

#AOP-15-005  
DEC# SJ95-0114

Operating Permit Expiration Date: September 11, 2022

State of Vermont  
Agency of Natural Resources  
Department of Environmental Conservation



Air Quality & Climate Division  
Montpelier, Vermont

**TITLE V**  
**AIR POLLUTION CONTROL PERMIT**  
**TO CONSTRUCT AND OPERATE**

Date Permit Issued: September 11, 2017

Owner/Operator: ATC Ryegate, LLC  
1990 Post Oak Blvd, Suite 1900  
Houston, TX 77056

Source: ATC Ryegate, LLC  
Wood-fired Electric Generating Station  
247 Weesner Drive  
East Ryegate, Vermont 05042

## (A) FACILITY DESCRIPTION

ATC Ryegate, LLC (also referred to herein as "Permittee") owns and operates a twenty (20) megawatt (net) wood-fired electrical power generation plant located at 247 Weesner Drive in East Ryegate, Vermont (also referred to herein as "Facility"). The Facility is operated as a base load electrical generation plant at or near to 100% capacity at all times, excluding plant outages. The electricity generated at the Ryegate Power Station is sold under the terms of a power purchase agreement (PPA) issued by the Public Service Board (PSB) on March 29, 2013. The PPA is valid for a 10-year period from November 1, 2012 to November 1, 2022. Operations performed at the Facility are classified within the Standard Industrial Classification Code - 4911 (Electrical Services), or under the North American Industrial Classification System Code 221117 (Biomass Electric Power Generation).

The Facility is fired with whole tree wood chips delivered in standard chip vans. The fuel is primarily mixed hardwood and softwood, with some lesser amounts of sawdust, mill chips, and bark. The fuel chips are stored in silos and outside storage pile(s) before being mechanically conveyed to the boiler. Wood fuel is fed into a single, high-pressure, boiler designed to burn green wood fuel (Main Boiler). Steam produced by the Main Boiler is passed through a condensing turbine generator set with extraction steam utilized for feedwater heating. Condenser heat is removed via an open loop circulating water system to a cooling tower structure.

The Main Boiler is fitted with a liquefied petroleum gas (LPG) auxiliary burner having a maximum rated heat input of 50 million British thermal units per hour (MMBtu/hr). This burner is used primarily for plant start-up and for supplemental fuel. The Facility also has a 430 horsepower LPG-fired engine generator (Emergency Generator) set for use during electric power outages, and an auxiliary LPG-fired boiler (Auxiliary Boiler) that supplies hot water for space heating purposes during plant outages.

Air contaminant emissions produced by the wood-fired boiler are controlled as follows: electrostatic precipitator, flue gas reinjection, selective non-catalytic reduction system (SNCR) using urea injection, selective catalytic reduction system (SCR) using urea injection, and combustion air control with oxygen trim and underfire/overfire air ratio. In 2014, the Permittee voluntarily installed the selective catalytic reduction (SCR) system in order to reduce the facility's emissions of NO<sub>x</sub>. The reduced NO<sub>x</sub> emissions are required for the Facility to qualify for Class 1 renewable energy credits (RECs) in New England. While the installation of the SCR system was voluntary, now that the capital costs have been expended and the system is operational, a new RACT evaluation based only on the operating costs has determined the Permittee must continue to operate the system to meet new NO<sub>x</sub> RACT limits contained in this permit, or file an amendment application for reconsideration of this NO<sub>x</sub> RACT determination.

Upon issuance of this Permit, the approved regulated operations at the Facility include the following air pollution related operations, equipment and emission control devices:

<b>Combustion Equipment Specifications</b>			
Equipment	Size <sup>1, 2, 3, 4</sup>	Fuel Type <sup>5</sup>	Date of Installation
Main Boiler Manufacturer: Riley Stoker Corp.	300 MMBtu/hr 20 MWe (net)	Wood	1992
Main Boiler Auxiliary Burner Manufacturer: Coen Model: 230/DAZ-22	50 MMBtu/hr	LPG	
Auxiliary Boiler Manufacturer: Weil-McLain Boiler Model: 1688R-W Burner Model: WCR3-G-25B	5 MMBtu/hr		
Emergency Generator Cummins Engine Model #: GTA19 Serial Number: 25178626 Engine Manufacture Date: 11 December, 1991 Marathon Electric Generator Model #: 432RSL4015BP-310W rs	430 bhp (300kW)		

<sup>1</sup> MMBtu/hr - Million British Thermal Units per hour maximum rated heat input.

<sup>2</sup> MWe (net) – Net electrical output in Megawatts

<sup>3</sup> bhp – brake horsepower rated output as specified by the manufacturer. kW – kilowatt electrical output.

<sup>4</sup> kW – kilowatt electrical output.

<sup>5</sup> LPG –Liquefied Petroleum Gas

<b>Pollution Control Equipment Specifications</b>	
Equipment	Specifications
Main Boiler – Mechanical Dust Collectors / Fly ash ReInjection System	Manufacturer: Zurn Mechanical Type of Unit: Cyclone Separator
Main Boiler – ESP	Manufacturer: PPC Industries Estimated Collection Efficiency: 99.5% Pressure Drop: 0.5 inch w.c. max Type of Unit: Plate and weighted wire Cleaning Method: Rapping Inlet Temperature: 300°F Collecting surface area: 77,175 ft <sup>2</sup> Air Flow Rate: 115,000 acfm

Pollution Control Equipment Specifications	
Equipment	Specifications
Main Boiler - SNCR	Manufacturer: Nalco/Fuel Tech Estimated Collection Efficiency:30% Pressure Drop: N/A Dimensions: 12 injection nozzles – located approximately 30 feet above the furnace grate. Air Flow Rate: 335,000 lb/hr (flue gas) Other Pertinent Information: Injection of a 15/85 solution of urea and water.
Main Boiler - SCR	Manufacturer: CCA / Peerless Pressure Drop: N/A Dimensions: 6,500 square feet.

Insignificant Fuel Combustion Equipment			
Equipment	Size <sup>1,2</sup>	Fuel Type <sup>3</sup>	Date of Installation
Diesel Fire Pump Cummins 6BTA 5.9 F1 Serial Number: 44698521	208 bhp	No. 2 Fuel Oil	1992
Fuel Yard Maintenance Building Heater	< 3 MMBtu/hr		
Main Maintenance Building Heater	< 3 MMBtu/hr	LPG	2009
LPG System Vaporizer Make: Algas-SDi Model Q1650V Serial Number 08116660	1.825 MMBtu/hr		

<sup>1</sup> MMBtu/hr - Million British Thermal Units per hour maximum rated heat input.

<sup>2</sup> bhp – brake horsepower rated output as specified by the manufacturer.

<sup>3</sup> LPG –Liquefied Petroleum Gas

## (B) FACILITY CLASSIFICATION

The Facility is classified as a source of air contaminants pursuant to Title 10 of the *Vermont Statutes Annotated* ("10 VSA") §555 and §5-401(3), [Electrical power generating facilities], of the *Vermont Air Pollution Control Regulations* (hereinafter "*Regulations*"). In addition, §5-101 of the *Regulations* defines a *stationary source* as any structure(s), equipment, installation(s), or operation(s), or combination thereof, which emit or may emit any air contaminant, which is located on one or more contiguous or adjacent properties and which is owned or operated by the same person or persons under common control. Based on this definition, all of the equipment, operations, and structures at the Facility are grouped together by the Agency of Natural Resources, Department of Environmental Conservation, Air Quality & Climate Division (hereinafter "*Agency*") as one stationary air contaminant source for purposes of review under the *Regulations*.

## (C) PRIOR AGENCY ACTIONS/APPROVALS

The Facility has been issued the following "Permit to Construct" approvals pursuant to 10 VSA §556 and §§5-501 and/or 5-502 of the *Regulations* and the following "Permit to Operate" approvals pursuant to 10 VSA §556a and Subchapter X of the *Regulations*.

<b>Prior Agency Approvals and Actions</b>		
Permit Number	Date Approval Issued	Description of Agency Approval/Action
N/A	January 11, 1988	Original Agency approval to construct the Facility.
AP-90-029a	July 11, 1990	Amendment issued to extend the deadline of construction of the Facility and added requirement for SNCR for NO <sub>x</sub> .
AP-90-029a2	August 15, 1991	Amendment issued to address design changes in the Facility (e.g., switch auxiliary fuel from No. 2 oil to LPG, increase in stack height, etc.).
AP-90-029b	October 30, 1991	Amendment issued requiring compliance with a revised NO <sub>x</sub> MSER limit 0.15 pounds per million British thermal units (lb/MMBtu) at start-up instead of three years following start-up.
AP-90-029c	January 24, 1992	Amendment issued approving the use of urea and/or ammonia for the selective non-catalytic control device.
AP-90-029d	April 29, 1992	Amendment issued in order to make clerical revisions to the conditions of the approval.
AP-90-029e	June 18, 1992	Amendment issued in order to revise the language of various reporting requirements.

AP-90-029f	February 23, 1993	Amendment issued in order to extend the deadline for emission testing.
AP-90-029g	February 25, 1997	Amendment issued eliminating the requirement to continuously monitor VOC emissions and the prohibition on simultaneous operation of the Main Boiler and Auxiliary Boiler.
AOP-95-031	September 15, 1997	Agency approval for initial Title V Permit to Operate.
AOP-01-037	May 16, 2011	Renewal of previous Title V Permit to Operate combined with previous Permit to Construct.

(D) FACILITY PERMIT APPLICABILITY

As noted above, the Facility is classified as a source of air contaminants under §5-401 of the *Regulations*. Pursuant to 10 VSA §556a and Subchapter X of the *Regulations* a Permit to Operate is required for any air contaminant source with allowable emissions of all air contaminants combined of ten (10) tons per year (tpy) or more or that is otherwise subject to Title 40 *Code of Federal Regulations* (40 CFR) Part 70.

The Facility currently operates under a Title V Permit to Operate (#AOP-01-037) issued on May 16, 2011. The allowable emissions from the Facility are estimated to be greater than ten (10) tpy combined and emissions of nitrogen oxides (NO<sub>x</sub>) and carbon monoxide (CO) are estimated to be in excess of the one-hundred (100) tpy threshold for applicability to Title V of the federal Clean Air Act. Therefore, pursuant to §§5-1002, 5-1003, and 5-1005 of the *Regulations* the Facility is classified as a Title V Subject Source. In accordance with §5-1009 of the *Regulations*, the Agency is issuing the Permit to Operate herein as a renewal of the previous Permit to Operate for the Facility and the Permit herein supersedes all prior Permits for the Facility.

In accordance with 10 VSA §556(e) the Agency has combined the previous Permit to Construct and the Title V Permit to Operate renewal for this Facility into one combined Permit to Construct and Operate. The allowable emissions for the Facility are summarized below:

Future Allowable Air Contaminant Emissions (tons/year) <sup>1</sup>						
PM/PM <sub>10</sub> /PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOCs	Total Criteria	HAPs <sup>2</sup>
34	25	100	394	39	>10	<10/25

<sup>1</sup> PM/PM<sub>10</sub>/PM<sub>2.5</sub> - particulate matter, particulate matter of 10 micrometers in size or smaller and particulate matter of 2.5 micrometers in size or smaller, respectively (unless otherwise specified, all PM is assumed to be PM<sub>2.5</sub>); SO<sub>2</sub> - sulfur dioxide; NO<sub>x</sub> - oxides of nitrogen measured as NO<sub>2</sub> equivalent; CO - carbon monoxide; VOCs - volatile organic compounds; HAPs - hazardous air pollutants as defined in §112 of the federal Clean Air Act.

<sup>2</sup> Emissions of individual HAPs each < 10 tpy and emissions of total HAPs combined <25 tpy. Actual total combined HAPs estimated at <12 tpy

(E) REVIEW OF CRITERIA POLLUTANT EMISSIONS FOR THE PERMIT TO CONSTRUCT

(a) New Source Review Designation

The Permittee has not proposed any modifications to the Facility in conjunction with the review for this Permit to Operate and therefore is not subject to review under the New Source Review requirements in §5-501 or §5-502 of the *Regulations* at this time.

(b) Most Stringent Emission Rate

Pursuant to §5-502 of the *Regulations*, the owner/operator of each new major stationary source or major modification must apply control technology adequate to achieve the Most Stringent Emission Rate (MSER) with respect to those air contaminants for which there would be a major or significant actual emissions increase, respectively, but only for those currently proposed physical or operational changes which would contribute to the increased emissions.

