



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:	The Metropolitan District
Address:	P.O. Box 800, Hartford, CT 06142-0800
Equipment Location:	Hartford WPCF, 240 Brainard Road, Hartford, CT
Equipment Description:	Nichols-Herreshoff Multiple Hearth Incinerator, Unit No. 2 (Serial No. 47173)

Town-Permit Numbers:	075-0007
Town/Premises Numbers:	075/505
Modification Issue Date:	April 1, 2013
Prior Permit Issue Date:	7/18/11
Original Permit Issue Date:	3/31/83
Expiration Date:	NONE

/s/ Anne Gobin for
Daniel C. Esty
Commissioner

April 1, 2013
Date

PERMIT FOR PROCESS EQUIPMENT

**DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
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PART I. PROCESS DESCRIPTION

A. General Process Description

The Nichols-Herreshoff Multiple Hearth Incinerator (MHI) is a part of the Metropolitan District's (MDC) Hartford Water Pollution Control Facility at 240 Brainard Road, Hartford. The unit incinerates domestic sewage sludge and sludge derived from industrial wastewater, commercial wastewater, and other wastewaters approved for disposal by the Department of Energy and Environmental Protection (DEEP).

This source has nine hearths with a zero hearth afterburner and a Venturi-Pak scrubber as control units. There are two other MHIs at the facility. Only two of the three MHIs may incinerate sewage sludge at the same time.

This unit has a Flue Gas Recirculation (FGR) system. Incinerator gases are withdrawn from the third hearth and reintroduced into the ninth and tenth hearths. This reduces temperatures in the incinerator and provides better mixing of the combustion air.

There is one fan with a capacity of 28,000 acfm. Control of the amount of air recirculated in the incinerator is accomplished through the use of a square flow damper mounted adjacent to the fan. The fan is designed for 1300°F. If the temperature rises above 1300°F, the round air inlet damper (different from that described above) will open introducing room temperature air to maintain proper incinerator temperature.

The primary function of the FGR system is to assist with the combustion control of the incinerator. There may be a reduction of nitrogen oxides (NO_x) due to the improved mixing and reduced fuel use. The improved temperature control should minimize the formation of clinkers thereby reducing operational problems associated with them.

B. Equipment Design Specifications

1. Incinerator Type: Nichols-Herreshoff multiple hearth, draft induced, continuous feed
2. Number of Hearths: 9
3. Burner Manufacturer: 9 North American MHF-6 (3 ea. in hearths 5,7,9); 3 North American MHF-7 (3 in hearth 2)

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PART I. PROCESS DESCRIPTION, continued

C. Control Equipment Specifications

1. Wet Scrubber:
 - a. Make and Model: VenturiPak System by EnviroCare, Inc.
 - b. Minimum Tray Water Flow Rate (gpm): 550
 - c. Minimum Pressure Drop: 20 inches of water or 30% less than the average pressure drop measured for each period of 15 minutes duration or more during the most recent performance test, whichever is less
2. In-situ Thermal Oxidizer
 - a. Nominal Steady State Operating Temperature(°F): 1200

D. Stack Parameters

1. Minimum Stack Height (ft): 107
2. Minimum Distance to Property Line (ft): 278
3. Exhaust Gas Flowrate Range (acfm): 12,000 - 32,000
4. Stack I.D. (ft): 5
5. Minimum Stack Exit Temperature (°F): 85(typical at normal operating conditions)

PART II. OPERATING REQUIREMENTS

Notwithstanding the design specifications or description provided in Part I, above, the permittee of the subject source shall comply with the following operating requirements.

A. Incinerator

1. Maximum Hourly Sludge Charging Rate: 2.5 dry tons per hour (DT/hr) based on a 30 day average as determined by either the product of the mass of wet sludge cake fed per unit time to the incinerator times the solids fraction or the product of the volumetric feed (in gallons of total wet feed per hour) times the density of wet feed to the dewatering operation times the solids fraction measured by the daily grab sample.

