



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

**BUREAU OF AIR MANAGEMENT
NEW SOURCE REVIEW PERMIT
TO CONSTRUCT AND OPERATE A STATIONARY SOURCE**

Issued pursuant to Title 22a of the Connecticut General Statutes (CGS) and Section 22a-174-3a of the Regulations of Connecticut State Agencies (RCSA).

Owner/Operator	Hamilton Sundstrand Corporation
Address	One Hamilton Road, Windsor Locks, CT 06096
Equipment Location	One Hamilton Road, Windsor Locks, CT 06096
Equipment Description	Cogeneration Facility consisting of a 5.4 megawatt Solar Taurus Gas Turbine, a 31.27 MMBtu/hr Coen Standard Duct Burner and a Rentech Heat Recovery Steam Generator
Town-Permit Numbers	213-0115
Premises Number	0002
Stack Number	78
Prior Permit Issue Dates	April 9, 2009 - Original Permit; April 29, 2009- Revision; December 1, 2011- Minor Modification; April 9, 2013 – Modification; July 31, 2107 – Minor Modification; October 9, 2017 - Revision
Modification Issue Date	November 20, 2017
Expiration Date	None

/s/ Anne Gobin for
Robert J. Klee
Commissioner

November 20, 2017
Date

This permit specifies necessary terms and conditions for the operation of this equipment to comply with state and federal air quality standards. The Permittee shall at all times comply with the terms and conditions stated herein.

PART I. DESIGN SPECIFICATIONS

A. General Description

Hamilton Sundstrand will install and operate a 5.4 MW combined heat and power (CHP) generation facility at its Windsor Locks facility. The CHP consists of a Solar Taurus 60 combustion turbine with a natural gas fired 31.27 MMBtu/hr Coen Standard duct burner and a Rentech heat recovery steam generator (HRSG). Emissions from the facility will be controlled by a selective catalytic reduction (SCR) unit for NO_x control and an oxidation catalyst for CO control.

B. Equipment Design Specifications

Turbine:

1. Fuel Types: Natural gas, No. 2 oil (ULSD)
2. Maximum Fuel Firing Rates¹: 67,078 ft³/hr (natural gas); 420 gal/hr (ULSD)
3. Maximum Gross Heat Input (MMBTU/hr) ¹: 67.08 (natural gas); 58.82 (ULSD) ²

Duct Burner:

4. Fuel Types: Natural gas
5. Maximum Fuel Firing Rates¹: 31,270 ft³/hr (natural gas)
6. Maximum Gross Heat Input (MMBTU/hr) ¹: 31.27 @ 1,000 Btu/scf

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

² at HHV of USLD of 140,037 Btu/gal

C. Control Equipment Design Specifications

1. Selective Catalytic Reduction (SCR)
 - a. Make and Model: Cormetech/Rentech or equivalent
 - b. Catalyst Type: Titania based ceramic honeycomb catalyst or equivalent
2. Oxidation Catalyst
 - a. Make and Model: Emerachem/Rentech or equivalent
 - b. Catalyst Type: Stainless steel monolith with alumina/platinum catalytic coating or equivalent

D. Stack Parameters

1. Minimum Stack Height (ft): 75
2. Minimum Stack Diameter (ft): 4
3. Minimum Exhaust Gas Flow Rate at 100% load (acfm): 54,444

4. Minimum Stack Exit Temperature at 100% load (°F): 260
5. Minimum Distance from Stack to Property Line (ft): 790

PART II. OPERATIONAL CONDITIONS

A. Equipment

Turbine:

1. Maximum Fuel Consumption over any Consecutive 12 Month Period: 587.6 MMft³ (natural gas), 420,000 gallons (ULSD)
2. Maximum Oil Sulfur Content (% by weight, dry basis): 0.0015

Duct Burner:

3. Maximum Fuel Consumption over any Consecutive 12 Month Period: 274 MMft³ (natural gas)

PART III. ALLOWABLE EMISSION LIMITS

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

A. Criteria Pollutants

1. Short term emission limits

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

a. Turbine operating on natural gas:

Pollutant	ppmvd @15% O₂	lb/MMBtu	lb/hr
PM ₁₀ /PM _{2.5}		0.017	1.11
SO ₂		0.0016	0.11
NO _x	2.5	0.011 ¹	0.74
VOC		7.77E-03	0.52
CO	10.0	0.027 ¹	1.80

b. Turbine operating on ULSD:

