

**PROPOSED REVISION
TO THE STATE IMPLEMENTATION PLAN
STATE OF CONNECTICUT
FOR SINGLE SOURCE COMPLIANCE WITH CONNECTICUT
EMISSION LIMITS ON OXIDES OF NITROGEN
REGULATIONS OF CONNECTICUT STATE AGENCIES, SECTION 22a-174-22
THROUGH CREATION AND USE OF
DISCRETE EMISSION REDUCTION CREDITS (DERCS)**

July 2011

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PART 1. ECONOMIC INCENTIVE PLAN ELEMENTS

This revision provides information to satisfy the requirements of 40 CFR Part 51, Appendix V and has been prepared with reference to EPA's guidance document, "Improving Air Quality with Economic Incentive Programs", January 2001 (the 2001 EIP).

A. PROGRAM SCOPE

Part I of this narrative is generic for Connecticut's program. Part II of this narrative is specific to the individual source involved and may be for the creation of discrete emission reduction credits (DERCs) and/or use of DERCs and allowances.

EPA has set forth its guidance for DERCs an EIP guidance designed to cover an entire range of market-based approaches for stationary and mobile sources, one of which is emissions trading, including the creation of DERCs from nitrogen oxides (NO_x) control and the use of DERCs and Allowances to meet NO_x Control requirements. Creation of DERCs for use in compliance with the NO_x Control rules meets the criteria for such programs set forth in the EIP rules. DERC creation is a type of emissions-limiting strategy, as that term is used in EPA's EIP guidance.

The present scope of this program includes approval of creation and use of specific discrete emission reductions from a single source, and thereby define them retrospectively as DERCs for use or trading for compliance with Section 22a-174-22 of the Regulations of Connecticut State Agencies (Regulations), regarding control of NO_x. Record keeping and monitoring by the Department, as described below, will allow an accurate retrospective assessment of the number of major sources creating and/or using NO_x DERCs as a method of compliance. The DERC creator and user must comply with all other applicable local, state and federal laws and regulations.

B. STATEMENT OF GOALS AND RATIONALE

The goal of the emissions trade is to lower the cost of compliance with NO_x control requirements. The purpose of approving emission reductions as DERCs is to encourage the over control of emissions, below the lower of actual or allowable emissions, and to provide affected sources the flexibility of an alternative mechanism for meeting environmental requirements as envisioned by the Connecticut NO_x Control regulations (Section 22a-174-22 of the Regulations).

An advantage of this mechanism is the incentive it provides sources of air contaminant emissions to reduce their emissions below the limits that are established under traditional command and control regulatory programs. It also improves rule effectiveness by allowing for more timely rule compliance because more options are available to the regulated source. DERC trading is intended to benefit both the environment and the regulated entities and can achieve equal or better

environmental results at a lower cost than traditional regulatory approaches.

Creation or use of DERCs in compliance with Section 22a-174-22 of the Regulations will not interfere with reasonable-further-progress (RFP) demonstrations filed with EPA by the State of Connecticut. Indeed, the program should assist the Department of Energy and Environmental Protection (Department) in advancing RFP. The DERC creator and user of DERCs will continue to report actual emissions. The state inventory will reflect shutdowns or actual emissions as determined from an approved baseline of emissions indicated in each Trading Agreement and Order (TAO). The Department monitors the generation of DERCs and the use of DERCs and conducts a yearly audit of the program.

DERCs produced by the above-described methodology are real, quantifiable, surplus, permanent and enforceable, as required by EPA EIP guidance. Specifically, the reductions are:

Real because they result in a reduction of actual emissions released into the air, net of any consequential increase in actual emissions resulting from shifting demand. The emission reductions are properly measured, recorded and reported.

Quantifiable because they are based on an appropriate reliable and replicable protocol, providing the rate and total mass amount of reduction.

Surplus because they are not required by any Connecticut Statute or regulation mandated by a current State Implementation Plan (SIP), and are not currently relied upon in any applicable attainment plan, any reasonable further progress plan or milestone demonstration.

Permanent because the advanced control systems are in place and operating and an appropriate tracking system is in place to monitor use of DERCs.

Enforceable because the DERCs are approved by the Commissioner retrospectively.

Creation and subsequent use of DERCs should be viewed as a program that operates within the known constraints of RFP, the NO_x rule, and other SIP requirements. Restrictions on the use of DERCs will address concerns about RFP and attainment in a context of inter-temporal trading. Specifically, the Commissioner will require that:

The generation of DERCs must be quantified using *approved CEM* prior to use.

DERCs generated during non-ozone season months may not be used during the ozone season. Only the DERCs produced during ozone-season months of May through September are available for use during the ozone season.

DERCs are presently authorized only for the purpose of compliance with Section 22a-

174-22 of the Regulations for use before January 1, 2013.

Written permission must be obtained from the Commissioner before DERCs are utilized by sources. Upon approval by the Commissioner, however, such DERCs may be used by sources with valid TAO authorizing such use.

On an overall state basis, improved NO_x rule-effectiveness will assure that any excess in the number of DERCs or allowances used as compared to those created or allocated during any particular time period will not have a significant impact on projected reductions of NO_x. Careful tracking and monitoring of DERC generation and use will allow timely program changes, as required.

Use of DERCs will not jeopardize RFP since the state's NO_x rule emission limits for the sources creating and/or using DERCs are more stringent than EPA's NO_x Control guidance (57 FR 55620, November 25, 1992) and, therefore, a reduction beyond that federally-required will be occurring. A periodic audit and on-going tracking and monitoring of DERC use and creation by the state will allow for timely program changes if the use of DERCs exceeds their creation by a significant amount.

The creation and use of DERCs improves the probability of the RFP demonstration as a result of a combination of factors including seasonal shifting of NO_x emissions from summer to winter, a minimum ten (10) percent retirement of DERCs upon their creation to assure a benefit to the environment and the inventorying of DERCs prior to use. There may be some environmental benefit from removing NO_x and other pollutants from the air at a time when emissions were at higher levels and using them at a later time. Taken together, these benefits qualify as exceptional under EIP requirements.

In addition to the above design considerations, this SIP revision states the following with respect to the 2001 EIP:

Equity. The fundamental design principle of equity is addressed in this program largely by the limitation of this program to NO_x. Localized impacts from NO_x emissions used in a trading program are minimal since regional transport of NO_x is the most significant factor contributing to ambient NO_x concentrations in Connecticut and the Northeast region.

Uncertainty. Uncertainty is addressed in this program by a number of direct and systematic protections. One protection is the criteria applied by the Department to the engineering review used to develop a TAO for each proposal to generate and/or use DERCs. A 5% design margin is added to every DERC use. Furthermore, emissions measurement uncertainty discounts ranging from no reductions for Continuous Emissions Monitors (CEMs), 10% for stack testing every 5 years, and up to an extreme of 70% for low probability AP-42 factors are incorporated into the calculations for all DERC generation. Additional Department implementation practices further

reduce uncertainty including: on-site inspections and annual record reviews; audits of all DERC use and generation to ensure that the cumulative DERCs generated exceed the cumulative DERCs used, and, if non-compliance is found, the correction of all excess emissions using approved DERCs on a ton for ton basis. Finally, if necessary and appropriate, the Department imposes penalties in the form of cash and/or DERCs or approved Supplemental Environmental Projects (SEPs) are collected.

All facilities participating in this program use either CEMs or periodic (five-year) emission test data to quantify their emissions. Uncertainties of the data measurements are addressed in each of the test programs. A CEM system is required for sources subject to Sections 22a-174-22c of the Regulations (NO_x CAIR). The CEM system must conform to the QA/QC requirements of 40 CFR 75, 40 CFR 60 app F and performance specifications in 40 CFR 60 appendix B performance specifications 2-6. These methods require that periodic Relative accuracy test audits (RATAs), Calibration drift (CD), and quarterly cylinder gas audits (CGA) be submitted to the Commissioner. A five-year emission test is used to demonstrate compliance by any source not required to install CEMs. The emission tests are conducted in accordance with procedures contained in 40 CFR appendix A method 7E for the general class of stationary sources, and method 20 for gas turbines. All emission tests must be performed with the prior approval of the Commissioner, using a qualified emission testing firm. In general, the CEM and emission testing protocols have a margin of error in the range of 2.5-7.5%. The trading program incorporates several discounts that offset the uncertainties inherent in the test methods. In particular, 10% of all credits created must be retired to assure a benefit to the environment. The NO_x allowable emission rate has been discounted 5% for design margin purposes. A Full Load Emission Rate (FLER) is generally set at 10% above the test rate to provide for an additional margin of safety.

Emissions Banking. Concerns related to the potential spiking of emissions as a result of emissions banking are addressed by the designed protections, notably that the total emissions reductions from the participating sources is small, comprising about 5% of major stationary source NO_x emissions in Connecticut annually. To further reduce concerns about emission spiking, this program's history demonstrates that emission withdrawals are spread steadily over an annual basis. Higher DERC usage has occurred during years when large numbers of DERCs have been retired for penalty purposes, not when DERCs have been used to offset actual excess emissions.

C. BASELINE

The program baseline is the Connecticut 1990 base year ozone emission inventory. This inventory is the benchmark against which early emission reductions are measured by the state and serve as the starting point from which to generate a projected inventory for the ozone season

used in the ozone attainment demonstration analysis. Finally, it is the basis for the evaluation of potential control strategies to meet the Clean Air Act mandates to reduce emissions. For individual sources the baseline will be the lower of actual or allowable emissions.

D. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS

Subject sources will comply with the applicable provisions of Section 22a-174-22(k) of the Regulations, Emissions Testing and Monitoring and Section 22a-174-22(l) of the Regulations, Reporting and Record keeping. Records will be maintained for a minimum of five (5) years, and will be made available during normal working hours for review by the Department upon request.

Sources are required to provide an accounting of the use of all DERCs created and approved by the Department to the Commissioner no later than March 1 and in some cases July 31 of every year for the preceding calendar year. This reporting is submitted on a form prescribed by the Commissioner and is used by the Department to audit the program, to assure that DERCs are used only once, and to represent the DERCs and their use in required EPA modeling, demonstration and reporting requirements.

The effects of the use of DERCs will be monitored by the state using an enhanced inventory reporting procedure. Reporting for purpose of DERC use and for the annual emission inventory program must be done on the same basis to address baseline accounting issues. Particular emphasis is placed on the relationship of the creation and use of DERCs to determine if additional restrictions are needed to assure that the use of DERCs does not jeopardize RFP. After issuance of each TAO the source using DERCs agrees to have sufficient approved DERCs in its possession at all times to provide for operation for the current calendar month and/or non-ozone season. At a minimum, any excess emissions not on hand, prior to use by an individual source are corrected by requiring the source to retire the number of DERCs that should have been on hand prior to use and an additional 100%. The Commissioner has provided notice to air pollution control agencies of all adjacent states of this SIP revision.

E. IMPLEMENTATION SCHEDULE

Once approved, DERCs created may be used for approved purposes for compliance with Section 22a-174-22 of the Regulations through January 1, 2013.

F. ADMINISTRATIVE PROCEDURES

This action will be submitted to EPA for their review and approval as a revision to the SIP for air quality, as required by the Clean Air Act. The authority to adopt this revision is granted by Section 22a-6 of the Connecticut General Statutes (CGS). Public notice has been provided as required in CGS Sections 22a-6 and 40 Code of Federal Regulations Part 51.102.

G. ENFORCEMENT MECHANISMS

Compliance is determined based upon emissions records, monitoring data, stack testing, DERC ownership and use records and compliance with the TAO. Conditions of the DERC TAO will be subject to enforcement procedures and penalties under Sections 22a-174-12 and 22a-174-22 of the Regulations and CGS Sections 22a-171, 22a-174, 22a-176, and 22a-177.

H. AUDIT AND RECONCILIATION

The State of Connecticut will monitor the effects of creation and subsequent use of DERCs by using the reporting procedures required herein. A summary of the creation and use of DERCs will be prepared each year for each source, which is conducted every summer. Additionally, the program's overall performance is reported on in the "NO_x Emissions Trading Audit Report" every two to three years. Particular emphasis is placed on the relationship of the creation and use of DERCs to determine if additional restrictions are needed to assure that the use of DERCs does not jeopardize RFP.

**PART 2A. SUMMARY OF TRADING AGREEMENTS AND ORDERS EXTENDED TO
MAY 1, 2009**

**Pfizer, Inc.
TAO 8136AM1**

I. DESCRIPTION OF DERC CREATION AND USE

Source and Identifier:

Pfizer, Inc.
445 Eastern Point Road
MS4157
Groton, CT 06340

Designated Representative:

Mr. Scott Smith
EH&S/Env.
Telephone No. (860) 686-0247

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC Creation and Use
Low-NOx Burner and Flue Gas Recirculation

Table 1			
Non CAIR NOx Ozone Season Units			
Allowable Limits (lbs/MMBtu, unless otherwise noted)			
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu/hr)	Allowable Emission Limit (AEL)
Boiler No. 1 R-070-0007	No. 6 Nat.Gas	153	0.25 0.20

Table 1			
Non CAIR NOx Ozone Season Units			
Allowable Limits (lbs/MMBtu, unless otherwise noted)			
Boiler No. 2 R-070-0008	No. 6 Nat.Gas	153	0.25 0.20
Boiler No. 3 R-070-0009	No. 6 Nat.Gas	153	0.25 0.20
Boiler No. 4 R-070-0010	No. 6 Nat.Gas	220	0.25 0.20

Discounts:

Design Margin-Less 5% from AEL upon DERC use
Environmental-Less 10% upon DERC Creation

Description of Compliance:

Pfizer, Inc. conducts research and development operations at its Groton facility. The facility is a major source for NOx and is located in an ozone non-attainment area. Pfizer’s significant air emission units are on-site utilities (i.e., steam and electrical power generation) and emergency steam and power generation equipment.

Four Combustion Engineering boilers, identified in Table 1 produce superheated, high pressure steam that is used to heat buildings throughout the facility. All four boilers can fire natural gas or No. 6 oil and are equipped with low-NOx burners. Boiler 4 is also equipped with flue gas recirculation systems. NOx emissions from the boilers are measured with NOx continuous emissions monitors (CEMs) that meet 40 CFR Parts 60 and 75. The Boilers are subject to RCSA §22a-174-22. TAO 8136AM1 was issued as a means of allowing Pfizer, Inc. to generate NOx DERCs and to use NOx DERCs or NOx Allowances to offset excess NOx emissions from the boilers, pursuant to RCSA §22a-174-22(j), until May 1, 2009.