The Permittee has not proposed any modifications to the Facility in conjunction with the review for this Permit to Operate and therefore is not subject to review under the MSER requirements in §5-502 of the *Regulations* at this time

Prior MSER Evaluations: The Facility was previously reviewed under §5-502 of the *Regulations* for modifications to the Facility. The following MSER determinations have been made at this Facility:

Most Stringent Emission Rate Determinations		
Determination Date & Permit #	Pollutant	Description/Emission limit <sup>1</sup>
Original Permit to Construct No Permit Number Issued: January 11, 1988	PM	<u>Main Boiler</u> : Installation and operation of mechanical collectors in series with a 670 SCA, five field electrostatic precipitator. Emission Limit: 0.00070 gr/dscf at 12% CO <sub>2</sub> .
	SO <sub>2</sub>	<u>Main Boiler</u> : Combustion of #2 fuel oil with a maximum sulfur content of 0.5 percent by weight, as the auxiliary fuel and the maximum combustion limit of 357,000 gallons/yr.
	NO <sub>x</sub>	<u>Main Boiler</u> : Modern combustion design devised to minimize nitrogen oxides emissions and the low flame temperature resulting from the utilization of wood as the primary fuel. Emission Limit: 0.250 lb/MMBtu.
	CO	<u>Main Boiler</u> : Modern combustion design devised to assure complete combustion of fuels. Emission Limit: 0.30 lb/MMBtu.

Most Stringent Emission Rate Determinations		
Determination Date & Permit #	Pollutant	Description/Emission limit <sup>1</sup>
July 11, 1990 #AP-90-029a	NO <sub>x</sub>	<u>Main Boiler:</u> Installation and operation of a non-catalytic reduction system wherein ammonia is injected into the boiler combined with modern combustion design of the boiler and the low flame temperature resulting from utilization of wood as the primary fuel. Emission Limits: 0.25 lb/MMBtu (first year of operation) 0.20 lb/MMBtu (second year of operation) 0.15 lb/MMBtu (third year of operation)
August 15, 1991 #AP-90-029b	PM	<u>Auxiliary Boiler:</u> Use of LPG fuel. Emission Limit: 0.005 lb/MMBtu <u>Emergency Generator:</u> Use of LPG fuel. Emission Limit: 0.001 g/bhp-hr
	NO <sub>x</sub>	<u>Auxiliary Boiler:</u> Modern combustion design and use of LPG fuel. _Emission Limit: 0.14 lb/MMBtu <u>Emergency Generator:</u> Modern combustion design and the use of LPG fuel. _Emission Limit: 8.5 g/bhp-hr
	CO	<u>Auxiliary Boiler:</u> Modern combustion design. Emission Limit: 0.035 lb/MMBtu <u>Emergency Generator:</u> Modern combustion design. Emission Limit: 28 g/bhp-hr
October 30, 1991 #AP-90-029c	NO <sub>x</sub>	<u>Main Boiler:</u> Installation and operation of a non-catalytic reduction system wherein ammonia is injected into the boiler combined with modern combustion design of the boiler and the low flame temperature resulting from utilization of wood as the primary fuel. Emission Limit: 0.15 lb/MMBtu (8 hour rolling average) to be met upon start-up of boiler.

<sup>1</sup> gr/dscf – grains per dry standard cubic feet, lb/hr – pounds per hour, lb/MMBtu – pounds per million British thermal unit at maximum rated heat input, g/bhp-hr – grams per break horsepower hour rated output as specified by the manufacturer.

(c) Ambient Air Quality Impact Evaluation

An ambient air quality impact evaluation is performed to demonstrate whether or not a proposed project will cause or contribute to violations of the ambient air quality standards and/or significantly deteriorate existing air quality. The Agency's implementation procedures concerning the need for an ambient air quality impact evaluation under §5-406(1) of the Regulations, specifies that such analyses may be required when a project results in an allowable emissions increase of ten (10) tons per year or more of any air contaminant, excluding VOCs. Additionally, the Agency may require an air quality impact evaluation where the short-term allowable emission rates will significantly increase as a result of a project.

The Permittee has not proposed any modifications to the Facility in conjunction with the review for this Permit to Operate and therefore is not subject to an air quality impact analysis under §5-501 of the *Regulations* at this time.

Ambient air quality impact analyses were performed in 1987 as part of the original review for the Facility and again as part of the review for #AP-90-029A2 issued August 15, 1991. The pollutants PM, SO<sub>2</sub>, CO and NO<sub>x</sub> were modeled and it was determined that the proposed impacts would not cause a violation of any National Ambient Air Quality Standard (NAAQS), exceed any PSD increment or significantly contribute to an existing violation of an NAAQS.

(F) REVIEW OF CRITERIA POLLUTANT EMISSIONS FOR THE PERMIT TO OPERATE

(a) Applicable Requirements

The operations at the Facility are subject to the following state and federal laws and regulations, the requirements of which are embodied in the conditions of this Permit.

(i) *Vermont Air Pollution Control Regulations:*

<b>Applicable Requirements from the Vermont Air Pollution Control Regulations</b>
Section 5-201 – Prohibition of Open Burning
Section 5-211(2) and (3) - Prohibition of Visible Air Contaminants, Installations Constructed Subsequent to April 30, 1970.
Section 5-221(1) - Prohibition of Potentially Polluting Materials in Fuel, Sulfur Limitation in Fuel.
Section 5-231(3) - Prohibition of Particulate Matter; Combustion Contaminants.
Section 5-231(4) - Prohibition of Particulate Matter; Fugitive Particulate Matter.
Section 5-241 – Prohibition of Nuisance and Odor.
Section 5-251 – Control of Nitrogen Oxide Emissions
Section 5-252 – Control of Sulfur Dioxide Emissions
Section 5-261(2) – Control of Hazardous Air Contaminants - Hazardous Most Stringent Emission Rate.
Section 5-402 – Written Reports When Requested.
Section 5-403 – Circumvention.
Section 5-404 – Methods for Sampling and Testing of Sources.
Section 5-405 – Required Air Monitoring.

<b>Applicable Requirements from the Vermont Air Pollution Control Regulations</b>
Subchapter VIII – Registration of Air Contaminant Sources.
Subchapter X – Operating Permits.

(ii) Reasonably Available Control Technology - §5-1010 of the *Regulations*

Pursuant to 10 VSA §556a(d) and §5-1010 of the *Regulations* the Agency may establish and include within any Permit to Operate emission control requirements based on Reasonably Available Control Technology (RACT).

The initial Permit to Operate for the Facility, #AOP-95-031 issued September 15, 1997, was issued within 10 years of the latest NOx MSER determination for the Facility contained in of #AP-90-029b issued October 30, 1991 and thus was not subject to this RACT requirement. The Operating Permit renewal, #AOP-01-037 issued May 16, 2011, did not imposed any further requirements on this Facility under this authority at that time and instead continued to rely on the prior MSER determinations. In permit #AP-90-029b, the Agency established MSER for NOx as 0.15 lb/MMBtu (8 hour rolling average) NOx emission rate for LPG and wood combustion. The limit was based on modern combustion design, the low flame temperature resulting from utilization of wood as the primary fuel, good combustion control and the selective non-catalytic reduction (SNCR).

In 2014, the Permittee voluntarily installed a selective catalytic reduction (SCR) system in order to reduce the facility's emissions of NOx. The reduced NOx emissions are required for the Facility to qualify for Class 1 renewable energy credits (RECs) in New England. While the installation of the SCR system was voluntary, now that the capital costs have been expended and the system is operational, a new RACT evaluation based only on the operating costs has determined the Permittee must continue to operate the system to meet new NOx RACT limits contained in this permit, or file an amendment application for reconsideration of this NOx RACT determination. The Agency has determined that RACT for the Main Boiler at the Facility will now be based on modern boiler combustion design, low flame temperatures resulting from utilization of wood as the primary fuel, good combustion control, the selective non-catalytic reduction (SNCR) and selective catalytic reduction (SCR) to achieve a NOx emission rate for wood combustion of 0.075 lb/MMBtu based on a calendar quarterly average.

With the exception of this revised NOx emission limit, the Agency has not imposed any further requirements on this Facility under this authority at this time

## (iii) Existing Air Pollution Control Permit to Construct and/or Operate

The Facility currently operates under the confines of a Permit to Construct and Operate issued on May 16, 2011 (#AOP-01-037). The conditions within that existing permit are considered applicable requirements pursuant to §5-1002 of the *Regulations*. The requirements of that permit which are not being modified herein are incorporated into this new combined Permit to Construct and Operate (#AOP-15-005).

## (iv) Federal Requirements:

**Applicable Requirements from  
Federal Regulations and the Clean Air Act**

40 *CFR* Part 60, Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units: §60.42b Standards for sulfur dioxide §60.43b Standards for particulate matter; §60.44b Standards for nitrogen oxides; §60.49b Reporting and recordkeeping requirements. The affected facility to which this Subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 19, 1984 and that has a maximum design heat input capacity of greater than 29 megawatts (MW) (100 million BTU per hour).

*The Main Boiler at the Facility is subject to the requirements of this regulation. The sulfur dioxide standards of this regulation (§60.42b) are not applicable, as the Facility does not combust coal or oil. The particulate matter standards of this regulation (§60.43b), are applicable, but the MSER for the Facility imposes a stricter PM standard. The NOx standards of this regulation (§60.44b) are not applicable, as the Main boiler does not fire natural gas, coal, distillate oil, or residual oil.*

40 *CFR* Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines. Applies to new engines that commenced construction (installed) on or after June 12, 2006 at area sources of HAPs. Requires such engines to comply with NSPS Subpart IIII or JJJJ, as applicable. Also applies to existing engines that commenced construction (installed) prior to June 12, 2006 at area sources of HAPs. By May 3, 2013 requires engines equal and greater than 300 bhp to meet CO emission standards which may necessitate catalytic controls, must install crankcase ventilation system, and requires ULSD fuel. Engines <300 bhp need only meet maintenance requirements including changing oil & filter and, inspecting and replacing if necessary, air filter, hoses and belts. Does not apply to emergency units at residential/commercial/institutional facilities unless they are enrolled in demand response programs. Subject emergency units are subject to maintenance requirements, must install an elapsed hour meter and must use ULSD commencing January 1, 2015 if used for DR.

*The Emergency Generator engine and Fire Pump engine at this Facility are subject to only the emergency engine requirements of this regulation, as they are intended for emergency use only.*

**Applicable Requirements from  
Federal Regulations and the Clean Air Act**

40 CFR Part 63, Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers. Applies to new and existing fuel oil and solid fuel fired boilers located at area sources (major sources are subject to Subpart DDDDD). Natural gas or LPG fired boilers are not subject. This gas exemption allows use of backup fuel during gas curtailments and up to 48 hours of elective use. Oil fired hot water boilers less than 1.6 MMBTU/hr are not subject. The rule requires a tune-up for each boiler once every two years except boilers with oxygen trim and oil boilers less than 5 MMBtu/hr must conduct tune-ups every five years. New boilers greater than 10 MMBtu/hr are subject to PM emission limits. Boilers that commenced construction on or before June 4, 2010 are considered an existing source.

*Subpart JJJJJJ is applicable to the Main Boiler at the Facility. Since the Main Boiler is considered an existing boiler under this regulation, it is subject to the work practice standards as well as notification, reporting and recordkeeping requirements established in this rule. The work practice standards include biennial tune-ups and a one-time energy assessment.*

*Table 1 of Subpart JJJJJJ indicates that the boiler is not considered a new boiler under this subpart, nor is it an existing coal-fired boiler, and as such is not subject to any emission standards under Subpart JJJJJJ.*

*The LPG-fired Auxiliary Boiler is not subject to Subpart JJJJJJ, as it is fired with gaseous fuel. Since the Facility is not a major source of HAPs, the Facility is not subject to Subpart DDDDD.*

40 CFR Parts 72, 73, 75, 76, 77, 78, Acid Rain Program

*Even though the Facility commenced commercial operation after November 15, 1990, the Facility was previously not subject to the requirements of the Acid Rain Program since, as a New Independent Power Production Facility, they had obtained a qualifying power purchase commitment prior to November 15, 1990 under 40 CFR Part 72.6(b)(6).*

*With the expiration of the contracts previously held by the Facility in 2012, the Facility is now subject to the requirements of the Acid Rain Program. However, the Facility complies with the new unit exemption requirements of 40 CFR §72.7(b)(1), as it has not been previously allocated any allowances under Subpart B of 40 CFR, Part 73, has a nameplate capacity less than or equal to 25 MWe, and combusts wood or LPG fuel, both of which have a sulfur content of less than 0.05%.*

*To obtain this exemption, the Facility was required to submit a statement to the permitting authority by December 31 of the first year for which the unit is to be exempt under this section. This statement was to be signed by the designated or, if no designated representative has been authorized, a certifying official of each owner of the unit. The statement identified the unit, the nameplate capacity of each generator served by the unit and the fuels currently burned or expected to be burned by the unit and their sulfur content by weight, and stated that the owners and operators of the unit will comply with 40 CFR §72.7 (f). This statement was received by the Agency on December 17, 2012. The Permit herein contains fuel sulfur monitoring provisions to ensure the wood fuel qualifies as a low sulfur fuel.*