Pollutant	ppmvd @15% O ₂	lb/MMBtu	lb/hr
PM ₁₀ /PM _{2.5}		0.019	1.11
SO ₂		1.52E-03	0.11
NO _x	9.6	0.042 ¹	2.49
VOC		0.039	2.29
CO	20.0	0.054 ¹	3.19
Pb		1.40E-05	8.24E-04

c. Turbine and Duct Burner operating on natural gas:

Pollutant	ppmvd @15% O ₂	lb/MMBtu	lb/hr
PM ₁₀ /PM _{2.5}		0.011	1.11
SO ₂		0.0016	0.161
NO _x	2.5	0.010 ¹	0.98
VOC		0.007	0.69
CO	10.0	0.026 ¹	2.60
Pb		1.88E-07	1.53E-05

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

d. For all Operating Scenarios:

Pollutant	ppmvd @15% O ₂
Ammonia	5.0

2. Startup and Shutdown Emission Limits

The Permittee shall minimize emissions during periods of startup and shutdown by the following work practices and time constraints. Start the ammonia injection as soon as minimum catalyst temperature is reached. The oxidation catalyst shall not be bypassed during startup or shutdown. The duration of startup shall not exceed 60 minutes for a hot start or a warm start, nor 240 minutes for a cold start.

- a. A “hot start” shall be defined as startup when the turbine has been down for less than 8 hours.
- b. A “warm start” shall be defined as startup when the turbine has been down for more than 8 hours, but less than 24 hours.
- c. A “cold start” shall be defined as startup when the turbine has been down for more than 24 hours. The duration of shutdown shall not exceed 60 minutes.

CO (startup/shutdown): Natural gas: 15.7/6.9 lb/event
 ULSD: 24.5/9.6 lb/event

NO_x (startup/shutdown): Natural gas: 0.8/0.4 lb/event
 ULSD : 1.7/0.8 lb/event

Emissions during these periods shall be counted towards the annual emission limits stated herein.

Annual Emission Limits

Pollutant	Tons per 12 consecutive months
PM ₁₀ /PM _{2.5}	4.86
SO ₂	0.71
NO _x	5.26
VOC	3.82
CO	11.39

B. Hazardous Air Pollutants

This equipment shall not cause an exceedance of the Maximum Allowable Stack Concentration (MASC) for any hazardous air pollutant (HAP) emitted and listed in RCSA Section 22a-174-29. [STATE ONLY REQUIREMENT]

C. Opacity

This equipment shall not exceed 10% opacity during any six minute block average as measured, if required by the commissioner, by 40 CFR 60, Appendix A, Reference Method 9.

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

- NO_x, CO, Ammonia: stack test data.
- PM-10/PM-2.5: 1.11 lb/hr (0.019 lb/MMBtu): Emission factors are from screening modeling recommendation approved by DEEP on August 5, 2011 (See evaluation for minor modification to Permit No. 213-0115-Application No. 201101730)
- SO₂, VOC, HAPs:
Turbine: Compilation of Air Pollutant Emission Factors, AP-42, fifth edition, Section 3.1, April 2000, or most recent revision, or equipment manufacturer data.
Duct Burner: Compilation of Air Pollutant Emission Factors, AP-42, fifth edition, Section 1.4, July 1998, or most recent revision, or equipment manufacturer data.

The commissioner may require other means (e.g. stack testing) to demonstrate compliance with the above emission limits, as allowed by state or federal statute, law or regulation.

PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS

A. Monitoring

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

B. Record Keeping

1. The Permittee shall keep records of monthly and consecutive 12 month fuel consumption. The consecutive 12 month fuel consumption shall be determined by adding (for each fuel) the current month's fuel consumption to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of the previous month.
2. The Permittee shall keep records of (1) the fuel certification for each delivery of fuel oil from a bulk petroleum provider; or (2) performing an analysis using the method found in ASTM D129, or alternatively D1266, D1552, D2622, D4294, or D5453; or (3) a copy of the current contract with the fuel supplier supplying the fuel used by the equipment that includes the applicable sulfur content of the fuel as a condition of each shipment. The shipping receipt or contract shall include the date of delivery, the name of the fuel supplier, type of fuel delivered, the percentage of sulfur in such fuel, by weight, dry basis, and the method used to determine the sulfur content of such fuel.
3. The Permittee shall calculate and record the monthly and consecutive 12 month PM₁₀, PM_{2.5}, SO₂, NO_x, VOC, and CO 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.
4. Emissions during startup and shutdown shall be counted towards the annual emission limitation in Part III.A.3. of this permit.
5. The Permittee shall keep records of each delivery of aqueous ammonia. The records shall include the date of delivery, the name of the supplier, the quantity of aqueous ammonia delivered, and the percentage of ammonia in solution, by weight.
6. The Permittee shall keep records of the inspection and maintenance of the SCR and oxidation catalysts. The records shall include the name of the inspector, the date, the results or actions and the date the catalyst is replaced.

7. The Permittee shall keep records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the stationary gas turbine, duct burner or any malfunction of the air pollution control equipment. [40 CFR §60.7(b)]
8. The Permittee shall keep all records required by this permit for a period of no less than five years and shall submit such records to the commissioner upon request.

C. Reporting

1. The Permittee shall notify the commissioner in writing of any malfunction of the stationary gas turbine/duct burner or the air pollution control equipment. The Permittee shall submit such notification within ten days of the malfunction. The notification shall include the following:
 - a. a description of the malfunction and a description of the circumstances surrounding the cause or likely cause of such malfunction, and
 - b. a description of all corrective actions and preventive measures taken and/or planned with respect to such malfunction and the dates of such actions and measures.

PART V. STACK EMISSION TEST REQUIREMENTS

- A. Stack emission testing shall be performed in accordance with the [Emission Test Guidelines](#) available on the DEEP website.
- B. Stack testing shall be required for the following pollutant(s):

<input type="checkbox"/> PM	<input type="checkbox"/> PM ₁₀	<input type="checkbox"/> PM _{2.5}	<input type="checkbox"/> SO ₂	<input checked="" type="checkbox"/> NO _x	<input checked="" type="checkbox"/> CO
<input type="checkbox"/> VOC	<input type="checkbox"/> Opacity	<input checked="" type="checkbox"/> Other (HAPs): <u>Ammonia</u>			
- C. For testing being conducted pursuant to 40 CFR Part 60, the test report shall be submitted within 180 days after the initial startup date or within 60 days after reaching maximum production rate. [40 CFR §60.8(a)]
- D. Recurrent stack testing for the above pollutants shall be conducted within five years from the date of the previous stack test.
- E. Stack test results shall be reported as follows: all pollutants in units of lb/hr, NO_x and CO in units of ppmvd at 15% O₂, ammonia in units of µg/m³ and ppmvd at 15% O₂.
- F. Annual/biennial stack testing for NO_x shall be performed to demonstrate compliance with the NO_x emission limits in accordance with 40 CFR §60.4400.
- G. Subject to Subsection V.H. below, stack testing shall be conducted for the following operating modes:
 1. Turbine on Natural Gas,
 2. Turbine on ULSD, and
 3. Turbine and Duct Burner on Natural Gas.

- H.** Stack testing for operating mode G(2) above (Turbine on ULSD) shall be deferred until such time as ULSD is combusted in the turbine. The permittee shall:
1. Notify the commissioner within 15 days of commencing operating mode G(2);
 2. Submit an ITT application to the commissioner within 30 days of commencing operating Mode G(2); and
 3. Perform stack testing for operating mode G(2) within 60 days of receipt of approval of the ITT application.

PART VI. OPERATION AND MAINTENANCE REQUIREMENTS

- A.** The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations.
- B.** The Permittee shall operate and maintain this stationary combustion turbine/duct burner, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.
- C.** The Permittee shall properly operate the control equipment at all times that this equipment is in operation and emitting air pollutants.
- D.** The Permittee shall keep records, when the turbine/duct burner is changed for routine maintenance, to include the following:
1. The date the turbine/duct burner was changed,
 2. The reason for the change,
 3. Documentation that the replacement turbine/duct burner is the same make and model number or equivalent,
 4. Documentation of all associated fixed capital costs, and
 5. Documentation showing that the replacement turbine/duct burner does not result in an increase in emissions, the emission of any new air pollutants, or increases in electrical output of the turbine.