II. Special Requirements

1. Expands Commissioner’s authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in Pfizer’s possession prior to the first day of each month. Also requires that Pfizer permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of Pfizer’s discovery of the DERC shortfall.

2. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
3. Requires that on or before September 1, 2008, Pfizer shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the boilers on and after May 1, 2009.

Pfizer, Inc.
TAO 8093CM2

I. DESCRIPTION OF DERC CREATION AND USE

Source and Identifier:

Pfizer, Inc.
 445 Eastern Point Road
 MS4157
 Groton, CT 06340

Designated Representative:

Mr. Scott Smith
 EH&S/Env.
 Telephone No. (860) 686-0247

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2005- May 1, 2009
Method: DERC Creation and Use
 Low-NOx Burner and Flue Gas Recirculation

Table 1				
NOx Allowable Limits and Baseline Emission Rate in lbs/MMBtu				
Emission Unit	Fuel	Heat Input MMBtu/hr	Emissions Test	Allowable/Baseline emission rate lbs/MMBtu
Boiler No. 5 Registration 070-0012	No. 6	399.50	CEM	0.25
	Nat.Gas	399.50	CEM	0.20
Boiler No. 8 Permit No. 070-0001	No. 6	266.40	CEM	0.25
	No. 2	266.40	CEM	0.20
	Nat.Gas	266.40	CEM	0.20

Discounts:

Design Margin-Less 5% from AEL upon DERC use
Environmental-Less 10% upon DERC Creation

Description of Compliance:

Pfizer Inc conducts research and development operations at its Groton facility. The facility is a major source for NO_x and is located in an ozone non-attainment area. Pfizer's significant air emission units are on-site utilities (i.e., steam and electrical power generation) and emergency steam and power generation equipment.

Two Combustion Engineering boilers, identified in Table 1 produce superheated, high pressure steam that is used to generate electricity and heat buildings throughout the facility. Both boilers can fire natural gas or No. 6 oil and are equipped with low-NO_x burners. Boiler 5 is also equipped with flue gas recirculation systems. NO_x emissions from the boilers are measured with NO_x continuous emissions monitors (CEMs) that meet 40 CFR Parts 60 and 75. The Boilers 5 (and former Boiler 8) are subject to RCSCA §22a-174-22 and §22a-174-22c (CAIR). Pfizer has repowered the facility by removing Boiler 8 and installing a Solar Mars 100S Turbine 10.5 MW Combined Cycle Cogeneration System. The Cogeneration system meets the applicable limits specified in Section 22a-174-22. TAO 8093CM2 was issued as a means of allowing Pfizer, Inc. to generate NO_x DERCs and to use NO_x DERCs or NO_x Allowances to offset excess NO_x emissions from the boilers, pursuant to RCSCA §22a-174-22(j), until May 1, 2009..

II. Special Requirements

1. Includes non-ozone season requirements for the Boilers and clarifies the definition of "dates".
2. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in Pfizer's possession prior to the first day of each month. Also requires that Pfizer permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of Pfizer's discovery of the DERC shortfall.
3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, Pfizer shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the boilers on and after May 1, 2009.

**Cascades Boxboard Group Connecticut LLC
TAO 8269**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Cascades Boxboard Group Connecticut LLC
130 Inland Road
Versailles, CT 06383

Designated Representative:

Mr. Ghislain Levesque
General Manager
Telephone No. (860) 822-3600

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC use
Low-NOx Burners

Table 1							
Cascades- FM and PFI Boiler							
NOx Emission Rates and Allowable Limits in pounds per million British thermal units							
("lbs/MMBtu")							
Unit: DEP Permit/Registration #	Fuel	Heat Input	Emission Rate	Generation FLER	Allowable Limits	Date of Emission Test	Next Emission Test Due
FM Boiler P-170-001	Nat. Gas	70	0.11	0.13	0.20	5/10/01	7/17/06
PFI Boiler R-170-003	No. 6 Oil	275	CEM	N/A	0.25	N/A	N/A
	Nat. Gas	288	CEM	N/A	0.20*	N/A	N/A

Discounts: Design Margin-Less 5% from AEL upon DERC use

Description of Compliance:

Cascades Boxboard Group Connecticut LLC (Cascades) owns and operates a recycle paperboard manufacturing facility on Inland Road, in the town of Sprague. The facility consists of a paperboard mill, power plant, and building heaters. At the power plant, Cascades operates an FM boiler on natural as identified in Table 1. Upon sufficient documentation, as described in TAO 8269, Cascades may generate DERCs when operating the FM boiler on natural gas. Cascades also operates a Babcock and Wilcox PFI boiler on #6 fuel oil and/or natural gas to provide process steam and electric power for mill operations. NOx emissions from the PFI boiler are measured with a continuous emissions monitor (CEM) that meets 40 CFR Part 75. The PFI boiler is subject to RCSA §22a-174-22, and RCSA §22a-174-22c (CAIR) for the control of NOx emissions.

II. Special Requirements

1. Calculation of creation and use of credits shall be as described in TAO 8269.
2. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in Cascade's possession prior to the first day of each month. Also requires that Cascade permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of Cascade's discovery of the DERC shortfall.
3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, Cascade shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the boilers on and after May 1, 2009.

**Hamilton Sundstrand Corporation
TAO 8109M1**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Hamilton Sundstrand Corporation
1 Hamilton Road
Windsor Locks, CT 06096

Designated Representative:

Maura Heffernan
Manager, Environmental Compliance
Telephone No. 860-654-2043

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: March 15, 2005- May 1, 2007
Method: DERC Use
Low-NOx Burners

Table 1 HSC – NO _x EMISSION TEST RATES AND LIMITS (lbs/MMBtu)								
Boilers in Building # 1								
Boiler	Fuel	Heat input MMBtu/hr	Test rate 5/95	Test rate 5/99 (5/00)	Test rate 2/04	FLERs	NO _x Limit Rate	Date Next Test Due
Boiler #1 (Riley)	#6 oil	61	0.38	0.25	0.294	0.33	0.25	2/26/09
	Nat. Gas		0.26	0.12	0.175	N/A	0.20	2/24/09
Boiler #2 (Riley)	#6 oil	61	0.36	0.24	0.263	0.29	0.25	2/25/09
	Nat. Gas		0.27	0.08	0.160	N/A	0.20	2/24/09
Boiler #3 (Riley)	#6 oil	61	0.40	0.25	0.294	0.33	0.25	2/26/09
	Nat. Gas		N/A	0.13	0.149	N/A	0.20	2/24/09
Boiler #4 (CE)	#6 oil	73	0.44	(0.374)	N/A	N/A	0.25	Shut down
Boilers in Building # 3								

Boiler	Fuel	Heat input MMBtu/hr	Test rate 5/95	Test rate 1/99 (5/00)	Test rate 12/03	FLER	NOx Limit Rate	Date Next Test Due
Boiler #1 (CB)	#4 oil	20.9	0.29	Ceased	N/A	0.29	0.25	N/A
	#2 Oil		N/A	0.171	0.192	0.20	1/9/09	
	Nat. Gas		0.08	(0.111)	0.114	0.20	12/18/08	
Boiler #2 (CB)	#4 oil	20.9	0.27	Ceased	N/A	0.27	0.25	N/A
	#2 Oil		N/A	0.189	0.174	0.20	1/9/09	
	Nat. Gas		0.07	(0.102)	0.099	0.20	12/18/08	

Discounts: Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

Hamilton Sundstrand Corporation (HSC) designs and manufactures aircraft and spacecraft control systems and components for the aerospace and marine industries at their Windsor Locks facility. At the facility, Hamilton operates three Riley boilers identified in Table 1 above. The boilers are subject to RCSA §22a-174-22 for the control of NOx emissions. Emission testing conducted on the dates specified in table 1 resulted in NOx emission rates that exceed the corresponding Allowable emission limits (AELs) listed in Table 22-1 of Section 22a-174-22 of the Regulations. Emission tests conducted on Boilers 1, 2, and 3 in building 1 indicated an exceedance of the full load emission rates (FLERs) shown in table 1 of TAO 8109. HSC requested that TAO 8109M1 be issued to adjust the FLERs to 10% higher than the most recent test results to provide for a margin of safety when calculating DERCs required. The modification to TAO 8109 captures the shortfall resulting from the FLER exceedance and requires the shutdown of Boilers #4 in Building 1. It also approves the creation of credits from the installation of low NOx burners in the boilers. This modification was issued to extend HSC's ability to use NOx DERCs or NOx Allowances to offset excess NOx emissions from the boilers pursuant to RCSA §22a-174-22(j) until May 1, 2007.

II. Special Requirements

1. Calculation of creation and use of credits shall be as described in TAO 8109 and 8109M1.
2. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in HSC's possession prior to the first day of each month. Also requires that HSC permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of HSC's discovery of the DERC shortfall.

3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2006, HSC shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the boilers on and after May 1, 2007.

**Hamilton Sundstrand Corporation
TAO 8109M2**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Hamilton Sundstrand Corporation
1 Hamilton Road
Windsor Locks, CT 06096

Designated Representative:

Maura Heffernan
Manager, Environmental Compliance
Telephone No. 860-654-2043

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period:	May 1, 2007- May 1, 2009
Method:	DERC Use Low-NOx Burners

Discounts: Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

The same as noted in TAO 8109M1 Description of Compliance. This modification was issued to extend HSC's ability to use NOx DERCs or NOx Allowances to offset excess NOx emissions from the boilers pursuant to RCSA §22a-174-22(j) until May 1, 2009.

II. Special Requirements

1. Calculation of creation and use of credits shall be as described in TAO 8109 and 8109M1.

2. Requires that on or before September 1, 2008, HSC shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the boilers on and after May 1, 2009.

**United Technologies Corporation (Pratt & Whitney)
TAO 8134AM1**

I. DESCRIPTION OF DERC USE

Source and Identifier:

United Technologies Corporation (Pratt & Whitney)
400 Main Street
East Hartford, CT 06108

Designated Representative:

David Russell
Director, Facilities and Services
Telephone No. (860) 565-7929

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- January 1, 2013
Method: DERC Use

Facility/ Equipment	Fuel	Heat Input Limitation MMBtu/hr	Steam Production Limitation Lbs steam/hr	Test Steam Production Lbs steam/hr	% of MRC	Test Rate*	FLER*	RACT*
Facility 1 - Boiler no. 6	Nat. gas	143	120,000	116,700	97	0.327	.46	0.20
	#6 oil	144	125,000	122,600	98	0.434	.51	0.25
Facility 1 - Boiler no. 8	Nat. gas	171	125,000	123,500	98	0.248	.32	0.20
	#6 oil	182	130,000	123,300	95	0.320	.56	0.25
Facility 1 -	Nat.	165	120,000	118,400	99	0.241	.36	0.20

Boiler no. 9	gas #6 oil	171	125,000	122,300	98	0.309	.65	0.25
Facility 2 - Boiler no. 2	#6 oil	106	73,334	69,473	95	0.337	.40	0.25
Facility 2 - Boiler no. 3	#6 oil	97	78,100	73,667	94	0.394	.45	0.25
Facility 2 - Boiler no. 4	#6 oil	57	36,886	35,667	97	0.398	.50	0.25
Facility 2 – Engines	Jet fuel	283	N/A	N/A	93**	364ppm	230 lb/hr	75 ppm

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

United Technologies Corporation/Pratt & Whitney (PW) conducts research and development, manufacturing, and repair of experimental and production aircraft engines and ground based gas turbine engines at their East Hartford facility. At the facility, PW operates three boilers identified in Table 1 above. The boilers are subject to RCSA §22a-174-22 for the control of NOx emissions. Emission testing conducted on the dates specified in table 1 resulted in NOx emission rates that exceed the corresponding Allowable emission limits (AELs) listed in Table 22-1 of Section 22a-174-22 of the Regulations. TAO 8134AM1 allows PW to use NOx DERCs or NOx Allowances to offset excess NOx emissions pursuant to RCSA §22a-174-22(j) until May 1, 2009.

II. Special Requirements

1. Calculation of creation and use of credits shall be as described in TAO 8134A and 8134AM1.
2. P&W agreed to accept the modified heat input and steam output operating restrictions on

the facility 1 boilers and facility 2 boilers as shown in Table 1.

3. TAO 8134AM1 expands the Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in P&W's possession prior to the first day of each month. Also requires that P&W permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of P&W's discovery of the DERC shortfall.
4. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
5. Requires that on or before September 1, 2008, P&W shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the boilers on and after May 1, 2007.

**Sikorsky Aircraft Corporation
TAO 8120AM1**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Sikorsky Aircraft Corporation
6900 Main Street
Stratford, CT 06614

Designated Representative:

John D. Conway, Compliance Manager
Telephone No. (203) 386-4000

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC Use
Low-NOx Burner and Flue Gas Recirculation

<p align="center">Table 1 NOx Stack Test Rates, FLERs and Allowable Limits (lbs/MMBtu)</p>							
UNIT Reg. or Permit No.	Fuel	Heat Input (MMBtu/hr)	Stack Test Rate	FLER	Allowable Limit Rate	Date of Last Stack Test	Date of Next Stack Test
Boiler No. 1 R178-0019	No. 6 oil	48.0	0.379	0.39	0.25	5/16/05	5/16/10
	Natural Gas	50.4	0.178	N/A	0.20	5/16/05	5/16/10
Boiler No. 2 R178-0018	No. 6 oil	48.0	0.289	0.34	0.25	5/16/05	5/16/10
	Natural Gas	50.4	0.175	N/A	0.20	5/16/05	5/16/10
Boiler No. 3	No. 6 oil	48.0	0.322	0.35	0.25	5/16/05	5/16/10
	Natural	50.4	0.196	N/A	0.20	5/16/05	5/16/10

Table 1 NOx Stack Test Rates, FLERs and Allowable Limits (lbs/MMBtu)							
R178-0017	Gas						
Boiler No. 4	No. 6 oil	48.0	0.319	0.33	0.25	5/16/05	5/16/10
R178-0016	Natural Gas	50.4	0.196	N/A	0.20	5/16/05	5/16/10
Boiler No. 5	No. 6 oil	49.5	0.325	0.35	0.25	9/2/05	9/2/10
P178-0039	Natural Gas	52.5	0.120	N/A	0.20	9/2/05	9/2/10

Discounts: Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

Sikorsky Aircraft manufactures, overhauls, and repairs military and commercial helicopters at 6900 Main Street, Stratford, CT. Steam generation is provided by five boilers identified in Table 1 above. The boilers are subject to RCSA §22a-174-22 for the control of NOx emissions. Emission testing conducted on the dates specified in table 1 resulted in NOx emission rates that exceed the corresponding Allowable emission limits (AELs) listed in Table 22-1 of Section 22a-174-22 of the Regulations. TAO 8120AM1 was issued as a means of allowing Sikorsky Aircraft to use NOx DERCs or NOx Allowances to offset excess NOx emissions from the boilers, pursuant to RCSA §22a-174-22(j), until May 1, 2009.