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PART II. OPERATING REQUIREMENTS, continued

- 2. Maximum Annual Sludge Charging Rate: 21,060 DT/yr based on a 12-month rolling average (current months dry tonnage added to the previous 11 months dry tonnage). Monthly dry tonnage is DT/hr times monthly hours of operation.
- 3. Allowable Primary Fuels: Only sewage sludge may be fired in this unit. Any substance which is considered "municipal-type solid waste," as defined in Title 40 of the Code of Federal Regulations (CFR) Part 60, §60.51a, or "hazardous waste," as defined in §22a-115 of the Connecticut General Statutes, is prohibited from being introduced to this unit. For the purpose of this permit, sewage sludge is defined as any solid, semi-solid or liquid residue from the pretreatment or primary, secondary or advanced treatment of domestic sewage, industrial wastewater, septage, portable toilet pumpings and grease traps.

B. Auxiliary Burner System

- 1. Fuel Type: Natural gas and propane back-up
- 2. Maximum Fuel Firing Rate: 21,300 ft³/hr or 21.3 MMBTU/hr
- 3. Maximum Annual Fuel Usage: 179.5 MM ft³

PART III. 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 properly operate the control equipment at all times that this equipment is in operation and emitting air pollutants.
- C. The Permittee shall minimize dilution air during startup by:
 - 1. Verifying that the emergency bypass stack damper linkage to insure the damper is in the closed position for start up.
 - 2. Verifying operation of the ash outlet drop damper to insure it is in the closed position, yet operates freely to allow ash to drop through.
 - 3. Verifying operation of the ambient air inlet damper. The

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damper shall be in the closed position for startup.

PART III. OPERATION AND MAINTENANCE REQUIREMENTS, continued

4. Visually inspecting center shaft plugs, arms, sockets and flanges for cracks or damage that would allow center shaft air to escape into the incinerator.
 5. Inspecting hearth access door seals and close doors tightly. Close all inspection ports.
 6. Placing the center shaft return air damper in the closed position.
 7. Inspecting ductwork and incinerator shell for air inleakage.
- D.** The Permittee shall minimize dilution air during operation by:
1. Opening the ambient air inlet damper only as needed to provide continuous combustion. Continue to monitor combustion oxygen (O₂) and regulate the damper to minimize excess air.
 2. Operating the center shaft cooling air fan to maintain shaft cooling. Open the center shaft return air damper as needed. Continue to monitor combustion temperature and regulate the damper to minimize excess air. The hearth combustion temperature shall not exceed the permit limits.
 3. If the incinerator hearth access doors are opened to remove slag clinkers, close them tightly immediately afterward. Minimize the time the inspection ports are opened, and close them tightly afterward.
 4. The FGR fan shall have a desired operating temperature of 300 to 1200°F and shall not exceed the maximum operating temperature of 1300°F. The FGR cooling fan shall be operated as needed to obtain the desired FGR fan operating temperature. The FGR cooling fan damper shall be opened in increments while maintaining the desired operating temperature of the FGR fan.
 5. Verifying operation of the ash outlet drop damper to insure it is operating freely to allow the ash to discharge and then close between discharges.

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PART IV. ALLOWABLE EMISSION LIMITS

The Permittee shall not exceed the emission limits stated herein at any time.

A. Criteria Pollutants

Criteria Pollutants	lb/hr	lb/MMBTU	lb/DT	ppmv @7% O ₂	TPY
PM/PM ₁₀	1.0		0.40		4.21
SO _x	4.9		1.96		20.6
NO _x	18.1	0.33	7.24		76.5
VOC	19.4			50 ¹ (dry)	82.0
CO	62.2			245 ¹ (dry)	262.0

¹Based on a monthly average.

