permittee shall notify the commissioner in writing of a deviation from an emission limit (short-term and/or long term) or operational parameter, used as a surrogate for any other regulated air pollutant or operating parameter, no later than ten days after such exceedance commenced. [Permit No. 043-0006, RCSA §22a-174-33(j)(1)(X)]

The notification shall include the following:

- (A) a description of the circumstances surrounding the cause or likely cause of such deviation; and
- (B) a description of all corrective actions and preventive measures taken and/or planned with respect to such deviation and the dates of such actions and measures.
- (C) the quantity of excess emissions occurring during the event.
- (D) the duration of the event.

3. Hazardous Air Pollutants (HAPs) [STATE ONLY REQUIREMENT]

a. Limitation or Restriction

Each turbine shall not cause an exceedance of the Maximum Allowable Stack Concentration (MASC) for any hazardous air pollutant (HAP) emitted and listed in RCSA § 22a-174-29. [Permit Nos. 043-0005 and 043-0006]

b. Monitoring Requirements

Record Keeping specified in Section III.A.3.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Record Keeping Requirements

- i. The Permittee shall make and keep records of the Actual Stack Concentration (ASC) and MASC calculations for each turbine to show compliance with RCSA §22a-174-29. [RCSA §22a-174-33(j)(1)(X)]
- ii. The Permittee shall keep all records for a period of no less than five years and shall submit such records to the commissioner upon request. [Permit No. 043-0006, RCSA §22a-174-33(j)(1)(X)]

d. Reporting Requirements

- i. The Permittee shall notify the commissioner in writing of a deviation from an emission limit (short-term and/or long term) or operational parameter, used as a surrogate, for any hazardous air pollutants,

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

no later than 24 hours after such exceedance commenced. [Permit Nos. 043-0005, RCSA §22a-174-33(j)(1)(X)]

The notification shall include the following:

- (A) A description of the circumstances surrounding the cause or the likely cause of such deviation;
- (B) A description of all corrective actions and preventive measures taken and/or planned with respect to such deviation and the dates of such actions and measures,
- (C) The quantity of excess emissions occurring during the event; and
- (D) The duration of the event.

4. Opacity

a. Limitation or Restriction

Opacity shall not exceed 10% during any six-minute block average as measured by 40 CFR Part 60, Appendix A, Reference Method 9 for each turbine. [Permit Nos. 043-0005 and 043-0006]

b. Monitoring and Testing Requirements

Record keeping specified in Section III.A.4.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Record Keeping Requirements

The Permittee shall maintain records sufficient to determine compliance with the limitation or restriction in Section III.A.4.a of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]

d. Reporting Requirements

The Permittee shall submit the additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

5. NO_x – RCSA §22a-174-22e

a. Limitation or Restriction

The Permittee shall not cause or allow an emission unit to exceed 40 ppmvd, corrected to 15% O₂. [RCSA §§22a-174-22e(d)(4)(C) and 22a-174-22e(d)(16)]

b. Monitoring and Testing Requirements

- i. The Permittee shall conduct periodic emissions testing for each turbine in GEU-1 in accordance with RCSA §22a-174-22e(l). [RCSA §22a-174-22e(l)(1)(C)]
- ii. The Permittee shall conduct emission tests within 63 calendar months following the date the previous emission test was conducted or the date the previous emission test was required to be conducted, whichever is earlier. [RCSA §22a-174-22e(l)(5)]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- iii. The Permittee shall conduct each emission test in accordance with RCOSA §22a-174-5 and compliance with the emissions limitations of RCOSA §22a-174-22e shall be determined in accordance with RCOSA §22a-174-22e(1)(6). [RCOSA §22a-174-22e(1)(6)]
- iv. The Permittee shall demonstrate compliance with the emission limitations using sampling and analytical procedures under 40 CFR Part 60, Appendix A or, under procedures in RCOSA §22a-174-5(d). Sampling shall be conducted when the emission unit is at normal operating temperature and, unless allowed otherwise by the commissioner in a permit or order, is operating at or above 90 percent of maximum capacity, except as prescribed by RCOSA §22a-174-22e(1)(7)(A) and (B). [RCOSA §22a-174-22e(1)(7)]

c. Record Keeping Requirements

- i. The Permittee shall retain all records and reports produced pursuant to RCOSA §22a-174-22e for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records and reports shall be retained at the premises where the emission unit is located. [RCOSA §22a-174-22e(j)(1)]
- ii. The Permittee shall make and keep the following records:
[RCOSA §§22a-174-22e(j)(2)(B), (C), (F) and (G)]
 - (A) The date and work performed for repairs, replacement of parts and other maintenance;
 - (B) Records of the dates and times of all emission testing required by RCOSA §22a-174-22e, the persons performing the measurements, the testing method used, the operating conditions at the time of testing, and the results of such testing;
 - (C) Copies of all documents submitted to the commissioner pursuant to RCOSA §22a-174-22e; and
 - (D) Any other records or reports required by an order or permit issued by the commissioner pursuant to RCOSA §22a-174-22e.

d. Reporting Requirements

Not more than 60 days after the completion of emission tests conducted under RCOSA §22a-174-22e(1), the Permittee of such emission unit shall submit a written report of the results of such testing to the commissioner. [RCOSA §22a-174-22e(k)(1)]

6. 40 CFR Part 60 Subpart GG – New Source Performance Standard for Stationary Gas Turbine

a. Limitation or Restrictions

- i. The Permittee shall not cause to be discharged into the atmosphere, any gases from either of the turbines which contain nitrogen oxides in excess of the allowable NO_x emission concentration in 40 CFR §60.332(a)(2). [40 CFR §60.332(c)]
- ii. The Permittee shall comply with the fuel sulfur content limit in 40 CFR §60.333(b) for each turbine. [40 CFR §60.333]

b. Monitoring Requirements

- i. Record keeping specified in Section III.A.6.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements. [RCOSA §22a-174-33(j)(1)(K)(ii)]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

c. Record Keeping Requirements

- i. In lieu of monitoring the nitrogen content of the fuel for each turbine, the Permittee shall maintain records to demonstrate an F-value equal to zero is used to calculate STD in 40 CFR §60.332. [40 CFR §60.334(h)(2); RCSA §22a-174-33(j)(1)(K)]

(A) The Permittee shall keep records of the fuel quality characteristics in a current, valid purchase contract tariff sheet or transportation contract for the fuel specifying that the maximum total sulfur content is 20 grains of sulfur or less per 100 standard cubic feet. [40 CFR §60.334(h)(3)(i)]

d. Reporting Requirements

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

7. Collateral Conditions for Pipeline Liquids Storage Tank

a. Limitation or Restriction

- i. Maximum throughput over any 12 month consecutive period: 5,880 gallons [Permit No. 043-0005]
- ii. Methane: 0.38 TPY [Permit No. 043-0005, RCSA §22a-174-33(j)(1)(H)]
- iii. VOC: 0.82 TPY [Permit No. 043-0005]

b. Monitoring Requirements

The Permittee shall monitor throughput for the pipeline liquids storage tank. [Permit No. 043-0005]

c. Record Keeping Requirements

- i. The Permittee shall keep records of monthly and 12 month consecutive throughput for the pipeline liquid storage tank in units of gallons. The 12 month consecutive throughput shall be determined by adding the current month's throughput to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of the previous month. [Permit No. 043-0005]
- ii. The Permittee shall calculate and record the monthly and consecutive 12 month Methane and VOC emissions, in units of 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. [Permit No. 043-0005]
- iii. The Permittee shall make and keep records for a period of no less than five years and submit such records to the commissioner upon request. [Permit No. 043-0005]

d. Reporting Requirements

No later than March 1st of each year, the Permittee shall submit to the commissioner a report demonstrating compliance with the requirements in Section III.A.7.a of this permit. [Permit No. 043-0005]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

B. GROUPED EMISSIONS UNIT 2 (GEU-2): Three Solar Turbines

- EU-9: Solar Mars 100-16002 Natural Gas Turbine (Permit No. 043-0031)
- EU-10: Solar Taurus 60-7802 Natural Gas Turbine (Permit No. 043-0035)
- EU-11: Solar Centaur 50-6102 Natural Gas Turbine (Permit No. 043-0036)
- Subject to RCSA §22a-174-22e
- Subject to 40 CFR Part 60 Subpart KKKK

1. Fuel Type, Fuel Consumption and Fuel Sulfur Content

a. Limitation or Restriction

- i. Fuel Type: Natural Gas [Permit Nos. 043-0031, 043-0035 and 043-0036]
- ii. Maximum Fuel Consumption:
 - (A) EU-9: 1,143 MMscf over any Consecutive 12 Month Period [Permit No. 043-0031]
 - (B) EU-10: 592.23 MMscf over any Consecutive 12 Month Period [Permit No. 043-0035]
 - (C) EU-11: 503.634 MMscf over any Consecutive 12 Month Period [Permit No. 043-0036]
- iii. Maximum Natural Gas Sulfur Content: 5.0 grains/100 scf
[Permit Nos. 043-0031, 043-0035 and 043-0036]

b. Monitoring Requirements

The Permittee shall use gas metering devices to continuously monitor fuel feed to each turbine.
[Permit Nos. 043-0031, 043-0035 and 043-0036]

c. Record Keeping Requirements

- i. The Permittee shall keep records of monthly and consecutive 12 month fuel consumption in units of standard cubic feet for each turbine. 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.
[Permit Nos. 043-0031, 043-0035 and 043-0036]
- ii. The Permittee shall make and 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 each turbine. [Permit Nos. 043-0031, 043-0035 and 043-0036]
- iii. The Permittee shall make and keep records of all exceedances of any operating parameter. Such records shall include: [Permit Nos. 043-0031, 043-0035 and 043-0036]
 - (A) The date and time of the exceedance;
 - (B) A detailed description of the exceedance;