**Applicable Requirements from  
Federal Regulations and the Clean Air Act**

Clean Air Act §§114(a)(3) Inspections, Monitoring and Entry; 502(b) Permit Programs; and 504(a)-(c) Permit Requirements and Conditions; 40 *CFR* Part 64 Compliance Assurance Monitoring; 40 *CFR* Part 70 §§70.6(a)(3)(i)(B) and 70.6(c)(1) State Operating Permit Programs - Permit content. Upon renewal of a Title V Permit to Operate, a facility must comply with enhanced monitoring and compliance assurance monitoring requirements if applicable. The CAM rule applies to each Pollutant Specific Emission Unit (PSEU) at a major source that is required to obtain a part 70 or part 71 permit if the unit satisfies all of the following criteria: 1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant other than an emissions limitation or standard that is exempt under §64.2(b)(1) [exempt limitations include emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to Section 111 or 112 of the Act], 2) The unit uses a control device to achieve compliance with any such limit or standard; and 3) The unit has pre-control device emissions of the applicable regulated pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

*The Compliance Assurance Monitoring requirements apply to the particulate matter and nitrogen oxide emissions from the wood-fired Main Boiler at this Facility since (1) potential uncontrolled emissions of these pollutants from the wood-fired Main Boiler exceeds the major source threshold, (2) the wood-fired Main Boiler is subject to an emission standards for each of these pollutants, and (3) the wood-fired Main Boiler is equipped with an emission control device for each of these pollutants.*

*Air contaminant emissions produced by the wood-fired boiler are controlled as follows: electrostatic precipitator, flue gas reinjection, selective non-catalytic reduction system (urea injection), selective catalytic reduction system (SCR) and combustion air control with oxygen trim and underfire/overfire air ratio.*

Clean Air Act §112r Prevention of Accidental Release; 40 *CFR* Part 68 Chemical Accident Prevention Programs. Facilities that have more than the threshold quantity of a regulated substance in a process are subject to these provisions including the requirements to conduct a hazard assessment, establish a prevention program and develop a risk management plan.

*The Permittee has stated that the Facility does not store more than the threshold quantity of a regulated substance and thus is not subject to these requirements.*

**Applicable Requirements from  
Federal Regulations and the Clean Air Act**

40 CFR Part 98 Mandatory Greenhouse Gas Reporting. Requires reporting of GHG emissions annually to EPA for 1) facilities in source categories listed in §98.2(a)(1) including electric utility units subject to Acid Rain, MSW landfills that generate CH<sub>4</sub> in amounts equivalent to 25,000 metric tons of CO<sub>2</sub>e or more per year and electrical transmission and distribution equipment at facilities where the total nameplate capacity of SF<sub>6</sub> and PFC containing equipment exceeds 17,820 pounds, 2) facilities in source categories listed in §98.2(a)(2) including electronics manufacturing, iron and steel production and pulp and paper manufacturing that emit 25,000 metric tons of CO<sub>2</sub>e or more per year from such source categories as well as all stationary combustion, 3) facilities with stationary combustion sources that aggregate to 30 MMBtu/hr or more and which emit 25,000 metric tons of CO<sub>2</sub>e or more per year from all stationary combustion sources combined, and 4) fuel suppliers including all local natural gas distribution companies.

*The U.S. EPA has retained the implementing authority for this regulation and is responsible for determining applicability. This regulation under Part 98 is not considered to be an applicable requirement per 40 CFR Part 70.2 and as noted in 74 FR 56260 (October 30, 2009). Part 98 is anticipated to apply to the Facility.*

*Emissions of CO<sub>2</sub> from biogenic sources are not included in the calculation of Facility CO<sub>2</sub> emissions. The emissions of CO<sub>2</sub> from non-biogenic sources, plus the CO<sub>2</sub> equivalent emissions of CH<sub>4</sub> and N<sub>2</sub>O from the Facility do not exceed the 25,000-metric ton CO<sub>2</sub> equivalent emission threshold for reporting under 40 CFR Part 98.*

(b) Non-Applicable Requirements

Pursuant to §5-1015(a)(14) of the *Regulations*, an owner or operator of a Facility may request a permit shield from specific state or federally enforceable regulations and standards which are not applicable to the source. The applicant has not requested such a permit shield in accordance with the requirements of §5-1015(a)(14) of the *Regulations*.

(c) Enforceability

This section delineates which permit conditions are federally enforceable and which conditions are state only enforceable. All federal enforceable conditions are subject to federal citizen suit provisions. All conditions of this Permit are enforceable by both state and federal authorities

(d) Compliance Certification

The Permittee is required by this Permit to certify compliance as part of its annual registration with the Agency pursuant to the requirements of Subchapter X of the *Regulations*. Additionally, this Permit requires the submission of quarterly reports of monitoring records used to demonstrate compliance with the limitations contained in this Permit.

(G) HAZARDOUS MOST STRINGENT EMISSION RATE

Pursuant to §5-261 of the *Regulations*, any stationary source subject to the rule<sup>1</sup> with current or proposed actual emissions of a hazardous air contaminant (HAC) equal to or greater than the respective Action Level (found in Appendix C of the *Regulations*) shall be subject to the Regulation and shall achieve the Hazardous Most Stringent Emission Rate (HMSEER) for the respective HAC. HMSEER is defined as a rate of emissions which the Secretary, on a case-by-case basis, determines is achievable for a stationary source based on the lowest emission rate achieved in practice by such a category of source and considering economic impact and cost. HMSEER may be achieved through application of pollution control equipment, production processes or techniques, equipment design, work practices, chemical substitution, or innovative pollution control techniques.

Pursuant to §5-261(1)(b)(ii) of the *Regulations*, all fuel burning equipment which combusts virgin liquid or gaseous fuel and wood boilers constructed before January 1, 1993 are exempt from this section. Therefore, the Main Boiler, Auxiliary Boiler and the engine/generator are not subject to §5-261 of the *Regulations* at this time.

The emission of HACs from the cooling tower drift are subject to §5-261, but no Action Levels are estimated to be exceeded. Therefore, the cooling tower emissions were not reviewed under the requirements of §5-261 of the *Regulations* at this time.

The Agency has determined that the Facility emissions of ammonia from the SNCR and SCR systems are in excess of the Action Level for ammonia (CAS #7664-41-7). Therefore, the Facility must achieve HMSEER, as determined by the Secretary, pursuant to §5-261(2) of the *Regulations*

The Agency has determined HMSEER to be a not-to-exceed limit on the ammonia emission rate from the wood-fired Main Boiler following the SNCR and SCR systems of 20 ppmvd. This HMSEER evaluation shall be subject to re-evaluation five (5) years from the date of its determination and shall remain in effect until revised by the Agency, unless the source is modified or reconstructed during the five year period. This and prior HMSEER determinations for this Facility are presented below.

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<sup>1</sup> APCR §5-261(1)(c)(ii) provides that solid fuel burning equipment (not including incinerators) installed or constructed prior to January 1, 1993, and all fuel burning equipment which combust virgin liquid or gaseous fuel shall not be subjects to the requirements of §5-261.

Hazardous Most Stringent Emission Rate Determinations		
Permit #	Pollutant / CAS #	Description/Emission limit
#AP-90-029a  Re-established #AOP-01-037  Superseded by #AOP-15-005	Ammonia (NH <sub>3</sub> ) / (7664-41-7)	40 ppmv (parts per million on a volume basis corrected to 12% CO <sub>2</sub> )(one-hour average) when wood is contributing more than thirty (30) % of the instantaneous heat input to the Main Boiler.
#AOP-15-005	Ammonia (NH <sub>3</sub> ) / (7664-41-7)	20 parts per million on a volume dry basis (ppmdv) (corrected to 12% CO <sub>2</sub> ) (one-hour average) when wood is contributing more than thirty (30) % of the instantaneous heat input to the Main Boiler.

(H) EQUIVALENCY DETERMINATIONS

Applicable Visible Emission Standards, Main Boiler		
Most Stringent	Regulatory Authority	Standard or Limit
	40 CFR Part 60 Subpart Db §60.43b(f)	Shall not exceed 20% opacity for any 6-minute average except for one 6-minute period per hour of not more than 27%. Does not apply to startup, shutdown and malfunction.
X	§5-211(2) and (3) of the Regulations	Shall not exceed 20% opacity for more than a period or periods aggregating to 6 minutes in any hour. The wood fuel burning exceptions of 5-211(3) were never approved by EPA and are not being incorporated into this Permit herein.

Applicable Filterable Particulate Matter Emission Standards, Main Boiler <sup>1</sup>		
Most Stringent	Regulatory Authority	Standard or Limit
	40 CFR Part 60 Subpart Db §60.43b(c)(1)	0.10 lb/MMBtu
X	MSER: Original Permit to Construct – Issued January 11, 1988	0.0007 gr/dscf corrected to 12% CO <sub>2</sub> equivalent to 0.002 lb/MMBtu

<sup>1</sup> Note that these standards are for filterable particulate matter emission standards. The Facility is also subject to a total particulate emission standard of 0.10 gr/dscf under §5-231(3)(b)(iii) of the Regulations and as such, condensable particulate matter emissions will be required to be measured with a stack test as part of this permit.

<b>Applicable Fuel Sulfur Limitations, Main Boiler <sup>1</sup></b>		
<b>Most Stringent</b>	<b>Regulatory Authority</b>	<b>Standard or Limit</b>
	40 CFR, Part 72 §72.7(d)(3)	Sulfur content not to exceed 0.05 percent by weight.
X	#AP-90-029b – Issued August 15, 1991	Sulfur content not to exceed 10 grains per 100 cubic feet, equivalent to 0.00121 percent by weight.

Based on the Agency's review of the Facility's application and the above Findings of Fact, the Agency concludes that the Facility, subject to the following Permit conditions, complies with all applicable state and federal air pollution control laws and regulations. Therefore, pursuant to 10 VSA §§556 and 556a, as amended, the Agency hereby issues a Permit approving the Facility, as described in the above Findings of Fact, subject to the following:

## PERMIT CONDITIONS

### - Construction and Equipment Specifications -

- (1) The Permittee shall construct and operate the Facility in accordance with the plans and specifications submitted to the Agency and in accordance with the conditions set forth herein, including the equipment specifications as listed in Findings of Fact (A) or their equivalent as approved by the Agency. [10 V.S.A. §§556(c) and 556a(d)] [§5-501(1) of the *Regulations*] [Original Agency Approval to Construct: 1/11/1988] [Applications for \*AP-90-029a, \*AP-90-029b and \*AP-90-029c]
- (2) Main Boiler Auxiliary Burner – Heat Input Limitation: The heat input to the Main Boiler's LPG-fired auxiliary burner shall not exceed fifty (50) MMBtu/hr. [10 V.S.A. §556(c)] [Application for AP-90-029b]
- (3) Main Boiler - Air Pollution Control Equipment
  - (a) The Main Boiler shall be equipped with a particulate matter control system consisting of mechanical collectors in series with a five (5) field electrostatic precipitator (ESP), each of the make and specifications indicated by the Permittee in its application entitled "Air Pollution Control Operating Permit Application" and dated 15 September 2001.

At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the mechanical collectors and ESP in a manner consistent with good air pollution control practice for minimizing emissions. The mechanical collectors and ESP shall be operated whenever the Main Boiler is running after initial start-up. [10 V.S.A. §556(c)] [Original Agency Approval to Construction: 1/11/1988] [40 CFR §60.11d]
  - (b) The Main Boiler shall be equipped with a non-catalytic nitrogen oxides reduction system consisting of either aqueous ammonia or urea injection into the boiler flue gas at appropriate points within the furnace. The Permittee shall maintain temperatures within the injection zones in a range between 1,600 degrees Fahrenheit (°F) and 1,900 °F. All elements of the non-catalytic reduction systems shall be maintained in good working order, in a manner consistent with good air pollution control practice for minimizing emissions, and shall be operating whenever the Main Boiler is running after initial start-up. [10 V.S.A. §556(c)] [Application for \*AP-90-029a]

- (c) The Main Boiler shall be equipped with a selective catalytic nitrogen oxides reduction system (SCR) consisting of a catalyst and either aqueous ammonia or urea injection into the boiler flue gas upstream of the SCR. All elements of the SCR system shall be maintained in good working order, in a manner consistent with good air pollution control practice for minimizing emissions, and shall be operating whenever the Main Boiler is running after initial start-up. [10 V.S.A. §556(c)] [§5-1010(a) of the *Regulations*] [Application for #AOP-15-005]
- (4) Generators/Engines: The Permittee shall install, operate and maintain each stationary reciprocating internal combustion engine, and any after-treatment control device (if any), in accordance with the manufacturer's written instructions and in a manner consistent with good air pollution control practices for minimizing emissions. For non-emergency engines under 300 bhp and all emergency engines subject to the existing engine requirements of 40 *CFR* Part 63 Subpart ZZZZ the Permittee shall:
- (a) Install a non-resettable hour meter (emergency engines only);
  - (b) At a minimum, for non-emergency engines under 300 bhp change the engine's oil and filter every 1,000 hours of operation or annually, whichever comes first, and for all emergency engines change the engine's oil and filter every 500 hours of operation or annually, whichever comes first;
  - (c) At a minimum, inspect the engine's air filter every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
  - (d) At a minimum, inspect the engine's hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary; and
  - (e) Maintain records of the above
- [10 V.S.A. §§556(c) and 556a(d)] [§§5-501 and 5-1015(a)(1) of the *Regulations*] [Application for #AP-90-029b] [40 *CFR* part 63, Subpart ZZZZ]
- (5) Emergency Generators/Engines: Stationary emergency generators/engines, including those specified as such in Finding of Fact (A), shall be used only for emergency purposes and up to 100 hours per year for routine testing and maintenance. Emergency purposes are limited to periods of time when:
- (a) The usual source of power, heat or lighting is temporarily unavailable due to reasons beyond the reasonable control of the owner/operator;
  - (b) A fire or flood makes it necessary to pump water to minimize property damage.