Non-Criteria

Pollutant	lb/24-hr
Be	0.022
Hg	7.055

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

1. PM, SO_x, NO_x, VOC, CO and Pb: Stack Test (see Part V: Stack Emission Test Requirements)
2. H₂SO₄: Stack Test (see Part V: Stack Emission Test Requirements)
3. As, Be, Cd, Cr, Cu, Hg, Mn, Ni, Se, Zn: Stack Test (see Part V: Stack Emission Test Requirements)
4. Organic HAPs: Gas Chromatography/Mass Spectroscopy analysis (see Part V: Stack Emission Test Requirements)

B. Hazardous Air Pollutants (HAPs) - (State Only Requirement)

This equipment shall not cause an exceedance of the Maximum Allowable Stack Concentration (MASC) for any hazardous air pollutant (HAP) emitted and listed in RCMA §22a-174-29.

Maximum Opacity: 10% during any six minute block average as measured by 40 CFR 60, Appendix A, Reference Method 9.

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Permit No: 0007

Stack No: 02

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PART V. STACK EMISSION TEST REQUIREMENTS

Stack emission testing shall be performed in accordance with the Emission Test Guidelines available on the DEEP website.

The Permittee shall conduct stack emission testing for the following pollutant(s) every five years from date of last test and as specified in Part V.A:

None at this time

PM SO_x NO_x CO

VOC PM₁₀ Pb

Other (NSPS): Be, Hg

Other (HAPS): H₂SO₄

Other (Metals): As, Cd, Cr, Cu, Mn, Ni, Se, Zn

A. Specific Requirements

1. Stack testing is required to determine compliance with the particulate matter emission limit of 0.40 lb/DT sludge input. [40 CFR §60.152(a)(1)]
2. Stack testing is required to determine compliance with the emission limit of 0.022 lb of beryllium (Be) over a 24-hour period. [40 CFR §61.33(a)]
3. Stack testing is required to determine compliance with the emission limit of 7.1 lb of mercury (Hg) per 24-hour period. [40 CFR §61.53(d)]
4. Stack testing is required to determine emissions of the following pollutants:
 - a. Nitrogen Oxides, expressed as nitrogen dioxide
 - b. Carbon Monoxide
 - c. Sulfur Oxides, expressed as sulfur dioxide
 - d. Total Volatile Organic Compounds, THC
 - e. Total Suspended Particulates

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PART V. STACK EMISSION TEST REQUIREMENTS, continued:

f. Lead

g. Sulfuric Acid

5. A Gas Chromatography/Mass Spectroscopy (GC/MS) of VOC sample is required for the following pollutants to determine compliance with the requirements listed in RCSA §22a-174-29:

Acrylonitrile	Ethylene Dichloride
Benzene	Methylene Chloride
Carbon Tetrachloride	Perchloroethylene
Chlorobenzene	Phenol
Chloroform	Toluene
Di(2-Ethyl Hexyl) Phthalate	1,1,1-Trichloroethane
1,2-Dichlorobenzene	Trichloroethylene
Ethylbenzene	Polychlorinated Biphenyls

6. Testing for the following additional metals is required to determine compliance with the requirements listed in RCSA §22a-174-29:

Arsenic (As)	Manganese (Mn)
Cadmium (Cd)	Nickel (Ni)
Chromium (Cr)	Selenium (Se)
Copper (Cu)	Zinc (Zn)
Lead (Pb)	

7. The Permittee shall determine annually the coefficient of correlation between the hearth No.3 exhaust gas dry O₂ concentration and stack gas dry O₂ concentration in accordance with EPA and DEEP approved procedures. If the minimum coefficient of correlation is less than 0.8, the Permittee shall immediately implement corrective measures to further reduce dilution air infiltration into the exhaust gas stream, and shall retest until the coefficient of correlation is 0.8 or greater. [EPA's letter to MDC dated May 27, 2008 and 40 CFR §60.153(b)(2)]

8. The Permittee shall stack test annually for the presence of mercury, metals and hydrocarbons in the incinerator exhaust gas. [CGS §22a-191a(b)]

9. The Permittee shall demonstrate stack test emission results are in compliance with permit limitations for each pollutant for which stack testing is required.