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- (C) The duration of the exceedance; and
 - (D) Reason and corrective action taken.
- iv. The Permittee shall make and keep all records for a period of no less than five years and shall submit such records to the commissioner upon request. [Permit Nos. 043-0031, 043-0035 and 043-0036]

d. Reporting Requirements

- i. The Permittee shall notify the commissioner in writing of any exceedance or deviation of an emission limitation or operating parameter, and shall identify the cause or likely cause of such exceedances or deviation, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows: [Permit Nos. 043-0031, 043-0035 and 043-0036]
 - (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. PM/PM₁₀/PM_{2.5}, SO₂, NO_x, VOC, CO and GHG

a. Limitation or Restriction

- i. Definitions: [Permit Nos. 043-0031, 043-0035 and 043-0036]
 - (A) Low load/speed operation shall be defined as periods of operation of the turbine with SoLoNO_x disabled, excluding startup/shutdown, low temperature events, and malfunctions.
 - (B) Low temperature event shall be defined as operation of the turbine when the inlet air temperature is below 0°F.
 - (C) Malfunction shall be defined as any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment or a process to operate in accordance with the allowable limits in Section III.B.2 of this permit. Failures that were caused in part by poor maintenance or careless operation are not malfunctions.
 - (D) Shutdown event shall be defined as the initial lowering of turbine fuel combustion rate beginning once SoLoNO_x is inactive and ending at the point which the fuel combustion process has stopped.
 - (E) Startup event shall be defined as the period of time from initiation of fuel combustion until SoLoNO_x is enabled and active.
 - (F) Steady-state operation shall be defined as operation of the turbine when SoLoNO_x is enabled and active and ambient temperatures are above 0°F.
 - (G) Transient event shall be defined as any infrequent or unplanned operation of the turbine outside of manufacturer warranty conditions with SoLoNO_x enabled but inactive, not including startup/shutdown, low load/speed operation, or low temperature events.
- ii. The Permittee shall not operate the turbine without the SoLoNO_x (control device), except as allowed during startup/shutdown, transient events, low load/speed operation, and low temperature events. [Permit Nos. 043-0031, 043-0035 and 043-0036]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- iii. The Permittee shall not bypass the oxidation catalyst at any time. [Permit Nos. 043-0031, 043-0035 and 043-0036]
- iv. The Permittee shall operate and maintain the turbine, air pollution control equipment and monitoring equipment in accordance with manufacturer's specification and written recommendations, with the exception of the oxidation catalyst, which will be operated and maintained in accordance with the Permittee's Connecticut Specific Oxidation Catalyst Monitoring Plan, as amended from time to time. [Permit No. 043-0031, 043-0035 and 043-0036]
- v. The Permittee shall not cause or allow EU-9 to exceed the emission limits stated herein at any time. [Permit Nos. 043-0031]

(A) Allowable Short Term Emission Limits at Steady State [Permit No. 043-0031]

(1) Turbine Inlet Temperatures above 0°F

- (a) PM/PM₁₀/PM_{2.5}: 0.95 lb/hr, 0.0066 lb/MMBtu
- (b) SO₂: 2.02 lb/hr
- (c) NO_x: 4.69 lb/hr, 0.032 lb/MMBtu, 9.0 ppmvd@15% O₂
- (d) CO: 0.40 lb/hr, 25 ppmvd@15% O₂
- (e) VOC: 0.50 lb/hr

(B) Allowable Short Term Emissions During Low Temperature Event [Permit No. 043-0031]

(1) For Turbine Inlet Temperatures Between -20°F and 0°F

- (a) PM/PM₁₀/PM_{2.5}: 0.98 lb/hr
- (b) SO₂: 2.09 lb/hr
- (c) NO_x: 22.58 lb/hr
- (d) CO: 1.64 lb/hr
- (e) VOC: 1.02 lb/hr

(2) For Turbine Inlet Temperatures Below -20°F

- (a) PM/PM₁₀/PM_{2.5}: 0.98 lb/hr
- (b) SO₂: 2.09 lb/hr
- (c) NO_x: 64.52 lb/hr
- (d) CO: 2.45 lb/hr
- (e) VOC: 1.54 lb/hr

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- (B) Allowable Short-Term Emissions During Transient Events and Low Load/Speed Operation [Permit No. 043-0031]
- (1) NOx: 1.08 lb/minute
 - (2) CO: 0.82 lb/minute
 - (3) VOC: 0.05 lb/minute
 - (4) The duration of an event shall not exceed 30 minutes.
 - (5) The Permittee shall not exceed 20 hours of low load/speed operation over any 12 consecutive month period for EU-9.
- (C) Allowable Short Term Emissions During Startup and Shutdown Events (at all temperatures) [Permit No. 043-0031]
- (1) Startup Emissions
 - (a) NOx: 1.52 lb/event
 - (b) CO: 146.98 lb/event
 - (c) VOC: 5.30 lb/event
 - (2) Shutdown Emissions
 - (a) NOx: 1.76 lb/event
 - (b) CO: 8.04 lb/event
 - (c) VOC: 2.63 lb/event
 - (3) The duration of a startup event shall not exceed 18 minutes.
 - (4) The duration of a shutdown event shall not exceed 17 minutes.
- (D) Annual Emission Limits [Permit No. 043-0031]
- (1) PM/PM₁₀/PM_{2.5}: 3.85 Tons per 12 consecutive months
 - (2) SO₂: 8.17 Tons per 12 consecutive months
 - (3) NOx: 19.38 Tons per 12 consecutive months
 - (4) CO: 33.04 Tons per 12 consecutive months
 - (5) VOC: 3.58 Tons per 12 consecutive months
 - (6) CO_{2e}: 69,113 Tons per 12 consecutive months

vi. The Permittee shall not cause or allow EU-10 to exceed the emission limits stated herein at any time.

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

[Permit Nos. 043-0035]

(A) Allowable Short Term Emission Limits at Steady State [Permit No. 043-0035]

- (1) Turbine Inlet Air Temperatures Above 0 °F
 - (a) PM/PM₁₀/PM_{2.5}: 0.48 lb/hr, 0.0066 lb/MMBtu
 - (b) SO₂: 1.03 lb/hr
 - (c) NO_x: 2.38 lb/hr, 0.033 lb/MMBtu, 9.0 ppmvd@15% O₂
 - (d) CO: 0.20 lb/hr, 25 ppmvd@15% O₂
 - (e) VOC: 0.25 lb/hr

(B) Allowable Short Term Emissions During Low Temperature Events [Permit No. 043-0035]

- (1) For Turbine Inlet Air Temperatures Between -20 °F and 0 °F
 - (a) PM/PM₁₀/PM_{2.5}: 0.49 lb/hr
 - (b) SO₂: 1.05 lb/hr
 - (c) NO_x: 11.4 lb/hr
 - (d) CO: 0.82 lb/hr
 - (e) VOC: 0.52 lb/hr
- (2) For Turbine Inlet Air Temperatures Below -20 °F
 - (a) PM/PM₁₀/PM_{2.5}: 0.49 lb/hr
 - (b) SO₂: 1.05 lb/hr
 - (c) NO_x: 32.5 lb/hr
 - (d) CO: 1.24 lb/hr
 - (e) VOC: 0.77 lb/hr

(C) Allowable Short Term Emissions During Transient Events and Low Load/Speed Operation [Permit No. 043-0035]

- (1) NO_x: 0.54 lb/minute
- (2) CO: 0.41 lb/minute
- (3) VOC: 0.03 lb/minute
- (4) The duration of an event shall not exceed 30 minutes.

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

(5) The Permittee shall not exceed 20 hours of low load/speed operation over any 12 consecutive month period for EU-10.

(D) Allowable Short Term Emissions During Startup and Shutdown Events (at all temperatures)

[Permit No. 043-0035]

(1) Startup Emissions

(a) NO_x: 0.80 lb/event

(b) CO: 77.24 lb/event

(c) VOC: 5.40 lb/event

(d) The duration of a startup event shall not exceed 18 minutes

(2) Shutdown Emissions

(a) NO_x: 0.93 lb/event

(b) CO: 4.23 lb/event

(c) VOC: 2.62 lb/event

(d) The duration of a shutdown event shall not exceed 17 minutes.