In the event the Permittee must take action to restore the normal power source, the Permittee must take such action in a reasonable period of time. Emergency engines shall not be operated as part of any other ISO or utility peaking or load shedding activities without the approval of the Agency. [10 V.S.A. §§556(c) and 556a(d)] [§§5-401(6)(c) and 5-501 of the *Regulations*]

- (6) Stack Heights: The exhaust gases from the following emission sources shall be vented vertically through a stack(s) of the configuration noted below. Where stack heights are noted in Findings of Fact A such stacks shall be configured accordingly. The stack(s) shall not be equipped with any device that may obstruct the upward discharge of the exhaust gases such as a fixed rain cap of a type that has not been approved by the Agency.

<b>Stack Height and Configuration</b>	
Emission source	Minimum stack height above stack grade (ft)
Main Boiler	212
Auxiliary Boiler	60
Emergency Generator	60

For all other non-fugitive emission points at the Facility, the Agency recommends that they each be exhausted vertically through a stack(s) which extend a minimum of four (4) feet above the roof where the stack penetrates the roof and that they not be equipped with any device that may obstruct the upward discharge of the exhaust gases such as a fixed rain cap of a type that has not been approved by the Agency. [10 V.S.A. §§556(c) and 556a(d)] [§5-406 of the *Regulations*] [Original Agency Approval to Construction: 1/11/1988]

**- Operational Limitations -**

- (7) Main Boiler – Wood Fuel: The Permittee shall utilize as solid fuel for the Main Boiler only wood fuel uncontaminated by glues, preservatives, oils, or similar foreign substances. Furthermore, The Permittee shall notify the Agency of all proposed sources of wood fuel other than whole tree wood chips, and of the nature of said fuels, prior to the securing of any purchase/utilization agreements for said fuels. Whole tree wood chips means chips made from virgin wood and include stumps, branches, bark, and sawdust incidental to chipping operations. [10 V.S.A. §§556(c) and 556a(d)] [§§5-101, 5-231(2) and 5-1015(a)(1) of the *Regulations*]
- (8) The 12-month rolling average sulfur content of wood fuel used as fuel in the Main boiler shall not exceed 0.05 percent by weight. [10 V.S.A. §§556(c) and 556a(d)] [§§5-101, 5-231(2) and 5-1015(a)(1) of the *Regulations*] [40 CFR, §72.7(d)(3)]
- (9) Main Boiler – LPG Fuel:
- (a) The annual LPG fuel consumption by the Main Boiler shall not exceed, 556,000 gallons, based upon any rolling twelve (12) consecutive calendar month period.
  - (b) The sulfur content of LPG combusted by the Facility shall at no time exceed 0.0121 percent by weight, which is equivalent to 10 grains per 100 cubic foot.

[10 V.S.A. §§556(c) and 556a(d)] [#AP-90-029b issued 8/15/1991][40 CFR, §72.7(d)(3)]

- (10) The Auxiliary Boiler shall not operate more than 720 hours during any rolling twelve (12) consecutive calendar month period. [10 V.S.A. §§556(c) and 556a(d)] [Application for \*AP-90-029b]
- (11) The Permittee shall not install or operate a stationary reciprocating internal combustion engine, as defined in the *Regulations*, that is 450 bhp or greater unless the engine complies with §5-271 of the *Regulations*, as applicable. Installation of any size stationary reciprocating internal combustion engine, even those below 450 bhp, may still require approval from the Agency in the form of an amended Permit prior to installation. Stationary reciprocating internal combustion engines include those used to power generator sets or to provide shaft power for equipment but does not include engines used to power motor vehicles. [§§5-501 and 5-271 of the *Regulations*]
- (12) Fugitive Particulate Matter Control: The Permittee shall take reasonable precautions at all times to prevent emissions of fugitive particulate matter, including, but not limited to, the following measures:
- (a) Techniques such as, but not limited to, enclosing or spraying with water or surfactants shall be employed by the Permittee to prevent particulate matter from becoming airborne from the handling and transportation of ash.
  - (b) The Permittee shall include in its contract(s) with those receiving ash from the Facility the following clause:
  - (c) The ash recipient shall take reasonable precautions at all times to prevent fugitive particulate matter from becoming airborne from the handling and disposing of ash.
  - (d) All roads, traffic areas, and storage piles on the premises shall be maintained and treated as necessary to control fugitive dust, and all trucks and railroad cars which may be sources of fugitive dust shall be covered or treated as necessary.
  - (e) Reasonable measures shall be taken to control fugitive dust resulting from any wood chipping operations conducted at the Facility.
- [10 V.S.A. §556(c) and §5-231(4) of the *Regulations*] [Original Agency Approval to Construction: 1/11/1988]
- (13) Chip management Plan: The Permittee shall operate the Facility in accordance with its Chip Management Plan, initially approved by the Agency on May 28, 1992. Future amendments to the plan do not require approval by the Agency, but a copy of the amended plan shall be sent to the Agency. Said plan shall detail the outdoor woodchip storage and handling methods to be utilized by the Permittee to prevent the decomposition of the woodchips and the emissions of objectionable odors beyond the property line of the premises. [Original Agency Approval to Construction: 1/11/1988]

- (14) Operation and Maintenance Plan – Main Boiler: The Permittee shall develop, maintain and implement an operation and maintenance plan (O&M Plan) for the Main Boiler and its associated air pollution control equipment. The O&M Plan shall include, but not be limited to the following:
- (a) Inspection and maintenance procedures to be followed to ensure proper operation of the Main Boiler and its associated pollution control equipment and continuing compliance with the emission standards specified in this Permit.
  - (b) Details of the practices and procedures to be followed during periods of startup, shutdown and upset conditions in order to prevent emissions in excess of the standards specified in this permit.
  - (c) A description of preventive maintenance schedules, spare parts inventories, procedures and protocols for unscheduled outages, and provisions for equipment replacement and measures to be taken to protect air pollution control equipment in the event of any control equipment failure or shutdown.
  - (d) All operators of the Facility shall be trained in the operation and maintenance of both the Main Boiler and its associated air pollution control equipment by qualified personnel.

[10 V.S.A. §§556(c)][Original Agency Approval to Construction: 1/11/1988]

- (15) In accordance with 40 *CFR* Part 63 Subpart JJJJJJ (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial and Institutional Boilers at area sources), the Permittee shall comply with the following applicable requirements for coal, oil and wood fired boilers as well as all other applicable requirements of this regulation:
- (a) Five year tune-ups of the boiler(s) as required by 40 *CFR* §63.11223(c). For boilers installed prior to June 4, 2010 the first tune-up is required by March 21, 2014. Subsequent tune-ups must be completed no later than 61 months after the prior tune-up.
  - (b) A one-time energy assessment of the boilers as well as the rest of the Facility as required by 40 *CFR* §63.11201(b). This provision only applies to existing facilities with one or more boilers of 10 MMBtu/hr heat input or greater that were installed prior to June 4, 2010. The energy assessment must be completed by March 21, 2014.
  - (c) Notification, reporting and recordkeeping requirements as specified in §63.11225. This includes:
    - (i) §63.11225(a)(2): Initial Notification:
      - a. For boilers installed prior to June 4, 2010 the initial notification must be sent to the EPA no later than January 20, 2014. The Initial Notification was received by the Agency on August 19, 2011
    - (ii) §63.11225(a)(4): Notification of Compliance Status:
      - a. Notification of the initial tune-up of the boiler must be submitted no later than July 19, 2014 for boilers installed prior to June 4, 2010. The Notification of Initial Tune-up was submitted March 27, 2013
      - b. Notification of the completion of the energy assessment must be submitted no later than July 19, 2014.
    - (iii) §63.11225(b): By March 1 of each year, prepare and submit an annual compliance certification report. For boilers only subject to a requirement to conduct a 5-year tune-up and not subject to emission limits or operating limits, the Permittee may prepare only a 5-year compliance report.
    - (iv) All records, reports and notifications that are required by this regulation shall be submitted to the Agency as well as the U.S. Environmental Protection Agency.

[40 *CFR* Part 63 Subpart JJJJJJ] [40 *CFR* Part 63]

- Emission Limitations -

(16) Main Boiler - Filterable Particulate Matter:

- (a) In the event that emission testing demonstrates that particulate matter emissions exceed 0.00070 grains per dry standard cubic foot corrected to twelve percent carbon dioxide (gr/dscf corrected to 12% CO<sub>2</sub>) or 0.50 pounds per hour (lbs/hour) when wood fuel is contributing more than thirty (30) percent ("%") of the instantaneous heat input to the Main Boiler, but are less than 0.0070 gr/dscf corrected to 12% CO<sub>2</sub> and 5.0 lbs/hour, the Permittee shall take all reasonable measures to reduce and maintain its emissions of particulate matter to the greatest extent practicable below 0.0070 gr/dscf corrected to 12% CO<sub>2</sub> and 5.0 lbs/hour. The Permittee shall report to the Secretary those measures implemented and the degree of improvement derived from them. [10 V.S.A. §556(c) and §5-502(3)(a)(i) of the *Regulations*] [Original Agency Approval to Construction: 1/11/1988]
- (b) In the event that emission testing demonstrates that particulate matter emissions exceed 0.0070 gr/dscf corrected to 12% CO<sub>2</sub> or 5.0 lbs/hour, when wood fuel is contributing more than thirty (30) % of the instantaneous heat input to the Main Boiler, the Main Boiler shall cease operation. Operation shall be discontinued within thirty (30) days after the Permittee or the Agency receives the results of said testing. The Main Boiler will be permitted to restart only after the Permittee has demonstrated to the satisfaction of the Secretary that all necessary corrective actions have been taken to ensure that the Main Boiler will operate in compliance with this Permit. Within sixty (60) days after restarting operation under these circumstances, compliance with the above particulate matter emission limit shall be demonstrated by emission testing to the satisfaction of the Secretary. [10 V.S.A. §556(c)] [Original Agency Approval to Construction: 1/11/1988]
- (c) Any emission testing conducted to demonstrate compliance with the above particulate matter emission limit shall be performed in accordance with 40 *CFR* Part 60, Appendix A, Reference Method 5 or an equivalent method approved in writing by the Agency. The sampling time for each test run shall be at least 120 minutes and the minimum sampling volume shall be sixty (60) dry standard cubic feet. [10 V.S.A. §556(c) and 40 *CFR* Part 60 Subpart Db §60.46b] [Original Agency Approval to Construction: 1/11/1988]

- (17) Main Boiler - Total Particulate Matter: Emissions of total particulate matter from the Main Boiler shall not exceed 0.10 grains per dry standard cubic foot (gr/dscf) corrected to 12% carbon dioxide. This PM limit is to quantify the boiler's total PM emissions to establish compliance with 5-231(3)(b)(iii). Total PM includes both solid/filterable emissions as measured by EPA Reference Method 5, as well as PM emissions that are formed from condensable matter in the exhaust gases as measure by EPA Reference Method 202.

Any emission testing conducted to demonstrate compliance with the above emission limit shall be performed in accordance with 40 *CFR* Part 60, Appendix A, Reference Method 5, and Part 51, Appendix M, Reference Method 202 or an alternative method which has been published in 40 *CFR*, provided the federally approved alternative method has been accepted in writing by the Agency before testing. [10 V.S.A. §§556(c) and 556a(d)] [§§5-231(3)(b)(iii) and 5-404 of the *Regulations*]

- (18) Visible Emissions [Facility Wide]: Emissions of visible air contaminants from any installation at the Facility, except where otherwise noted in this Permit, shall not exceed twenty (20) percent opacity for more than a period or periods aggregating six (6) minutes in any hour and at no time shall visible emissions exceed sixty (60) percent opacity.