PART VI. CONTINUOUS EMISSION MONITORING REQUIREMENTS AND ASSOCIATED

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EMISSION LIMITS

The Permittee shall comply with the CEM requirements as set forth in RCSA §22a-174-4. CEM shall be required for the following pollutant/operational parameters and enforced on the following basis:

<u>Pollutant/Operational Parameter</u>	<u>Averaging Times</u>	<u>Emission Limit</u>	<u>Units</u>
O ₂	1 hour block		
Temperature	1 hour block		
THC	1 hour block		

A. Specific Requirements

1. The Permittee shall operate and maintain the stack O₂ CEMS consistent with the applicable provisions of 40 CFR Part 60, Subparts B and F and DEEP CEMS guidelines. [EPA's letter to MDC dated May 27, 2008 and 40 CFR §60.153(b)(2)]
2. The Permittee shall calculate the data availability on a semi-annual basis. [RCSA §22a-174-4(c)(5)]
3. The Permittee shall create, maintain and submit data and records or reports of monitoring data. The Permittee shall submit this information on forms furnished or prescribed by the commissioner at the same time as the semi-annual reports. [RCSA §22a-174-4(d)(1)]

PART VII. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS

A. Monitoring and Record Keeping Equipment

The Permittee shall install, calibrate, maintain and operate the following monitoring and record keeping equipment:

1. A flow measuring device which can be used to determine either the mass or volume of sludge charged to the incinerator. The flow device shall be certified by the manufacturer to have an accuracy of ±5% over the operating range. [40 CFR §60.153(a)(1)]

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PART VII. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS, cont.

2. A monitoring device that continuously measures and records the pressure drop of the gas flow through the wet scrubber. The device shall be certified by the manufacturer to be accurate within ± 1 inch of water gauge and shall be calibrated on an annual basis in accordance with the manufacturer's instructions. [40 CFR §60.153(b)(1)]
3. A monitoring device that continuously measures and records the scrubber tray water flow rate. The device shall be certified by the manufacturer to be accurate within $\pm 5\%$ over its operating range and shall be calibrated on an annual basis in accordance with the manufacturer's instructions.
4. A monitoring device that continuously measures and records the oxygen content (wet) of the incinerator exhaust gas. The oxygen monitoring device shall be certified by the manufacturer to have an accuracy of $\pm 5\%$ over its operating range and shall be calibrated in accordance with the manufacturer's instructions at least once each 24-hour period. [40 CFR §60.153(b)(2)][40 CFR §503.45(b)]
5. A monitoring device that continuously measures and records the combustion temperatures. Temperature measuring devices in each hearth, including the afterburner, and at the outlet of the incinerator. Each temperature device shall be certified by the manufacturer to have an accuracy of $\pm 5\%$ over its operating range. [40 CFR §60.153(b)(3)][40 CFR §503.45(d)]
6. A monitoring device that continuously measures the auxiliary fuel flow to the incinerator. The auxiliary flow measuring device shall be certified by the manufacturer to have an accuracy of $\pm 5\%$ over its operating range. [40 CFR §60.153(b)(4)]
7. The Permittee shall collect and analyze a grab sample of the sludge fed to the incinerator once per day. The dry sludge content and the volatile solids content of the sample shall be determined in accordance with the method specified under 40 CFR §60.154(b)(5), except that the determination of volatile solids, step (3)(b) of the method, shall not be deleted. Daily records of the total solids and volatile solids content of the sludge charged to the incinerator shall be kept. [40 CFR §60.153(b)(5)]

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PART VII. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS, cont.