(E) Annual Emission Limits [Permit No. 043-0035]

(1) PM/PM₁₀/PM_{2.5}: 1.99 Tons per 12 Consecutive Months

(2) SO₂: 4.23 Tons per 12 Consecutive Months

(3) NO_x: 10.04 Tons per 12 Consecutive Months

(4) CO: 17.28 Tons per 12 Consecutive Months

(5) VOC: 2.64 Tons per 12 Consecutive Months

(6) CO_{2e}: 35,800 Tons per 12 Consecutive Months

vii. The Permittee shall not cause or allow EU-11 to exceed the emission limits stated herein at any time.
[Permit Nos. 043-0036]

(A) Allowable Short Term Emission Limits at Steady State [Permit No. 043-0036]

(1) Turbine Inlet temperatures Above 0 °F

(a) PM/PM₁₀/PM_{2.5}: 0.40 lb/hr, 0.0066 lb/MMBtu

(b) SO₂: 0.86 lb/hr

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- (c) NO_x: 1.99 lb/hr, 0.033 lb/MMBtu, 9.0 ppmvd@ 15% O₂
- (d) CO: 0.17 lb/hr, 25 ppmvd@ 15% O₂
- (e) VOC: 0.21 lb/hr

(B) Allowable Short Term Emissions During Low Temperature Event [Permit No. 043-0036]

(1) For Turbine Inlet Air Temperatures Between -20 °F and 0 °F

- (a) PM/PM₁₀/PM_{2.5}: 0.41 lb/hr
- (b) SO₂: 0.87 lb/hr
- (c) NO_x: 9.43 lb/hr
- (d) CO: 0.68 lb/hr
- (e) VOC: 0.43 lb/hr

(2) For Turbine Inlet Air Temperatures Below -20 °F

- (a) PM/PM₁₀/PM_{2.5}: 0.41 lb/hr
- (b) SO₂: 0.87 lb/hr
- (c) NO_x: 26.93 lb/hr
- (d) CO: 1.02 lb/hr
- (e) VOC: 0.64 lb/hr

(C) Allowable Short Term Emissions During Transient Events and Low Load/Speed Operation [Permit No. 043-0036]

- (1) NO_x: 0.45 lb/minute
- (2) CO: 0.34 lb/minute
- (3) VOC: 0.02 lb/minute
- (4) The duration of an event shall not exceed 30 minutes.
- (5) The Permittee shall not exceed 20 hours of low load/speed operation over any 12 consecutive month period for EU-11.

(D) Allowable Short Term Emissions During Startup and Shutdown Events (at all temperatures) [Permit No. 043-0036]

- (1) Startup Emissions
 - (a) NO_x: 0.85 lb/event

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

(b) CO: 82.08 lb/event

(c) VOC: 5.26 lb/event

(d) The duration of a startup events shall not exceed 18 minutes.

(2) Shutdown Emissions

(a) NOx: 0.97 lb/event

(b) CO: 4.45 lb/event

(c) VOC: 2.58 lb/event

(d) The duration of a shutdown event shall not exceed 17 minutes.

(E) Annual Emission Limits [Permit No. 043-0036]

(1) PM/PM₁₀/PM_{2.5}: 1.70 Tons per 12 Consecutive Months

(2) SO₂: 3.60 Tons per 12 Consecutive Months

(3) NOx: 8.62 Tons per 12 Consecutive Months

(4) CO: 18.82 Tons per 12 Consecutive Months

(5) VOC: 2.51 Tons per 12 Consecutive Months

(6) CO_{2e}: 30,481 Tons per 12 Consecutive Months

viii. Demonstration of compliance with the above emission limits shall be met by calculating the emission rate using the most recent stack test results for that pollutant, or if unavailable, emission factors from the following sources: [Permit Nos. 043-0031, 043-0035 and 043-0036]

(A) Turbine Inlet Air Temperature Above 0°F

(1) PM/PM₁₀/PM_{2.5}: AP-42, Section 3.1, Tables 3.1-2a (April 2000)

(2) NOx: Vendor Guaranteed Emission Rate

(3) CO: Vendor Guaranteed Emission Rate

(4) VOC: Vendor Guaranteed Emission Rate

(5) SO₂: 0.94 x S lb/MMBtu Where S: percent sulfur in fuel – AP-42, Section 3.1, Table 3.1-2a (April 2000) using Tariff (5.0 gr/100 scf)

(6) CO_{2e}: 40 CFR Part 98 Subpart C – Tables C-1 and C-2

(B) Turbine Inlet Air Temperatures Between -20 °F and 0 °F

[Permit Nos. 043-0031, 043-0035 and 043-0036]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- (1) PM/PM₁₀/PM_{2.5}, NO_x, CO, VOC, SO₂: Emission factors were calculated using Solar information and best engineering judgement
 - (2) CO_{2e}: 40 CFR Part 98 Subpart C – Tables C-1 and C-2
- (C) Turbine Inlet Air Temperatures Below -20 °F [Permit Nos. 043-0031, 043-0035 and 043-0036]
- (1) PM/PM₁₀/PM_{2.5}, NO_x, CO, VOC, SO₂: Emission factors were calculated using Solar information and best engineering judgement
 - (2) CO_{2e}: 40 CFR Part 98 Subpart C – Tables C-1 and C-2
- (D) Startup/Shutdown Events, at all temperatures [Permit Nos. 043-0031, 043-0035 and 043-0036]
- (1) NO_x, CO, VOC: The startup/shutdown emission factors were calculated based on, not directly from, information provided by Solar, Product Information Letter 170 (PIL170) – Revision 8 (February 21, 2018), and best engineering judgement.
- (E) Transient event and low load/speed operation emission factors were calculated based on, not directly from, information provided by Solar, Product Information Letter 167 (PIL167) – Revision 6 (December 1, 2016) for full load operation at ambient temperature less than or equal to -20 °F, and best engineering judgement. [Permit No. 043-0031, 043-0035 and 043-0036]
- ix. The commissioner may require other means (e.g. stack testing) to demonstrate compliance with above emission limits, as allowed by state or federal statute, law or regulation. [Permit Nos. 043-0031, 043-0035 and 043-0036]

b. Monitoring and Testing Requirements

- i. The Permittee shall continuously monitor the oxidation catalyst temperature and differential pressure alarms. [Permit Nos. 043-0031, 043-0035 and 043-0036]
- ii. The Permittee shall monitor all startup/shutdown, malfunction, low load/speed operation and transient events. [Permit Nos. 043-0031, 043-0035 and 043-0036]
- iii. The Permittee shall continuously monitor the turbine inlet air temperature. [Permit Nos. 043-0031, 043-0035 and 043-0036]
- iv. The Permittee shall monitor the status of the SoLoNO_x operation at all times. [Permit Nos. 043-0031, 043-0035 and 043-0036]
- v. The Permittee shall perform inspections of the turbine, air pollution control equipment and monitoring equipment in accordance with manufacturer's specifications and written recommendations, with the exception of the oxidation catalyst, which will be operated and maintained in accordance with the Permittee's Connecticut Specific Oxidation Catalyst Monitoring Plan, as amended from time to time. [Permit Nos. 043-0031, 043-0035 and 043-0036]
- vi. Annual/biennial stack testing for NO_x shall be performed in accordance with 40 CFR §60.4400. [Permit Nos. 043-0031, 043-0035 and 043-0036]
- vii. Recurrent stack testing for NO_x, CO and VOC shall be performed within five years from the previous stack test. [Permit Nos. 043-0031, 043-0035 and 043-0036]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- viii. During stack emission testing of EU-9, the manufacturer's performance data curve may be used to determine the Maximum Gross Heat Input, which may vary +/- 5%, at inlet air temperature between 0 °F and 100 °F using Equation 1 below: [Permit No. 043-0031]

Equation 1:

$$Y: -0.0008X^2 - 0.2049X + 143.3$$

Where Y= Heat Input (MMBtu/hr)
X= Inlet Air Temperature (°F)

- ix. During stack emission testing of EU-10, the manufacturer's performance data curve may be used to determine the Maximum Gross Heat Input, which may vary +/- 5%, at inlet air temperature between 0 °F and 100 °F using Equation 1 below. [Permit No. 043-0035]

Equation 1:

$$Y: -0.0006X^2 - 0.0811X + 73.4$$

Where Y= Heat Input (MMBtu/hr)
X= Inlet Air Temperature (°F)

- x. During stack emission testing of EU-11, the manufacturer's performance data curve may be used to determine the Maximum Gross Heat Input, which may vary +/- 5%, at inlet air temperature between 0 °F and 100 °F using Equation 1 below. [Permit No. 043-0036]

Equation 1:

$$Y: -0.0007X^2 - 0.0450X + 61.5$$

Where Y= Heat Input (MMBtu/hr)
X= Inlet Air Temperature (°F)

c. Record Keeping Requirements

- i. The Permittee shall calculate and record the monthly and consecutive 12 month PM, PM₁₀, PM_{2.5}, SO₂, NO_x, CO and VOC emissions in units of 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. [Permit Nos. 043-0031, 043-0035 and 043-0036]
- ii. The Permittee shall calculate and record the monthly and consecutive 12 month CO₂e emissions from the facility using the following methodologies: [Permit Nos. 043-0031, 043-0035 and 043-0036]
- (A) CO₂ emissions from combustion sources shall be determined using the default emission factors found in 40 CFR Part 98 Subpart C – Table C-1.
- (B) Methane (CH₄) and nitrous oxide (N₂O) from combustion sources shall be determined using the default emission factors found in 40 CFR Part 98 Subpart C, Table C-2.

