Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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March 10, 2015

Ms. Julie M. Hubbard
Erving Industries, Inc. d/b/a Erving
Paper Mills
97 East Main Street
Erving, MA 01344

RE: Erving
Transmittal No.: X264103
Application No.: WE-14-030
Class: *OP*
FMF No.: 130789
AIR QUALITY PLAN APPROVAL

Dear Ms. Julie M. Hubbard:

The Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Air and Waste, has reviewed your Non-major Comprehensive Plan Application ("Application") listed above. This Application concerns the proposed construction and operation of a new dual fuel Solar Taurus, Model 60-7901S combustion turbine and a compressed natural gas and propane-fired heat recovery steam generator (HRSG) at your paper manufacturing facility located at 97 East Main Street in Erving, Massachusetts ("Facility"). The Application bears the seal and signature of Dale Raczynski, Massachusetts Registered Professional Engineer Number 36207.

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control" regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-N, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP's review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator ("Permittee") must comply in order for the Facility to be operated in compliance with this Plan Approval.

1. DESCRIPTION OF FACILITY AND APPLICATION

Erving Industries, Inc. manufactures food service paper products such as napkins utilizing 100% waste (recycled) paper. The facility is currently operating in accordance with Title V Operating Permit#1-O-04-051, issued February 10, 2009, with a renewal operating permit application submitted on August 5, 2013.

Erving Industries, Inc. is proposing to construct and operate a combined heat and power (CHP) project to generate nearly all of the electricity and process steam for the facility. The CHP will consist of a maximum 6.5 megawatt Solar Taurus Model 60-7901S, or equivalent, combustion turbine (Emission Unit 15) with thermal energy recovered in a heat recovery steam generator (HRSG) which will be equipped with a Eclipse Model 36FFB, or equivalent, duct burner (Emission Unit 16). The duct burner will have a maximum heat input of 28.5 million British thermal units per hour (MMBtu/hr) when combusting compressed natural gas (CNG) and 29.2 MMBtu/hr when combusting propane. The turbine will be primarily fired using CNG and will have the capability of using ultra low sulfur distillate (ULSD) oil with a maximum sulfur content of 0.0015 percent, by weight, as backup fuel. The duct burner will use CNG or propane to provide additional heat input to produce more steam if needed. The duct burner will always be operated with the turbine since it has no source of combustion air other than the turbine exhaust. An existing boiler and electric power from the grid will be used for backup steam and backup power. In addition, there will be a 30 MMBtu/hr open flare (Emission Unit 17) for the propane/air makeup unit.

The turbine will be subject to the MassDEP Environmental Results Program (ERP) for Engines and Turbines at 310 CMR 7.26(43). The duct burner in the HRSG will be subject to the plan approval requirements of 310 CMR 7.02 since the Boiler ERP, contained in 310 CMR 7.26(30), does not apply to sources located at a facility who has secured an operating permit pursuant to 310 CMR 7.00: Appendix C. The project will also include a new 7.6 MMBtu/hr (800 kilowatt) #2 fuel oil-fired emergency generator which will not be subject to plan approval since it will be certified pursuant to the MassDEP ERP for Emergency Engines and Turbines at 310 CMR 7.26(42).

The exhaust gases from EU 15/EU 16 will be vented through a 4 foot diameter stack, the top of which is at least 43 feet above the roof. The stack gas exit velocity range will be between 38 and 88 feet per second. EU 17 will have a height of 15 feet above the ground.

Control Equipment Description

The air contaminant emissions from the exhaust stream of EU 15/EU16 will be controlled first by a Rentech, or equivalent, oxidation catalyst for control of carbon monoxide (CO) and volatile organic compounds (VOCs), which include volatile hazardous air pollutants (VHAPs), and will then be followed by a Cormetech, Model CM21, or equivalent, selective catalytic reduction

(SCR) system for control of nitrogen oxides (NOx). Emission monitors will be used to measure and record the NOx, CO and oxygen from the combined exhaust stream of EU 15/EU16.

The oxidation catalyst is a passive system which will have a design operating temperature range of 600°F to 1150°F according to the manufacturer Synergy Catalyst. The oxidation catalyst will be equipped with instrumentation capable of continuously monitoring the exhaust gas temperature at the inlet of the oxidation catalyst. The oxidation catalyst will have a minimum CO and VOC destruction efficiency of 95.5% and 61% for emissions from the duct burner.