Compliance with the above visible emission limits for the Main Boiler shall be determined by means of a continuous opacity monitoring system (COMS). At the Secretary's discretion, compliance shall, in the alternative, be determined by observations by a trained observer in accordance with 40 *CFR* Part 51, Appendix M, Methods 203B and 203C, respectively, or Method 9. For all other installations and operations at the Facility, any emission testing conducted to demonstrate compliance with the above emission limits shall be performed in accordance with 40 *CFR* Part 51, Appendix M, Methods 203B and 203C, respectively. [§§5-211(2), 5-211(3) and 5-404 of the *Regulations*] [Original Agency Approval for Construction: 1/11/1988]

- (19) Main Boiler - Nitrogen Oxides: Nitrogen oxides ("NO<sub>x</sub>") emissions from the Main Boiler shall not exceed 0.075 lb/MMBtu of heat input and 22.5 lbs/hour (based on a calendar quarterly average) when wood is contributing more than thirty (30) % of the instantaneous heat input to the Main Boiler. Nitrogen oxides ("NO<sub>x</sub>") emissions from the Main Boiler shall also not exceed 0.15 pounds per million BTU ("lb/MMBtu") of heat input and 45 lbs/hour (eight-hour rolling average) when wood is contributing more than thirty (30) % of the BTU input to the Main Boiler. Compliance with this NO<sub>x</sub> emission limit shall be determined by means of continuous emission monitoring system (CEMS) as required in this Permit.

Any emission testing conducted to demonstrate compliance with the above emission limits shall be performed in accordance with Title 40 *CFR* Part 60, Appendix A, Reference Method 10 or an alternative method which has been published in 40 *CFR*, provided the federally approved alternative method has been accepted in writing by the Agency before testing. [10 V.S.A. §556(c) and §§5-502(3)(a)(i) and 5-1010(a) of the *Regulations*] [Application for #AP-95-031] [Application for #AOP-15-005]

- (20) Main Boiler - Carbon Monoxide: Carbon Monoxide (CO) emissions from the Main Boiler shall not exceed 0.30 lb/MMBtu and 90 lbs/hour on an eight-hour rolling average when wood is contributing more than thirty (30) % of the instantaneous heat input to the Main Boiler.

Any emission testing conducted to demonstrate compliance with the above emission limits shall be performed in accordance with 40 *CFR*, Part 60, Appendix A, Reference Method 10 or an alternative method which has been published in 40 *CFR*, provided the federally approved alternative method has been accepted in writing by the Agency before testing. [10 V.S.A. §556(c) and §§5-502(3)(a)(i) and 5-261(3) of the *Regulations*] [Original Agency Approval to Construction: 1/11/1988]

- (21) Main Boiler - Volatile Organic Compounds: Volatile Organic Compounds (VOC) emissions from the Main Boiler shall not exceed 0.03 lb/MMBtu of heat input and 9.0 lbs/hour (1-hour average) when wood is contributing more than thirty (30) % of the instantaneous heat input to the Main Boiler.

Any emission testing conducted to demonstrate compliance with the above emission limit shall be performed in accordance with Method 25 or Method 25a of 40 *CFR* part 60, appendix A, combined with Method 18 of 40 *CFR* Part 60, appendix A, or an alternative method which has been published in 40 *CFR*, provided the federally approved alternative method has been accepted in writing by the Agency before testing. [10 V.S.A. §556(c) and §§5-502(3)(a)(i) and 5-261(3) of the *Regulations*] [Original Agency Approval to Construction: 1/11/1988]

- (22) Main Boiler - Ammonia: Ammonia (NH<sub>3</sub>) emissions from the Main Boiler shall not exceed 20 ppmvd (parts per million on a volume dry basis corrected to 12% CO<sub>2</sub> for a one-hour average) when wood is contributing more than thirty (30) % of the instantaneous heat input to the Main Boiler.

Any emission testing conducted to demonstrate compliance with the above emission limit shall be performed in accordance with EPA Conditional Test Method 027 (CTM-027), or an alternative method which has been published in 40 *CFR*, provided the federally approved alternative method has been accepted in writing by the Agency before testing. [10 V.S.A. §556(c) and §§5-502(3)(a)(i) and 5-261(3) of the *Regulations*] [Application for #AP-90-029a]

- (23) Hazardous Air Pollutants: Emissions of federally regulated hazardous air pollutants (HAPs) from the Facility shall not equal or exceed ten (10) tons per year of any single HAP or twenty-five (25) tons per year of all HAPs combined per year based on any rolling twelve (12) consecutive calendar month period.

The annual combined and individual HAP emissions from the Facility shall be calculated according to the following methodology:

a) Total HAP Emissions (<25 tons/year)

Annual Total HAP Emissions = The sum of the Monthly Total HAP Emissions during the previous 12-month period, where:

$$\text{Monthly Total HAP Emissions} = [(EF_{\text{wood}}) * (HHV_{\text{wood}}) * (\text{monthly wood fuel usage in wet, as-fired tons}) + (EF_{\text{distillate}}) * (HHV_{\text{distillate}}) * (\text{monthly distillate fuel usage in gallons}) + (EF_{\text{natural gas}}) * (HHV_{\text{natural gas}}) * (\text{monthly natural gas usage in standard cubic feet}) + (EF_{\text{LPG}}) * (HHV_{\text{LPG}}) * (\text{monthly LPG usage in gallons})] / 2000 \text{ lb/ton}$$

Where:

$$EF_{\text{wood}} = 7.54\text{E-}03 \text{ lb/MMBtu, or as determined and approved below.}$$

$HHV_{\text{wood}} = 8.5 \text{ MMBtu/ton}$  or a site-specific value based on monthly wood fuel sampling performed in accordance with the Wood Fuel Sampling Plan required by this Permit.

$$EF_{\text{distillate}} = 4.93\text{E-}04 \text{ lb/MMBtu}$$

$$HHV_{\text{distillate}} = 0.14 \text{ MMBtu/gallon}$$

$$EF_{\text{natural gas}} = 1.85\text{E-}03 \text{ lb/MMBtu}$$

$$HHV_{\text{natural gas}} = 0.00102 \text{ MMBtu/standard cubic foot}$$

$$EF_{\text{LPG}} = 1.85\text{E-}03 \text{ lb/MMBtu}$$

$$HHV_{\text{LPG}} = 0.0915 \text{ MMBtu/gallon}$$

The total HAP emissions factor for wood ( $EF_{\text{wood}}$ ) shall be based on the following table:

<b>Detail of Total HAP Emission Factor for Wood (lb/MMBtu)</b>		
<b>HAP</b>	<b>CAS #</b>	<b>HAP Fraction Emission Factor</b>
Formaldehyde	50-00-0	1.20E-03
Benzene	71-43-2	8.54E-04
Hydrogen Chloride	7647-01-0	8.34E-04
Methanol	67-56-1	8.30E-04
Chlorine	7782-50-5	7.90E-04
Styrene	100-42-5	6.40E-04
Dichloromethane (Methylene Chloride)	75-09-2	5.40E-04
All other HAPs	---	1.86E-03
<b>Total EF<sub>wood</sub></b>		<b>7.54E-03</b>

As required by Condition (26(f)) of this Permit, the Permittee shall conduct periodic stack emission testing for the seven listed individual HAPs. Where the site-specific testing results for an individual HAP, as determined by the Agency, is greater than its respective value in the above table, then the site-specific testing result shall be used in the calculations of the Total EF<sub>wood</sub>. Where the site-specific testing results for an individual HAP, as determined by the Agency, are lower than its respective value in the above table, then the Permittee may at their discretion, use the site-specific testing result to calculate the Total EF<sub>wood</sub>.

b) Individual HAP Emissions (each < 10 tons/year)

Annual Individual HAP Emissions = The sum of each Individual Monthly HAP Emission during the previous 12-month period, where:

$$\text{Monthly Individual HAP Emission} = [(IEF_{\text{wood}}) * (HHV_{\text{wood}}) * (\text{monthly wood fuel usage in wet, as-fired tons}) + (IEF_{\text{distillate}}) * (HHV_{\text{distillate}}) * (\text{monthly distillate fuel usage in gallons}) + (IEF_{\text{natural gas}}) * (HHV_{\text{natural gas}}) * (\text{monthly natural gas usage in standard cubic feet}) + (IEF_{\text{LPG}}) * (HHV_{\text{LPG}}) * (\text{monthly LPG usage in gallons})] / 2,000 \text{ lb/ton}$$

Where emissions are evaluated each month for each individual HAP in the following table:

Individual HAP Emission Factors (lb/MMBtu)					
HAP	CAS #	IEF <sub>wood</sub>	IEF <sub>distillate</sub>	IEF <sub>natural gas</sub>	IEF <sub>LPG</sub>
Formaldehyde	50-00-0	1.20E-3	3.43E-04	7.35E-05	7.35E-05
Benzene	71-43-2	8.54E-04	1.53E-06	2.06E-06	2.06E-06
Hydrogen Chloride	7647-01-0	8.34E-04	-- <sup>1</sup>	-- <sup>1</sup>	-- <sup>1</sup>
Methanol	67-56-1	8.30E-04	-- <sup>1</sup>	-- <sup>1</sup>	-- <sup>1</sup>
Chlorine	7782-50-5	7.90E-04	-- <sup>1</sup>	-- <sup>1</sup>	-- <sup>1</sup>
Styrene	100-42-5	6.40E-04	-- <sup>1</sup>	-- <sup>1</sup>	-- <sup>1</sup>
Dichloromethane (methylene chloride)	75-09-2	5.40E-04	-- <sup>1</sup>	-- <sup>1</sup>	--

<sup>1</sup> Emissions of certain HAPs and chlorinated compounds are typically negligible from the combustion of commercially available fossil fuels.

The HHV and fuel usage for each fuel used in the calculation of each Monthly Individual HAP Emission shall be the same HHV and fuel usage as used in the calculation of the corresponding Monthly Total HAP Emissions.

As required by Condition (26(f)) of this Permit, the Permittee shall conduct periodic stack emission testing for the seven listed individual HAPs. Where the site-specific testing results for an individual HAP, as determined by the Agency, is greater than its respective value in the above table, then the site-specific testing result shall be used in the calculations of the Total EF<sub>wood</sub>. Where the site-specific testing results for an individual HAP, as determined by the Agency, are lower than its respective value in the above table, then the Permittee may at their discretion, use the site-specific testing result to calculate the Total EF<sub>wood</sub>. [10 V.S.A. §556(c) and §§5-404 and 5-405 of the *Regulations*] [40 CFR Part 63] [Application for #AOP-15-005]

- (24) Hazardous Air Contaminants: Emissions of state hazardous air contaminants (HACs) from the applicable operations at the Facility shall not equal or exceed their respective Action Level (found in Appendix C of the *Regulations*) unless the Agency has reviewed and approved such HAC emission under §5-261 of the *Regulations*. [§5-261 of the *Regulations*]
- (25) Nuisance and Odor: The Permittee shall not discharge, cause, suffer, allow, or permit from any source whatsoever such quantities of air contaminants, or odors beyond the property line of a premises, which will cause injury, detriment, nuisance or annoyance to any considerable number of people or to the public or which endangers the comfort, repose, health or safety of any such persons or the public or which causes or has a natural tendency to cause injury or damage to business or property. [10 V.S.A. §§556(c) and 556a(d)] [§5-241(1) of the *Regulations*]

**- Compliance Testing and Monitoring -**

## (26) Main Boiler - Compliance Testing and Monitoring

- (a) Continuing compliance with the particulate matter emission standards specified in Condition (16) and (17) of this Permit and the VOC emission standard specified in Condition (21) of this Permit shall be determined by biennial emissions testing, to be conducted beginning in 1995 and every other year thereafter. The Permittee shall conduct such testing and furnish the Agency with a written report of the results of such testing within ninety (90) days after June 1<sup>st</sup> for those years when re-testing is required. At least thirty (30) days prior to the re-testing, the Permittee shall submit a pre-test report prepared in accordance with the Agency's "Source Emission Testing Guidelines".
- (b) Continuing compliance with the visible air contaminant emission standards specified in Condition (18) of this Permit shall be determined by means of continuous opacity monitoring system (COMS), as required in Condition (30) of this Permit. At the Secretary's discretion, compliance shall, in the alternative, be determined by observations by a trained observer in accordance with 40 *CFR* Part 51, Appendix M, Methods 203B and 203C, respectively, or equivalent methods approved in writing by the Agency.
- (c) Continuing compliance with the nitrogen oxides and carbon monoxide emission standards specified in Conditions (20) and (21) of his Permit shall be determined by means of continuous emission monitoring, as required in Condition (30) of this Permit
- (d) Continuing compliance with fuel sulfur content limitations specified in Condition (8) of this Permit shall be determined by fuel sulfur content sampling as required by Condition (27) of this Permit.
- (e) Continuing compliance with the ammonia emission standard specified in Condition (22) of this Permit shall be determined by continuous emission monitoring, as required in Condition (30) of this Permit.
- (f) Continuing compliance with the hazardous air pollutant (HAP) emissions standard specified in Condition (23) of this Permit shall be determined by emissions testing for the following compounds:
  - Formaldehyde 50-00-0
  - Benzene 71-43-2
  - Hydrogen Chloride 7647-01-0
  - Methanol 67-56-1
  - Chlorine 7782-50-5
  - Styrene 100-42-5
  - Dichloromethane (methylene chloride)

Emissions testing for these compounds shall be conducted beginning in 2019 and every four (4) years thereafter. The Permittee shall conduct such testing and furnish the Agency with a written report of the results of such testing within ninety (90) days after June 1<sup>st</sup> for those years when re-testing is required. At least thirty (30) days prior to the re-testing, the Permittee shall submit a pre-test report prepared in accordance with the Agency's "Source Emission Testing Guidelines".  
[10 V.S.A. §§556(c) and 556a(d)] [§§5-402, 5-404(1) and 5-405(1) of the Regulations] [40 CFR 60.8]

- (27) Wood Fuel - Sulfur Content and Heating Value Analysis: Wood fuel combusted in the Main Boiler at the Facility shall be sampled and analyzed for sulfur as a percent of wet wood weight and gross calorific value (GCV) of the wet wood fuel in units of Btu/pound on a monthly basis.