PART VII. SPECIAL REQUIREMENTS

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

Title 40 CFR Part 60, Subparts KKKK and A

Copies of the Code of Federal Regulations (CFR) are available online at the U.S. Government Printing Office website.

- B.** The Permittee shall operate this facility at all times in a manner so as not to violate or contribute significantly to the violation of any applicable state noise control regulations, as set forth in RCSA

Sections 22a-69-1 through 22a-69-7.4. [STATE ONLY REQUIREMENT]

- C. The Permittee shall not cause or permit the emission of any substance or combination of substances which creates or contributes to an odor beyond the property boundary of the premises that constitutes a nuisance as set forth in RCSA Section 22a-174-23. [STATE ONLY REQUIREMENT]
- D. In the event that a malfunction causing either an emission exceedance or a parameter monitored out of recommended range is not corrected within three hours, the Permittee shall immediately institute shutdown of the turbine/duct burner.

PART VIII. ADDITIONAL TERMS AND CONDITIONS

- A. This permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the regulated activity in compliance with all applicable requirements of any federal, municipal or other state agency. Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B. Any representative of DEEP may enter the Permittee's site in accordance with constitutional limitations at all reasonable times without prior notice, for the purposes of inspecting, monitoring and enforcing the terms and conditions of this permit and applicable state law.
- C. This permit may be revoked, suspended, modified or transferred in accordance with applicable law.
- D. This permit is subject to and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut and conveys no property rights in real estate or material, nor any exclusive privileges, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby. This permit shall neither create nor affect any rights of persons or municipalities who are not parties to this permit.
- E. Any document, including any notice, which is required to be submitted to the commissioner under this permit shall be signed by a duly authorized representative of the Permittee and by the person who is responsible for actually preparing such document, each of whom shall certify in writing as follows: "I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under section 22a-175 of the Connecticut General Statutes, under section 53a-157b of the Connecticut General Statutes, and in accordance with any applicable statute."
- F. Nothing in this permit shall affect the commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the Permittee by the commissioner.

- G.** Within 15 days of the date the Permittee becomes aware of a change in any information submitted to the commissioner under this permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the Permittee shall submit the correct or omitted information to the commissioner.

- H.** The date of submission to the commissioner of any document required by this permit shall be the date such document is received by the commissioner. The date of any notice by the commissioner under this permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three days after it is mailed by the commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" means calendar day. Any document or action which is required by this permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.

- I.** Any document required to be submitted to the commissioner under this permit shall, unless otherwise specified in writing by the commissioner, be directed to: Office of Director; Engineering & Enforcement Division; Bureau of Air Management; Department of Energy and Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.



NSR Engineering Evaluation
 CT Department of Energy and Environmental Protection
 Bureau of Air Management

Company Name:	Hamilton Sundstrand Corporation	Permit No.:	213-0115
Equipment Location:	1 Hamilton Road, Windsor, CT 06096-1010	Date App Received:	10/18/2017
Mailing Address:	1 Hamilton Road, M/S 1-F-S23, Windsor Locks, CT 06096-1010	SIMS No.:	201708953
Contact Person:	Mr. John Petrik	Date Prepared:	11/8/2017
Contact Title:	Manager Environmental Compliance	Prepared By:	Kevin O'Neil
Contact Phone:	860-654-3107	Single or Multiple Units:	Single
Contact Email:	John.petrik@utas.utc.com	Permit Type:	Minor Mod (prepaid)
Ozone:	serious non-attainment	Premises Size:	Major
PM2.5:	attainment	Equipment Size:	Minor
Equipment Description	Cogeneration Facility Consisting of a 5.4 Megawatt Solar Taurus Gas Turbine, a 31.27 MMBtu/hr Coen Standard Duct Burner and a Rentech Heat Recovery Steam Generator	TV Permit No:	213-0081-TV
Step 1: Complete all the fields above			
Step 2: <input type="button" value="Generate Eval"/>		Step 3: <input type="button" value="Update Fields"/>	

Introduction

Hamilton Sundstrand Corporation – UTC Aerospace Systems Company designs and manufactures aircraft and spacecraft control systems and components for the aerospace and marine industries at their Windsor Locks facility.