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- (C) Estimated fugitive emissions of CH₄ from piping components shall be determined using the default emission factors found in 40 CFR Part 98 Subpart W, Tables W-3A and W-3B, as appropriate.
- (D) Estimated fugitive emissions of CH₄ from gas releases shall be determined using the default emission factors found in 40 CFR Part 98 Subpart W, as appropriate.
- iii. The Permittee shall keep on site a record of the vendor guaranteed emission rates for NO_x, CO and VOC at inlet air temperature greater than 0°F.
- iv. The Permittee shall make and keep records of turbine inlet air temperature on a no less frequent basis than hourly while the turbine is operating during the months in which low ambient temperatures are within the realm of reasonability (October, November, December, January, February and March). The Permittee may utilize ambient temperature monitoring data recorded at the nearest observing station which collects National Weather Service (NWS) data for data substitution purposes should the monitoring and recording system which is integral to the turbine malfunction.
[Permit Nos. 043-0031, 043-0035 and 043-0036]
- v. The Permittee shall make and keep records of the date and hours of operation when the turbine inlet air temperature is equal to or below 0 °F and greater than -20 °F. Such records shall contain the following information: [Permit Nos. 043-0031, 043-0035 and 043-0036]
- (A) date and time of the event;
- (B) duration of the event, and
- (C) total emissions emitted (lb) during the event.
- These emissions shall be counted towards the annual emissions limits.
- vi. The Permittee shall make and keep records of the occurrence and duration of any startup, shutdown, or malfunction event in the operation of the turbine; or any malfunction of the air pollution control equipment [40 CFR §60.7(b)]. Such records shall contain the following information:
[Permit Nos. 043-0031, 043-0035 and 043-0036]
- (A) type of event (startup, shutdown, or malfunction);
- (B) equipment affected;
- (C) date of event;
- (D) duration of event (minutes); and
- (E) total emissions emitted (lb) during the event.
- These emissions shall be counted towards the annual emissions.
- vii. The Permittee shall make and keep records indicating the instances when the SoLoNO_x is disabled while the turbine is in operation, not including startup/shutdown, low load/speed operation, or low temperature events. Such records shall include: [Permit Nos. 043-0031, 043-0035 and 043-0036]
- (A) the date and time the SoLoNO_x is disabled;
- (B) the duration the SoLoNO_x is disabled; and

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- (C) the reason and corrective action taken.
- viii. The Permittee shall make and keep records of all transient events and low load/speed operation. Such records shall include, but not be limited to the following: [Permit Nos. 043-0031, 043-0035 and 043-0036]
- (A) date and time of the event;
 - (B) duration of the event, and
 - (C) identification of transient event or low load/speed operation, if such event caused a shutdown of the turbine.
- These emissions shall be counted towards the annual emissions.
- ix. The Permittee shall calculate and record NO_x, CO and VOC emissions during transient events and low load/speed operation using emission rates supplied by the manufacturer. These emissions shall be counted towards the annual emissions limits. [Permit Nos. 043-0031, 043-0035 and 043-0036]
- x. The Permittee shall make and keep records of all exceedances of any operating parameter. Such records shall include: [Permit Nos. 043-0031, 043-0035 and 043-0036]
- (A) the date and time of the exceedance;
 - (B) a detailed description of the exceedance;
 - (C) the duration of the exceedance; and
 - (D) reason and corrective action taken.
- xi. The Permittee shall maintain records of the maintenance/repairs/parts replacement of the turbine. The maintenance records shall include, at a minimum, a description of the maintenance activity, the date the maintenance was performed, and cost of service. [Permit Nos. 043-0031, 043-0035 and 043-0036]
- xii. The Permittee shall record the oxidation catalyst inlet temperature (°F) and differential pressure at least once every 15 minutes. [Permit Nos. 043-0031, 043-0035 and 043-0036]
- (A) The Permittee shall demonstrate compliance with the operating ranges specified in the Connecticut Specific Oxidation Catalyst Monitoring Plan based on a 4-hour rolling average during all permitted operating modes, except startup and shutdown.
- xiii. The Permittee shall make and keep records of the inspection and maintenance of the oxidation catalyst. The records shall include: [Permit Nos. 043-0031, 043-0035 and 043-0036]
- (A) the name of the person conducting the inspection or maintenance;
 - (B) the date;
 - (C) the results or actions; and
 - (D) the date the catalyst is replaced.

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- xiv. The Permittee shall make and keep records of manufacturer's information for the turbine, oxidation catalyst and SoLoNOx. [Permit Nos. 043-0031, 043-0035 and 043-0036]
- xv. The Permittee shall keep records of stack testing results.
[Permit Nos. 043-0031, 043-0035 and 043-0036]
- xvi. The Permittee shall keep copies of all reports and notifications submitted to the commissioner.
[Permit Nos. 043-0031, 043-0035 and 043-0036]
- xvii. The Permittee shall make and keep records of any applicable requirement as required by 40 CFR Part 60 Subpart KKKK. [Permit Nos. 043-0031, 043-0035 and 043-0036]
- xviii. The Permittee shall make and keep all records required by this permit, including the Connecticut Specific Oxidation Catalyst Monitoring Plan, for a period of no less than five years and shall submit such records to the commissioner upon request. [Permit Nos. 043-0031, 043-0035 and 043-0036]

d. Reporting Requirements

- i. The Permittee shall submit all reports as required pursuant to 40 CFR §60.4375.
[Permit Nos. 043-0031, 043-0035 and 043-0036]
- ii. The Permittee shall notify the commissioner in writing of any exceedance or deviation of an emissions limitation or operating parameter, and shall identify the cause or likely cause of such exceedances or deviations, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows:
[Permit Nos. 043-0031, 043-0035 and 043-0036]
 - (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.
- iii. The Permittee shall notify the commissioner in writing of any malfunction of the turbine, the air pollution control equipment or the continuous monitoring system. The Permittee shall submit such notification within ten days of the malfunction. The notification shall include the following:
[Permit Nos. 043-0031, 043-0035 and 043-0036]
 - (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.
- iv. The Permittee shall submit a copy of every amendment to the Connecticut Specific Oxidation Catalyst Monitoring Plan within 60 days of its approval.
[Permit Nos. 043-0031, 043-0035 and 043-0036]
- v. The Permittee shall submit the above notifications to the Supervisor of the Compliance Analysis & Coordination Unit, Enforcement Section, Bureau of Air Management; Department of Environmental Protection; 79 Elm Street, 5th Floor; Hartford, CT 06106-5127.
[Permit Nos. 043-0031, 043-0035 and 043-0036]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

3. Hazardous Air Pollutants (HAPs) [STATE ONLY REQUIREMENT]

a. *Limitation or Restriction*

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 §22a-174-29. [Permit Nos. 043-0031, 043-0035 and 043-0036]

b. *Monitoring and Testing Requirements*

Record keeping specified in Section III.B.3.c of this Title V permit shall be sufficient to meet Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. *Record Keeping Requirements*

i. The Permittee shall make and keep records of the Actual Stack Concentration (ASC) and MASC calculations for each of the turbines to show compliance with RCSA §22a-174-29. [Permit Nos. 043-0031, 043-0035 and 043-0036]

ii. The Permittee shall make and keep all records required by this Title V permit for a period of no less than five years and shall submit such records to the commissioner upon request. [RCSA §22a-174-33(o)(2)]

d. *Reporting Requirements*

i. The Permittee shall notify the commissioner in writing of any exceedance or deviation of an emission limitation or operating parameter, and shall identify the cause or likely cause of such exceedance or deviations, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows:[Permit Nos. 043-0031, 043-0035 and 043-0036]

(A) For any Hazardous Air Pollutant, no later than 24 hours after such exceedance commenced.

ii. The Permittee shall submit the above notifications to the Supervisor of the Compliance Analysis & Coordination Unit, Enforcement Section, Bureau of Air Management; Department of Energy and Environmental Protection; 79 Elm Street, 5th Floor; Hartford, CT 06106-5127. [Permit Nos. 043-0031, 043-0035 and 043-0036]

4. Opacity

a. *Limitation or Restriction*

Opacity shall not exceed 10% during any six minute block average as measured by 40 CFR Part 60, Appendix A, Reference Method 9 for each turbine. [Permit Nos. 043-0031, 043-0035 and 043-0036]

b. *Monitoring and Testing Requirements*

Record keeping specified in Section III.B.4.c of this Title V permit shall be sufficient to meet Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. *Record Keeping Requirements*

The Permittee shall maintain records sufficient to determine compliance with the limitation or restriction

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

in Section III.B.4.a of this Title V permit. [RCSA §22a-174-33(j)(1)(K)(ii)]

d. Reporting Requirements

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

5. NO_x – RCSA §22a-174-22e

a. Limitation or Restriction

- i. The Permittee shall comply with the following emissions limitations:
[RCSA §§22a-174-22e(d)(4)(C), and 22a-174-22e(d)(16)]

