



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).

<b>Owner/Operator</b>	Algonquin Power Windsor Locks LLC
<b>Address</b>	26 Canal Bank Road, Windsor Locks, CT 06096
<b>Equipment Location</b>	26 Canal Bank Road, Windsor Locks, CT 06096
<b>Equipment Description</b>	Nebraska Modified Type A Boiler
<b>Town-Permit Numbers</b>	213-0032
<b>Premises Number</b>	1
<b>Stack Number</b>	29
<b>Prior Permit Issue Dates</b>	November 16, 1988 (Permit to Construct) September 29, 1989 (Temporary Permit to Operate) November 6, 1991 (Permit to Operate) October 29, 1993 (Revision) November 5, 1996 (Revision) June 28, 2018 (Minor Modification) August 15, 2018 (Revision)
<b>Modification Issue Date</b>	March 3, 2020
<b>Expiration Date</b>	None

/s/Tracy Babbidge for  
Betsey C. Wingfield  
Deputy Commissioner

March 3, 2020  
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.

Prevention of Significant Deterioration: The following language is for historical purposes only:

This permit was issued pursuant to Section 22a-174-3 of the Regulations of Connecticut State Agencies and pursuant to the Clean Air Act and U.S. Environmental Protection Agency's (U.S. EPA) Prevention of Significant Deterioration (PSD) Regulations (40 CFR Part 52.21) under the authority granted to the Connecticut Department of Environmental Protection by the U.S. EPA on September 29, 1982.

## **PART I. DESIGN SPECIFICATIONS**

### **A. Equipment Design Specifications**

1. Fuel Types: Natural Gas and No. 2 Fuel Oil
2. Maximum Fuel Firing Rates:
  - a. Natural Gas: 172,427 cf/hr
  - b. No. 2 Fuel Oil: 1,206 gal/hr
3. Maximum Gross Heat Input:
  - a. Natural Gas: 177.6 MMBtu/hr
  - b. No. 2 Fuel Oil: 170.1 MMBtu/hr

### **B. Control Equipment Design Specifications**

1. Low NO<sub>x</sub> Burner
  - a. Make and Model: Todd DYNASWIRL

### **C. Stack Parameters**

1. Minimum Stack Height: 177 feet above grade
2. Minimum Exhaust Gas Flow Rate at Maximum Operation: 49,836 acfm
3. Minimum Stack Exit Temperature: 325°F
4. Minimum Distance from Stack to Nearest Property Line: 250 feet

### **D. Definitions**

1. "Nebraska Boiler" means one or both boilers operating in accordance with Permit Nos. 213-0031 and 213-0032.
2. "Combustion turbine" means General Electric gas turbine operating in accordance with Permit No. 213-0029.

## PART II. OPERATIONAL CONDITIONS

### A. Equipment

1. If the Nebraska boiler is operating simultaneously with the combustion turbine, the combined maximum firing rate of the boilers operating when burning No. 2 fuel oil is limited to 1,206 gal/hr.
2. The NO<sub>x</sub> allowable emission limits contained in Part III.A.1. and B.1. do not apply during boiler tuning events. A boiler tuning event shall not exceed three consecutive hours or six total hours per day. A tuning event that results in an exceedance of the allotted time and/or NO<sub>x</sub> emission limits in Part III.A and B.1 shall be reported in accordance with Part IV.C.1

Emissions during boiler tuning events shall be counted towards the annual emission limitation in Part III.C of this permit.

3. Maximum Fuel Sulfur Content (% by weight, dry basis): 0.0015 [RCSA §22a-174-19b]

Note: Pursuant to RCSA §22a-174-19b(c)(3), fuel stored in the state of Connecticut that meets any applicable sulfur content limitation at the time it is stored in the state of Connecticut, may be stored, offered for sale, sold, delivered or exchanged in trade for combustion in the state of Connecticut and combusted in the state of Connecticut even if the sulfur content limitation applicable at the time of storage has been changed subsequent to the date of storage.