II. SPECIAL REQUIREMENTS

1. Calculation of credit use shall be as described in TAO 8120A and 8120AM1.
2. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in Sikorsky's possession prior to the first day of each month. Also requires that Sikorsky permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of Sikorsky's discovery of the DERC shortfall.
3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.

4. Requires that on or before September 1, 2008, Sikorsky shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the boilers on and after May 1, 2009.

**Dominion Nuclear Connecticut, Inc
TAO 8221AM1**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385

Designated Representative:

Steven Horn, Environmental Specialist
Telephone No. (401)-457-9191

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC use

Peaking Unit	Fuel	Maximum Capacity (BHP-Hr)	Stack Test	FLER	RACT	Last Emission Test	Next Emission Test Due
EU 2.3 (U2A)	Diesel	3825	8.32	10.96	8	12/3/03	12/3/08
EU 2.4 (U2B)	Diesel	3825	6.75	10.0	8	12/17/03	12/17/08
EU 2.5 (U3A)	Diesel	6941	6.77	N/A	8	11/12/03	11/12/08
EU 2.6 (U3B)	Diesel	6941	7.36	N/A	8	1/2/04	1/2/09
EU 2.7 (SBO)	Diesel	3400	12.40	14.3	8	12/15/03	12/15/08
EU 2.10 (SEC)	Diesel	620	9.45	11.6	8	7/15/03	7/15/08

Discounts: Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

Dominion Nuclear Connecticut, Inc. (DNC) operates a nuclear fueled electric generating facility at Millstone Point in Waterford, CT. At the facility DNC operates the fossil fuel fired combustion units identified in Table 1 to support the operation of two nuclear reactors (Unit 2 and Unit 3). The combustion units are subject to RCSA §22a-174-22 for the control of NO_x emissions. Emission testing conducted on the dates specified in table 1 resulted in NO_x emission rates that exceed the corresponding Allowable emission limits (AELs) listed in Table 22-1 of Section 22a-174-22 of the Regulations. The TAO 8221AM1 extends DNC's ability to continue the use of NO_x DERCs or NO_x Allowances to offset excess NO_x emissions from the combustion units until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit use shall be as described in TAO 8221A and 8221AM1.
2. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in DNC's possession prior to the first day of each month. Also requires that DNC permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of DNC's discovery of the DERC shortfall.
3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, DNC shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the combustion units on and after May 1, 2009.

**Dominion Nuclear Connecticut, Inc
TAO 8222AM1**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385

Designated Representative:

Steven Horn, Environmental Specialist
Telephone No. (401)-457-9191

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC use

Emission Unit	Fuel	Heat Input MMBtu/hr	Test Rate Lbs/MMBtu	FLER Lbs/MMBtu	Allowable Rate Lbs/MMBtu	Date of Stack Test	Next Emission Test Due
B&W #1	No. 4 fuel oil	69.6	0.26	0.29	0.25	11/19/2004	11/19/2009
B&W #2	No. 4 fuel oil	69.6	0.32	0.35	0.25	11/19/2004	11/19/2009

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

Dominion Nuclear Connecticut, Inc. (DNC) operates a nuclear fueled electric generating facility at Millstone Point in Waterford, CT. At the facility DNC operates the fossil fuel fired combustion units identified in Table 1 to support the operation of two nuclear reactors (Unit 2 and Unit 3). The combustion units are subject to RCSA §22a-174-22 for the control of NOx emissions. Emission testing conducted on the dates specified in table 1 resulted in NOx emission rates that exceed the corresponding Allowable emission limits (AELs) listed in Table 22-1 of Section 22a-174-22 of the Regulations. The TAO 8221AM1 extends DNC's ability to continue the use of NOx DERCs or NOx Allowances to offset excess NOx emissions from the combustion units until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit use shall be as described in TAO 8222A and 8222AM1.
2. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in DNC's possession prior to the first day of each month. Also requires that DNC permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of DNC's discovery of the DERC shortfall.
3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, DNC shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the combustion units on and after May 1, 2009.

**Algonquin Power Windsor Locks, LLC
TAO 8261M1**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Algonquin Power Windsor Locks, LLC
P.O. Box 289
Windsor Locks, CT 06096

Designated Representative:

James A. White, Plant Manager
Telephone No. (860) 627-6616

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC Use for Non-ozone season only
steam Injection, Ammonia Injection

Table 1 CAIR NOx Ozone Season Unit			
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu)	Allowable Emission Limit (AEL)-Lbs/MMBtu
GE PB6541(B) Cogeneration Turbine P-213-0029	Nat. Gas #2 Fuel	555.2 529.5	.15 During the Non-Ozone Season

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

Algonquin Power Windsor Locks, LLC (Algonquin), operates a General Electric model MS6001(B) combined cycle gas turbine generator equipped with a John Zink duct burner. The turbine is subject to RCSA §22a-174-22 and RCSA §22a-174-22c (CAIR). NOx emissions from the turbine are measured with a NOx continuous emissions monitor (CEM) that meets 40 CFR Part 75. The turbine meets RCSA §22a-174-22 limits if firing natural gas in compliance with the permit limits. However, with a permit limit of .20 lbs/MMBTu, the turbine may at times exceed the seven month average non-ozone season limit of 0.15 lbs/MMBTu specified in RCSA §22a-174-22(e) when firing #2 oil. TAO 8261M1 extends Algonquin's ability to use NOx DERCs or Allowances to offset excess emissions during the non-ozone season until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit use shall be as described in TAO 8261A and 8261AM1.
2. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in Algonquin's possession prior to the first day of each month. Also requires that Algonquin permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of Algonquin's discovery of the DERC shortfall.
3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, Algonquin shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the combustion unit on and after May 1, 2009.

**Capitol District Energy Center Cogeneration and Associates (CDECCA)
TAO 8249M1**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Capitol District Energy Center Cogeneration and Associates (CDECCA)
490 Capital Avenue
Hartford, CT 06340

Designated Representative:

Mr. Michael Baier
Plant Manager
Telephone No. (860) 727-0283

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC Use for Non-ozone season only
Steam Injection and Low-NOx Burner

Table 1 CAIR NO_x Ozone Season Unit			
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu/hr)	Allowable Emission Limit (AEL)-Lbs/MMBtu
GE PG6531 Cogeneration Turbine P-75-0064	Nat. Gas #2 Fuel	738.8 708.2	.15 During the Non-Ozone Season

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

Capitol District Energy Center Cogeneration Associates (CDECCA), operates a General Electric model PG 6531 combined cycle gas turbine generator equipped with a John Zink duct burner. The turbine is subject to RCOSA §22a-174-22 and RCOSA §22a-174-22c (CAIR). NOx emissions from the turbine are measured with a NOx continuous emissions monitor (CEM) that meets 40 CFR Part 75. The turbine meets all applicable limits while firing natural gas. However, the turbine may at times exceed the seven month average non-ozone season limit of 0.15 lbs/MMBtu when firing #2 oil. TAO 8249M1 extends CDECCA's ability to use NOx DERCs or Allowances to offset excess emissions during the non-ozone season until May 1, 2009 pursuant to RCOSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit use shall be as described in TAO 8249A and 8249AM1.
2. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in CDECCA's possession prior to the first day of each month. Also requires that CDECCA permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of CDECCA's discovery of the DERC shortfall.
3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, CDECCA shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the combustion unit on and after May 1, 2009.

NRG Energy, Inc., et al.
TAOs 8213AM2, 8214AM2, 8215AM2, 8182AM2

I. DESCRIPTION OF DERC USE

Source and Identifier:

Middletown Power, LLC
P.O. Box 1001
Middletown, CT 06457

Designated Representative:

Cynthia Karlic
Regional Environmental Director
Telephone No. (860) 343-6962

CT Nonattainment Area Classification: Serious and Severe

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC Creation and Use
Excess air control on Boilers 2-4

8213A Table 1				
NOx Allowable Limits and Baseline Emission Rate in lbs/MMBtu				
Emission Unit	Fuel	Heat Input MMBtu/hr	Emissions Test	Allowable/Baseline emission rate lbs/MMBtu
Boiler 2	No. 6	1,295	CEM	0.25
Registration	No. 2		CEM	0.17
No. 104-0098	Nat.Gas		CEM	0.20

8214A Table 1				
NOx Allowable Limits and Baseline Emission Rate in lbs/MMBtu				
Emission Unit	Fuel	Heat Input MMBtu/hr	Emissions Test	Allowable/Baseline emission rate lbs/MMBtu
Boiler 3	No. 6	2,370	CEM	0.43
Registration	No. 2		CEM	0.17
No. 104-0100	Nat.Gas		CEM	0.43

8215A Table 1 NOx Allowable Limits and Baseline Emission Rate in lbs/MMBtu				
Emission Unit	Fuel	Heat Input MMBtu/hr	Emissions Test	Allowable/Baseline emission rate lbs/MMBtu
Boiler 4 Permit No. 104-0003	No. 6	4,684	CEM	0.25
	No. 2		CEM	0.17

8182A Table 1							
Facility/ Peaking Unit	Fuel	Heat Input MMBtu/hr	Stack Test (ppmvd)	FLER lbs/MMBtu	Allowable Rate lbs/MMBtu	Date of Stack Test	Next Stack Test Due
Middletown-10	#2 oil	256	148.8	0.67	0.29	6/11/01	6/11/06

Discounts:

- Design Margin- Less 5% from AEL upon DERC use
- Environmental- Less 10% upon DERC Creation

Description of Compliance:

NRG Energy Inc, Middletown Power LLC (MP), owns and operates the boilers and peaking unit identified in the tables above. The boilers and peaking unit are subject to RCSA §22a-174-22 and RCSA §22a-174-22c (CAIR). NOx emissions from the boilers are measured with a NOx continuous emissions monitors (CEMs) that meet 40 CFR Part 75. The actual 24-hour, block average NOx emission rate from the boilers, at times, may be less than the corresponding AELs. At such times, the MP may generate DERCs in accordance with the provisions of this TAO. NOx emission rates from the emission units described in the tables referenced in TAOs 8213A, 8214A, and 8215A, at times, exceed the corresponding AELs. Emission testing conducted on the date specified in Table 1 of TAO 8182 resulted in a NOx emission rate that exceeds the corresponding Allowable emissions limit (AEL). In accordance with Section 22a-174-22(j) of the Regulations, MP may comply with Section 22a-174-22 of the Regulations through the use of emissions trading. TAO's 8213AM2-8215AM2 and 8182AM2 extend MP's ability to use NOx DERCs or Allowances to offset excess emissions until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit creation and use shall be as described in TAO's 8213A-8215A, 8182A and subsequent modifications.

2. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in MP's possession prior to the first day of each month. Also requires that MP permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of MP's discovery of the DERC shortfall.
3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, MP shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the combustion unit on and after May 1, 2009.

**NRG Energy, Inc., et al.
TAO 8216AM2, 8217AM2, 8183AM2**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Montville Power, LLC
74 Lathrop Road
Uncasville, CT 06382

Designated Representative:

Cynthia Karlic
Regional Environmental Director
Telephone No. (860) 343-6962

CT Nonattainment Area Classification: Serious and Severe

Summary of Compliance:

Time Period: May 1, 2007- May 31, 2009
Method: DERC Creation and Use
Excess air control on Boilers 5 and 6

8216A Table 1				
NOx Allowable Limits and Baseline Emission Rate in lbs/MMBtu				
Emission Unit	Fuel	Heat Input MMBtu/hr	Emissions Test	Allowable/Baseline emission rate lbs/MMBtu
Boiler 5 Registration No. 107-0017	No. 6 Natural gas	995	CEM CEM	0.25 0.20

8217A Table 1				
NOx Allowable Limits and Baseline Emission Rate in lbs/MMBtu				
Emission Unit	Fuel	Heat Input MMBtu/hr	Emissions Test	Allowable/Baseline emission rate lbs/MMBtu
Boiler 6 Registration No. 107-0020	No. 6 No. 2	4,658	CEM CEM	0.25 0.17

8183A Table 1

Facility/ Peaking Unit	Fuel	Heat Input MMBtu/hr	Stack Test (gm/bhp/hr)	FLER lbs/MMBtu	Allowable Rate lbs/MMBtu	Date of Stack Test	Next Stack Test Due
Montville-10	#2 oil	256	9.718	3.11	2.35	5/23/01	5/23/06
Montville-11	#2 oil	256	10.236	2.96	2.35	5/23/01	5/23/06

Discounts:

- Design Margin- Less 5% from AEL upon DERC use
- Environmental- Less 10% upon DERC Creation

Description of Compliance:

NRG Energy Inc, Montville Power LLC (MP), owns and operates the boilers and peaking units identified in the tables referenced to each TAO. The peaking units identified in Table 1 of TAO 8183A are subject to RCSA §22a-174-22. Boilers 5 and 6 identified in the Tables above are subject to RCSA §22a-174-22 and RCSA §22a-174-22c (CAIR). NOx emissions from the boilers are measured with a NOx continuous emissions monitors (CEMs) that meet 40 CFR Part 75. The actual 24-hour, block average NOx emission rate from the boilers, at times, may be less than the corresponding AELs. At such times, the MP may generate DERCs in accordance with the provisions of this TAO. NOx emissions rates from the emission units described in the tables referencing TAOs 8216A and 8217A, at times, exceed the corresponding AELs. Emission testing conducted on the dates specified in Table 1 of TAO 8183 resulted in NOx emission rates that exceed the corresponding Allowable emissions limits (AELs). In accordance with Section 22a-174-22(j) of the Regulations, may comply with Section 22a-174-22 of the Regulations through the use of emissions trading. TAO’s 8216AM2, 8217AM2 and 8183AM2 extend MP’s ability to use NOx DERCs or Allowances to offset excess emissions until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit creation and use shall be as described in TAO’s 8216A, 8217A, 8183A and subsequent modifications.
2. Expands Commissioner’s authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in MP’s possession prior to the first day of each month. Also requires that MP permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of MP’s discovery of the DERC shortfall.