(A) 40 ppmvd, corrected to 15% O₂

b. Monitoring and Testing Requirements

The Permittee shall conduct periodic emissions testing for GEU-2 in accordance with 40 CFR Part 60 Subpart KKKK. [RCSA §§22a-174-22e(l)(1)(B)]

c. Record Keeping Requirements

- i. The Permittee shall retain all records and reports produced pursuant to RCSA §22a-174-22e for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records and reports shall be retained at the premises where the emission unit is located. [RCSA §22a-174-22e(j)(1)]

- ii. The Permittee shall make and keep the following records:
[RCSA §§22a-174-22e(j)(2)(B), (C), (F) and (G)]

(A) The date and work performed for repairs, replacement of parts and other maintenance;

(B) Records of dates and times of emission testing, the person performing the measurements, the testing methods, the operating conditions at the time of testing and the result of such testing;

(C) Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22e; and

(D) Any other records or reports required by an order or permit issued by the commissioner pursuant to RCSA §22a-174-22e.

d. Reporting Requirements

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

6. 40 CFR Part 60 Subpart KKKK - New Source Performance Standard for Stationary Gas Turbines

a. Limitation or Restriction

- i. SO₂: 0.060 lb/MMBtu [40 CFR §60.4430(a)(2)]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- ii. NO_x: 25 ppmvd @ 15% O₂ [40 CFR §60.4320(a), Table 1, New turbine firing natural gas > 50 MMBtu/hr and < 850 MMBtu/hr]
- iii. The Permittee must operate and maintain each turbine, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including startup, shutdown, and malfunction. [40 CFR §60.4333]

b. *Monitoring and Testing Requirements*

The Permittee must perform annual performance tests for each turbine in accordance with 40 CFR §60.4400 to demonstrate continuous compliance. If the NO_x emission result from the performance test is less than or equal to 75 percent of the NO_x emission limit for any of the turbines, the Permittee may reduce the frequency of subsequent performance tests to once every two years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NO_x emission limit for any of the turbines, the Permittee must resume annual performance tests. [40 CFR §60.4340(a)]

c. *Record Keeping Requirements*

- i. The Permittee shall maintain records sufficient to determine compliance with the restriction in Section III.B.6 of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]
- ii. The Permittee shall keep records of the fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel specifying that the maximum total sulfur content is 20 grains of sulfur or less per 100 standard cubic feet. [40 CFR §60.4365(a)]

d. *Reporting Requirements*

The Permittee shall comply with the applicable reporting requirements in accordance with 40 CFR §§60.4375 and 60.4395. [40 CFR §§60.4375]

C. EMISSIONS UNIT 6 (EU-6): 1,175 bhp Waukesha Emergency Engine

Classification:

- **Emergency engine operating under RCSA §22a-174-3b(e)**
- **Subject to RCSA §22a-174-22e**
- **Subject to 40 CFR Part 60 Subpart JJJJ**

1. Exemption from Permitting for Construction and Operation of Emergency Engines [STATE ONLY REQUIREMENT]

a. *Limitation or Restriction*

- i. The Permittee shall operate the engine as an emergency engine as defined in RCSA §22a-174-22e. [RCSA §§22a-174-3b and 22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall not allow the emergency engine to operate except during periods of testing and scheduled maintenance or during an emergency and unless the following conditions are met: [RCSA §§22a-174-3b(e)(2)(A) and (B)]

(A) Operation of the emergency engine shall not exceed 300 hours during any 12 month rolling aggregate;

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

(B) Any non-gaseous fuel consumed by the engine shall comply with the fuel sulfur content requirements of RCSA §22a-174-19b(d)(2).

b. Monitoring and Testing Requirements

Record keeping specified in Section III.C.1.c of this Title V permit shall be sufficient to meet Monitoring and Testing Requirements. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Record Keeping Requirements

i. The Permittee shall make and keep the following records:

(A) Hours of operation for each month and each 12-month rolling aggregate.
[RCSA §22a-174-3b(e)(4)]

(B) Records sufficient to demonstrate the sulfur content of fuel used, as specified in RCSA §22a-174-19b(g)(3). [RCSA §22a-174-3b(h)]

ii. All records above shall be maintained for a period of five years and made available to the commissioner to inspect and copy upon request. [RCSA §22a-174-3b(c)(3)]

d. Reporting Requirements

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

2. NOx: RCSA §22a-174-22e

a. Limitation or Restriction

i. The Permittee of an emergency engine shall not operate the emergency engine for routine, scheduled testing or maintenance on any day for which the commissioner has forecast that ozone levels will be "moderate to unhealthy for sensitive groups" or greater. If, subsequent to the initial forecast of "moderate to unhealthy for sensitive groups" or greater, the forecast is revised to "moderate" or lower, the Permittee is no longer prohibited from operating the engine for routine, schedule testing or maintenance for the remainder of that day. The Permittee of an emergency engine may rely on an ozone forecast of "moderate" or lower obtained after 3 p.m. on the preceding day. Subsequent changes to the ozone forecast after 3 p.m. that forecast ozone levels of "moderate to unhealthy for sensitive groups" or greater shall not obligate the Permittee to refrain from operation of the emergency engine at the facility on the following day. The commissioner may exempt, by permit or order, the Permittee of an emergency engine from RCSA §22a-174-22e if such emergency engine is unattended and the testing is automated and cannot be modified from a remote location.
[RCSA §22a-174-22e(d)(14)]

Note: Emergency engines are exempt from the emission limitations of RCSA §22a-174-22e(d)(6).
[RCSA §22a-174-22e(c)(5)(A)]

b. Monitoring Requirements

This emergency engine is exempt from the emission testing and monitoring requirements of RCSA §22a-174-22e. Record keeping specified in Section III.C.2.c of this Title V permit shall be sufficient to

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

meet other Monitoring and Testing Requirements pursuant to RCSA § 22a-174-33. [RCSA §§22a-174-22e(c)(5)(C) and (D)]

c. Record Keeping Requirements

The Permittee shall make and keep the following records:

- i. For an emergency engine not subject to 40 CFR Part 63 Subpart ZZZZ, records of total monthly operating hours of such engine, identifying the dates and operating hours of emergency use and the reason for non-emergency operation. [RCSA §22a-174-22e(j)(2)(A)]
- ii. The date and work performed for repairs, replacement of parts and other maintenance. [RCSA §22a-174-22e(j)(2)(B)]
- iii. Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22e. [RCSA §22a-174-22e(j)(2)(F)]
- iv. Any other record or report required by an order or permit issued by the commissioner pursuant to RCSA §22a-174-22e. [RCSA §22a-174-22e(j)(2)(G)]
- v. The Permittee shall retain all records and reports produced pursuant to RCSA 22a-174-22e for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records and reports shall be retained at the premises where each emission unit is located, unless the commissioner approves in writing the use of another location in Connecticut. [RCSA §22a-174-22e(j)(1)]

d. Reporting Requirements

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is the earlier. [RCSA §22a-174-33(j)(1)(X)]

3. 40 CFR Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Classification:

- Non-certified engine
- Emergency Spark Ignition Engine constructed after June 12, 2006 where the engine was manufactured on or after January 1, 2009
- Pursuant to 40 CFR §63.6590(c), EU-6 meets the requirements of 40 CFR Part 63 Subpart ZZZZ by complying with 40 CFR Part 60 Subpart JJJJ.
- The Permittee should re-evaluate the requirements of 40 CFR Part 60 Subpart JJJJ if any of the above conditions change.

a. Limitation or Restriction

- i. The emission rate of NO_x, CO and VOC discharged to the atmosphere from the stationary internal combustion engine shall not exceed the respective emission limitation specified in 40 CFR Part 60 Subpart JJJJ - Table 1. [40 CFR §60.4233(e)]

(A) NO_x: 2.0 g/hp-hr (160 ppmvd @ 15% O₂)

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

(B) CO: 4.0 g/hp-hr (540 ppmvd @ 15% O₂)

(C) VOC: 1.0 g/hp-hr (86 ppmvd @ 15% O₂)