The SCR system will have one layer of catalyst and use aqueous ammonia, 19% by weight, as the reducing agent which will be injected upstream from the catalyst. The system will be equipped with 6 lance assemblies and static mixers to ensure adequate mixing of the injected ammonia and exhaust gas prior to the catalyst. According to the information provided by the catalyst manufacturer Cormetech, the catalyst will have a design operating temperature range of 480°F to 800° F. The system will be equipped with instrumentation capable of continuously monitoring the ammonia injection rate as well as the exhaust gas temperature at the outlet of the SCR system. The ammonia will be stored in either two 275 gallon portable totes or two 330 gallon portable totes. The totes will be manufactured of plastic or stainless steel. The totes will be designed with a secondary containment dike designed to hold at least 110 percent of the volume of the largest tote volume. The SCR will have a minimum destruction efficiency of 93.8% for NOx emissions from the duct burner.

Regulatory Applicability

Best Available Control Technology – 310 CMR 7.02(8)(a)2.

The CNG and propane-fired duct burner and the open flare are subject to and must satisfy the best available control technology (BACT) requirements of 310 CMR 7.02(8)(a)2.

MassDEP has determined that BACT for the duct burner includes the use of a natural gas or propane-fired Eclipse model 36FFB, or equivalent, duct burner, using good combustion practices as well as being equipped with an oxidation catalyst and a SCR system.

The NOx, CO, VOC, total particulate matter (PM), PM with an aerodynamic diameter less than or equal to 10 microns (PM10) and PM with an aerodynamic diameter less than or equal to 2.5 microns (PM2.5) emission rates proposed as BACT for the duct burner have been based on guarantees from RENTECH which include the use of the oxidation catalyst (for controlling CO and VOC) and a SCR system (for controlling NOx). Erving has also added the amount of ammonium sulfate formation from the oxidation of SO_2 to SO_3 over the oxidation catalyst (30% oxidation per the CO catalyst vendor, Synergy) to the duct burner's guaranteed emission rate of 0.01 pounds per MMBtu (lb/MMBtu) for total PM, PM10 and PM2.5. This results in total PM, PM10 and PM2.5 emission rates of 0.012 lb/MMBtu and 0.017 lb/MMBtu while firing CNG and propane, respectively. The contribution of NOx, CO, VOC and total PM (without additional PM from ammonium sulfate formation) emissions from the duct burner are more stringent or equivalent to the Massachusetts Department of Environmental Protection Top Case BACT Guidelines For Combustion Sources, dated June 2011. In addition, BACT for SO_2 is the use of

CNG or propane. A small amount of hazardous air pollutants (HAPs) are emitted from the combustion of natural gas and propane. A portion of these HAPs are also VOCs which are controlled by the oxidation catalyst.

BACT for the open flare includes the use of propane and a fuel usage limitation of 300 MMBtu/year of propane.

Emission Offsets and Nonattainment Review regulations of 310 CMR 7.00: Appendix A
Erving Industries, Inc. is an existing major stationary source of nitrogen oxides (NOx) pursuant to the Emission Offsets and Nonattainment Review regulations of 310 CMR 7.00: Appendix A because the existing facility has the potential to emit more than 50 tons per year of NOx. Therefore, the facility must calculate the net emissions increase for NOx from the physical change/ change in the method of operation of the duct burner to determine the applicability of 310 CMR 7.00: Appendix A. The facility has demonstrated that the air contaminant emissions from the construction and operation of the CHP project, which includes a 7.6 MMBtu/hr (800 kilowatt) #2 fuel oil-fired emergency generator and a 30 MMBtu/hr propane-fired open flare along with a contemporaneous project for a new 9.5 MMBtu/hr natural gas-fired, propane-fired and ULSD oil-fired burner in the No. 5 paper machine, will not have a significant net emission increase for NOx and is therefore not a major modification as defined in 310 CMR 7.00: Appendix A. As a result, the project will not be subject to 310 CMR 7.00: Appendix A.

Prevention of Significant Deterioration regulations of 40 CFR § 52.21
Erving Industries, Inc. is an existing major stationary source pursuant to the Prevention of Significant Deterioration regulations of 40 CFR § 52.21 because the facility has the potential to emit more than 250 tons per year of a new source review (NSR) regulated pollutant in an area designated as attainment under sections 107(d)(1)(A)(ii) or (iii) of the Act. Therefore, the facility must determine if the project will be a major modification which results in a (1) significant emission increase of a regulated NSR pollutant and a (2) significant net emissions increase of that pollutant from the major stationary source. The facility has demonstrated that the construction and operation of the CHP project, including a 7.6 MMBtu/hr (800 kilowatt) #2 fuel oil-fired emergency generator and a 30 MMBtu/hr propane-fired open flare, will not have a significant emissions increase of a regulated NSR pollutant and is therefore not a major modification as defined in 40 CFR 52.21. As a result, the project will not be subject to 40 CFR 52.21.