3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, MP shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the combustion unit on and after May 1, 2009.

TAO 8218AM2, 8184AM2

I. DESCRIPTION OF DERC USE

Source and Identifier:

Norwalk Power, LLC
 Manresa Island Ave.
 South Norwalk, CT 06854

Designated Representative:

Cynthia Karlic
 Regional Environmental Director
 Telephone No. (860) 343-6962

CT Nonattainment Area Classification: Serious and Severe

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC Creation and Use
 NOXOUT SNCR on Boilers 1 and 2

8218A Table 1				
NOx Allowable Limits and Baseline Emission Rate in lbs/MMBtu				
Emission Unit	Fuel	Heat Input MMBtu/hr	Emissions Test	Allowable/Baseline emission rate lbs/MMBtu
Boiler 1 Registration No. 137-0028	No. 6 No. 2	1776	CEM CEM	0.25 0.17
Boiler 2 Registration No. 137-0030	No. 6 No. 2	1776	CEM CEM	0.25 0.17

8184A Table 1							
Facility/ Peaking Unit	Fuel	Heat Input MMBtu/hr	Stack Test (ppmvd)	FLER lbs/MMBtu	Allowable Rate lbs/MMBtu	Date of Stack Test	Next Stack Test Due
Norwalk-10	#2 oil	256	94.2	0.52	0.29	6/22/01	6/21/06

Discounts:

Design Margin- Less 5% from AEL upon DERC use
Environmental- Less 10% upon DERC Creation

Description of Compliance:

NRG Energy Inc, Norwalk Power LLC (NP), owns and operates the boilers and peaking unit identified in the tables referenced to each TAO. The boilers and peaking unit are subject to RCSA §22a-174-22 and RCSA §22a-174-22c (CAIR). NOx emissions from the boilers are measured with a NOx continuous emissions monitors (CEMs) that meet 40 CFR Part 75. The actual 24-hour, block average NOx emission rate from the emissions units described in tables, at times, may be less than the corresponding AELs. At such times, NP may generate DERCs in accordance with the provisions of this TAO. The NOx emission rate from the boilers, at times, may exceed the corresponding AELs. Emission testing conducted on the date specified in Table 1 of TAO 8184 resulted in a NOx emission rate that exceeded the corresponding Allowable emissions limit (AEL). In accordance with Section 22a-174-22(j) of the Regulations, may comply with Section 22a-174-22 of the Regulations through the use of emissions trading. TAO 8218AM2 and 8184AM2 extend NP's ability to use NOx DERCs or Allowances to offset excess emissions until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit creation and use shall be as described in TAO's 8218A and 8182A and subsequent modifications.
2. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in NP's possession prior to the first day of each month. Also requires that NP permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of NP's discovery of the DERC shortfall.
3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, DP shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the combustion unit on and after May 1, 2009.

TAO's 8219AM2, 8181AM2, 8251M2

I. DESCRIPTION OF DERC USE

Source and Identifier:

Devon Power, LLC
 700 Naugatuck Avenue
 Devon, CT 06460

Designated Representative:

Cynthia Karlic
 Regional Environmental Director
 Telephone No. (860) 343-6962

CT Nonattainment Area Classification: Serious and Severe

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC Creation and Use
 Excess air control on Boilers 7 and 8

8219A Table 1				
NOx Allowable Limits and Baseline Emission Rate in lbs/MMBtu				
Emission Unit	Fuel	Heat Input MMBtu/hr	Emissions Test	Allowable/Baseline emission rate lbs/MMBtu
Boiler 7 Registration No. 105-0055	No. 6	1139	CEM	0.25
	No. 2		CEM	0.17
	Natural gas		CEM	0.20
Boiler 8 Registration No. 105-0058	No. 6	1139	CEM	0.25
	No. 2		CEM	0.17
	Natural Gas		CEM	0.20

8181A Table 1							
Facility/ Peaking Unit	Fuel	Heat Input MMBtu/hr	Stack Test (ppmvd)	FLER lbs/MMBtu	Allowable Rate lbs/MMBtu	Date of Stack Test	Next Stack Test Due
Devon-10	#2 oil	256	181.6	0.74	0.29	4/16/01	4/16/06

Table 2

TAO 8251			
CAIR NO_x Ozone Season Unit, equipped with CEMS			
Allowable Limits (lbs/MMBtu, unless otherwise noted)			
UNIT- reg. or permit no.	Fuel	Heat Input (MMBTU/hr)	Allowable Emission Limit (AEL)
Devon Unit-11 P-105-0040	other oil Nat gas	394	0.15 non-ozone season average, regardless of fuel burned
Devon Unit-12 P-105-0041	other oil Nat gas	394	0.15 non-ozone season average, regardless of fuel burned
Devon Unit-13 P-105-0042	other oil Nat gas	394	0.15 non-ozone season average, regardless of fuel burned
Devon Unit-14 P-105-0043	other oil Nat gas	394	0.15 non-ozone season average, regardless of fuel burned

Discounts:

- Design Margin- Less 5% from AEL upon DERC use
- Environmental- Less 10% upon DERC Creation

Description of Compliance:

NRG Energy Inc, Devon Power LLC (DP), owns and operates the boilers and peaking units identified in the tables above. The boilers and peaking units are subject to RCSA §22a-174-22 and RCSA §22a-174-22c (CAIR). NO_x emissions from the boilers listed in Table 1 of TAO 8219A and the turbines listed in Table 2 are measured with a NO_x continuous emissions monitors (CEMs) that meet 40 CFR Part 75. The actual 24-hour, block average NO_x emission rate from the boilers, at times, may be less than the corresponding AELs. At such times, DP may generate DERCs in accordance with the provisions of TAO 8219A NO_x. The NO_x emission rates from the boilers listed in table 1 of TAO 8219A, at times, exceed the corresponding AELs. The turbines listed in Table 2 may, at times, exceed the seven month average non-ozone season limit of 0.15 lbs/MMBtu specified in RCSA §22a-174-22(e) when firing #2 oil. Emission testing conducted on the date specified in Table 1 of TAO 8181 resulted in a NO_x emission rate that exceeds the corresponding Allowable emissions limit (AEL). In accordance with Section 22a-174-22(j) of the Regulations, DP may comply with Section 22a-174-22 of the Regulations through the use of emissions trading. TAO's 8219AM2, 8181AM2, and 8251M2 extend DP's ability to use NO_x DERCs or Allowances to offset excess emissions until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit creation and use shall be as described in TAO's 8219A, 8181A, 8251A, and subsequent modifications.
2. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in DP's possession prior to the first day of each month. Also requires that DP permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of DP's discovery of the DERC shortfall.
3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, DP shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the combustion unit on and after May 1, 2009.

TAO 8180AM2

I. DESCRIPTION OF DERC USE

Source and Identifier:

CT Jet Power
 Manresa Island Avenue
 South Norwalk. CT 06854
 (turbine locations in Cos Cob, Torrington, and Branford)

Designated Representative:

Cynthia Karlic
 Regional Environmental Director
 Telephone No. (860) 343-6962

CT Nonattainment Area Classification: Serious and Severe

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC Use

Facility/ Peaking Unit (serial #)	Fuel	Heat Input MMBtu/hr	Stack Test (ppmvd)	FLER lbs/MMBtu	Allowable Rate lbs/MMBtu	Date of Stack Test	Next Stack Test Due
Boston Post Road Branford - 10 (675102)	#2 oil	256	184	0.80	0.29	9/6/01	9/6/06
Sound Shore Drive Greenwich-10 (675337)	#2 oil	256	193	0.80	0.29	8/22/01	8/22/06
Sound Shore Drive Greenwich-11 (675192)	#2 oil	256	144	0.80	0.29	8/23/01	8/23/06
Sound Shore Drive Greenwich-12 (675342)	#2 oil	256	182	0.80	0.29	8/23/01	8/23/06
Franklin Drive	#2 oil	256	194	0.80	0.29	4/20/01	4/20/06

Torrington-10 (F662098)							
South Main Street Torrington-10 (612599)	#2 oil	256	197	0.80	0.29	4/19/01	4/19/06

Discounts:

- Design Margin- Less 5% from AEL upon DERC use
- Environmental- Less 10% upon DERC Creation

Description of Compliance:

NRG Energy Inc, Connecticut Jet Power LLC owns and operates the combustion turbines (peaking units) identified in Table 1 of TAO 8180A. The peaking units are subject to RCSA §22a-174-22(d) and (e) and RCSA §22a-174-22c (CAIR). Emission testing conducted on the dates specified in Table 1 of TAO 8180A resulted in NOx emission rates that exceed the corresponding Allowable emissions limits (AELs). TAO 8180AM2 extends CJP’s ability to use NOx DERCs or Allowances to offset excess emissions until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit use shall be as described in TAO 8180A, and all subsequent modifications.
2. Expands Commissioner’s authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in CJP’s possession prior to the first day of each month. Also requires that CJP permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of CJP’s discovery of the DERC shortfall.
3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, CJP shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the combustion unit on and after May 1, 2009.

**PSEG Power LLC
TAOs 8241M2, 8244M2. 8253M2**

I. DESCRIPTION OF DERC USE

Source and Identifier:

PSEG Power LLC
1 Atlantic Street
Bridgeport, Connecticut 06604

Designated Representative:

Mr. Robert Sylvestri
Senior Environmental Engineer
Telephone No. (203)-551-6032

CT Nonattainment Area Classification: Serious and Severe

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC Use, Creation-Low NOx Concentric firing system on unit 3
DERC Use for Unit 2 and the Turbine

8241M2			
Coal-Fired CAIR NOx Ozone Season Unit –			
Allowable Limits (lbs/MMBtu, unless otherwise noted)			
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu)	Allowable Emission Limit (AEL)
Bridgeport Harbor Unit 3 P-015-0089	Coal	4,100	0.38
	No.6		0.25
	No.2		0.20
			0.15 non-ozone season average for all fuels)

8253M2 CAIR NOx Ozone Season Unit Allowable Limits (lbs/MMBtu, unless otherwise noted)			
UNIT-reg. or permit no.	Fuel	Heat Input (MMBtu)	Allowable Emission Limit (AEL)
Bridgeport Harbor Unit 2 R-015-0162	No. 6 No.2	1,785	0.15 non-ozone season average, regardless of fuel burned

8244M2 CAIR NOx Ozone Season Units NOx Emission Rates, FLERs and Allowable Limits (lbs/MMBtu, unless otherwise noted)								
UNIT-reg. or permit no.	Fuel	Heat Input (MMBtu)	Stack Test Rates		AEL (ppmvd)	FLER (lb/mmbtu)	Date of Last Stack Test	Date of Next Stack Test
			lb/mmbtu	ppmvd @ 15% O ₂				
FT 4A-8LI Turbine R-0166	Jet Fuel	287	0.709	186.17	75	0.73	1/19/2010	1/19/2015

Discounts:

- Design Margin- Less 5% from AEL upon DERC use
- Environmental- Less 10% upon DERC Creation

Description of Compliance:

PSEG Power LLC owns and operates the boilers and combustion turbine identified in the tables above. The boilers and the combustion turbine are subject to RCSA §22a-174-22c (CAIR) and the limits specified in RCSA §22a-174-22(d) and (e). NOx emissions from the boilers 2 and 3 are measured with NOx continuous emissions monitors (CEMs) that meet 40 CFR Part 75. The actual 24-hour, block average NOx emission rate from boiler 3, at times, may be less than the corresponding AELs. At such times, PSEG may generate DERCs in accordance with the provisions of TAO 8241. Emission testing of the turbine conducted on the date specified in table above resulted in a NOx emission rate that exceeds the corresponding allowable emission limit (AEL). NOx emissions rates from the boilers, at times, exceed the corresponding AELs. At such times, in accordance with Section 22a-174-22(j) of the Regulations, PSEG may comply with Section 22a-174-22 of the Regulations through the use of emissions trading. TAO's 8241M2,

8244M2, and 8253M2 extend PSEG's ability to use NOx DERCs or Allowances to offset excess emissions until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit creation and use shall be as described in TAO's 8241, 8244, and 8253, and all subsequent modifications.
2. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in PSEG's possession prior to the first day of each month. Also requires that PSEG permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of PSEG's discovery of the DERC shortfall.
3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, PSEG shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the boilers and combustion turbine on and after May 1, 2009.

**PSEG Power LLC
TAOs 8240M2, 8243M1**

I. DESCRIPTION OF DERC USE

Source and Identifier:

PSEG Power Connecticut LLC
1 Waterfront Street
New Haven, CT 06512

Designated Representative:

Ms. Sally Kruse
Senior Environmental Engineer
Telephone No. (203)-974-5055

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC Use and creation for Unit 1 with over-fire air, flue gas recirculation, water-wall lances, and low NOx Burners.
DERC Use for the aux Boiler

8240M2			
CAIR NOx Ozone Season Unit –			
Allowable Limits (lbs/MMBtu, unless otherwise noted)			
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu)	Allowable Emission Limit (AEL)
New Haven Harbor Unit 1 P-117-0031	No.6	4,286	0.25
	No.2		0.17
	Nat Gas		0.20
			0.15 non-ozone season average, regardless of fuel burned

8243M1 Non CAIR NOx Ozone Season Unit NOx Emission Rates, FLERs and Allowable Limits (lbs/MMBtu, unless otherwise noted)							
UNIT-reg. or permit no.	Fuel	Heat Input (MMBtu)	Stack Test Rate	FLER (lb/mmbtu)	Allowable Emission Limit (AEL)	Date of Last Stack Test	Date of Next Stack Test
New Haven Aux. Boiler P 117-0021	No. 6	143.4	<0.4	0.4	0.25	2/3/2010	2/3/2015

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

PSEG Power LLC owns and operates the boilers identified in the tables above. Boiler 1 is subject to RCSA §22a-174-22 and RCSA §22a-174-22c (CAIR). The Aux boiler is subject to RCSA §22a-174-22. NOx emissions from boiler 1 are measured with NOx continuous emissions monitors (CEMs) that meet 40 CFR Part 75. The actual 24-hour, block average NOx emission rate from boiler 1, at times, may be less than the corresponding AELs. At such times, PSEG may generate DERCs in accordance with the provisions of TAO 8240. Emission testing of the Aux boiler conducted on the date specified in table above resulted in a NOx emission rate that exceeds the corresponding allowable emission limit (AEL). At such times, in accordance with Section 22a-174-22(j) of the Regulations, PSEG may comply with Section 22a-174-22 of the Regulations through the use of emissions trading. TAO’s 8240M2 and 8243M1 extend PSEG’s ability to use NOx DERCs or Allowances to offset excess emissions until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit creation and use shall be as described in TAO’s 8240 and 8243, and all subsequent modifications.
2. Expands Commissioner’s authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance

or violation of law if DERCs are not in PSEG's possession prior to the first day of each month. Also requires that PSEG permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of PSEG's discovery of the DERC shortfall.

