



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OFFICE BUILDING HARTFORD, CONNECTICUT 06115



January 19, 1983

The Honorable Lester Sutton  
Regional Administrator  
U.S. Environmental Protection Agency  
Region I  
JFK Federal Building  
Boston, Massachusetts 02203

REC'D  
JAN 20 1983  
RECEIVED  
JAN 20 1983  
AIR MGMT. DIVISION

Dear Mr. Sutton:

The Department of Environmental Protection is submitting a revision to our State Implementation Plan (SIP) for your approval. This revision is our approval of Simkins Industries, 259 East Street, New Haven under the State Air Pollution Control/Energy Trade Option Program (SET) and allows the company to use 2.2% sulfur oil under specified conditions.

A 30 day comment period legal notice regarding the proposed action was published in the New Haven Journal-Courier on August 17, 1982. Several comments were received, and a source specific public hearing was held. I certify that all approved public notice procedures (see 46FR 24601) have been followed.

The source application was forwarded to Linda Murphy on August 11, 1982. The source acceptance letter was given to Sara Simon during her visit here on December 14, 1982.

This revision submittal includes:

1. The permit cover letter, and the final signed permit.
2. A copy of the proposed decision public notice, copies of the public hearing proposed decision of August 18, 1982 and final decision of October 21, 1982.
3. Maximum rated capacity of main boiler is  $147 \times 10^6$  BTUH.
4. EPA Attachment II - "Summary of Results for BTU Bubbles <250 MMBTU That are Certified for Screening Per the Connecticut Guidelines".


I certify that the subject application has been reviewed under the procedures of and meets all requirements of the approved SET program,

Regulation 19-508-19(a)(3)(i), and the Connecticut Modeling Guideline. This premise has potential to emit SO<sub>2</sub> emissions of greater than 100 tons per year (TPY). There are no sources on this premise that have a maximum rated capacity or a capacity limited by enforceable permit conditions of 250 MMBTU/hour or greater.

Our analysis has shown that the revision will not violate the sulfur dioxide NAAQS and will not either cause or exacerbate a violation of the TSP NAAQS. The applicant is located more than 20 kilometers from any PSD baseline area as defined in your letter of October 27, 1982. If you determine that further PSD analysis is necessary, please inform me within 14 days. The applicant's maximum allowable operating conditions modeled SO<sub>2</sub> impacts were 337 ug/m<sup>3</sup> (24-hour), 1200 ug/m<sup>3</sup> (3-hour) and 45 ug/m<sup>3</sup> (annual). The applicant's normal operating conditions maximum modeled SO<sub>2</sub> impacts were 325 ug/m<sup>3</sup> (24-hour) and 1041 ug/m<sup>3</sup> (3-hour). The applicant conforms with EPA regulations and guidance on good engineering practice stack heights. The applicant is located at the following UTM coordinates: (km) 4574.51 N; 675.05 E.

I am of the opinion that this final, adopted DEP approval for Simkins Industries is in conformance with all provisions of State law and the Federal Clean Air Act, and I recommend that you approve it for inclusion in our SIP.

Sincerely yours,

  
Stanley J. Pac  
Commissioner

SJP/ml

Encs.

cc: Milton Anderson, Simkins Industries  
SET File E-21  
Sara Simon, EPA, Region I  
Harley Laing, EPA, Region I  
Wallace E. Stickney, EPA, Region I

Mr. Leonard Bruckman  
Director  
Air Compliance Unit  
Department of Environmental Protection  
State Office Building  
Hartford, Connecticut 06115

Dear Mr. Bruckman:

I have reviewed the preliminary approval by the Department of Environmental Protection regarding the application by Simkins Industries, Inc. (hereinafter the "Applicant") for relief to burn fuel oil with a sulfur content greater than one percent (1.0%) by weight pursuant to Section 19-508-19(a)(3) and (a)(4) of the Rules and Regulations of Connecticut State Agencies (hereinafter the "Regulations"). I understand that final approval by the Commissioner of Environmental Protection of the State of Connecticut (hereinafter the "Commissioner") for burning non-conforming fuel oil at 259 East Street, New Haven shall be subject to the following terms and conditions:

1. The Applicant shall at no time burn fuel oil containing sulfur in excess of 2.2 percent (2.2%) by weight (Dry Basis) in the following equipment:

Registration #117-673 - Bigelow Stirling Type Water Tube Boiler

Registration #117-674 - Bigelow Hornsby Water Tube Boiler

2. Stack emission tests are to be conducted on the Bigelow Stirling Type Boiler (Reg. # 117-673) at 1057.5 gph maximum firing rate ( $147 \times 10^6$  BTUH) and the Bigelow Hornsby Boiler (Reg. #117-674) at 619 gph maximum firing rate ( $85 \times 10^6$  BTUH) at maximum capacity to determine compliance with Section 19-508-18 (d) of the "Regulations". An acceptable stack test report shall be submitted within three (3) months after final approval.
3. The Applicant shall not purchase, store or otherwise take delivery of fuel oil containing sulfur in excess of the limit established by the Commissioner.
4. The Applicant shall maintain facilities and equipment as may be necessary to blend fuel oils at 259 East Street, New Haven so as to comply at all times with conditions No. 1 above.
5. The Applicant shall maintain accurate daily records of the amount and percent sulfur content of all fuel oil burned at its 259 East Street, New Haven facility and shall make such records available to the Commissioner upon request.
6. For purpose of determining compliance with this approval, the percent fuel content of the fuel oil actually burned by the Applicant may be determined based upon analysis of a sample taken at any time from the burner feedline and the company shall make provision for such sampling from the burner feedline satisfactory to the Commissioner.