4. Maximum Allowable Fuel Firing Rate:
  - a. Natural Gas: 162,081 ft<sup>3</sup>/hr

**B.** The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations.

**C.** The Permittee shall shut down the boiler in accordance with the following:

Pollutant/Parameter	Shutdown Limits
NO <sub>x</sub>	Shutdown: 24 consecutive 1 hour block averages > permit limit
Opacity	Shutdown: Five consecutive six minute block averages > 40%

**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. Natural Gas**

1. Criteria Pollutants

Pollutant	lb/hr	lb/MMBtu	ppmvd	Tons per 12 Consecutive Months
PM <sup>(1)</sup>	1.86	0.010		8.16
PM <sub>10</sub> <sup>(1)</sup>	1.32	7.45E-03		5.80
PM <sub>2.5</sub> <sup>(1)</sup>	1.32	7.45E-03		5.80
SO <sub>2</sub>	0.10			0.44
NO <sub>x</sub>	19.54		29	85.59
VOC	1.00			4.38
CO	14.56			63.77
GHG				83,567

<sup>(1)</sup> PM/PM<sub>10</sub>/PM<sub>2.5</sub>: Filterable + Condensable

2. Non-Criteria Pollutants

Pollutant	lb/hr	Tons per 12 Consecutive Months
H <sub>2</sub> SO <sub>4</sub>	0.005	0.02

**B. No. 2 Fuel Oil**

1. Criteria Pollutants

a. Filterable PM and PM<sub>10</sub>

Pollutant	lb/hr	lb/MMBtu	Tons per 12 Consecutive Months
PM	2.41	0.014	10.56
PM <sub>10</sub>	1.30	0.0077	5.710

Note: Once the Permittee completes the stack test requirements in Part V of this permit, Table III.B.1.a will no longer apply and shall remain in the permit for historical purposes only until the Permittee opens the permit and the condition is removed.

b. PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, CO and GHG

Pollutant	lb/hr	lb/MMBtu	ppmvd	Tons per 12 Consecutive Months
PM	3.96	0.023		17.35
PM <sub>10</sub>	2.89	0.017		12.66
PM <sub>2.5</sub>	1.88	0.011		8.25
SO <sub>2</sub>	8.51			37.25
NO <sub>x</sub>	34.02		52	149.01
VOC	0.82			3.59
CO	13.95			61.10
Pb	0.0015			0.007
GHG				111,567

2. No. 2 Fuel Oil

Pollutant	lb/hr	Tons per 12 Consecutive Months
H <sub>2</sub> SO <sub>4</sub>	0.188	0.82

C. Annual Emission Limits – Combustion Turbine and the Equivalent of One Nebraska Boiler (both burning No. 2 Fuel Oil) at Maximum Rated Capacity

1. Criteria Pollutants

Pollutant	Tons per 12 Consecutive Months
PM <sup>(1)</sup>	105.03
PM <sub>10</sub> <sup>(1)</sup>	91.20
PM <sub>2.5</sub> <sup>(1)</sup>	32.14
SO <sub>2</sub>	136.15
NO <sub>x</sub>	635.6
VOC	58.44
CO	296.6
Pb	0.032
GHG	458,862

(1) PM/PM<sub>10</sub>/PM<sub>2.5</sub>: Filterable + Condensable

2. Non-Criteria Pollutants

Pollutant	Tons per 12 Consecutive Months
H <sub>2</sub> SO <sub>4</sub>	12.6

D. Hazardous Air Pollutants

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

**E. Opacity**

This equipment shall not exceed 10% opacity for any 6 minute block average or 40% instantaneous opacity.

**F.** 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 (except for pollutants that have CEM), or if unavailable, emission factors from the following sources:

- NO<sub>x</sub>, Opacity: Continuous emissions/opacity monitoring system (CEM/COM)
- SO<sub>2</sub>: Mass balance
- PM/PM<sub>10</sub>/PM<sub>2.5</sub>, VOC and Lead: Compilation of Air Pollution Factors, AP42, Fifth Edition, Table 1.3 and 1.4
- H<sub>2</sub>SO<sub>4</sub>: Mass balance

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 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:

<b>Pollutant/Operational Parameter</b>	<b>Averaging Times</b>	<b>Emissions Limit</b>
Opacity	Six minute block	10%
NO <sub>x</sub> (No. 2 fuel oil)	One hour block	52 ppmvd
NO <sub>x</sub> (Natural gas)	One hour block	29 ppmvd

Note: the CEM sampling probe for this boiler is located in the ductwork of the boiler prior to the exhaust to the stack.