Reason for Application:

Ms. Alyssa Park, Air Bureau field enforcement, conducted an inspection of Hamilton Sundstrand Corporation’s (HSC) Windsor Locks facility in August of 2017. This inspection included a review of the facility’s Title V permit, Permit No. 213-0081-TV, as well as Permit No. 213-0115 for the facility’s co-gen system. Review of Permit No. 213-0115 revealed that the allowable emission rates for SO₂ were incorrectly calculated for the turbine and duct burner while burning natural gas. It is believed the calculations in the original permit application were incorrect because the EPA AP-42 equations used were incorrectly interpreted resulting in the error in the permit when issued. Subsequently, HSC submitted a minor modification application to correct these allowable emissions rates for SO₂.

Regulatory Applicability:

The requested changes are considered a minor modification pursuant to RCSA §22a-174-2a(e) since the changes are not considered a non-minor modification or revision. Pursuant to RCSA §22a-174-2a(e)(6), this permit will be modified without published notice, public comment, or hearing.

Discussion of Modification:

When Permit No. 213-0115 was initially issued in 2009 the allowable emission rates for SO₂ for the turbine, with and without the duct burner, while the equipment is burning natural gas, used AP-42 emission factors according to the application submitted for the original permit. However the allowable emission rates in the original and current permit for SO₂ for both the turbine and duct burner while operating on natural gas are not consistent with the emissions rates derived from using AP-42 emission factors. Therefore, it is unclear why these allowable emission rates were used. In any case they appear to be too low and need to be corrected.

The turbine is subject to 40 CFR Part 60 Subpart KKKK, however the definition of “natural gas” in such subpart does not include a sulfur content. As such, the definition of “pipeline natural gas” as defined in 40 CFR §72.2, which does include a sulfur content, will be used. HSC uses pipeline natural gas for this source.

40 CFR §72.2 states that pipeline natural gas contains 0.5 grains or less of total sulfur per 100 standard cubic feet. Using the conversion factor of 7000 grains per pound and assuming that at standard pressure and temperature 23.8 cubic feet of gas equals one pound, a conservative estimate is that pipeline natural gas contains 17 ppm of sulfur, which is 0.0017% by weight. Emission factors for natural gas turbines can be found in section 3.1 *Stationary Gas Turbines* of AP-42, 5th edition, Table 3.1-2a (Table 3.1-2a). Table 3.1-2a’s emission factor for SO₂ for natural gas fired turbines is 0.94S lb/MMBtu. Where S represents the sulfur content of the natural gas in percentage by weight and all sulfur in the fuel is assumed to be converted to SO₂. Using the calculated percentage by weight and the emission factor for SO₂ from natural gas combustion found in Table 3.1-2a, the emission rate of SO₂ is 0.001598 lb/MMBtu, rounded up to 0.0016 lb/MMBtu.

The current permit has a SO₂ emission rate for the turbine operating on natural gas of 0.000658 lb/MMBtu and 0.000631 lb/MMBtu for the turbine and duct burner operating together. In the minor modification application submitted by HSC the sulfur content of natural gas stated in 40 CFR §72.2 was used and applied to the emission factor in Table 3.1-2a to get the emission rate for SO₂ of 0.0016 lb/MMBtu for the turbine burning natural gas. However, for the duct burner burning natural gas, an emission factor from section 1.4 *Natural Gas Combustion* of AP-42 5th edition, Table 1.4-2 (Table 1.4-2) was used. The emission factor for SO₂ in Table 1.4-2 is based on assuming the pipeline natural gas contains 2000 grains per million cubic feet of sulfur. This calculates to 6.8 ppm. Since the turbine and the duct burner use the same natural gas supply, one sulfur content for the natural gas burned in the turbine and duct burner must be used.

Therefore, to be conservative, a sulfur content of 0.5 grains per 100 cubic feet for pipeline natural gas as stated in 40 CFR §72.2 will be used for the duct burner as well. Also, to be conservative and consistent, the natural gas emission factor for SO₂ in Table 3.1-2a will be used for both the turbine and the duct burner. Doing so, the allowable rate of SO₂ is 0.0016 lb/MMBtu for both the turbine and duct burner; and rates of 0.11 lb/hr for the turbine and 0.051 lb/hr for the duct burner. The lb/hr rates are based on a maximum gross heat input rates of 67.08 MMBtu for the turbine and 31.27 MMBtu for the duct burner. Therefore, the allowable emission rates for the turbine and duct burner both burning natural gas are 0.0016 lb/MMBtu and 0.161 lb/hr.