- ii. The Permittee shall operate and maintain the engine to achieve the emission standards as required in 40 CFR §60.4233 over the entire life of the engine. [40 CFR §60.4234]
- iii. The Permittee shall, to the extent practicable, maintain and operate the emergency engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §60.4243(b)(2)(ii)]
- iv. The Permittee may operate the emergency stationary RICE for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The Permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that federal, state, or local standards require maintenance and testing of the ICE beyond 100 hours per calendar year. [40 CFR §60.4243(d)(2)(i)]
- v. The Permittee shall install a non-resettable hour meter. [40 CFR §60.4237]

b. Monitoring and Testing Requirements

The Permittee shall conduct performance testing every 8,760 hours or three years, whichever comes first, thereafter to demonstrate compliance. Emission testing shall comply with the requirements of 40 CFR §60.4244. [40 CFR §60.4244]

c. Record Keeping Requirements

- i. The Permittee shall comply with all record keeping requirements of the General Provisions in 40 CFR §§60.1 through 60.19, inclusive, as specified in 40 CFR Part 60 Subpart JJJJ, Table 3. [40 CFR §60.4246]
- ii. The Permittee must keep records of all notifications submitted to comply with 40 CFR Part 60 Subpart JJJJ and all documentation supporting any notification. [40 CFR §60.4245(a)(1)]
- iii. The Permittee shall keep records of maintenance conducted on the engine. [40 CFR §60.4245(a)(2)]
- iv. The Permittee shall keep documentation to demonstrate compliance with the emissions standards in Sections III.C.3.a of this Title V permit. [40 CFR §60.4245(a)(4)]
- v. The Permittee shall keep records of the hours of operation of the engine that are recorded using a non- resettable hour meter. The Permittee must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. [40 CFR §60.4245(b)]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

d. Reporting Requirements

- i. The Permittee shall comply with all reporting requirements of the General Provisions in 40 CFR §§60.1 through 60.19, inclusive, as specified in 40 CFR Part 60 Subpart JJJJ, Table 3. [40 CFR §60.4246]
- ii. The Permittee shall submit a copy of each performance test as conducted under 40 CFR §60.4244 within 60 days after the test has been completed. [40 CFR §60.4245(d)]

D. 40 CFR Part 60 Subpart OOOOa - New Source Performance Standard for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced after September 18, 2015

a. Limitation or Restriction

- i. The Permittee must monitor all fugitive emission components, as defined in 40 CFR §60.5430a, in accordance with the following: [40 CFR §60.5397a(a)]

(A) Frequency for conducting surveys: The Permittee must develop an emission monitoring plan that covers the collection of fugitive emissions components within each company-defined area in accordance with the following:
[40 CFR §60.5397a(b)]

(1) Fugitive emissions monitoring plans must include the following: [40 CFR §60.5397a(c)]

(a) Frequency for conducting surveys: The Permittee shall conduct surveys at least as frequently as required in 40 CFR §§60.5397a(f)(2) and (g). [40 CFR §60.5397a(c)(1)]

(b) Technique for determining fugitive emissions: The Permittee shall use Method 21 at 40 CFR Part 60, Appendix A-7, or optical gas imaging. [40 CFR §60.5397a(c)(2)]

(c) Manufacturer and model number of fugitive emissions detection equipment to be used. [40 CFR §60.5397a(c)(3)]

(d) Procedures and timeframes for identifying and repairing fugitive emissions components from which fugitive emissions are detected, including timeframes for fugitive components that are unsafe to repair. The repair schedule must meet the requirements of 40 CFR §60.5397a(h) at a minimum. [40 CFR §60.5397a(c)(4)]

(e) Procedures and timeframes for identifying fugitive component repairs. [40 CFR §60.5397a(c)(5)]

(f) Records that will be kept and the length of time records will be kept. [40 CFR §60.5397a(c)(6)]

(g) If using optical gas imaging, the plan must also include the elements specified in 40 CFR §§60.5397a(c)(7)(i) through (vii). [40 CFR §§60.5397a(c)(7)(i) through (vii)]

(h) If Method 21 at 40 CFR Part 60, Appendix A-7, is used the plan must also include the elements specified in 40 CFR §§60.5397a(c)(8)(i) through (iii). [40 CFR §§60.5397a(c)(8)(i) through (iii)]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- (i) For the purposes of complying with the fugitive emissions monitoring program using Method 21 a fugitive emission is defined as an instrument reading of 500 ppm or greater. [40 CFR §60.5397a(c)(8)]
- (2) Each fugitive emissions monitoring plan must include the elements specified in 40 CFR §60.5397a(d)(1) through (3), at a minimum, as applicable. [40 CFR §60.5397a(d)]
 - (a) If the Permittee is using optical gas imaging, the plan must include procedures to ensure that all fugitive emissions components are monitored during each survey. Example procedures include, but are not limited to, a site map with an observation path, a written narrative of where the fugitive emissions components are located and how they are monitored, or an inventory of fugitive emissions components. [40 CFR §60.5397a(d)(1)]
 - (b) If Method 21 of Appendix A-7 of 40 CFR Part 60 Subpart OOOOa is used, the plan must also include a list of fugitive emissions components to be monitored and method for determining location of fugitive emissions components to be monitored in the field (e.g. tagging, identification on a process and instrumentation diagram, etc.). [40 CFR §60.5397a(d)(2)]
 - (c) The plan must also include the written plan developed for all of the fugitive emission components designated as difficult-to-monitor in accordance with 40 CFR §60.5397a(g)(3), and the written plan for fugitive emission components designated as unsafe-to-monitor in accordance with 40 CFR §60.5397a(g)(4). [40 CFR §60.5397a(d)(4)]
 - (d) Each monitoring survey shall observe each fugitive emissions components, as defined in 40 CFR §60.5430a, for fugitive emissions. [40 CFR §60.5397a(e)]
 - (e) Each identified source of fugitive emissions shall be repaired or replaced in accordance with 40 CFR §§60.5397a (h)(1) and (2). [40 CFR §60.5397a(h)]

b. Monitoring Requirements

Record keeping requirements specified in Section III.D. c of this Title V permit shall be sufficient to meet other Monitoring Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Record Keeping Requirements

- i. The Permittee shall maintain the applicable records as specified in 40 CFR §60.7(f). [40 CFR §60.5420a(c)]
- ii. The Permittee shall maintain records of each monitoring survey as specified in 40 CFR §60.5420a(c)(15). [40 CFR §60.5420a(c)]

d. Reporting Requirements

The Permittee shall submit annual reports as specified in 40 CFR §§60.5420a(b)(7) and (b)(11). [40 CFR §60.5420a(b)]

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

E. PREMISES-WIDE GENERAL REQUIREMENTS

1. **Annual Emission Statements:** The Permittee shall submit annual emission statements requested by the commissioner as set forth in RCSA §22a-174-4a(b)(1).
2. **Emission Testing:** The Permittee shall comply with the procedures for sampling, emission testing, sample analysis, and reporting as set forth in RCSA §22a-174-5.
3. **Emergency Episode Procedures:** The Permittee shall comply with the procedures for emergency episodes as set forth in RCSA §22a-174-6.
4. **Reporting of Malfunctioning Control Equipment:** The Permittee shall comply with the reporting requirements of malfunctioning control equipment as set forth in RCSA §22a-174-7.
5. **Prohibition of Air Pollution:** The Permittee shall comply with the requirement to prevent air pollution as set forth in RCSA §22a-174-9.
6. **Public Availability of Information:** The public availability of information shall apply, as set forth in RCSA §22a-174-10.
7. **Prohibition Against Concealment/Circumvention:** The Permittee shall comply with the prohibition against concealment or circumvention as set forth in RCSA §22a-174-11.
8. **Violations and Enforcement:** The Permittee shall not violate or cause the violation of any applicable regulation as set forth in RCSA §22a-174-12.
9. **Variances:** The Permittee may apply to the commissioner for a variance from one or more of the provisions of these regulations as set forth in RCSA §22a-174-13.
10. **No Defense to Nuisance Claim:** The Permittee shall comply with the regulations as set forth in RCSA §22a-174-14.
11. **Severability:** The Permittee shall comply with the severability requirements as set forth in RCSA §22a-174-15.
12. **Responsibility to Comply:** The Permittee shall be responsible to comply with the applicable regulations as set forth in RCSA §22a-174-16.
13. **Particulate Emissions:** The Permittee shall comply with the standards for control of particulate matter and visible emissions as set forth in RCSA §22a-174-18.
14. **Fuel Sulfur Content:** The Permittee shall not use No. 2 heating oil that exceeds fifteen parts per million of sulfur by weight as set forth in CGS §16a-21a(a)(2)(B) .
15. **Sulfur Dioxide Emissions:** The Permittee shall comply with the requirements for Control of Sulfur Dioxide Emissions from Power Plants and other large stationary sources of air pollution as set forth in RCSA §22a-174-19a.
16. **Sulfur Compound Emissions:** The Permittee shall comply with the requirements for control of sulfur compound emissions as set forth in RCSA §§22a-174-19, 22a-174-19a and 22a-174-19b, as applicable.

Section III: Applicable Requirements and Compliance Demonstration

DRAFT

17. **Organic Compound Emissions:** The Permittee shall comply with the requirements for control of organic compound emissions as set forth in RCSA §22a-174-20.
18. **Nitrogen Oxide Emissions:** The Permittee shall comply with the requirements for control of nitrogen oxide emissions as set forth in RCSA §22a-174-22e.
19. **Ambient Air Quality:** The Permittee shall not cause or contribute to a violation of an ambient air quality standard as set forth in RCSA §22a-174-24(b).
20. **Open Burning:** The Permittee is prohibited from conducting open burning, except as may be allowed by CGS §22a-174(f).
21. **Asbestos:** Should the premises, as defined in 40 CFR §61.145, become subject to the national emission standard for asbestos regulations in 40 CFR Part 61 Subpart M when conducting any renovation or demolition at this premises, then the Permittee shall submit proper notification as described in 40 CFR §61.145(b) and shall comply with all other applicable requirements of 40 CFR Part 61 Subpart M.
22. **Emission Fees:** The Permittee shall pay an emission fee as set forth in RCSA §22a-174-26(d).