3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, PSEG shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the boilers on and after May 1, 2009.

**Connecticut Resources Recovery Authority
TAO 8116BM1**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Connecticut Resources Recovery Authority
Reserve-Maxim Road
Hartford, Connecticut 06106

Designated Representative:

Mr. Steven Yates
Air Compliance Manager
Telephone No. (860) 757-7726

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC Use

NOx EMISSION RATES AND ALLOWABLE LIMITS (lbs/MMBtu)						
Fuel Burning Equipment/Registration No.	FUEL	FLER (lbs/MMBtu)	NOx Allowable Rate (lbs/MMBtu)	Stack Test Rate (lbs/MMBtu)	Date of Stack Test	Next Stack Test Due Date
11A R260	No. 2 or other distillate oil	0.81	0.289	0.79	11/30/04	11/30/09
11B R261	No. 2 or other distillate oil	0.81	0.289	0.70	11/30/04	11/30/09
12A R262	No. 2 or other distillate oil	0.81	0.289	0.76	12/1/04	12/1/09
12B R263	No. 2 or other distillate oil	0.81	0.289	0.68	12/1/04	12/1/09
13A R264	No. 2 or other distillate oil	0.81	0.289	0.80	12/2/04	12/2/09
13B	No. 2 or	0.81	0.289	0.77	12/2/04	12/2/09

NO_x EMISSION RATES AND ALLOWABLE LIMITS (lbs/MMBtu)						
Fuel Burning Equipment/Registration No.	FUEL	FLER (lbs/MMBtu)	NO_x Allowable Rate (lbs/MMBtu)	Stack Test Rate (lbs/MMBtu)	Date of Stack Test	Next Stack Test Due Date
R265	other distillate oil					
14A R266	No. 2 or other distillate oil	0.81	0.289	0.80	12/3/04	12/3/09
14B R267	No. 2 or other distillate oil	0.81	0.289	0.68	12/3/04	12/3/09

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

CRRA owns and operates the combustion turbines identified in Table 1. The combustion turbines are subject to RCSA §22a-174-22 and RCSA §22a-174-22c (CAIR). Emission testing conducted on the dates specified in Table 1 resulted in NO_x emission rates that exceed the corresponding allowable emissions limits (AELs). At such times, in accordance with Section 22a-174-22(j) of the Regulations, CRRA may comply with Section 22a-174-22 of the Regulations through the use of emissions trading. TAO 8116BM1 extends CRRA’s ability to use NO_x DERCs or Allowances to offset excess emissions until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit use shall be as described in TAO 8116B, and all subsequent modifications.
2. Expands Commissioner’s authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in CRRA’s possession prior to the first day of each month. Also requires that CRRA permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of CRRA’s discovery of the

DERC shortfall.

3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, CRRA shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the boilers on and after May 1, 2009.

**City of Norwich Department of Public Utilities (NDPU)
TAO 8119AM2**

I. DESCRIPTION OF DERC USE

Source and Identifier:

City of Norwich Department of Public Utilities (NDPU)
16 South Golden Street
Norwich, CT 06360

Designated Representative:

Mr. John Bilda
General Manager
Telephone No. (860) 823-4172

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC Use

Table 1 CAIR NOx Ozone Season Unit NOx Emission Rates, FLERs and Allowable Limits (lbs/MMBtu, unless otherwise noted)								
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu)	Stack Test Rates		AEL (ppmvd)	FLER (lb/mmbtu)	Date of Last Stack Test	Date of Next Stack Test
			lb/mmbtu	ppmvd @ 15% O ₂				
Rolls Royce Turbine	#2 oil	249	0.552	103.8	75	0.7	7/31/09	7/31/14

Discounts:

Design Margin- Less 5% from AEL upon DERC use.

Description of Compliance:

NDPU owns and operates the combustion turbine identified in Table 1. The combustion turbine is subject to RCSA §22a-174-22 and RCSA §22a-174-22c (CAIR). Emission testing conducted on the date specified in Table 1 resulted in a NO_x emission rate that exceeds the corresponding allowable emission limit (AEL). In accordance with Section 22a-174-22(j) of the Regulations, NDPU may comply with Section 22a-174-22 of the Regulations through the use of emissions trading. TAO 8119AM2 extends NDPU's ability to use NO_x DERCs or Allowances to offset excess emissions until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit use shall be as described in TAO 8119A, and all subsequent modifications.
2. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in NDPU's possession prior to the first day of each month. Also requires that NDPU permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of NDPU's discovery of the DERC shortfall.
3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, NDPU shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the boilers on and after May 1, 2009.

**NE Hydro Generating Company
TAO 8272**

I. DESCRIPTION OF DERC USE

Source and Identifier:

NE Hydro Generating Company
Tunnel Road
Preston, CT 06365

Designated Representative:

Mr. Thomas Padberg
Operations and Maintenance Manager
Telephone No. (860) 350-3624

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009
Method: DERC Use

Table 1 CAIR NOx Ozone Season Units NOx Emission Rates, FLERs and Allowable Limits (lbs/MMBtu, unless otherwise noted)								
UNIT- reg. or permit no.	Fuel	FLER in lbs/mmbtu	Allowable Emission Limit (AEL) in lbs/mmbtu	AEL in ppmvd	Stack Test Rate in lbs/MMBtu	Stack test rate in ppmvd	Date of Last Stack Test	Date of Next Stack Test
Tunnel Road Preston 10	other oil	0.72	.29	75	0.698	119.6	3/29/2006	3/29/2011

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

NE Hydro Generating Company (NEHGC) owned and operated the combustion turbine identified in Table 1. The combustion turbine is subject to RCSA §22a-174-22 and RCSA §22a-174-22c (CAIR). Emission testing conducted on the date specified in Table 1 resulted in a NO_x emission rate that exceeds the corresponding allowable emission limit (AEL). In accordance with Section 22a-174-22(j) of the Regulations, NEHGC complied with Section 22a-174-22 of the Regulations through the use of emissions trading. TAO 8272 extended NEHGC's ability to use NO_x DERCS or Allowances to offset excess emissions from November 11, 2006 until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit use shall be as described in TAO 8272.
2. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCS are not in NDPU's possession prior to the first day of each month. Also requires that NDPU permanently retire DERCS calculated in accordance with the above plus a 100% premium within sixty (60) days of NDPU's discovery of the DERC shortfall.
3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, NDPU shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the boilers on and after May 1, 2009.

**Combustion Engineering
TAO 8154AM1**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Combustion Engineering
2000 Day Hill Road
Windsor, CT 06095

Designated Representative:

Mr. R. Keith Knauerhase
Manager, Environmental Control and Support

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- May 31, 2014
Method: DERC Use

Table 1 CE - NOx Emission Rates and RACT Limits (lbs/MMBtu)							
Unit: Reg. R- or Permit P-	Fuel	Heat Input (MMBtu)	Stack Test Rate	Allowable Rate	Use FLER	Emissions Test Date	Next Test Due
Boiler No. 3 R-212-09	No. 6 oil	14.3	0.338	0.25	0.39	2/28/02	2/28/07
	No. 2 oil	14.3	0.18	0.20	N/A		
	Nat. Gas	13.8	0.11	0.20	N/A		
Boiler No. 4 R-212-10	No. 6 oil	30.8	0.403	0.25	0.47	2/14/02	2/14/07
	No. 2 oil	30.8	0.17	0.20	N/A		
	Nat. Gas	30.8	0.10	0.20	N/A		
Boiler No. 5 P-212-08	No. 6 oil	30.8	0.317	0.25	0.37	2/13/02	2/13/07
	No. 2 oil	30.8	0.098	0.20	N/A		
	Nat. Gas	30.8	0.101	0.20	N/A		

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

Combustion Engineering (CE) owns and operates the boilers identified in Table 1 above. The boilers are subject to RCSA §22a-174-22 for the control of NO_x emissions. Emission testing conducted on the dates specified in table 1 resulted in NO_x emission rates that exceed the corresponding Allowable emission limits (AELs) listed in Table 22-1 of Section 22a-174-22 of the Regulations. In accordance with Section 22a-174-22(j) of the Regulations, CE may comply with Section 22a-174-22 of the Regulations through the use of emissions trading. TAO 8154AM1 extends CE's ability to use NO_x DERCs or Allowances to offset excess emissions until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit use shall be as described in TAO 8154A and all subsequent modifications.
2. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in CE's possession prior to the first day of each month. Also requires that CE permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of CE's discovery of the DERC shortfall.
3. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
4. Requires that on or before September 1, 2008, CE shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the boilers on and after May 1, 2009.

**Cytec Industries Inc.
TAO 8114AM1**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Cytec Industries Inc.
POB 425
Wallingford, CT 06492

Designated Representative:

Larry Stauffer, Site Manager
203-269-4481

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- May 31, 2014
Method: DERC Use

Table 1							
Cytec – NOx Test rates, FLERs and Allowable Rates in Lbs/MMBtu							
Unit Registration (R) or Permit (P) No.	Fuel	Heat Input MMBtu/hr	Emission Test Rate	FLER (credit or debit)	Allowable Limits	Stack Test Date	Next Test Due
Boiler 1 R-108	No. 6 oil	80	0.39	0.39	0.25	2/2/05	2/2/10
	Nat. Gas	80	0.07	0.09	0.20	1/31/05	1/31/10
Boiler 3 R-110	No. 6 oil	89	0.29	0.30	0.25	11/29/06	11/29/11
	Nat. Gas	89	0.17	N/A	0.20	1/31/05	1/31/10
Hot Oil Furnace P-9	No. 2 oil	11	0.08	0.16	0.20	2/1/05	2/1/10
	Nat. Gas	11	0.08	0.11	0.20	5/27/05	5/27/10
Spray Dryer R-173	No. 2 oil	10	0.17	0.17	0.25	2/2/05	2/2/10
	Nat. Gas	10	0.05	0.13	0.19	5/26/05	5/26/10

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

Cytec Industries Inc. (Cytec) owns and operates the fuel burning equipment identified in Table 1 above. The fuel burning equipment are subject to RCSA §22a-174-22 for the control of NOx emissions. Emission testing conducted on the dates specified in table 1 resulted in NOx emission rates that exceed the corresponding Allowable emission limits (AELs) listed in Table 22-1 of Section 22a-174-22 of the Regulations. In accordance with Section 22a-174-22(j) of the Regulations, Cytec may comply with Section 22a-174-22 of the Regulations through the use of emissions trading. TAO 8114AM1 extends Cytec's ability to use NOx DERCs or Allowances to offset excess emissions until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit use shall be as described in TAO 8114A and all subsequent modifications.
2. TAO 8114AM1 removed Boiler #4 and the sludge incinerator from the original TAO 8114A.
3. Expands Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law if DERCs are not in Cytec's possession prior to the first day of each month. Also requires that Cytec permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of Cytec's discovery of the DERC shortfall.
4. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.
5. Requires that on or before September 1, 2008, Cytec shall submit a report in writing to the Commissioner indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the boilers on and after May 1, 2009.

**University of Connecticut
TAOs 8115BM1, 8115BM2**

I. DESCRIPTION OF DERC USE

Source and Identifier:

University of Connecticut
Office of Environmental Policy
31 LeDoyt Road Unit 3055
Storrs, CT 06269-3055

Designated Representative:

Richard Miller, Director of Environmental Policy
860-486-8741

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- May 31, 2014
Method: DERC Use

8115BM1

Unit: DEEP Registration No.	Fuel	Heat Input	Stack Test Rate	FLER	NOx Allowable Emission Limits	Date of Last Emission Test	Next Emission Test Due
Boiler 2: 98-15115	No. 2 Oil	89	.24	.27	0.20	3/23/00	3/32/05

8115BM2

Unit: DEEP Registration No.	Fuel	Heat Input	Stack Test Rate	NOx Allowable Emission Limits	Date of Last Emission Test	Next Emission Test Due
Boiler 2: 98-15115	No. 2 Oil	89	.193	0.20	2/15/2005	2/15/2010
	Natural Gas	89	.188	0.20	2/22/2005	2/22/2010

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

University of Connecticut (UCONN) owns and operates boiler 2 identified in Table 1 above. Boiler 2 is subject to RCSA §22a-174-22 for the control of NOx emissions. Emission testing conducted on the date specified in the table referencing TAO 8115BM1 resulted in a NOx emission rate that exceeded the corresponding Allowable emission limit (AEL) listed in Table 22-1 of Section 22a-174-22 of the Regulations. In accordance with Section 22a-174-22(j) of the Regulations, UCONN complied with Section 22a-174-22 of the Regulations through the use of emissions trading. Emission testing conducted on the date specified in the table referencing TAO 8115BM2 resulted in a NOx emission rate that was less than the corresponding allowable emission limit (AEL) listed in Table 22-1 of Section 22a-174-22 of the Regulations. However, UCONN operated boiler 7 during emission testing at less than 90% of maximum operating capacity. Pursuant to RCSA §22a-174-22(k) of the Regulations, and in accordance with TAO 8115B, UCONN accepted an operating restriction on Boiler 7. TAO 8115AM1 was issued to remove natural gas from Table 1 for boiler 2. TAO 8115BM2 was issued to update the emission test rates for boiler 2 and extended the Departments ability to enforce the operating restriction on boiler 7 until May 1, 2009 pursuant to RCSA §22a-174-22(k).