8. A monitoring device that continuously measures and records the total hydrocarbons (THC) concentration of the incinerator exhaust gas. [40 CFR §503.45(a)(1)]
9. A monitoring device that continuously measures and records the information used to determine the moisture content in the sewage sludge incinerator exhaust gas. [40 CFR §503.45(c)]

B. Record Keeping Requirements

1. The Permittee shall make and keep calibration and maintenance records and original instrument recordings for all continuous monitoring instruments and equipment.
2. The Permittee of this source shall make and keep records of the results of any incinerator performance tests.
3. The Permittee shall demonstrate stack test emission results are in compliance with permit limitations for each pollutant for which stack testing is required.
4. Annual sludge charge rate and annual auxiliary fuel consumption shall be calculated on a 12 month rolling average basis obtained by adding the current month's charge rate (or auxiliary fuel consumption) to that of the previous eleven 11 months. These calculations shall be performed monthly.
5. The Permittee shall make and keep a record of the measured pressure drop of the gas flow through the scrubber. [40 CFR §60.153(c)(1)]
6. The Permittee shall make and keep a record of the following parameters [40 CFR §60.153(c)(2) and (3)]:
 - a. Rate of sludge charged to the incinerator
 - b. Measured temperatures of the incinerator
 - c. Fuel flow to the incinerator
 - d. Total solids and volatile solids content of the sludge charged to the incinerator
 - e. Oxygen content of the incinerator exhaust gas

PART VII. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS, cont.

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7. The Permittee shall make and keep a record of the total hydrocarbons concentrations in the incinerator exhaust gas. [40 CFR §503.47(c)]
8. The Permittee shall make and keep a record of the operating combustion temperatures of the incinerator. [40 CFR §503.47(f)]
9. The Permittee shall make and 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 Requirements

1. The Permittee shall submit a written report to the commissioner and to EPA Region I for each semi-annual period ending June 30 and December 31 of each year. The semi-annual reports shall be submitted on or before March 1 and September 1 following the end of the semi-annual period. The report shall contain the following:
 - a. A record of the average scrubber pressure drop measurements for each period of 15 minutes duration or more during which the pressure drop of the scrubber was less than 30 percent from the average pressure drop measured during the most recent performance test. [40 CFR §60.155(a)(1)(i)]
 - b. A record of the average oxygen content in the incinerator exhaust for each period of 1-hour duration or more that the oxygen content of the incinerator exhaust gas exceeds the average oxygen content measured during the most recent performance test by more than three percent. [40 CFR §60.155(a)(2)]
2. The Permittee shall submit annually the correlation report, at the same time as the Title V permit compliance certification is due, to EPA and the DEEP. Failure to submit accurate, complete, and timely correlation reports may be cause for EPA and/or the DEEP to require oxygen monitoring as stipulated in 40 CFR §60.153(b)(2). [EPA's letter to MDC dated May 27, 2008 and 40 CFR §60.153(b)(2)]

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PART VIII. PREMISES REQUIREMENTS

- A. Only two of the three MHI's may incinerate sewage sludge at the same time.
- B. The Maximum Annual Sludge Charging Rate for the facility is 42,120 DT/yr.
- C. The Permittee shall make and keep records of monthly and rolling 12 month total of the premises maximum annual sludge charging rate (DT/yr).
- D. The Permittee shall comply with the following federal regulations:
 - 1. 40 CFR, Part 60, Subpart A, General Provisions
 - 2. 40 CFR, Part 60, Subpart O, Standards of Performance for Sewage Treatment Plants
 - 3. 40 CFR, Part 61, Subpart A, General Provisions
 - 4. 40 CFR, Part 61, Subpart C, National Emissions Standards for Beryllium
 - 5. 40 CFR, Part 61, Subpart E, National Emissions Standards for Mercury
 - 6. 40 CFR, Part 503, Technical Standards for the Use and Disposal of Sewage Sludge, Subpart E, Incineration
- E. STATE ONLY REQUIREMENT: 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 §22a-174-23.
- F. STATE ONLY REQUIREMENT: The Permittee shall operate this source and all accompanying equipment at all times in a manner so as not to violate or significantly contribute to the violation of any applicable state noise control regulations, as set forth in RCSA Sections 22a-69-1 through 22a-69-7.4.

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PART IX. ADDITIONAL TERMS AND CONDITIONS

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

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PART IX. ADDITIONAL TERMS AND CONDITIONS, continued

- 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.

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