The annual emission calculations used to support the applicability determinations for 310 CMR 7.00: Appendix A and 40 CFR § 52.21 for the turbine were based on an annual average heat input of 67 million Btu per hour for firing CNG, propane or ultra low sulfur distillate oil and a usage limitation of no more than 1,310,222 gallons per year of ultra low sulfur distillate oil. The duct burner's annual emissions were based on the worst case of 8,760 hours per year of operation using propane with a maximum heat input of 29.2 MMBtu/hr. The annual emission calculations for the 7.6 MMBtu per hour emergency generator and the 9.5 million Btu per hour paper machine hood burner were based on maximum design capacity and 8,760 hours of operation

with the exception that the emergency generator will only operate a maximum of 300 hours per year.

New Source Performance Standards (NSPS) and National Emissions Standards for Hazardous Air Pollutants (NESHAPs)

Pursuant to 60.4305(a), the new combustion turbine and duct burner are subject to the requirements of 40 CFR Part 60 Subpart KKKK, Standards of Performance for Stationary Combustion Turbines. The turbine and duct burner will be more than capable of complying with the applicable Subpart KKKK emission limits for NO_x and SO_2 since the proposed NOx and SO_2 emission limits are more stringent. The applicable NOx and SO_2 emission limits are specified in Table 1 of Subpart KKKK and 40 CFR 60.4330(a)(2), respectively.

Since the duct burner is subject to the requirements of Subpart KKKK, it is not subject to 40 CFR Part 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

The facility is not a major source of hazardous air pollutants. Therefore, the combustion turbine is not subject to 40 CFR Part 63 Subpart YYYY - National Emissions Standards for Hazardous Air Pollutants for Combustion Turbines, because this subpart applies only to major sources of hazardous air pollutants.

The duct burner is not subject to 40 CFR Part 63 Subpart JJJJJJ - National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, because this subpart does not apply to units that combust natural gas or propane only.

2. EMISSION UNIT IDENTIFICATION

Each Emission Unit ("EU") identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1

EU	Description	Design Capacity	Pollution Control Device (PCD)
15	Solar Taurus Model 60-7901S, or equivalent, Combustion Turbine	• 76.8 million Btu per hour of heat input – compressed natural gas • 72.6 million Btu per hour of heat input – ultra low sulfur distillate oil • 6.5 Megawatts	• Selective Catalytic Reduction System • Oxidation Catalyst
16	Eclipse Model 36FFB, or equivalent, Heat Recovery Steam Generator Duct Burner	• 28.5 million Btu per hour of heat input –compressed natural gas • 29.2 million Btu per hour of heat input - propane	
17	Propane-Fired Open Flare System	• 30 million Btu per hour of heat input	None

Table 1 Key:

EU = Emission Unit Number PCD = Pollution Control Device

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2:

Table 2a

EU	Operational / Production Limit	Air Contaminant	Emission Limit				
			Lb/MMBtu [1]	Lb/hr[1]	Lb/MMBtu[2]	Lb/hr[2]	TPY
15/16 (combined emissions)	1. Pursuant to 40 CFR Part 52.21 and 310 CMR 7.00: Appendix A, EU 15 shall be fired using only compressed natural gas, propane or ultra low sulfur distillate oil. 2. Pursuant to 40 CFR Part 52.21 and 310 CMR 7.00: Appendix A, EU 15 shall use no more than 1,310,222 gallons of ultra low sulfur distillate oil in any 12 consecutive month period. 3. Pursuant to 40 CFR Part 52.21 and 310 CMR 7.00: Appendix A, EU 15 shall not exceed 67 million Btu per hour of heat input based on any 12 consecutive month average. 4. Pursuant to 40 CFR Part 52.21, 310 CMR 7.00: Appendix A and the best available control technology provision of 310 CMR 7.02(8)(a)2, EU 16 shall be fired using only compressed natural gas or propane. 5. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, EU 16 shall only be operated in conjunction with EU 15.	NOx[4]	0.011	1.12	0.024	2.39	6.0
		CO[4]	0.007	0.71	0.013	1.28	3.5
		VOC[4]	0.005	0.53	0.013	1.30	3.2
		PM, including PM10 and PM2.5[4]	0.015	1.63	0.034	3.39	9.1
		SO_2[4]	0.003	0.31	0.004	0.44	2.1
		Ammonia[4]	0.003	0.28	0.003	0.29	1.2
		HAP (total)	0.26 TPY 0.043 TPM				
		Smoke	< No. 1 of Chart[3], except No. 1 to < No. 2 of Chart for ≤ 6 minutes during any one hour				
		Opacity	10 % opacity (excluding water vapor) at any time				
17	6. Pursuant to 40 CFR Part 52.21, 310 CMR 7.00: Appendix A and the best available control technology provision of 310 CMR 7.02(8)(a)2, EU 17 shall be fired using only propane. 7. Pursuant to 40 CFR Part 52.21, 310 CMR 7.00: Appendix A and the best available control technology provision of 310 CMR 7.02(8)(a)2, EU 17 shall use no more than 300 MMBtu of propane in any 12 consecutive month period.	NOx	0.068 lb/MMBtu, 2.0 lb/hr, 0.01 TPY				
		CO	0.37 lb/MMBtu, 11 lb/hr, 0.05 TPY				
		VOC	0.14 lb/MMBtu, 4.2 lb/hr, 0.02 TPY				
		SO2	0.011 lb/MMBtu, 0.33 lb/hr, 0.002 TPY				
		HAP (total)	0.14 lb/MMBtu, 4.2 lb/hr, 0.02 TPY				

Table 2b			
EU	**Operational / Production Limit**	**Air Contaminant**	**Emission Limit**
17		Opacity	No visible emissions except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. If there are visible emissions occurring for 5 minutes or less, the visible emissions shall comply with 310 CMR 7.06

Table 2 Key:

EU = Emission Unit Number
CO = Carbon Monoxide
PM = Total Particulate Matter
PM_{10} = Particulate Matter less than or equal to 10 microns in diameter
$PM_{2.5}$ = Particulate Matter less than or equal to 2.5 microns in diameter
Lb/MMBtu = pounds per million Btu of heat input
NO_x = Nitrogen Oxides
SO_2 = Sulfur Dioxide
VOC = Volatile Organic Compounds
HAP (total) = total Hazardous Air Pollutants
TPM = tons per month
TPY = tons per consecutive12-month period
Lb/hr = pounds per hour

Table 2 Notes

1.The lb/MMBtu and lb/hr emission rates apply during the combustion of compressed natural gas or propane in the turbine in combination with the combustion of compressed natural gas or propane in the duct burner.

2. The lb/MMBtu and lb/hr emission rates apply during the combustion of ultra low sulfur distillate oil in the turbine in combination with the combustion of compressed natural gas or propane in the duct burner.

3. Chart means the Ringelmann Scale for grading the density of smoke, as published by the United States Bureau of Mines and as referred to in the Bureau of Mines Information Circular No. 8333, or any smoke inspection guide approved by MassDEP.

4. Compliance with the lb/MMBtu and lb/hr emission limits for NOx, CO, VOC, PM, including PM10 and PM2.5, SO_2 and ammonia shall be based on the results of an applicable USEPA Reference Test Method.

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5:

Table 3a	
EU	**Monitoring and Testing Requirements**
15 16	1. The Permittee shall continuously monitor the emissions of NOx, CO and oxygen as a diluent by installing, calibrating, maintaining and operating a monitoring system.
	2. The Permittee shall install and maintain instrumentation for EU 15 and EU16 which is capable of continuously monitoring the ammonia injection rate for the SCR system.
	3. The Permittee shall install and maintain instrumentation for EU 15 and EU16 which is capable of continuously monitoring the exhaust gas temperature at the inlet to the oxidation catalyst and at the outlet of the SCR system.
	4. The Permittee shall operate the temperature, ammonia injection rate and emission monitoring equipment at all times that EU 15 and 16 are operating, except for periods of calibration checks, zero and span adjustments, and preventive maintenance.
	5. The Permittee shall maintain on-site for the temperature, ammonia injection rate, NOx, CO and oxygen monitoring equipment an adequate supply of spare parts.
	6. The Permittee shall equip the continuous temperature monitoring system for the oxidation catalyst and the SCR system with audible and visible alarms which activate when these temperatures deviate from normal operating temperatures.
	7. EU 15 and EU 16 shall each be equipped with a fuel meter to continuously monitor the fuel flow rate for each fuel being used.
	8. The Permittee shall conduct annual compliance stack testing for NO_x, CO, VOC, NH_3, total PM, PM_{10} and $PM_{2.5}$ while EU15 and EU16 are operating at or near design capacity to demonstrate compliance with the emission limitations as specified in Table 2 above in accordance with procedures set forth in Appendix A of 40 CFR Part 60 or another method approved by the Department and EPA. The stack testing shall be conducted when combusting natural gas and ultra low sulfur distillate oil in EU 15. The initial compliance stack test shall be performed within 90 days of continuous operation of EU 15/16.
	9. In accordance with 310 CMR 7.04(4)(a), the Permittee shall inspect and maintain EU 16 in accordance with the manufacturer's recommendations and test each unit in accordance with the manufacturer's recommendations for efficient operation at least once each calendar year.
	10. In accordance with 310 CMR 7.04(2)(a), EU 15 shall be equipped with a smoke density sensing instrument and recorder which are properly maintained in an accurate operating condition, operates continuously and is equipped with an audible alarm to signal the need for combustion equipment adjustment or repair with the smoke density is equal to or greater than NO. 1 of the Chart. Such smoke density equipment shall be available for inspection at reasonable times by a representative of the Department.
	11. EU 15 and EU 16 are subject to and shall comply with all applicable monitoring and testing requirements contained in the federal Standards of Performance for Stationary Combustion Turbines, 40 CFR Part 60, Subpart KKKK.

Table 3b	
EU	**Monitoring and Testing Requirements**
17	12. EU 17 shall be equipped with instrumentation which is capable of continuously monitoring the fuel flow rate.
15 16 17	13. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	14. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and Regulation 310 CMR 7.13.

Table 3 Key:

EU = Emission Unit Number
PM = Total Particulate Matter
PM_{10} = Particulate Matter less than or equal to 10 microns in diameter
$PM_{2.5}$ = Particulate Matter less than or equal to 2.5 microns in diameter
CO = Carbon Monoxide
VOC = Volatile Organic Compounds
NO_x = Nitrogen Oxides
CFR = Code of Federal Regulations
SCR = Selective Catalytic Reduction
USEPA = United States Environmental Protection Agency

Table 4a	
EU	**Recordkeeping Requirements**
15 16	1. The Permittee shall continuously record the emissions of NO_x, CO and O2 as a diluent gas.
	2. The Permittee shall continuously record the ammonia injection rate.
	3. The Permittee shall continuously record the exhaust gas temperature at the inlet to the oxidation catalyst and at the outlet of the SCR system.
	4. Each unit shall record with a fuel meter, for each fuel of use, the amount of fuel combusted.
	5. In accordance with 310 CMR 7.04(4)(a), the results of the EU 16 inspection, maintenance, and testing and the date upon which it was performed shall be recorded and posted conspicuously on or near EU 16.
	6. In accordance with 310 CMR 7.04(2)(a), the smoke density recording charts must be retained and made available for a period of one year from the date of use.
	7. In accordance with 40 CFR 60.4365(a), the Permittee shall record the fuel quality characteristics in a current, valid purchase contract or tariff sheet for the fuel, specifying that the maximum total sulfur content for oil is 0.05 weight percent (500 ppmw) or less, the total sulfur content for natural gas is 20 grains of sulfur or less per 100 standard cubic feet and has potential sulfur emissions of less than 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input.

Table 4b	
EU	**Recordkeeping Requirements**
15 16	8. EU 15 and EU 16 are subject to and shall comply with all applicable recordkeeping requirements contained in the federal Standards of Performance for Stationary Combustion Turbines, 40 CFR Part 60, Subpart KKKK.
17	9. The Permittee shall continuously record the fuel flow rate.
15 16 17	10. The Permittee shall maintain adequate records on-site to demonstrate compliance status with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve-month period (current month plus prior eleven months). These records shall be compiled no later than the 15th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping.
	11. The Permittee shall maintain records of monitoring, testing and fuel usage as required by Table 3.
	12. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) and PCD(s) approved herein on-site.
	13. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	14. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s), PCD(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	15. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	16. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	17. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:

EU = Emission Unit Number
CFR = Code of Federal Regulations
CO = Carbon Monoxide
NOx = Nitrogen Oxides
O2 = Oxygen
PCD = Pollution Control Device
SOMP = Standard Operating and Maintenance Procedure
SCR = Selective Catalytic Reduction
USEPA = United States Environmental Protection Agency