II. SPECIAL REQUIREMENTS

1. Calculation of credit use shall be as described in TAO 8115B and all subsequent modifications.
2. TAO 8115BM2 all credit usage calculations and maintains the operating restriction on Boiler 7. TAO 8115BM2 includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.

**Algonquin Gas Transmission
TAO 8123AM1**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Algonquin Gas Transmission, LLC
Shunpike Road, Cromwell, Connecticut

Designated Representative:

Thomas V. Wooden, Jr., Vice President- Northeast Operations
890 Winter Street, Suite 300
Waltham, MA 02451

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2007- May 1, 2009

Method: DERC Creation

Table 1

Emission Unit	Fuel	Heat Input MMBtu/hr	FLER Lbs/MMBtu	Baseline Emission rate Lbs/MMBtu	Allowable Rate Lbs/MMBtu	Date of Emission Test	Next Emission Test Due
C-7	Natural gas	46	.145	.410	.170	1/26/05	1/26/10

Table 2

Year of Generation	Ozone season DERC serial numbers	Ozone	Non-Ozone season DERC serial numbers	Non-Ozone	Expiration Date
1997-1999	Not assigned	7	Not assigned	52	12/31/04
2000	N/A	0	CT00/8123(DC)Noxnoz1-19	19	12/31/05
2001	CT01/8123(DC)Noxoz1-2	2	CT01/8123(DC)Noxnoz1-14	14	12/31/06
2002	CT02/8123(DC)Noxoz1-6	6	CT02/8123(DC)Noxnoz1-16	16	12/31/07

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

Algonquin Gas Transmission (Algonquin) owns and operates the Natural Gas Turbine Engine identified in Table 1. The turbine is subject to RCSA §22a-174-22. Emission testing conducted on the date specified in Table 1 resulted in a NO_x emission rate that is less than the corresponding allowable rate. In accordance with RCSA §22a-174-22(j) and the provisions of TAO 8123A, Algonquin may generate DERCs from the difference between the allowable (permitted) rate and the full load emission rate (FLER). The Commissioner, in accordance with the provisions of this TAO, pursuant to Section 22a-174-22(d)(3) of the Regulations, will allow Algonquin and approved sources within Connecticut to use the NO_x DERCs referenced in Table 2 of this TAO for purposes of compliance under Section 22a-174-22(j) of the Regulations to achieve a portion of the nitrogen oxide emission reductions required by Section 22a-174-22 of the Regulations. DERC creation serial numbers assigned by the Department to these approved reductions are provided in Table 2. Continuous emission reduction credits (CERCs) will continue to be created from the difference between the baseline (pre-controlled) emission rate and the allowable emission rate. TAO 8123AM1 extends Algonquin's ability to create NO_x DERCs and CERCs until May 1, 2009 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

1. Calculation of credit use shall be as described in TAO 8123A and all subsequent modifications.
2. Includes language that there is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this TAO.

**PART 2B. SUMMARY OF TRADING AGREEMENTS AND ORDERS EXTENDED TO
MAY 1, 2010**

Facility	Trading Order Modification
PSEG Power Connecticut LLC	8241M3
Bridgeport Harbor Station	8244M3
1 Atlantic Street	8253M3
Bridgeport, CT 06604	
PSEG Power Connecticut LLC	8240M3
1 Waterfront Street	8243M2
New Haven, CT 06512	
Norwalk Power, LLC	8218A M3
Manresa Island Ave.	8184A M3
South Norwalk, CT 06854	
Montville Power, LLC	8216AM3
74 Lathrop Road	8217AM3
Uncasville, CT 06382	8183AM3
Middletown Power, LLC	8213AM3
P.O. Box 1001	8214AM3
Middletown, CT 06457	8215AM3
	8182AM3
Devon Power, LLC	8219AM3
700 Naugatuck Avenue	8181AM3
Devon, CT 06460	8251M3
CT Jet Power	8180AM3
Manresa Island Avenue	
South Norwalk. CT 06854	
(turbine locations in Cos Cob, Torrington, and Branford)	
City of Norwich	8119AM3
16 South Golden Street	
Norwich, CT 06360	

Facility**Trading Order Modification**

Capitol District Energy Center Cogeneration Associates 490 Capitol Avenue Hartford, CT 06106	8249M3
First Light Power Resources One Corporate Center 20 church Street, 16 th Floor Hartford, CT 06103 (Tunnel Road Preston, CT 06365)	8279M
Pfizer Inc. 445 Eastern Point Road Groton, CT 06340	8136AM2 8093CM3
Pratt & Whitney 400 Main Street East Hartford, CT 06108	8134AM2
Algonquin Gas Transmission, LLC 890 Winter Street, Suite 300 Waltham, MA 02451	8123AM2
Sikorsky 6900 Main Street PO Box 9729 Stratford, CT 06615-9129	8120AM2
Hamilton Sundstrand 1 Hamilton Road Windsor Locks, CT 06096	8109M3
University of Connecticut Office of Environmental Policy 31 LeDoyt Road Unit 3055 Storrs, CT 06269-3055	8115BM3

Facility**Trading Order Modification**

Cytec Industries Inc. 8114AM2
POB 425
Wallingford, CT 06492

CRRA 8116BM2
100 Constitution Plaza – 6th Floor
Hartford, CT 06103

Algonquin Windsor Locks 8261M2
P.O. Box 289
Windsor Locks, CT 06096

Cascades 8269M1
130 Inland Road
Versailles, CT 06383

Combustion Engineering 8154AM2
2000 Day Hill Road
Windsor, CT 06095

Dominion 8221AM2
Millstone Power Station 8222AM2
Rope Ferry Road
Waterford, CT 06385

I. SPECIAL REQUIREMENTS

1. All references to May 1, 2009 with respect to the authorization to use emissions reduction credit trading and/or emission reduction credits and NO_x allowances to comply with the emissions limits of Subsections 22a-174-22(d)(1) through 22a-174-22(d)(2)(A) of the Regulations of Connecticut State Agencies (“Regulations”) are hereby replaced with May 1, 2010.
2. Any references to October 1st with respect to the date by which the Respondent shall estimate and acquire (“DERCs”) and/or allowances for the non-ozone season shall now include October 1, 2009.
3. Any references to May 31, 2007 and May 31, 2008 with respect to calculation and retirement of non-ozone season DERCS shall now include May 31, 2009 and May 31, 2010.
4. All references to September 1, 2008 with respect to the submission of Future Compliance Reports are hereby replaced with September 1, 2009.
5. No later than May 1, 2010, with respect to the emission units identified in TAO and/or its subsequent modifications, the Respondent shall comply with the requirements of Sections 22a-174-22(d)(1) and 22a-174-22(d)(2)(A) of the Regulations.
6. All other terms and conditions of TAO, as modified, shall remain in effect.

**PART 2C. SUMMARY OF TRADING AGREEMENTS AND ORDERS EXTENDED TO
MAY 31, 2014 FOR EGUS OR JANUARY 1, 2013 FOR ICI'S**

**Pfizer, Inc.
TAO 8296**

I. DESCRIPTION OF DERC CREATION AND USE

Source and Identifier:

Pfizer, Inc.
445 Eastern Point Road
MS4157
Groton, CT 06340

Designated Representative:

Mr. Scott Smith
EH&S/Env.
Telephone No. (860) 686-0247

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- January 1, 2013
Method: DERC Creation and Use
Low-NOx Burner and Flue Gas Recirculation

Table 1			
Non CAIR NOx Ozone Season Units			
Allowable Limits (lbs/MMBtu, unless otherwise noted)			
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu/hr)	Allowable Emission Limit (AEL)
Boiler No. 1 R-070-0007	No. 6 Nat.Gas	153	0.25 0.20
Boiler No. 2 R-070-0008	No. 6 Nat.Gas	153	0.25 0.20

Table 1			
Non CAIR NOx Ozone Season Units			
Allowable Limits (lbs/MMBtu, unless otherwise noted)			
Boiler No. 3 R-070-0009	No. 6 Nat.Gas	153	0.25 0.20
Boiler No. 4 R-070-0010	No. 6 Nat.Gas	220	0.25 0.20

Table 2			
CAIR NOx Ozone Season Units –			
Allowable Limits (lbs/MMBtu, unless otherwise noted)			
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu/hr)	Allowable Emission Limit (AEL)
Boiler No. 5 R-070-0012	No. 6 Nat.Gas	399.50 399.50	0.25 0.20

Discounts:

Design Margin-Less 5% from AEL upon DERC use
 Environmental-Less 10% upon DERC Creation

Description of Compliance:

Pfizer Inc conducts research and development operations at its Groton facility. The facility is a major source for NOx and is located in an ozone non-attainment area. Pfizer’s significant air emission units are on-site utilities (i.e., steam and electrical power generation) and emergency steam and power generation equipment.

Five Combustion Engineering boilers, identified in Tables 1 and 2, produce superheated, high pressure steam that is used to generate electricity and heat buildings throughout the facility. All five boilers can fire natural gas or No. 6 oil and are equipped with low-NOx burners. Boilers 4 and 5 are also equipped with flue gas recirculation systems. NOx emissions from the boilers are measured with NOx continuous emissions monitors (CEMs) that meet 40 CFR Parts 60 and 75. Boilers 1, 2, 3 and 4 are subject to RCSA §22a-174-22 and were formerly included in TAO No. 8136A. Boiler 5 (and former Boiler 8) were subject to RCSA §22a-174-22 and §22a-174-22c (CAIR) and were included in TAO No. 8093C. Pfizer has repowered the facility by removing Boiler 8 and installing a Solar Mars 100S Turbine 10.5 MW Combined Cycle Cogeneration System. The Cogeneration system meets the applicable limits specified in Section 22a-174-22. Both orders were superseded by TAO 8296 on April 27, 2010 and allows Pfizer to continue to use emission trading as a means of compliance until January 1, 2013.

II. Special Requirements

- a. Calculation of creation and use of credits shall be as described in TAO.
- b. The TAO restrict allowance use to CAIR NO_x ozone season allowances that were originally allocated to a source located in Connecticut or the functional equivalent thereof, in anticipation of a revision to the CAIR NO_x Ozone season program. Furthermore, the allowance user must demonstrate that the actual emissions from the source of the allowances are less than the total number of allowances allocated to the source minus the allowances that were sold by the source.
- c. The TAO includes an ozone season fuel use restriction which allows the source to operate on only the lowest NO_x emitting fuel that the unit is capable of burning, unless such fuel is generally unavailable or the supply of such fuel has been interrupted in accordance with an interruptible service agreement.
- d. Source shall perform maintenance and tune-up on the subject emissions units within one year of the issuance of the TAO.
- e. The emission unit described in Table 1 must meet a seven month average limit of 0.15 lbs MMBtu/hr during the Non-Ozone Season (i.e. currently, the period of consecutive months between October 1 of each calendar year and April 30 of the following calendar year).
- f. All DERCs used during the Ozone Season for the emissions units described in Table 1, shall have been generated during an Ozone Season by the operation of an emission unit that is not a CAIR NO_x Ozone Season unit, as defined in Section 22a-174-22c of the Regulations. All DERCs used during the Ozone Season for the emissions units described in Table 2, shall have been generated during an Ozone Season.

**Cascades Boxboard Group Connecticut LLC
TAO 8297**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Cascades Boxboard Group Connecticut LLC

Designated Representative:

Mr. Ghislain Levesque
General Manager
Telephone No. (860) 822-3600

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- January 1, 2013
Method: DERC use
Low-NOx Burners

Table 1 CAIR NO_x Ozone Season Unit			
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu)	Allowable Emission Limit (AEL)-Lbs/MMBtu
PFI Boiler	No. 6 Oil	275	.25
P-170-0003	Nat. Gas	288	.20

Discounts: Design Margin-Less 5% from AEL upon DERC use

Description of Compliance:

Cascades Boxboard Group Connecticut LLC owns and operates a recycle paperboard manufacturing facility on Inland Road, in the town of Sprague. The facility consists of a paperboard mill, power plant, and building heaters. At the power plant, a Babcock and Wilcox PFI boiler provides process steam and electric power for mill operations. Fuels and allowable emission rates are identified in table 1 below. NOx emissions from the PFI boiler are measured with a continuous emissions monitor (CEM) that meets 40 CFR Part 75. The PFI boiler is subject to RCSA §22a-174-22, and RCSA §22a-174-22c (CAIR) for the control of NOx emissions. On April 30, 2010 TAO 8297 superseded TAO 8269 and allows Cascades to use NOx DERCs or NOx Allowances to offset excess NOx emissions pursuant to RCSA §22a-174-22(j) until January 1, 2013.

II. Special Requirements

- a. Calculation of creation and use of credits shall be as described in TAO.
- b. The TAO restrict allowance use to CAIR NOx ozone season allowances that were originally allocated to a source located in Connecticut or the functional equivalent thereof, in anticipation of a revision to the CAIR NOx Ozone season program. Furthermore, the allowance user must demonstrate that the actual emissions from the source of the allowances are less than the total number of allowances allocated to the source minus the allowances that were sold by the source.
- c. The TAO includes an ozone season fuel use restriction which allows the source to operate on only the lowest NOx emitting fuel that the unit is capable of burning, unless such fuel is generally unavailable or the supply of such fuel has been interrupted in accordance with an interruptible service agreement.
- d. Source shall perform maintenance and tune-up on the subject emissions units within one year of the issuance of the TAO.
- e. The emission unit described in Table 1 must meet a seven month average limit of 0.15 lbs MMBtu/hr during the Non-Ozone Season (i.e. currently, the period of consecutive months between October 1 of each calendar year and April 30 of the following calendar year).
- f. All DERCs used during the Ozone Season for the emissions units described in Table 1, shall have been generated during an Ozone Season.