Based on the maximum SO₂ emission rate of 0.161 lb/hr and the permit allowing operation 8,760 hr/yr, the consecutive 12 month allowable emission rate for the co-gen system has been increased from 0.27 tpy to 0.71 tpy. This rate remains well below the level that would trigger air screen modeling for SO₂ emissions.

In reviewing the permit for the requested changes to the SO₂ allowable rates for the turbine and duct burner using natural gas it was found that SO₂ lb/hr rate for the turbine operating on ultra low sulfur diesel (ULSD) is incorrectly stated as 0.09 lb/hr. The permit limits the maximum sulfur content for fuel oil to 0.0015 percent by weight. Based on this limit and using Table 3.1-2a for diesel fired turbines the correct SO₂ emission rate of

0.00152 lb/MMBtu is stated in the permit. However, using this rate and the turbine gross heat input value of 67.08 MMBtu the hourly rate is a little over 0.10 lb/hr. Therefore, the allowable emission rate for SO₂ has been updated to 0.11 lb/hr for the turbine firing ULSD. This change has no impact on the consecutive 12 month SO₂ limit.

The original permit issue date as well as the permit revision issue date as they appear on the current permit's cover page need to be corrected. The original permit was issued on April 9, 2009 and was revised on April 29, 2009. However when a minor modification of the permit was issued on December 1, 2011 the year of issuance for the original and revised permit were accidental changed to the year 2011. This error has been carried through to the current permit. This error has been corrected as part of this minor modification.

HSC has reviewed a draft of the modified permit and has approved the changes via email. A copy of the email is attached.

Emissions Changes from Modification

SO₂ Natural Gas	Existing Permit	Requested	Modified Permit
lb/MMBtu (Turbine)	6.58E-4	0.0016	0.0016
lb/hr (Turbine)	0.04	0.11	0.11
lb/MMBtu (Turbine & Duct Burner)	6.31E-4	0.0013	0.0016
lb/hr (Turbine & Duct Burner)	0.06	0.13	0.161
SO₂ ULSD			
lb/hr (Turbine)	0.09	-	0.11
Tons per 12 Consecutive Months	0.27	0.56	0.71

Pollutant	Existing Permit (tpy)	Modified Permit (tpy)	Change in Emissions (tpy)
PM	4.86	4.86	0.00
PM₁₀	4.86	4.86	0.00
PM_{2.5}	4.86	4.86	0.00
SO_x	0.27	0.71	0.44
NO_x	5.26	5.26	0.00
VOC	3.82	3.82	0.00
CO	11.39	11.39	0.00

Permit Fee(s) (Double Click to edit)

Equipment Size Major Minor

Permit Type

Permit Fee \$1,750 ea.

Municipality Yes

of Permits/Applications 1 \$1,750

Application Fee Submitted Yes \$0

Was Permit Fee paid with Application Fee? Yes -1750

Additional Application Fees (\$1750 Each)

	Quantity	
BACT Review	0	\$0
LAER Review	0	\$0

Money Owed	\$0
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Compliance History Review

Was the SIMS Enforcement Report run and reviewed for this applicant?	Yes
Were other bureaus contacted to resolve any outstanding enforcement actions shown in the SIMS Report?	N/A
What is the date on the Enforcement Section's review of air compliance email?	10/11/2017
Was the compliance record reviewed in accordance with the Environmental Compliance History Policy?	Yes

Recommendation

Based on the information submitted by the applicant, this engineering evaluation and the compliance history review, the granting of the requested permit modification is recommended for Hamilton Sundstrand Corporation.

/s/ Kevin O'Neil
Kevin J. O'Neil
APCE II

11/16/2017
Date

Approvals

/s/ Susan Amarello
Susan Amarello
Supervising APCE

11/16/2017
Date

/s/ Jaimeson Sinclair
Jaimeson Sinclair
Assistant Director

11/17/2017
Date