Section IV: Compliance Schedule

DRAFT

TABLE IV: COMPLIANCE SCHEDULE				
Emissions Unit	Applicable Regulations	Steps Required for Achieving Compliance (Milestones)	Date by which Each Step is to be Completed	Dates for Monitoring, Record Keeping, and Reporting
		No Steps are required for achieving compliance at this time		

Section V: State Enforceable Terms and Conditions

DRAFT

Only the Commissioner of the Department of Energy and Environmental Protection has the authority to enforce the terms, conditions and limitations contained in this section.

SECTION V: STATE ENFORCEABLE TERMS AND CONDITIONS

- A.** This Title V permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the emissions units in compliance with all applicable requirements of any other Bureau of the Department of Energy and Environmental Protection or any federal, local or other state agency. Nothing in this Title V permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B.** Nothing in this Title V 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, investigate air 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.
- C.** Additional Emissions Units
- 1.** The Permittee shall make and submit a written record, at the commissioner's request, within 30 days of receipt of notice from the commissioner, or by such other date specified by the commissioner, of each additional emissions unit or group of similar or identical emissions units at the premises.
 - 2.** Such record of additional emissions units shall include each emissions unit, or group of emissions units, at the premises which is not listed in Section II.A of this Title V permit, unless the emissions unit, or group of emissions units, is:
 - a. an insignificant emissions unit as defined in RCSA §22a-174-33; or
 - b. an emissions unit or activity listed in *White Paper for Streamlined Development of Part 70 Permit Applications, Attachment A* (EPA guidance memorandum dated July 10, 1995).
 - 3.** For each emissions unit, or group of emissions units, on such record, the record shall include, as available:
 - a. Description, including make and model;
 - b. Year of construction/installation or if a group, range of years of construction/installation;
 - c. Maximum throughput or capacity; and
 - d. Fuel type, if applicable.
- D.** Odors: The Permittee shall not cause or permit the emission of any substance or combination of substances which creates or contributes to an odor that constitutes a nuisance beyond the property boundary of the premises as set forth in RCSA §22a-174-23.
- E.** Noise: The Permittee shall operate in compliance with the regulations for the control of noise as set forth in RCSA §§22a-69-1 through 22a-69-7.4, inclusive.

Section V: State Enforceable Terms and Conditions

DRAFT

- F. Hazardous Air Pollutants (HAPs): The Permittee shall operate in compliance with the regulations for the control of HAPs as set forth in RCSA §22a-174-29.
- G. The Permittee shall comply with the requirements for Control of Carbon Dioxide Emissions as set forth in RCSA §22a-174-31.
- H. The Permittee shall comply with the requirements for Architectural and Industrial Maintenance Coatings as set forth in RCSA §22a-174-41.
- I. The Permittee shall comply with the requirements for Adhesives and Sealants as set forth in RCSA §22a-174-44.

Section VI: Title V Requirements

DRAFT

The Administrator of the United States Environmental Protection Agency and the Commissioner of the Department of Energy and Environmental Protection have the authority to enforce the terms and conditions contained in this section.

SECTION VI: TITLE V REQUIREMENTS

A. SUBMITTALS TO THE COMMISSIONER & ADMINISTRATOR

The date of submission to the commissioner of any document required by this Title V permit shall be the date such document is received by the commissioner. The date of any notice by the commissioner under this Title V permit, including, but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is delivered or the date three days after it is mailed by the commissioner, whichever is earlier. Except as otherwise specified in this Title V permit, the word "day" means calendar day. Any document or action which is required by this Title V 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.

Any document required to be submitted to the commissioner under this Title V permit shall, unless otherwise specified in writing by the commissioner, be directed to: Compliance Analysis and Coordination Unit, Bureau of Air Management, Department of Energy and Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

Any submittal to the Administrator of the Environmental Protection Agency shall be submitted per the procedure required by the applicable requirement or otherwise in a computer-readable format and addressed to: Director, Enforcement and Compliance Assurance Division, U.S. EPA Region I, 5 Post Office Square, Suite 100 (Mailcode: 04-02), Boston, Massachusetts 02109-3912, Attn: Air Compliance Clerk.

B. CERTIFICATIONS [RCSA §22a-174-33(b)]

In accordance with RCSA §22a-174-33(b), any report or other document required by this Title V permit and any other information submitted to the commissioner or Administrator shall be signed by an individual described in RCSA §22a-174-2a(a), or by a duly authorized representative of such individual. Any individual signing any document pursuant to RCSA §22a-174-33(b) shall examine and be familiar with the information submitted in the document and all attachments thereto, and shall make inquiry of those individuals responsible for obtaining the information to determine that the information is true, accurate, and complete, and shall also sign the following certification as provided in RCSA §22a-174-2a(a)(4):

“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.”

C. SIGNATORY RESPONSIBILITY [RCSA §22a-174-2a(a)]

For purposes of signing any Title V-related application, document, report or certification required by RCSA §22a-174-33, any corporation's duly authorized representative may be either a named individual or any individual occupying a named position. Such named individual or individual occupying a named position is a duly authorized representative if such individual is responsible for the overall operation of one or more manufacturing, production or operating facilities subject to RCSA §22a-174-33 and either:

Section VI: Title V Requirements

DRAFT

1. The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding 25 million dollars in second quarter 1980 dollars; or
2. The delegation of authority to the duly authorized representative has been given in writing by an officer of the corporation in accordance with corporate procedures and the following:
 - i. Such written authorization specifically authorizes a named individual, or a named position, having responsibility for the overall operation of the Title V premises or activity,
 - ii. Such written authorization is submitted to the commissioner and has been approved by the commissioner in advance of such delegation. Such approval does not constitute approval of corporate procedures, and
 - iii. If a duly authorized representative is a named individual in an authorization submitted under subclause ii. of this subparagraph and a different individual is assigned or has assumed the responsibilities of the duly authorized representative, or, if a duly authorized representative is a named position in an authorization submitted under subclause ii. of this subparagraph and a different named position is assigned or has assumed the duties of the duly authorized representative, a new written authorization shall be submitted to the commissioner prior to or together with the submission of any application, document, report or certification signed by such representative.

D. ADDITIONAL INFORMATION [RCSA §22a-174-33(j)(1)(X), RCSA §22a-174-33(h)(2)]

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier, including information to determine whether cause exists for modifying, revoking, reopening, reissuing, or suspending this Title V permit or to determine compliance with this Title V permit.

In addition, the Permittee shall submit information to address any requirements that become applicable to the subject source and shall submit correct, complete, and sufficient information within 15 days of the applicant's becoming aware of any incorrect, incomplete, or insufficient submittal, during the pendency of the application, or any time thereafter, with an explanation for such deficiency and a certification pursuant to RCSA §22a-174-2a(a)(5).

E. MONITORING REPORTS [RCSA §22a-174-33(o)(1)]

A Permittee, required to perform monitoring pursuant to this Title V permit, shall submit to the commissioner, on forms prescribed by the commissioner, written monitoring reports on March 1 and September 1 of each year or on a more frequent schedule if specified in such permit. Such monitoring reports shall include the date and description of each deviation from a permit requirement including, but not limited to:

1. Each deviation caused by upset or control equipment deficiencies; and
2. Each deviation of a permit requirement that has been monitored by the monitoring systems required under this Title V permit, which has occurred since the date of the last monitoring report; and
3. Each deviation caused by a failure of the monitoring system to provide reliable data.

Section VI: Title V Requirements

DRAFT

F. PREMISES RECORDS [RCSA §22a-174-33(o)(2)]

Unless otherwise required by this Title V permit, the Permittee shall make and keep records of all required monitoring data and supporting information for at least five years from the date such data and information were obtained. The Permittee shall make such records available for inspection at the site of the subject source, and shall submit such records to the commissioner upon request. The following information, in addition to required monitoring data, shall be recorded for each permitted source:

1. The type of monitoring or records used to obtain such data, including record keeping;
2. The date, place, and time of sampling or measurement;
3. The name of the individual who performed the sampling or the measurement and the name of such individual's employer;
4. The date(s) on which analyses of such samples or measurements were performed;
5. The name and address of the entity that performed the analyses;
6. The analytical techniques or methods used for such analyses;
7. The results of such analyses;
8. The operating conditions at the subject source at the time of such sampling or measurement; and
9. All calibration and maintenance records relating to the instrumentation used in such sampling or measurements, all original strip-chart recordings or computer printouts generated by continuous monitoring instrumentation, and copies of all reports required by the subject permit.

G. PROGRESS REPORTS [RCSA §22a-174-33(q)(1)]

The Permittee shall, on March 1 and September 1 of each year, or on a more frequent schedule if specified in this Title V permit, submit to the commissioner a progress report on forms prescribed by the commissioner, and certified in accordance with RCSA §22a-174-2a(a)(5). Such report shall describe the Permittee's progress in achieving compliance under the compliance plan schedule contained in this Title V permit. Such progress report shall:

1. Identify those obligations under the compliance plan schedule in this Title V permit which the Permittee has met, and the dates on which they were met; and
2. Identify those obligations under the compliance plan schedule in this Title V permit which the Permittee has not timely met, explain why they were not timely met, describe all measures taken or to be taken to meet them and identify the date by which the Permittee expects to meet them.