The Permittee shall revise and update their existing Wood Fuel Sampling Plan within thirty (30) days following issuance of this Permit as necessary. The purpose of Wood Fuel Sampling Plan shall be to provide procedures to evaluate continuous compliance with the respective wood fuel sulfur content limitations of this Permit.

The Wood Fuel Sampling Plan shall include, but not be limited to, a description of the procedures and methods for sample collection, handling, analysis, and reporting of results from the analytical laboratory. Said Wood Fuel Sampling Plan shall be present at the facility at all times and shall be made available to representatives of the Agency upon request. The Permittee shall revise said Wood Fuel Sampling Plan at the Agency's request or on its own motion based on operating experience or to reflect equipment or operational changes. [10 V.S.A. §§556(c) and 556a(d)] [§5-405(1) of the Regulations] [40 CFR Part 72.7(b)(1)]

**- Compliance Assurance Monitoring -**

- (28) Main Boiler - Compliance Assurance Monitoring (CAM) – NO<sub>x</sub>:

The Permittee shall use the continuous emission monitoring system for oxides of nitrogen, required in this permit, to fulfill their CAM obligation.

<b>Compliance Assurance Monitoring (CAM) – NO<sub>x</sub></b>	
Indicator	Measured NO <sub>x</sub>
Approach	Use of NO <sub>x</sub> CEM
Indicator Range	Alarm for NO <sub>x</sub> concentration >= 39 ppm (approximately equivalent to 0.07 lb/MMBtu)
Measurement location	Exhaust stack after all control systems.
QA/QC	Described in Condition (30) of this permit
Frequency	Continuous

The submittal by the Permittee of reporting information from the CEM as required by Condition (30)(e) of this Permit shall satisfy the reporting requirement of CAM for NO<sub>x</sub> emissions.

[40 CFR Part 64]

(29) Main Boiler - Compliance Assurance Monitoring (CAM) – Particulate Matter:

<b>Compliance Assurance Monitoring (CAM) – Particulate Matter</b>			
<b>Indicator</b>	<b>Secondary Voltage</b>	<b>Secondary Amperage</b>	<b>Inspection &amp; Maintenance</b>
<b>Approach</b>	<p>The transformer-rectifier secondary voltage for each of the 5 fields is transmitted to the process control computer.</p> <p>The Unit Supervisor will monitor the computer which indicates and continuously monitors the secondary voltage.</p>	<p>The ESP field milliamps value for each of the 5 fields is transmitted to the process control computer.</p> <p>The Unit Supervisor will monitor the computer which indicates and continuously monitors the secondary amperage.</p>	<p>A. Inspection and Maintenance generated by work order and round sheets.</p> <p>B. Computer continuously records TR voltage and milliamp readings that are submitted in the QER.</p> <p>C. DCS alarm acknowledgement when a precipitator field fails.</p> <p>D. Inspections of screws, conveyors, and rotary seal valves daily.</p> <p>E. Inspect and test rappers, vibrators, and insulator blowers weekly.</p> <p>F. Test hopper high level alarms monthly.</p> <p>G. Internal inspection of precipitator annually.</p>
<b>Indicator Range</b>	<p>Field T-R kilovolt range:                      TR-1: 30-50                      TR-2: 30-50                      TR-3: 20-25                      TR-4: 20-25                      TR-5: 20-25</p> <p>TR low kilovolt alarm for all fields is 10KVDC</p> <p>TR high kilovolt alarm for all fields is 60.5KVDC</p> <p>Excursions trigger an inspection, corrective action and a reporting requirement.</p>	<p>Field milliamp range:                      TR-1: 100-400                      TR-2: 300-500                      TR-3: 50-100                      TR-4: 50-100                      TR-5: 50-100</p> <p>There are no low current alarms.</p> <p>TR high current alarm is on the primary side only and is set at 133AAC.</p> <p>Excursions trigger an inspection, corrective action and a reporting requirement.</p>	<p>Computer generated work orders to track and schedule inspection and maintenance.</p>
<b>Measurement location</b>	Transformer-rectifier	Transformer-rectifier	Inspections are performed at the ESP, in the control room, and ancillary equipment locations.

Compliance Assurance Monitoring (CAM) – Particulate Matter			
Indicator	Secondary Voltage	Secondary Amperage	Inspection & Maintenance
Frequency	Record readings during every shift.	Record readings during every shift.	Depending on which function of A-G is occurring the frequency will be continuous to annual. When one of the functions unveils a problem, action is taken to resolve the problem.

The Permittee shall submit a summary report for each calendar quarter, within thirty (30) days after the close of the quarter, in a format acceptable to the Agency. The summary shall contain information on the number, duration, value (% opacity) and cause (including unknown cause, if applicable) of excursions (as defined in (c) of this condition) and any corrective actions taken. In addition, the on/off field status and ESP voltage and current readings shall be provided for each reported excursion. If there are no excursions to report, then “none” or an equivalent statement shall be indicated. The report shall include a summary of the invalid 1-hour COMS averages with duration, cause and corrective action and the valid % data capture value.

[40 CFR Part 64]

**- Continuous Emissions Monitoring -**

(30) Continuous Emission Monitoring (CEM): The Permittee shall install a continuous emission monitoring system (CEMS) and continuous opacity monitoring system (COMS) approved by the Agency, to measure and permanently record, emissions of CO in ppm, lb/MMBtu, lb/hr, emissions of NOx in ppm, lb/MMBtu, lb/hr, NH<sub>3</sub> ppm emissions, CO<sub>2</sub> content, stack gas volumetric flow rate and visible emissions discharged to the atmosphere from the Main Boiler exhaust. The Permittee shall operate and maintain such system in good working order, within manufacturer’s specifications and as specified below:

(a) Except for NH<sub>3</sub>, the CEMS and COMS shall be designed, installed, calibrated, maintained and operated in such a manner as to meet the requirements of 40 CFR Part 60, Standards of Performance for New Stationary Sources, Subparts A, and Appendix B, Performance Specification 1, 2, 3, 4 and 6, 40 CFR Part 60, Appendix F-Quality Assurance Procedures, and latest revision of the Agency’s Continuous Emission Monitoring Requirements (“CEM Requirements”).

- (b) The NH<sub>3</sub> CEMS shall be designed, installed, calibrated, maintained, operated and audited in such a manner as to meet the requirements of 40 CFR Part 60, Appendix F-Procedure 1. *Quality Assurance Requirements for Gas Continuous Emission Monitoring Systems Used For Compliance Determination* and the latest revision of the Agency's CEM Requirements.
- (c) The CEMS and COMS shall be operated, calibrated and maintained continuously, independent of the Main Boiler's operation. The Permittee must measure and record valid continuous emission data for the parameters listed in this condition during all periods of the Main Boiler's operation including periods of boiler startup, shutdown, malfunction or emergency conditions, except for periods of CEMS and COMS quality assurance/quality control (QA/QC) identified in the approved Quality Assurance Plan, routine maintenance, or uncontrolled malfunction. Nevertheless, the Permittee must obtain valid data for all CEMS parameters listed in this condition and COMS for a minimum of 90% of the Main Boiler's operating hours, based on the calendar quarter.
- (d) The Permittee shall develop a Quality Assurance Plan (QA Plan) for the above CEMS and COMS that is acceptable to the Agency. Said QA Plan shall satisfactorily document instrumentation, monitoring procedures, calibration procedures, QA/QC procedures, data acquisition, validation and reporting procedures as required to demonstrate compliance with this Permit. The Permittee shall formally review the QA Plan annually. The Permittee shall revise and update the QA Plan as necessary, based on the results of this review, or at the request of the Agency or at any other appropriate time to accurately document CEMS and COMS operations. The Permittee shall notify the Agency in writing of the results of the annual QA Plan review. QA Plan modifications are subject to Agency review and shall not be implemented until approval has been received from the Agency.
- (e) The Permittee shall submit a summary report for each calendar quarter, within thirty (30) days after the close of the quarter, in a format acceptable to the Agency and in accordance with the Agency's CEM Requirements and the Permittee's approved QA Plan. The report shall include at a minimum, all valid CO lb/MMBtu, CO lb/hr, NO<sub>x</sub> lb/MMBtu, NO<sub>x</sub> lb/hr, NH<sub>3</sub> ppm (corrected to 12% CO<sub>2</sub>) and visible emissions data in excess of the emissions standards specified in this Permit, as well as a frequency distribution summary of all valid CO lb/MMBtu, CO lb/hr, NO<sub>x</sub> lb/MMBtu, NO<sub>x</sub> lb/hr, NH<sub>3</sub> ppm (corrected to 12% CO<sub>2</sub>) data collected, a summary of valid CEMS and COMS data capture, periods of CEMS and COMS downtime, CEMS and COMS invalid data, CEMS and COMS calibration and QA/QC results.
- (f) The CEMS CO and NO<sub>x</sub> data shall be recorded and reported in units of pounds per MMBtu of heat input and lb/hour (NO<sub>x</sub> as NO<sub>2</sub> and both CO and NO<sub>x</sub> in terms of 8-hour rolling averages, calculated on an hourly basis). NH<sub>3</sub> data shall be recorded and reported in units of ppm (corrected to 12% CO<sub>2</sub>) in terms of 1 hour averages, calculated on an hourly basis. Valid CEMS 8-hour rolling averages during source operation must be calculated from valid CEMS 1-hour sub-average data representing at least 75% of the particular averaging period.

- (g) The COMS shall measure and record visible emissions at least every 10-seconds. COMS data shall be reported in whole numbers in units of % Opacity in terms of 1-minute averages. Valid COMS 1-minute averages during source operation must be calculated from at least five (5) valid 10-second measurements recorded during the clock minute. One (1)-minute averages shall be used for determining compliance with the twenty (20) % opacity aggregated six (6) minute standard and with the sixty (60) % opacity standard.
- (h) The Permittee shall maintain a file of all information reported in the quarterly summaries and all other supporting information and data collected by the monitoring system for at least five (5) years from the date of collection of such data or submission of such summaries.