7. The Applicant shall not purchase or otherwise take delivery of fuel oil containing sulfur in excess of one percent (1.0%) by weight (Dry Basis) from any fuel merchant unless, prior to the sale, storage or delivery of such fuel, such fuel merchant or fuel merchants shall deliver to the Commissioner of Environmental Protection a letter of application containing the following additional conditions:
- (a) Fuel merchants shall provide the Commissioner with an ultimate analysis of each shipment of fuel delivered to 259 East Street, New Haven.
  - (b) Fuel merchants shall keep the Commissioner informed as to the quantity and location of any fuel oil containing sulfur in excess of one percent (1.0%) by weight (Dry Basis) stored by such fuel merchants (in Connecticut) for delivery to the Applicant.
  - (c) Fuel merchants shall maintain accurate records of each fuel shipment delivered to the Applicant including date of delivery, quantity of shipment and the storage tank to which such shipment is unloaded.
8. The subject approval shall expire one year from the date of issuance by the Commissioner. A separate application should be filed at least 90 days prior to the expiration of this approval, if approval for the following year is desired.
9. The subject approval may be revoked, suspended or modified in accordance with applicable law in the event the Commissioner finds at any time that the sale, storage, delivery, use or burning of fuel containing sulfur in excess of one percent (1.0%) by weight (Dry Basis) as authorized herein is not in conformity with law or in the event the Commissioner finds at any time that the sale, storage, delivery, use or burning of fuel is not otherwise in conformity with the terms and conditions hereof, or for other good cause shown.

Dated at New Haven, Connecticut, this 3rd  
(City) (State) (day)  
of September, 1982.  
(Month) (yr.)

SIMKINS INDUSTRIES, INC.

(Company)

BY Milton L. Anderson

ASSISTANT CONTROLLER

(Title)

DEC 16 1982

NEW SOURCE REVIEW

EPE # \_\_\_\_\_

**PERMIT TO OPERATE** (SET E-21)  
EP-12 NEW 6-72



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



File for renewal 120 days before expiration date.		STACK NO.: 01, 02	PERMIT NO. 117-078
PREMISE NO.: 117-464		DATE ISSUED 11/1/82	EXPIRATION DATE 11/30/83
EQUIPMENT CLASSIFICATION			
<input checked="" type="checkbox"/> FUEL BURNING	<input type="checkbox"/> INCINERATOR	<input type="checkbox"/> PROCESS MFG.	<input type="checkbox"/> AIR POLLUTION CONTROL
CONDITIONS			

These two Bigelow boilers shall be operated in accordance with the specifications listed in the permit application, with the terms of the permit letter, and with all applicable sections of the Connecticut "Administrative Regulations for the Abatement of Air Pollution."

MAXIMUM FUEL FIRING RATE: 1057.5 gph #6 oil - main unit  
619.0 gph #6 oil - standby unit

MAXIMUM PERCENT SULFUR ALLOWED: 2.2% by weight, dry basis

NOTES

1. Simultaneous operation of main and standby units not allowed.
2. Operation under this permit is subject to the conditions specified in the permit letter.

FIRM NAME

Simkins Industries

LOCATION OF EQUIPMENT (No. & Street, Town, Zip)

259 East Street, New Haven

APPLICANT'S SIGNATURE

*Cliff Anderson*

COMMISSIONER OR HIS REPRESENTATIVE

*Stanley C. Pas*

Permit is invalid unless signed by Applicant, such signature constituting agreement to the conditions listed above.

Summary of Results for BTU Bubbles (less than 250 MMBTU) that  
Are Certified for Screening per the CT Guideline

Source Name

% Sulfur Allowable

SIMKINS INDUSTRIES

2.2%

259 East Street, New Haven

I. SO<sub>2</sub> NAAQS RESULTS (ug/m<sup>3</sup>)

	Maximum Receptor		Subject Facility	Nearby Sources	Background	SUM	NAAQS
	UIM's	Town					
3-hr	4577.00 N	New Haven	853	152	195	1200	1300
24-hr	675.30 E	"	134	78	125	337	365
Annual	4573.17 N	"	<1	>11 <12	33	45	80
	675.45 E						

II. TSP NAAQS RESULTS (ug/m<sup>3</sup>)

A. Non-Attainment Receptors

	Receptor Point		Incremental Impact		24-hr	Annual
	UIM's	Town	24-hr	Annual		
Monitors <sup>a</sup>			Since the <u>max. full impact</u> of the subject source equals 10 ug/m <sup>3</sup> at a high terrain receptor point, and the incremental emission rate is less than 5 half the full-emission rate, the source's incremental impact can be assumed to be <5 ug/m <sup>3</sup> at the two monitoring sites in violation. Therefore no actual modeling at monitors was performed.			
1					5	1
2					5	1
etc.						
Model Receptors <sup>b</sup>	None					
1					5	1
2					5	1
etc.						

a) Any monitor within the impact area of the subject facility with recorded violati

b) Any receptor where the sum of the modeled impact of nearby sources plus back-ground exceeds the NAAQS.

B. Attainment Receptors

	Maximum Receptor		Subject Facility	Nearby Sources	Background	SUM	NAAQS
	UTM'S	Town					
24-hr	4574.3 N 677.2 E	New Haven	7	0	140	147	150
Annual	4578.40 N 671.50 E	Hamden	< 1	> 2 < 3	61	64	75

III. SO<sub>2</sub> PSD RESULTS (ug/m<sup>3</sup>)

Distance to nearest baseline area 22.5 km

Radius of influence of subject facility        km

The distance to the nearest baseline area is greater than 20 km and the radius of influence does not intersect any baseline area; no evaluation of increment consumption is necessary.

Maximum Incremental Impact in Each Baseline Area Town (based on EPA specified receptors)

EPA Receptor	UTM'S	Town	State	3-hr	24-hr	Annual
	1					
2						
etc.						