Any progress report prepared and submitted pursuant to RCSA §22a-174-33(q)(1) shall be simultaneously submitted by the Permittee to the Administrator.

Section VI: Title V Requirements

DRAFT

H. COMPLIANCE CERTIFICATIONS [RCSA §22a-174-33(q)(2)]

The Permittee shall, on March 1 of each year, or on a more frequent schedule if specified in this Title V permit, submit to the commissioner a written compliance certification certified in accordance with RCSA §22a-174-2a(a)(5) and which includes the information identified in 40 CFR §70.6(c)(5)(iii)(A) to (C), inclusive.

Any compliance certification prepared and submitted pursuant to RCSA §22a-174-33(q)(2) shall be simultaneously submitted by the Permittee to the Administrator.

I. PERMIT DEVIATION NOTIFICATIONS [RCSA §22a-174-33(p)]

Notwithstanding Section VI.E. of this Title V permit, the Permittee shall notify the commissioner in writing, on forms prescribed by the commissioner, of any deviation from an emissions limitation, and shall identify the cause or likely cause of such deviation, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows:

1. For any hazardous air pollutant, no later than 24 hours after such deviation commenced; and
2. For any other regulated air pollutant, no later than ten days after such deviation commenced.

J. PERMIT RENEWAL [RCSA §22a-174-33(j)(1)(B)]

All of the terms and conditions of this Title V permit shall remain in effect until the renewal permit is issued or denied provided that a timely renewal application is filed in accordance with RCSA §§22a-174-33(g), -33(h), and -33(i).

K. OPERATE IN COMPLIANCE [RCSA §22a-174-33(j)(1)(C)]

The Permittee shall operate the source in compliance with the terms of all applicable regulations, the terms of this Title V permit, and any other applicable provisions of law. In addition, any noncompliance constitutes a violation of the Clean Air Act and Chapter 446c of the Connecticut General Statutes and is grounds for federal and/or state enforcement action, permit termination, revocation and reissuance, or modification, and denial of a permit renewal application.

L. COMPLIANCE WITH PERMIT [RCSA §22a-174-33(j)(1)(G)]

This Title V permit shall not be deemed to:

1. Preclude the creation or use of emission reduction credits or allowances or the trading thereof in accordance with RCSA §§22a-174-33(j)(1)(I) and -33(j)(1)(P), provided that the commissioner's prior written approval of the creation, use, or trading is obtained;
2. Authorize emissions of an air pollutant so as to exceed levels prohibited pursuant to 40 CFR Part 72;
3. Authorize the use of allowances pursuant to 40 CFR Parts 72 through 78, inclusive, as a defense to noncompliance with any other applicable requirement; or
4. Impose limits on emissions from items or activities specified in RCSA §§22a-174-33(g)(3)(A) and -33(g)(3)(B) unless imposition of such limits is required by an applicable requirement.

Section VI: Title V Requirements

DRAFT

M. INSPECTION TO DETERMINE COMPLIANCE [RCSA §22a-174-33(i)(1)(M)]

The commissioner may, for the purpose of determining compliance with this Title V permit and other applicable requirements, enter the premises at reasonable times to inspect any facilities, equipment, practices, or operations regulated or required under such permit; to sample or otherwise monitor substances or parameters; and to review and copy relevant records lawfully required to be maintained at such premises in accordance with this Title V permit. It shall be grounds for permit revocation should entry, inspection, sampling, or monitoring be denied or effectively denied, or if access to and the copying of relevant records is denied or effectively denied.

N. PERMIT AVAILABILITY

The Permittee shall have available at the facility at all times a copy of this Title V permit.

O. SEVERABILITY CLAUSE [RCSA §22a-174-33(j)(1)(R)]

The provisions of this Title V permit are severable. If any provision of this Title V permit or the application of any provision of this Title V permit to any circumstance is held invalid, the remainder of this Title V permit and the application of such provision to other circumstances shall not be affected.

P. NEED TO HALT OR REDUCE ACTIVITY [RCSA §22a-174-33(j)(1)(T)]

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Title V permit.

Q. PERMIT REQUIREMENTS [RCSA §22a-174-33(j)(1)(V)]

The filing of an application or of a notification of planned changes or anticipated noncompliance does not stay the Permittee's obligation to comply with this Title V permit.

R. PROPERTY RIGHTS [RCSA §22a-174-33(j)(1)(W)]

This Title V permit does not convey any property rights or any exclusive privileges. This Title V 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 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, including CGS §4-181a(b) and RCSA §22a-3a-5(b). This Title V permit shall neither create nor affect any rights of persons who are not parties to this Title V permit.

S. ALTERNATIVE OPERATING SCENARIO RECORDS [RCSA §22a-174-33(o)(3)]

The Permittee shall, contemporaneously with making a change authorized by this Title V permit from one alternative operating scenario to another, maintain a record at the premises indicating when changes are made from one operating scenario to another and shall maintain a record of the current alternative operating scenario.

T. OPERATIONAL FLEXIBILITY AND OFF-PERMIT CHANGES [RCSA §22a-174-33(r)(2)]

The Permittee may engage in any action allowed by the Administrator in accordance with 40 CFR §§70.4(b)(12)(i) to (iii)(B), inclusive, and 40 CFR §§70.4(b)(14)(i) to (iv), inclusive, without a Title V non-minor permit modification, minor permit modification or revision and without requesting a Title V non-minor permit modification, minor permit modification or revision provided such action does not:

Section VI: Title V Requirements

DRAFT

1. Constitute a modification under 40 CFR Part 60, 61 or 63;
2. Exceed emissions allowable under the subject permit;
3. Constitute an action which would subject the Permittee to any standard or other requirement pursuant to 40 CFR Parts 72 to 78, inclusive; or
4. Constitute a non-minor permit modification pursuant to RCSA §22a-174-2a(d)(4).

At least seven days before initiating an action specified in RCSA §22a-174-33(r)(2)(A), the Permittee shall notify the Administrator and the commissioner in writing of such intended action.

U. INFORMATION FOR NOTIFICATION [RCSA §22a-174-33(r)(2)(A)]

Written notification required under RCSA §22a-174-33(r)(2)(A) shall include a description of each change to be made, the date on which such change will occur, any change in emissions that may occur as a result of such change, any Title V permit terms and conditions that may be affected by such change, and any applicable requirement that would apply as a result of such change. The Permittee shall thereafter maintain a copy of such notice with the Title V permit. The commissioner and the Permittee shall each attach a copy of such notice to their copy of the Title V permit.

V. TRANSFERS [RCSA §22a-174-2a(g)]

No person other than the Permittee shall act or refrain from acting under the authority of this Title V permit unless such permit has been transferred to another person in accordance with RCSA §22a-174-2a(g).

The proposed transferor and transferee of a permit shall submit to the commissioner a request for a permit transfer on a form provided by the commissioner. A request for a permit transfer shall be accompanied by any fees required by any applicable provision of the general statutes or regulations adopted thereunder. The commissioner may also require the proposed transferee to submit with any such request, the information identified in CGS §22a-60.

W. REVOCATION [RCSA §22a-174-2a(h)]

The commissioner may revoke this Title V permit on his own initiative or on the request of the Permittee or any other person, in accordance with CGS §4-182(c), RCSA §22a-3a-5(d), and any other applicable law. Any such request shall be in writing and contain facts and reasons supporting the request. The Permittee requesting revocation of this Title V permit shall state the requested date of revocation and provide evidence satisfactory to the commissioner that the subject source is no longer a Title V source.

Pursuant to the Clean Air Act, the Administrator has the power to revoke this Title V permit. Pursuant to the Clean Air Act, the Administrator also has the power to reissue this Title V permit if the Administrator has determined that the commissioner failed to act in a timely manner on a permit renewal application.

This Title V permit may be modified, revoked, reopened, reissued, or suspended by the commissioner, or the Administrator in accordance with RCSA §22a-174-33(r), CGS §22a-174c, or RCSA §22a-3a-5(d).

Section VI: Title V Requirements

DRAFT

X. REOPENING FOR CAUSE [RCSA §22a-174-33(s)]

This Title V permit may be reopened by the commissioner, or the Administrator in accordance with RCSA §22a-174-33(s).

Y. CREDIBLE EVIDENCE

Notwithstanding any other provision of this Title V permit, for the purpose of determining compliance or establishing whether a Permittee has violated or is in violation of any permit condition, nothing in this Title V permit shall preclude the use, including the exclusive use, of any credible evidence or information.

DRAFT

Print for Compliance Certification or Enforcement

Click the button below to generate the appropriate checklist. Be aware that this macro does not work unless you have access to the DEEP D-Drive.

This macro takes anywhere from 2-5 minutes to run. Your computer will look like it is locked up but it is working. Unfortunately the new DEEP virtual computer system makes this process even slower. Please be patient.

Print Enforcement Checklist

Print Compliance Certification