[§§5-405, 5-1015(a)(3)-(5) of the Regulations][40 CFR Part 60 Subpart Db 60.49b(f)]

#### - Record Keeping and Reporting -

- (31) Record keeping: In addition to the record keeping and reporting requirements specified in Conditions (26) and (29) of this Permit, the Permittee shall maintain records of the following data:
- (a) The quantity of wood fuel fired during each day and calendar month;
  - (b) The quantity of wood fuel other than whole tree chips, such as sawdust, mill chips and bark received during each calendar month;
  - (c) The sulfur content in percent of wet weight for wood fuel fired in the Main Boiler as analyzed on a monthly basis,
  - (d) Supplier certifications providing the sulfur content in percent by weight of LPG fuel fired in the main boiler, for each delivery of LPG to the Facility
  - (e) The quantity of LPG fired during each day and calendar month in each of the following:
    - (i) Main Boiler;
    - (ii) Auxiliary Boiler;
    - (iii) Auxiliary Generator;
  - (f) The total hours of operation during each calendar month of the Auxiliary Generator;
  - (g) The total quantity of aqueous ammonia or urea injected into the Main Boiler and SNCR and the total quantity of aqueous ammonia or urea injected into the SCR during each calendar month;
  - (h) Electricity supplied and used by each field of the electrostatic precipitator pursuant to the inspection and maintenance plan referenced by Condition 15 of this Permit

A report, signed by a responsible official of the Facility and containing summaries of such records shall be submitted to the Agency for each calendar quarter within thirty (30) days after the close of each quarter. [10 V.S.A. §556(c)] [40 CFR Part 60 Subpart Db §§ 60.49b(d)(1) and 60.49b(w)] [40 CFR Part 70 §70.6(a)(3)(iii)(A)] [40 CFR Part 72 §72.7(f)(3)]

- (32) 5-year Compliance Report: Within 120 days of completing the 5-year tune-up of the Main Boiler, required by Condition (15)(a) of this Permit, the Permittee shall submit a 5-year compliance report as required by 40 CFR Part 63 Subpart JJJJJJ §63.11225(b). [40 CFR Part 63 Subpart JJJJJJ]
- (33) Startup / Shutdown / Malfunction Occurrences and Periods Records: The Permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the Main Boiler; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. [40 CFR Part 60 Subpart A §60.7(b)] [Application for #AOP-15-005]
- (34) Records of all required compliance testing shall include the following:
- (a) The date, place, and time of sampling or measurements;
  - (b) The date analyses were performed;
  - (c) The company or entity that performed the analyses;
  - (d) The analytical techniques or methods used;
  - (e) The results of all such analyses; and
  - (f) The operating conditions existing at the time of sampling or measurement.
- [§§5-402(1), 5-405(1) and 5-1015(5) of the Regulations][40 CFR 70.6(a)(3)(ii)(A)]
- (35) All records shall be retained for a minimum period of five (5) years from the date of record and shall be made available to the Agency upon request. [§§5-402(1), 5-405(1) and 5-1015(a)(7) of the Regulations]
- (36) The Permittee shall notify the Agency in writing within ten (10) days of any violation, of which it is aware, of any requirements of this Permit. This notification shall include, at a minimum, the cause for the violation and corrective action or preventative maintenance taken to correct the violation. [§§5-402(1) and 5-1015(a)(6) of the Regulations]
- (37) The Permittee shall notify the Agency in writing of any proposed physical or operational change at the Facility which may increase the emission rate of any air contaminant to the ambient air regardless of any concurrent emission reductions that may be achieved. If the Agency determines that a permit amendment is required, a new application and the appropriate application fee shall be submitted. The permit amendment shall be obtained prior to commencing any such change. [10 V.S.A. §556(c)] [§§5-402(1) and 5-501 of the Regulations]

- (38) Annual Compliance Certification: By February 1st of each year, the Permittee shall submit to the Agency an annual certification of compliance for the previous calendar year which ascertains and identifies the compliance status of the Facility with respect to all terms and conditions of this Permit, including but not limited to the following:
- (a) Identification of each term or condition of the permit that is the basis of the certification;
  - (b) The compliance status;
  - (c) Whether compliance was continuous or intermittent; and
  - (d) The methods used for determining the compliance status of the Facility over the reporting period.
  - (e) For any periods of deviation, report the cause of the deviation and the corrective action taken.

[§§5-402(1) and 5-1015(a)(11) of the *Regulations*] [§114(a)(3) of the CAA] [40 CFR 70.6(c)(1)]

- (39) Annual Registration: The Permittee shall calculate the quantity of emissions of air contaminants from the Facility annually. If the Facility emits more than five (5) tons of any and all air contaminants per year, the Permittee shall register the source with the Secretary of the Agency (hereinafter "Secretary"), and shall renew such registration annually. Each day of operating a source which is subject to registration without a valid, current registration shall constitute a separate violation and subject the Permittee to civil penalties. The registration process shall follow the procedures set forth in Subchapter VIII of the *Regulations*, including the payment of the annual registration fee on or before May 15 of each year. Annual registration forms submitted to the Agency shall contain a compliance certification statement in accordance with Condition (38) of this Permit. [Subchapter VIII §§5-802, 5-803, 5-807, 5-808 of the *Regulations*]

- (40) All records, reports, and notifications that are required to be submitted to the Agency by this Permit shall be submitted to:

Air Quality & Climate Division  
Department of Environmental Conservation  
Agency of Natural Resources  
Davis 2  
One National Life Drive  
Montpelier, Vermont 05620-3802

[§5-402(1) of the *Regulations*] and (2) of the *Regulations*]

- (41) All records, notifications and reports that are required to be submitted to the U.S. EPA by this Permit shall be submitted to:

Air Compliance Clerk  
U.S. EPA-New England  
5 Post Office Sq. Suite 100 (OES04-2)  
Boston, MA 02109-3912

[10 V.S.A. §§556(c) and 556a(d)] [§5-402 of the *Regulations*]

**- ACID RAIN PORTION OF PERMIT TO OPERATE -**

The Facility was previously not subject to the requirements of the Acid Rain Program as a New Independent Power Production Facility under 40 CFR Part 72.6(b)(6). With the expiration of the contracts previously held by the Facility, the Facility is now subject to the requirements of the Acid Rain Program. However, the Facility complies with the new unit exemption requirements of 40 CFR §72.7(b)(1), as it has not been previously allocated any allowances under Subpart B of 40 CFR, Part 73, has a nameplate capacity less than or equal to 25 MWe, and combusts wood and LPG fuel, with both fuels having a sulfur content of less than 0.05%.

To obtain this exemption, the Facility was required to submit a statement to the permitting authority by December 31 of the first year for which the unit is to be exempt under this section. This statement was to be signed by the designated or, if no designated representative has been authorized, a certifying official of each owner of the unit. The statement identified the unit, the nameplate capacity of each generator served by the unit and the fuels currently burned or expected to be burned by the unit and their sulfur content by weight, and stated that the owners and operators of the unit will comply with 40 CFR §72.7 (f). This statement was received by the Agency on December 17, 2012.

Accordingly, the Agency will incorporate the provisions and requirements of the exemption as described in 40 CFR, Part 72.7(a), (b)(1), (d), and (f) into this Permit.

- (42) Applicability and Maintenance of Exemption: To maintain the new unit exemption requirements of 40 CFR §72.7(b)(1) the Permittee shall operate the Facility such that the Facility:

- (a) Serves during the entire year one or more generators with total nameplate capacity of 25 MWe or less
- (b) Combusts fuel that does not include any coal or coal-derived fuel (except coal-derived gaseous fuel with a total sulfur content no greater than natural gas); and
- (c) Combusts gaseous and nongaseous fuel with an annual average sulfur content of 0.05 percent or less by weight as determined by Condition (27) and (44) of this Permit.

[40 CFR, Part 72.7(a)] [40 CFR, Part 72.7(f)(1)(i)]

- (43) Applicable Portions of Part 72 for Exempt Facilities: The Facility, during the period that it maintains its exemption under 40 *CFR*, Part 72.7(a) shall be exempt from the Acid Rain Program, except for the provisions of 40 *CFR* §§ 72.2 through 72.6, and §§ 72.10 through 72.13. [40 *CFR*, Part 72.7(b)(1)] [40 *CFR*, Part 72.7(f)(2)]
- (44) Fuel Sulfur Content – Compliance: Compliance with the requirement that fuel burned during the year has an annual average sulfur content of 0.05 percent by weight or less shall be determined as follows:

The annual average sulfur content, as a percentage by weight, shall be calculated using the equation shown below:

$$\%S_{\text{annual}} = \frac{\sum_{x=1}^{\text{last}} \%S_x V_x d_x}{\sum_{x=1}^{\text{last}} V_x d_x}$$

For gaseous fuel burned during the year the requirement is met if the annual average sulfur content is equal to or less than 0.05 percent by weight. The sulfur content of the gaseous fuel shall be determined by certifications provided from the fuel supplier certifying the sulfur content of the gaseous fuel that is delivered to the Facility.

For wood fuel, in lieu of the factor, volume times density ( $V_n d_n$ ), in the equation, the factor, mass ( $M_n$ ), may be used, where  $M_n$  is: mass of the nongaseous fuel in a delivery during the year to the unit of which the nth sample is taken, in lb;

Samples of wood fuel shall be collected and analyzed on a monthly basis, in accordance with the requirements Wood Fuel Sampling Plan required by this Permit. [10 V.S.A. §§556(c) and 556a(d)] [§§5-402, 5-404, 5-405(1) and 5-1015(5) of the *Regulations*] [40 *CFR*, Part 72.7(d)] [Application for #AOP-15-005]

- (45) Recordkeeping Requirements: For a period of 5 years from the date the records are created, Permittee shall retain at the Facility, records demonstrating that the requirements 40 *CFR*, Part 72.7(b)(1) are met. The 5-year period for keeping records may be extended for cause, at any time prior to the end of the period, upon written request by the EPA or Agency.

Such records shall include, for each monthly period of wood fuel delivery to the Facility, the unit or for fuel delivered to the unit continuously by pipeline, the type of fuel and the sulfur content of this fuel based on monthly sampling. [40 *CFR*, Part 72.7(f)(3)]

- (46) Loss of Exemption: On the earliest of the following dates, a unit exempt 40 *CFR* §72.7(b)(1) shall lose its exemption and for purposes of applying parts 70 and 71 of this chapter, shall be treated as an affected unit under the Acid Rain Program:
- (a) The date on which the unit first serves one or more generators with total nameplate capacity in excess of 25 MWe;
  - (b) The date on which the unit burns any coal or coal-derived fuel except for coal-derived gaseous fuel with a total sulfur content no greater than natural gas; or
  - (c) January 1 of the year following the year in which the annual average sulfur content for gaseous fuel burned at the unit exceeds 0.05 percent by weight (as determined under paragraph (d) of this section) or for nongaseous fuel burned at the unit exceeds 0.05 percent by weight (as determined under paragraph (d) of this section)

[40 *CFR*, Part 72.7(f)(4)]

- (47) Duty to Apply for Acid Rain Permit on Loss of Exemption: Notwithstanding § 72.30(b) and (c), the designated representative for a unit that loses its exemption under this section shall submit a complete Acid Rain permit application 60 days after the first date on which the unit is no longer exempt.

For the purpose of applying monitoring requirements under part 75 of this chapter, a unit that loses its exemption under this section shall be treated as a new unit that commenced commercial operation on the first date on which the unit is no longer exempt. [40 *CFR*, Part 72.7(f)(4)]

**- Standard Permit Conditions -**

- (48) At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Agency which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [10 V.S.A. §§556(c) and 556a(d)] [40 *CFR* Part 60.11(d) and 63.6(e)]

(49) Approval to construct or modify under this Permit shall become invalid if construction or modification is not commenced within eighteen (18) months after issuance of this Permit, if construction or modification is discontinued for a period of eighteen (18) months or more, or if construction is not substantially completed within a reasonable time. The Agency may extend any one of these periods upon a satisfactory showing that an extension is justified. The term "commence" as applied to the proposed construction or modification of a source means that the Permittee either has:

- (a) Begun, or caused to begin, a continuous program of actual on-site construction or modification of the source, to be completed within a reasonable time; or
- (b) Entered into binding agreements or contractual obligations, which cannot be cancelled or modified without substantial loss to the Permittee, to undertake a continuous program of actual on-site construction or modification of the source to be completed within a reasonable time.

[10 V.S.A. §556(c)] [§5-501 of the *Regulations*]

(50) These Permit conditions may be suspended, terminated, modified, or revoked for cause and reissued upon the filing of a written request with the Secretary of the Agency (hereinafter "Secretary") or upon the Secretary's own motion. Any modification shall be granted only with the written approval of the Secretary. If the Secretary finds that modification is appropriate, only the conditions subject to modification shall be re-opened. The filing of a request for modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay any terms or conditions of this Permit. The Secretary may provide opportunity for public comment on any proposed modification of these conditions. If public comments are solicited, the Secretary shall follow the procedures set forth in 10 V.S.A. §556 and §556a, as amended.

[10 V.S.A. §§556(d) and 556a(g)] [§§5-1008(a) and 5-1008(e) of the *Regulations*]

(51) Cause for reopening, modification, termination and revocation of this Permit includes, but is not limited to:

- (a) Inclusion of additional applicable requirements pursuant to state or federal law;
- (b) A determination that the permit contains a material mistake or that inaccurate information was used to establish emissions standards or other terms or conditions of the operating permit;
- (c) A determination that the operating permit must be modified or revoked to ensure compliance with applicable requirements;
- (d) A determination that the subject source has failed to comply with a permit condition;
- (e) For Title V subject sources, a determination by U.S. EPA that cause exists to terminate, modify, revoke or reissue an operating permit;
- (f) Those causes which are stated as grounds for refusal to issue, renew or modify an operating permit under §5-1008(a) of the *Regulations*; or
- (g) If more than three (3) years remain in the permit term and the source becomes subject to a new applicable requirement.