**Hamilton Sundstrand Corporation
TAO 8291**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Hamilton Sundstrand Corporation
1 Hamilton Road
Windsor Locks, CT 06096

Designated Representative:

Maura Heffernan
Manager, Environmental Compliance
Telephone No. 860-654-2043

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- January 1, 2013
Method: DERC Use
Low-NOx Burners

<p align="center">Table 1 NOx Emission Rates, FLERs and Allowable Limits (lbs/MMBtu)</p>							
<p align="center">Boilers in Building #1</p>							
UNIT- reg. or permit no.	Fuel	Heat Input (mmbtu)	Stack Test Rate	FLER (lb/mmbtu)	Allowable Emission Limit (AEL)	Date of Last Stack Test	Date of Next Stack Test
Boiler No. 1 (Riley) R#213-0052	No. 6 oil	61	0.35	0.425	0.25	11/5/2008	11/6/2013
	Nat. Gas		0.14	N/A	0.20	11/3/2008	11/4/2013
Boiler No. 2 (Riley) R#213-0053	No. 6 oil	61	0.36	0.434	0.25	11/4/2008	11/5/2013
	Nat. Gas		0.14	N/A	0.20	11/3/2008	11/4/2013
Boiler No. 3 (Riley) R#213-0054	No. 6 oil	61	0.37	0.445	0.25	11/4/2008	11/5/2013
	Nat. Gas		0.11	N/A	0.20	11/3/2008	11/4/2013

Discounts: Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

Hamilton Sundstrand Corporation designs and manufactures aircraft and spacecraft control systems and components for the aerospace and marine industries at their Windsor Locks facility. At the facility, Hamilton operates three Riley boilers identified in Table 1 above. The boilers are subject to RCSA §22a-174-22 for the control of NOx emissions. Emission testing conducted on the dates specified in table 1 resulted in NOx emission rates that exceed the corresponding Allowable emission limits (AELs) listed in Table 22-1 of Section 22a-174-22 of the Regulations. On April 26, 2010 TAO 8291 superseded 8109 as a means of allowing Hamilton Sundstrand Corporation to use NOx DERCs or NOx Allowances to offset excess NOx emissions from the boilers pursuant to RCSA §22a-174-22(j) until January 1, 2013.

II. Special Requirements

- a. Calculation of creation and use of credits shall be as described in TAO.
- b. The TAO restrict allowance use to CAIR NOx ozone season allowances that were originally allocated to a source located in Connecticut or the functional equivalent thereof, in anticipation of a revision to the CAIR NOx Ozone season program. Furthermore, the allowance user must demonstrate that the actual emissions from the source of the allowances are less than the total number of allowances allocated to the source minus the allowances that were sold by the source.
- c. The TAO includes an ozone season fuel use restriction which allows the source to operate on only the lowest NOx emitting fuel that the unit is capable of burning, unless such fuel is generally unavailable or the supply of such fuel has been interrupted in accordance with an interruptible service agreement.
- d. Source shall perform maintenance and tune-up on the subject emissions units within one year of the issuance of the TAO.
- e. All DERCs used during the Ozone Season for the emissions units described in Table 1, shall have been generated during an Ozone Season by the operation of an emission unit that is not a CAIR NOx Ozone Season unit, as defined in Section 22a-174-22c of the Regulations.

**Hamilton Sundstrand Corporation
TAO 8291 Modification 1**

II. DESCRIPTION OF DERC USE

Source and Identifier:

Hamilton Sundstrand Corporation
1 Hamilton Road
Windsor Locks, CT 06096

Designated Representative:

Maura Heffernan
Manager, Environmental Compliance
Telephone No. 860-654-2043

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period:	October 22, 2010- January 1, 2013
Method:	DERC Use Low-NOx Burners

Description of Compliance:

TAO 8291 Modification 1 was issued to correct minor errors. Paragraph B. 12 of the TAO requires, in part, that the respondent maintain daily records of fuel use, monthly records indicating the amount of DERCs and/or allowances used, and certifications demonstrating that the DERCs and/or allowances are valid for use. Paragraph B.14 requires that such records be submitted to the Department by March 1 of the following year. However, paragraph B.14 incorrectly references paragraph B.9 instead of paragraph B.12.

**United Technologies Corporation (Pratt & Whitney)
TAO 8289**

I. DESCRIPTION OF DERC USE

Source and Identifier:

United Technologies Corporation (Pratt & Whitney)
400 Main Street
East Hartford, CT 06108

Designated Representative:

David Russell
Director, Facilities and Services
Telephone No. (860) 565-7929

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- January 1, 2013
Method: DERC Use

Table 1								
NOx Emission Test Rates, FLERs and AELs in (lbs/MMBtu, unless specified)								
Facility/ Equipment	Fuel	Heat Input Limitation MMBtu/hr	Maximum Allowable Steam Production Limitation Lbs steam/hr	Test Rate	Full Load Emission rate (FLER)	Allowable Emission Limit (AEL)	Date of Last Stack Test	Next Stack Test Due
Boiler no. 6 R# 053-0039	Nat. gas	143	120,000	0.327	0.36	0.20	1/27/2006	1/27/2011
	#6 oil	144	125,000	0.434	0.48	0.25		
Boiler no. 8 R# 053-0041	Nat. gas	171	125,000	0.248	0.27	0.20	1/26/2006	1/26/2011
	#6 oil	182	130,000	0.320	0.35	0.25		
Boiler no. 9 R #053-0042	Nat. gas	165	120,000	0.241	0.27	0.20	1/25/2006	1/25/2011
	#6 oil	171	125,000	0.309	0.35	0.25		

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

United Technologies Corporation/Pratt & Whitney (PW) conducts research and development, manufacturing, and repair of experimental and production aircraft engines and ground based gas turbine engines at their East Hartford facility. At the facility, PW operates three boilers identified in Table 1 above. The boilers are subject to RCSA §22a-174-22 for the control of NO_x emissions. Emission testing conducted on the dates specified in table 1 resulted in NO_x emission rates that exceed the corresponding Allowable emission limits (AELs) listed in Table 22-1 of Section 22a-174-22 of the Regulations. On April 29, 2010 TAO 8289 superseded TAO 8134A and allows PW to use NO_x DERCs or NO_x Allowances to offset excess NO_x emissions pursuant to RCSA §22a-174-22(j) until January 31, 2013. TAO 8134A (Modification 1) had included two boilers and a GG-8 gas turbine test stand located at their Middletown facility. One of the boilers was removed and the second boiler was converted from #6 oil to #2 oil. Following a request by PW that the Department reconsider the applicability of the GG-8 test stands to Section 22a-174-22(d), the Department determined that the QC testing of unassembled GG-8 turbines did not fit the regulatory definition of a turbine engine. This determination is supported by the fact that in August 2002 the EPA determined that Subpart GG did not apply to the quality control (QC) testing of the GG-8 gas turbines. The Department has determined that the QC testing of gas generator portion of a turbine is a process sources subject to the limit specified in Section 22a-174-22(e)(2)(G). The GG-8 turbine test stands meet the allowable and therefore, have not been included in TAO 8289.

II. Special Requirements

- a. Calculation of creation and use of credits shall be as described in TAO.
- b. The TAO restrict allowance use to CAIR NO_x ozone season allowances that were originally allocated to a source located in Connecticut or the functional equivalent thereof, in anticipation of a revision to the CAIR NO_x Ozone season program. Furthermore, the allowance user must demonstrate that the actual emissions from the source of the allowances are less than the total number of allowances allocated to the source minus the allowances that were sold by the source.
- c. The TAO includes an ozone season fuel use restriction which allows the source to operate

on only the lowest NO_x emitting fuel that the unit is capable of burning, unless such fuel is generally unavailable or the supply of such fuel has been interrupted in accordance with an interruptible service agreement.

- d. Source shall perform maintenance and tune-up on the subject emissions units within one year of the issuance of the TAO.
- e. All DERCs used during the Ozone Season for the emissions units described in Table 1, shall have been generated during an Ozone Season by the operation of an emission unit that is not a CAIR NO_x Ozone Season unit, as defined in Section 22a-174-22c of the Regulations.

**United Technologies Corporation (Pratt & Whitney)
TAO 8289 Modification 1**

I. DESCRIPTION OF DERC USE

Source and Identifier:

United Technologies Corporation (Pratt & Whitney)
400 Main Street
East Hartford, CT 06108

Designated Representative:

David Russell
Director, Facilities and Services
Telephone No. (860) 565-7929

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: January 6, 2011- January 1, 2013
Method: DERC Use

Facility/ Equipment	Fuel	Fuel Flow (cf/hr) (gal/hr)	Test Rate	Full Load Emission rate (FLER)	Allowable Emission Limit (AEL)	Date of Last Stack Test	Next Stack Test Due
Boiler no. 6 R# 053-0039	Nat. gas #6 oil	168,750 1,101	0.327 0.434	.36 .48	0.20 0.25	1/27/2006	1/27/2011
Boiler no. 8 R# 053-0041	Nat. gas #6 oil	187,500 1,274	0.248 0.320	.27 .35	0.20 0.25	1/26/2006	1/26/2011
Boiler no. 9 R #053-0042	Nat. gas #6 oil	187,500 1,274	0.241 0.309	.27 .35	0.20 0.25	1/25/2006	1/25/2011

Description of Compliance:

The original version of TAO 8289, limits maximum allowable steam production and by means of an empirical correlation, the associated maximum allowable heat input to these boilers to amounts less than the design capacities specified in the stationary source registrations for these units. This was done in preceding TAOs with P&W because P&W lacked the capability of

monitoring and therefore limiting hourly fuel flow to the boilers. In accordance with collateral conditions in a recently issued modified permit to construct and operate a combined heat and power (CHP) source, P&W installed new fuel meters capable of monitoring hourly fuel flow from the boilers. Consequently, P&W has asked to have TAO 8289 modified to remove the steam production limits and replace them with the hourly fuel flow limits specified on the stationary source registrations for the units.

**Sikorsky Aircraft Corporation
TAO 8293**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Sikorsky Aircraft Corporation
6900 Main Street
Stratford, CT 06614

Designated Representative:

John D. Conway, Compliance Manager
Telephone No. (203) 386-4000

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period:	May 1, 2010- January 1, 2013
Method:	DERC Use Low-NOx Burner and Flue Gas Recirculation

Table 1							
Source– NOx Emission Rates, FLERs and Allowable Limits (lbs/MMBtu)							
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu)	Stack Test Rate	FLER (lb/mmmbtu)	AEL (lb/mmmbtu)	Date of Last Stack Test	Date of Next Stack Test
Boiler No. 1 R178-0019	No. 6 oil	48.0	0.379	0.39	0.25	5/16/2005	5/17/2010
Boiler No. 2 R178-0018	No. 6 oil	48.0	0.289	0.34	0.25	5/16/2005	5/17/2010
Boiler No. 3 R178-0017	No. 6 oil	48.0	0.322	0.35	0.25	5/16/2005	5/17/2010
Boiler No. 4 R178-0016	No. 6 oil	48.0	0.319	0.33	0.25	5/16/2005	5/17/2010
Boiler No. 5 P178-0039	No. 6 oil	49.5	0.325	0.35	0.25	9/2/2005	9/3/2010

Discounts: Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

Sikorsky Aircraft manufactures, overhauls, and repairs military and commercial helicopters at 6900 Main Street, Stratford, CT. Steam generation is provided by five boilers identified in Table 1 above. The boilers are subject to RCSA §22a-174-22 for the control of NOx emissions. Emission testing conducted on the dates specified in table 1 resulted in NOx emission rates that exceed the corresponding Allowable emission limits (AELs) listed in Table 22-1 of Section 22a-174-22 of the Regulations. On April 15, 2010 TAO 8293 superseded TAO 8120A as a means of allowing Sikorsky Aircraft to use NOx DERCs or NOx Allowances to offset excess NOx emissions from the boilers, pursuant to RCSA §22a-174-22(j), until January 31, 2013. Sikorsky Aircraft intends on replacing #6 fuel oil with #2 fuel oil in the future and is not expected to require emission trading satisfy applicable requirements.

II. SPECIAL REQUIREMENTS

- a. Calculation of creation and use of credits shall be as described in TAO.
- b. The TAO restrict allowance use to CAIR NOx ozone season allowances that were originally allocated to a source located in Connecticut or the functional equivalent

thereof, in anticipation of a revision to the CAIR NO_x Ozone season program. Furthermore, the allowance user must demonstrate that the actual emissions from the source of the allowances are less than the total number of allowances allocated to the source minus the allowances that were sold by the source.

- c. The TAO includes an ozone season fuel use restriction which allows the source to operate on only the lowest NO_x emitting fuel that the unit is capable of burning, unless such fuel is generally unavailable or the supply of such fuel has been interrupted in accordance with an interruptible service agreement.
- d. Source shall perform maintenance and tune-up on the subject emissions units within one year of the issuance of the TAO.
- e. All DERCs used during the Ozone Season for the emissions units described in Table 1, shall have been generated during an Ozone Season by the operation of an emission unit that is not a CAIR NO_x Ozone Season unit, as defined in Section 22a-174-22c of the Regulations.