Table 5	
EU	**Reporting Requirements**
15 16	1. The Permittee shall notify MassDEP, in writing, the date on which EU 15 and EU 16 commences operation at the facility. This notice shall be provided to MassDEP within (5) days of commencing operation.
	2. The Permittee shall submit a pretest protocol for the required emission test for review and MassDEP approval at least 30 days prior to the anticipated date of test. The pretest protocol shall include a description of sampling point locations, sampling equipment, sampling and analytical procedures, and the operating conditions for the required testing.
	3. The Permittee shall submit to MassDEP a notification of the anticipated test date a minimum of 30 days prior to conducting the stack emission test as required by Table 3a Monitoring and Testing Requirements herein.
	4. The Permittee shall submit to MassDEP a final stack emission test results report, within 60 days after emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements. The emission test report shall contain the results of the testing, a description of the test methods and procedures actually used in the performance of the tests, copies of all process data (ex. exhaust gas temperature at the inlet to the oxidation catalyst and at the outlet of the SCR system, ammonia injection rate and fuel usage rate) collected during the testing, copies of all raw test data and copies of all calculations generated during data analysis. The results of the testing shall be expressed in units which allow for a direct comparison, and determination of compliance, with the air contaminant emission limitations contained herein.
	5. EU 15 and EU 16 are subject to and shall comply with all applicable reporting requirements contained in the federal Standards of Performance for Stationary Combustion Turbines, 40 CFR Part 60, Subpart KKKK
15 16 17	6. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a "Responsible Official" as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	7. The Permittee shall notify the Western Regional Office of MassDEP, BAW Compliance& Enforcement Chief by telephone: 413-755-2131, email: saadi.motamedi@state.ma.us, or fax : 413-784-1149, as soon as possible, but no later than three (3) business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to Compliance & Enforcement Chief at MassDEP within ten (10) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	8. The Permittee shall report annually to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. The Permittee shall note therein any minor changes (under 310 CMR 7.02(2)(e), 7.03, 7.26, etc.), which did not require Plan Approval.
	9. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP's request.

Table 5 Key:

EU = Emission Unit Number

4. SPECIAL TERMS AND CONDITIONS

A. The Permittee is subject to, and shall comply with, the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU	**Special Terms and Conditions**
15 16	1. EU 15 and EU 16 shall consist of the equipment specified in Table 1 herein.
	2. EU 15 and EU 16 shall be equipped with a Rentech, or equivalent, oxidation catalyst and a Cormetech Model CM21, or equivalent, selective catalytic reduction system
	3. The Permittee shall operate the selective catalytic reduction system and oxidation catalyst at all times that EU 15 and EU 16 are operating.
	4. The operating temperature for the selective catalytic reduction system shall be within 480°F to 800°F.
	5. The operating temperature for the oxidation catalyst shall be within 600°F to 1150°F.
	6. EU 15 shall be operated in accordance with the requirements specified in 310 CMR 7.26(43).
	7. EU 15 and EU 16 are subject to Subpart KKKK of the federal Standards of Performance for Stationary Combustion Turbines, 40 CFR Part 60.4300 through 60.4420 and shall comply with the applicable requirements.
15 16 17	8. The Permittee may make the approved changes herein, upon the submittal of an amended Title V Operating Permit Renewal Application (BWP AQ 12) which incorporates these changes.

Table 6 Key:

EU = Emission Unit Number

B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including, but not limited to, rain protection devices known as “shanty caps” and “egg beaters.”

C. The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7, for the Emission Units that are regulated by this Plan Approval:

Table 7				
EU	**Stack Height Above Ground (feet)**	**Stack Inside Exit Dimensions (feet)**	**Stack Gas Exit Velocity Range (feet per second)**	**Stack Gas Exit Temperature Range (^{o}F)**
15 16	75	4	38-88	180-540
17	15	1	~200	~1500

Table 7 Key:
EU = Emission Unit Number
^{o}F = Degree Fahrenheit

5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).

B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.

C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.

D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.

E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.

F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.

G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.

H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.

I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.

J. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars ($100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions concerning this Plan Approval, please contact Cortney Danneker by telephone at 413-755-2234, or in writing at the letterhead address.

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Marc Simpson
Air Quality Permit Chief
Bureau of Air and Waste

ecc: MassDEP/Boston - Yi Tian
MassDEP/WERO – Peter Czapienski
Dale Raczynski –Epsilon Associates Inc.