2. The Permittee shall use individual fuel metering devices or billing meters to continuously monitor fuel feed to the boiler.

**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 the fuel certification for each delivery of fuel oil from a bulk petroleum provider or 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, and 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 keep records of the natural gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel specifying the maximum total sulfur content for the natural gas.
4. The Permittee shall calculate and record the monthly and consecutive 12 month PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, CO and H<sub>2</sub>SO<sub>4</sub> emissions in units of tons for natural gas and No. 2 fuel oil separately. The consecutive 12 month emissions shall be determined by adding (for each pollutant) the current month's emissions to that of the previous 11 months. Such records shall include a sample calculation for each pollutant. The Permittee shall make these calculations within 30 days of the end of the previous month.
5. The Permittee shall calculate and record the monthly and consecutive 12 month PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, CO and H<sub>2</sub>SO<sub>4</sub> emissions in units of tons for Permit Nos. 213-0029, 213-0031 and 213-0032 combined. The monthly and consecutive 12 month emissions shall be calculated to demonstrate compliance with the annual emission limitation in Part III.C of this permit. The combined consecutive 12 month emissions shall be determined by adding (for each pollutant) the current month's combined 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.
6. The Permittee shall keep all records required by this permit for a period of no less than five years and shall submit such records to the commissioner upon request.

### **C. Reporting**

1. The Permittee shall notify the commissioner in writing of any exceedance of an emissions limitation or operating parameter, and shall identify the cause or likely cause of such exceedance, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows:
  - a. For any hazardous air pollutant, no later than 24 hours after such exceedance commenced; and
  - b. For any other regulated air pollutant or operating parameter, no later than ten days after such exceedance commenced.
2. The Permittee shall notify the commissioner in writing of any malfunction of the stationary gas 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:
  - 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.
3. The Permittee shall notify the commissioner, in writing, of the date that No. 2 fuel oil is burned in either of the two Nebraska boilers, after the issuance of the minor modification to Permit Nos. 213-0031 and 213-0032 (Application Nos. 201608191 and 201608192). Such written notifications shall be submitted no later than 30 days after the subject event.

4. The Permittee shall submit the above notification 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, Connecticut 06106-5127.

#### **PART V. STACK EMISSION TEST REQUIREMENTS**

- A. The Permittee shall perform one set of stack tests on any one of the boilers when burning natural gas and one set of stack tests when burning No. 2 fuel oil.
- B. No. 2 Fuel Oil
  1. Within six months of burning No. 2 fuel oil in the combustion turbine or any of the two Nebraska boilers, after the issuance of the minor modification to Permit Nos. 213-0031 and 213-0032 (Application Nos. 20168191 and 201608192), the Permittee shall conduct a one time emission test for the following pollutants:  
  
 PM (Filterable + Condensable)     PM<sub>10</sub> (Filterable + Condensable)  
  
 PM<sub>2.5</sub> (Filterable + Condensable)
  2. The Filterable portion of the emissions test shall be used to demonstrate compliance with the PM and PM<sub>10</sub> emission limits in Part III.B.1.a of this permit.
- C. Stack emission testing shall be performed in accordance with the Emission Test Guidelines available on the DEEP website.
- D. Stack test results shall be reported in units of lb/hr and lb/MMBtu.
- E. The Permittee shall submit test results within 60 days after completion of testing.

#### **PART VI. 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 A and Db  
  
Copies of the Code of Federal Regulations (CFR) are available online at the U.S. Government Printing Office website.
- B. The Permittee shall comply with all applicable sections of the following National Emission Standards for Hazardous Air Pollutants at all times.  
  
Title 40 CFR Part 63, Subparts A and JJJJJ  
  
Copies of the Code of Federal Regulations (CFR) are available online at the U.S. Government Printing Office website.
- 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.** The Permittee shall operate this facility at all times in a manner so as not to violate or contribute significantly to the violation of any applicable state noise control regulations, as set forth in RCSA Sections 22a-69-1 through 22a-69-7.4. [STATE ONLY REQUIREMENT]

## **PART VII. ADDITIONAL TERMS AND CONDITIONS**

- A.** This permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the regulated activity in compliance with all applicable requirements of any federal, municipal or other state agency. Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B.** Any representative of 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.