[§5-1008(e)(4) of the *Regulations*]

- (52) The Permittee shall furnish to the Agency, within a reasonable time, any information that the Agency may request in writing to determine whether cause exists to modify, revoke, reissue, or terminate the Permit or to determine compliance with this Permit. Upon request, the Permittee shall also furnish to the Agency copies of records required to be kept by this Permit. [10 V.S.A. §§556(c) and 556a(d)] [§5-402 of the *Regulations*] [40 CFR Part 70 §70.6(a)(6)(v)]
- (53) By acceptance of this Permit, the Permittee agrees to allow representatives of the State of Vermont access to the properties covered by the Permit, at reasonable times, to ascertain compliance with Vermont environmental and health statutes and regulations and with this Permit. The Permittee also agrees to give the Agency access to review and copy any records required to be maintained by this Permit, and to sample or monitor at reasonable times to ascertain compliance with this Permit. [10 V.S.A. §§556(c), 556a(d) and 557] [ §§5-402, 5-404, and 5-1015(a)(10) of the *Regulations*]
- (54) All data, plans, specifications, analyses and other information submitted or caused to be submitted to the Agency as part of the application for this Permit or an amendment to this Permit shall be complete and truthful and, for Title V permit applications, certified by a responsible official whose designation has been approved by the Secretary. Any such submission which is false or misleading shall be sufficient grounds for denial or revocation of this Permit, and may result in a fine and/or imprisonment under the authority of Vermont statutes. [10 V.S.A. §§556(c) and 556a(d)] [§§5-505 and 5-1006(f) of the *Regulations*]
- (55) For the purpose of establishing whether or not a person has violated or is in violation of any condition of this Permit, nothing in this Permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [10 V.S.A. §§556(c) and 556a(d)]
- (56) Any permit noncompliance could constitute a violation of the federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [10 V.S.A. §§556(c) and 556a(d)] [§§5-1008(a) and 5-1008(e) of the *Regulations*]
- (57) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this Permit. [10 V.S.A. §§556(c) and 556a(d)]
- (58) No person shall build, erect, install or use any article, machine, equipment or other contrivances, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which otherwise would constitute a violation of these *Regulations*. [§5-403 of the *Regulations*]

- (59) The provisions of this Permit are severable. If any provision of this Permit, or its application to any person or circumstances is held invalid, illegal, or unenforceable by a court of competent jurisdiction, the invalidity shall not apply to any other portion of this Permit which can be given effect without the invalid provision or application thereof. [10 V.S.A. §§556(c) and 556a(d)]
- (60) This Permit does not convey any property rights of any sort or any exclusive privilege, nor does it authorize any injury to private property or any invasion of personal rights. [10 V.S.A. §§556(c) and 556a(d)]
- (61) All subsequent owners and/or operators of this Facility must request an amendment and transfer of this Permit prior to commencing any operations covered by this Permit. All subsequent owners and/or operators shall submit to the Agency as part of the request for amendment all such information the Agency deems necessary to establish legal ownership and/or interest in the property and all such information the Agency deems necessary to ensure the new owners and/or operators will construct and operate the Facility in compliance with the *Regulations* and this Permit. The terms and conditions of this Permit shall remain in full force and effect after submittal of the request for amendment and until the issuance of an amended Permit or denial. Should the Secretary deny the request, the new owner and/or operator must take whatever action is necessary to comply with the denial. [10 V.S.A. §§556 and 556a] [§§5-501, 5-1004, and 5-1013(a) of the *Regulations*]
- (62) Renewable Energy Projects – Right to Appeal to Public Service Board: If this decision relates to a renewable energy plant for which a certificate of public good is required under 30 V.S.A. §248, any appeal of this decision must be filed with the Vermont Public Service Board pursuant to 10 V.S.A. §8506. This section does not apply to a facility that is subject to 10 V.S.A. §1004 (dams before the Federal Energy Regulatory Commission), 10 V.S.A. §1006 (certification of hydroelectric projects) or 10 V.S.A. Chapter 43 (dams). Any appeal under this section must be filed with the Clerk of the Public Service Board within 30 days of the date of this decision; the appellant must file with the Clerk an original and six copies of its appeal. The appellant shall provide notice of the filing of an appeal in accordance with 10 V.S.A. 8504(c)(2), and shall also serve a copy of the Notice of Appeal on the Vermont Department of Public Service. For further information, see the Rules and General Orders of the Public Service Board, available on line at [www.psb.vermont.gov](http://www.psb.vermont.gov). The address for the Public Service Board is 112 State Street, Montpelier, Vermont, 05620-2701 (Tel. # 802-828-2358).

- (63) All Other Projects – Right to Appeal to Environmental Court: Pursuant to 10 V.S.A. Chapter 220, any appeal of this decision must be filed with the clerk of the Environmental Court within 30 days of the date of the decision. The Notice of Appeal must specify the parties taking the appeal and the statutory provision under which each party claims party status; must designate the act or decision appealed from; must name the Environmental Court; and must be signed by the appellant or their attorney. In addition, the appeal must give the address or location and description of the property, project or facility with which the appeal is concerned and the name of the applicant or any permit involved in the appeal. The appellant must also serve a copy of the Notice of Appeal in accordance with Rule 5(b)(4)(B) of the Vermont Rules for Environmental Court Proceedings. For further information, see the Vermont Rules for Environmental Court Proceedings, available on line at [www.vermontjudiciary.org](http://www.vermontjudiciary.org). The address for the Environmental Court is 2418 Airport Road, Suite 1, Barre, VT 05641 (Tel. # 802-828-1660).
- (64) Conditions (1) – (4), (6), (9) – (14), (16) and (18) – (22) are derived from the new source review requirements of Subchapter V of the *Regulations*. With the exception of the cited new source review conditions, this Operating Permit shall expire as indicated on the cover page to this Permit. The Permittee shall submit to the Agency a complete application for renewal of the Operating Permit at least twelve (12) months before the expiration of the Operating Permit. If a timely and administratively complete application for an operating permit renewal is submitted to the Secretary, but the Secretary has failed to issue or deny such renewal before the end of the term of this Operating Permit, then the Permittee may continue to operate the subject source and all terms and conditions of this Operating Permit shall remain in effect until the Secretary has issued or denied the operating permit renewal. However, this Operating Permit shall automatically expire if, subsequent to the renewal application being determined or deemed administratively complete pursuant to §5-1006 of the *Regulations*, the Permittee fails to submit any additional information required by the Secretary as well as information pertaining to changes to the Facility within thirty (30) days or such other period as specified in writing by the Secretary. [§§5-1011 and 5-1012(a) of the *Regulations*] [§§5-1005(c) and 5-1012 of the *Regulations*]
- (65) The conditions of this Permit as set forth above supersede all conditions contained in all prior Permits issued by the Agency to the Permittee for this Facility. [10 V.S.A. §§556(c) and 556a(d)]

The Agency's issuance of this Air Pollution Control Permit relies upon the data, judgment, and other information supplied by the Permittee. The Agency makes no assurances that the air contaminant source approved herein will meet performance objectives or vendor guarantees supplied to the source Permittee. It is the sole responsibility of the Permittee to operate the source in accordance with the conditions herein and with all applicable state and federal standards and regulations.

Permit issued and effective this 11<sup>th</sup> day of September, 2017.

Permit issuance authorized by:  
Agency of Natural Resources  
Emily Boedecker, Commissioner  
Department of Environmental Conservation

By: Heidi Hales 9/11/17  
Heidi C. Hales, Director Date Signed  
Air Quality & Climate Division

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State of Vermont  
Department of Environmental Conservation  
Air Quality & Climate Division  
Davis Building – 2<sup>nd</sup> Floor  
One National Life Drive  
Montpelier, VT 05620-3802  
(802) 828-1288  
FAX (802) 828-1250

September 11, 2017

Lawrence Anderson  
ATC Ryegate, LLC  
247 Weesner Drive  
East Ryegate, Vermont 05042

RE: Final Title V Air Pollution Control Permit to Construct and Operate (#AOP-15-005)  
ATC Ryegate, LLC - Wood-fired Electric Generating Station

Dear Mr. Anderson:

The Vermont Agency of Natural Resources, Department of Environmental Conservation, Air Quality & Climate Division (Agency) has completed its review of ATC Ryegate's application for the renewal of the Title V Permit to Construct and Operate the wood-fired electric generating station located at Weesner Drive in the town of Ryegate, Vermont. The Agency is now issuing a final Air Pollution Control Permit to Construct and Operate approving the continued operation of the Facility.

Consistent with the provisions of 10 V.S.A. §556(e) and for the purposes of reducing the administrative burden of enforcing two separate permits for this Facility, the Agency is incorporating the existing Permit to Construct requirements contained in the prior Air Pollution Control Permit to Construct (#AP-90-029g) previously issued on February 25, 1997 with the current renewal of the Air Pollution Control Permit to Operate. The result is a combined Air Pollution Control Permit to Construct and Operate which satisfies both the construction permit (10 V.S.A. §556 and Subchapter V of the Regulations) and operating permit (10 V.S.A. §556a and Subchapter X of the Regulations) requirements for your Facility. This combined permit incorporates and supersedes all prior Permit to Construct and/or Operate approvals issued in the past. Please note this permit is valid for a period of five (5) years and an application to renew the permit must be filed at least six (6) months prior to the date of expiration.

Please review this Permit carefully to ensure that you are currently, and continue to be, in compliance with all the requirements contained in this Permit. There are a few key points included in this permit, or that you may otherwise be subject to, that I would like to highlight for your information:

- Condition (17) of #AOP-15-005 - Main Boiler - Total Particulate Matter: This Condition formalizes the limitation that existed in the Regulations regarding emissions of total particulate matter from wood combustion at the Facility. Future particulate matter emissions testing at the Facility will need to collect information regarding both filterable and condensable particulate matter to ensure that the Facility is in compliance with this requirement.



- Condition (23) of #AOP-15-005 - Hazardous Air Pollutants: This Condition requires that Emission of federally regulated hazardous air pollutants (HAPs) from the Facility shall not equal or exceed ten (10) tons per year of any single HAP or twenty-five (25) tons per year of all HAPs combined per year based on any rolling twelve (12) consecutive calendar month period. The annual combined and individual HAP emissions from the Facility shall be calculated according to the methodology specified in this Condition, and stack testing for HAPS shall be performed as required by Condition (26(f)) of this Permit.
  
- Condition (27) of #AOP-15-005 - Wood Fuel - Sulfur Content and Heating Value Analysis: This Condition requires that wood fuel combusted in the Main Boiler at the Facility shall be sampled and analyzed for sulfur as a percent of wet wood weight and gross calorific value (GCV) of the wet wood fuel in units of Btu/pound monthly, and requires updating the existing Wood Fuel Sampling Plan to conform to these requirements. Records of these analyses shall be retained as required in Condition (31).
  
- Fuel oil sulfur: Consistent with New England regional efforts, Vermont has adopted regulations that will be lowering the allowed sulfur content of fuels oils between the years 2014 and 2018. Commencing on July 1, 2014, the sulfur content of No.2 and lighter distillate oils purchased shall not exceed 0.05 percent by weight and commencing July 1, 2018 such oils shall not exceed 0.0015 percent by weight (15 ppm). Distillate fuel oils meeting the 0.0015% by weight sulfur limit are commonly referred to as ultra-low sulfur distillate or diesel (ULSD). To the extent your permit may currently allow higher sulfur content fuel oils, this regulation will take precedence and further restrict your sulfur content on the respective dates. The Permit also requires obtaining a certification or invoice regarding the sulfur content of the fuel oil from the fuel supplier, for each shipment of fuel oil received at the Facility.
  
- Reciprocating Internal Combustion Engines: The federal U.S. EPA has several regulations that apply to stationary reciprocating internal combustion engines. Provided the LPG-fueled engine powering the emergency generator at your facility and the fire pump engine continue to be used only for emergency purposes only, as described in Condition (5) of the permit, the emergency engine provisions of 40 CFR Part 63 Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines would apply to these engines. These requirements of Subpart ZZZZ for emergency engines are found in Condition (4) of this Permit.
  
- Biomass Boiler Requirements: The federal U.S. EPA has recently adopted and amended 40 CFR Part 63 Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial and Institutional Boilers at Area Sources, which applies to the main wood boiler at the Facility. The requirements of this federal regulation are found in Condition (15) of this Permit. Condition (32) of #AOP-15-005 requires that the 5-year compliance report required by 40 CFR Part 63 Subpart JJJJJJ §63.11225(b) be filed within 120 days of completing the 5-year tune-up of the Main Boiler, required by Condition (15)(a) of this Permit.:

If you have any questions or comments, please do not hesitate to contact me by phone at (802) 272-3445, by email at [tony.mathis@vermont.gov](mailto:tony.mathis@vermont.gov), or in writing at the above address.

Sincerely,



Tony Mathis, Environmental Engineer  
Engineering Services / Permitting Section  
Air Quality & Climate Division

cc: Mark Bannon  
Bannon Engineering  
Post Office Box 171  
Randolph, VT 05060-0171

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