**Sikorsky Aircraft Corporation
TAO 8293 Modification 1**

II. DESCRIPTION OF DERC USE

Source and Identifier:

Sikorsky Aircraft Corporation
6900 Main Street
Stratford, CT 06614

Designated Representative:

John D. Conway, Compliance Manager
Telephone No. (203) 386-4000

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: September 17, 2010- January 1, 2013
Method: DERC Use
Low-NOx Burner and Flue Gas Recirculation

Description of Compliance:

TAO 8293 Modification 1 was issued to correct minor errors. Paragraph B. 12 of the TAO requires, in part, that the respondent maintain daily records of fuel use, monthly records indicating the amount of DERCs and/or allowances used, and certifications demonstrating that the DERCs and/or allowances are valid for use. Paragraph B.14 requires that such records be submitted to the Department by March 1 of the following year. However, paragraph B.14 incorrectly references paragraph B.9 instead of paragraph B.12

**Dominion Nuclear Connecticut, Inc
TAO 8288**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385

Designated Representative:

Steven Horn, Environmental Specialist
Telephone No. (401)-457-9191

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- January 1, 2013
Method: DERC use

Table 1 Dominion Boilers – NOx Emission Rates, FLERs and Allowable Limits (lbs/MMBtu)							
UNIT- reg. or permit no.	Fuel	Heat Input	Stack Test Rate	FLER	AEL	Date of Last Stack Test	Date of Next Stack Test
Boiler No.1 B&W FM10-79 Permit #199-0007	No. 4 oil	69.6	0.26	0.29	0.25	8/13/2009	8/14/2014
Boiler No. 2 B&W FM10-79 Permit #199-0008	No. 4 oil	69.6	0.26	0.35	0.25	8/14/2009	8/15/2014

Table 2							
Dominion Engines – NOx Emission Rates, FLERs and Allowable Limits (gm/bhp-hr)							
UNIT reg. or permit no.	Fuel	Capacity (bhp)	Stack Test Rate	FLER	AEL	Date of Last Stack Test	Date of Next Stack Test
Electromotive Emer. Engine Permit #199-0010	diesel	3400	11.97	14.3	8	9/17/2008	9/18/2013
Cummins VT1710 GS/GC Engine	diesel	620	8.1	11.6	8	7/14/2008	7/15/2013

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

Dominion Nuclear Connecticut, Inc. (DNC) operates a nuclear fueled electric generating facility at Millstone Point in Waterford, CT. At the facility DNC operates the fossil fuel fired combustion units identified in Tables 1 and 2 to support the operation of two nuclear reactors (Unit 2 and Unit 3). The combustion units are subject to RCSA §22a-174-22 for the control of NOx emissions. Emission testing conducted on the dates specified in tables 1 and 2 resulted in NOx emission rates that exceed the corresponding Allowable emission limits (AELs) listed in Table 22-1 of Section 22a-174-22 of the Regulations. On April 22, 2010 TAO 8288 replaced TAO’s 8221 and 8222 to allow for the continued use of NOx DERCs or NOx Allowances to offset excess NOx emissions from the combustion units until January 1, 2013 pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

- a. Calculation of creation and use of credits shall be as described in TAO.
- b. The TAO restrict allowance use to CAIR NOx ozone season allowances that were originally allocated to a source located in Connecticut or the functional equivalent thereof, in anticipation of a revision to the CAIR NOx Ozone season program. Furthermore, the allowance user must demonstrate that the actual emissions from the source of the allowances are less than the total number of allowances allocated to the source minus the allowances that were sold by the source.
- c. The TAO includes an ozone season fuel use restriction which allows the source to operate on only the lowest NOx emitting fuel that the unit is capable of burning, unless such fuel is generally unavailable or the supply of such fuel has been interrupted in accordance with

an interruptible service agreement.

- d. Source shall perform maintenance and tune-up on the subject emissions units within one year of the issuance of the TAO.
- e. All DERCs used during the Ozone Season for the emissions units described in Table 1, shall have been generated during an Ozone Season by the operation of an emission unit that is not a CAIR NO_x Ozone Season unit, as defined in Section 22a-174-22c of the Regulations.

**Dominion Nuclear Connecticut, Inc
TAO 8288 Modification 1**

III. DESCRIPTION OF DERC USE

Source and Identifier:

Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385

Designated Representative:

Steven Horn, Environmental Specialist
Telephone No. (401)-457-9191

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: October 12, 2010- January 1, 2013
Method: DERC use

Description of Compliance:

TAO 8288 Modification 1 was issued to correct minor errors. Paragraph B. 12 of the TAO requires, in part, that Dominion maintain daily records of fuel use, monthly records indicating the amount of DERCs and/or allowances used, and certifications demonstrating that the DERCs and/or allowances are valid for use. Paragraph B.14 requires that such records be submitted to the Department by March 1 of the following year. However, paragraph B.14 incorrectly references paragraph B.9 instead of paragraph B.12.

In addition, Table 2 of the TAO incorrectly identifies the permit number for the electromotive emergency engine as 199-0010 rather than 199-0017.

**Algonquin Power Windsor Locks, LLC
TAO 8299**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Algonquin Power Windsor Locks, LLC
P.O. Box 289
Windsor Locks, CT 06096

Designated Representative:

James A. White, Plant Manager
Telephone No. (860) 627-6616

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- January 1, 2013
Method: DERC Use for Non-ozone season only
steam Injection, Ammonia Injection

Table 1 CAIR NOx Ozone Season Unit			
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu)	Allowable Emission Limit (AEL)-Lbs/MMBtu
GE PB6541(B) Cogeneration Turbine P-213-0029	Nat. Gas #2 Fuel	555.2 529.5	.15 During the Non-Ozone Season

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

Algonquin Power Windsor Locks, LLC (Algonquin), operates a General Electric model MS6001(B) combined cycle gas turbine generator equipped with a John Zink duct burner. The turbine is subject to RCSA §22a-174-22 and RCSA §22a-174-22c (CAIR). NO_x emissions from the turbine are measured with a NO_x continuous emissions monitor (CEM) that meets 40 CFR Part 75. The turbine meets RCSA §22a-174-22 limits if firing natural gas in compliance with the permit limits. However, with a permit limit of .20 lbs/MMBTu, the turbine may at times exceed the seven month average non-ozone season limit of 0.15 lbs/MMBTu specified in RCSA §22a-174-22(e) when firing #2 oil. On April 20, 2010 TAO 8299 superseded TAO 8261, and allows Algonquin to use NO_x DERCS or Allowances to offset excess emissions during the non-ozone season until January 1, 2013.

II. SPECIAL REQUIREMENTS

- a. Calculation of the use of credits shall be as described in TAO.
- b. The TAO restrict allowance use to CAIR NO_x ozone season allowances that were originally allocated to a source located in Connecticut or the functional equivalent thereof, in anticipation of a revision to the CAIR NO_x Ozone season program. Furthermore, the allowance user must demonstrate that the actual emissions from the source of the allowances are less than the total number of allowances allocated to the source minus the allowances that were sold by the source.
- c. The TAO includes an ozone season fuel use restriction which allows the source to operate on only the lowest NO_x emitting fuel that the unit is capable of burning, unless such fuel is generally unavailable or the supply of such fuel has been interrupted in accordance with an interruptible service agreement.
- d. Source shall perform maintenance and tune-up on the subject emissions units within one year of the issuance of the TAO.
- e. All DERCS used during the Ozone Season for the emissions units described in Table 1, shall have been generated during an Ozone Season by the operation of an emission unit that is not a CAIR NO_x Ozone Season unit, as defined in Section 22a-174-22c of the Regulations.
- f. The emission unit described in Table 1 must meet a seven month average limit of 0.15 lbs MMBtu/hr during the Non-Ozone Season (i.e. currently, the period of consecutive months between October 1 of each calendar year and April 30 of the following calendar year).

**Capitol District Energy Center Cogeneration and Associates (CDECCA)
TAO 8298**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Capitol District Energy Center Cogeneration and Associates (CDECCA)
490 Capital Avenue
Hartford, CT 06340

Designated Representative:

Mr. Michael Baier
Plant Manager
Telephone No. (860) 727-0283

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- January 1, 2013
Method: DERC Use for Non-ozone season only
Steam Injection and Low-NOx Burner

Table 1 CAIR NO_x Ozone Season Unit			
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu/hr)	Allowable Emission Limit (AEL)-Lbs/MMBtu
GE PG6531 Cogeneration Turbine P-75-0064	Nat. Gas #2 Fuel	738.8 708.2	.15 During the Non-Ozone Season

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

Capitol District Energy Center Cogeneration Associates (CDECCA), operates a General Electric model PG 6531 combined cycle gas turbine generator equipped with a John Zink duct burner. The turbine is subject to RCOSA §22a-174-22 and RCOSA §22a-174-22c (CAIR). NO_x emissions from the turbine are measured with a NO_x continuous emissions monitor (CEM) that meets 40 CFR Part 75. The turbine meets all applicable limits while firing natural gas. However, the turbine may at times exceed the seven month average non-ozone season limit of 0.15 lbs/MMBtu when firing #2 oil. On April 21, 2010 TAO 8298 superseded TAO 8249 and allows CDECCA to use NO_x DERCS or Allowances to offset excess emissions during the non-ozone season until January 1, 2013.

II. SPECIAL REQUIREMENTS

- a. Calculation of the use of credits shall be as described in TAO.
- b. The TAO restrict allowance use to CAIR NO_x ozone season allowances that were originally allocated to a source located in Connecticut or the functional equivalent thereof, in anticipation of a revision to the CAIR NO_x Ozone season program. Furthermore, the allowance user must demonstrate that the actual emissions from the source of the allowances are less than the total number of allowances allocated to the source minus the allowances that were sold by the source.
- c. The TAO includes an ozone season fuel use restriction which allows the source to operate on only the lowest NO_x emitting fuel that the unit is capable of burning, unless such fuel is generally unavailable or the supply of such fuel has been interrupted in accordance with an interruptible service agreement.
- d. Source shall perform maintenance and tune-up on the subject emissions units within one year of the issuance of the TAO.
- e. All DERCS used during the Ozone Season for the emissions units described in Table 1, shall have been generated during an Ozone Season by the operation of an emission unit that is not a CAIR NO_x Ozone Season unit, as defined in Section 22a-174-22c of the Regulations.
- f. The emission unit described in Table 1 must meet a seven month average limit of 0.15 lbs MMBtu/hr during the Non-Ozone Season (i.e. currently, the period of consecutive months between October 1 of each calendar year and April 30 of the following calendar year).

**NRG Energy, Inc., et al.
TAO 8306**

I. DESCRIPTION OF DERC USE

Source and Identifier:

NRG Energy, Inc.
P.O. Box 1001
1866 River Road
Middletown, CT 06457

Designated Representative:

Cynthia Karlic
Regional Environmental Director
Telephone No. (860) 343-6962

CT Nonattainment Area Classification: Serious and Severe

Summary of Compliance:

Time Period: May 1, 2010- May 31, 2014
Method: DERC Creation and Use
Excess air control , NOXOUT SNCR on Norwalk Units 1&2

Table 1 CAIR NO_x Ozone Season Units – Allowable Limits (lbs/MMBtu, unless otherwise noted)			
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu)	Allowable Emission Limit (AEL)
Middletown Unit 2 R104-0098	No.6 No.2 Nat Gas	1,295	0.25 0.20 0.15 non-ozone season average , regardless of fuels burned
Middletown Unit 3 R104-0100	No.6 No.2 Nat Gas	2,370	0.43 0.43 0.15 non-ozone season average , regardless of fuels burned
Middletown Unit 4 P104-0003	No.6 No.2	4,684	0.25 0.15 non-ozone season average , regardless of fuels burned

Table 1			
CAIR NO_x Ozone Season Units –			
Allowable Limits (lbs/MMBtu, unless otherwise noted)			
Montville Unit 5 R107-0017	No.6 Nat Gas	995	0.25 0.20 0.15 non-ozone season average , regardless of fuels burned
Montville Unit 6 R107-0020	No.6 No.2	4,658	0.25 0.15 non-ozone season average , regardless of fuels burned
Norwalk Unit 1& 2 R137-0028 R137-0030	No.6 No.2	1,776 each	0.25 0.20 0.15 non-ozone season average , regardless of fuels burned

Discounts:

- Design Margin- Less 5% from AEL upon DERC use
- Environmental- Less 10% upon DERC Creation

Description of Compliance:

NRG Energy Inc and its subsidiaries, Middletown Power LLC, NRG Middletown Operations Inc., Montville Power LLC, NRG Montville Operations Inc., Norwalk Power LLC, NRG and Norwalk Harbor Operations Inc. own and operate the Boilers identified in Table 1. The boilers are subject to RCSA §22a-174-22 and RCSA §22a-174-22c (CAIR). NO_x emissions from the boilers are measured with a NO_x continuous emissions monitors (CEMs) that meet 40 CFR Part 75. NO_x emissions rate from the emission units described in Table 1, at times, exceed the corresponding AELs. At such times, in accordance with Section 22a-174-22(j) of the Regulations, may comply with Section 22a-174-22 of the Regulations through the use of emissions trading. In addition, the actual 24-hour, block average NO_x emission rate from the emissions units described in Table 1, at times, may be less than the corresponding AELs. At such times, the NRG may generate DERCs in accordance with the provisions of this TAO. On April 26, 2010 TAO 8306 was issued to NRG to allow for the use of NO_x DERCs and/or NO_x Allowances to offset excess NO_x emissions from the boilers pursuant to RCSA §22a-174-22(j).

II. SPECIAL REQUIREMENTS

- a. Calculation of creation and use of credits shall be as described in TAO.
- b. The TAO restricts allowance use to CAIR NO_x ozone season allowances that were originally allocated to a source located in Connecticut or the functional equivalent thereof, in anticipation of a revision to the CAIR NO_x Ozone season program.

Furthermore, the allowance user must demonstrate that the actual emissions from the source of the allowances are less than the total number of allowances allocated to the source minus the allowances that were sold by the source.

- c. The source shall operate those emission units described in Table 1 during the Ozone Season, while firing or co-firing the lowest NO_x emitting fuel type or combination of fuel types that the units are physically able to burn to achieve the units' rated electricity output, according to the Independent System Operator- New England (ISO NE), and that the Respondents are authorized to burn in accordance with Departmental permit, registration, or applicable regulation
- d. The source shall perform maintenance and tune-up on the subject emissions units within two years of the issuance of the TAO.
- e. All DERCs used during the Ozone Season for the emissions units described in Table 1, shall have been generated during an Ozone Season.
- f. The emission units described in Table 1 must meet a seven month average limit of 0.15 lbs MMBtu/hr during the Non-Ozone Season (i.e. currently, the period of consecutive months between October 1 of each calendar year and April 30 of the following calendar year).
- g. Not more than 12 months from the date of issuance of this TAO, the Respondents shall submit a control technology evaluation to reduce emissions of NO_x from the emissions units described in Table 1 to, at a bare minimum, a rate or concentration that complies with the applicable limits of Section 22a-174-22 of the Regulations as may be amended, without using, tendering, or otherwise acquiring Allowances or DERCs

**PSEG Power LLC
TAO 8305**

I. DESCRIPTION OF DERC USE

Source and Identifier:

PSEG Power LLC
1 Atlantic Street
Bridgeport, Connecticut 06604

Designated Representative:

Mr. Robert Sylvestri
Senior Environmental Engineer
Telephone No. (203)-551-6032

CT Nonattainment Area Classification: Serious and Severe

Summary of Compliance:

Time Period: May 1, 2010- May 31, 2014
Method: DERC Creation and Use
Low NOx Concentric firing system.

Table 1: Non CAIR NOx Ozone Season Unit NOx Emission Rates, FLERs and Allowable Limits (lbs/MMBtu, unless otherwise noted)							
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu)	Stack Test Rate	FLER (lb/mmmbtu)	Allowable Emission Limit (AEL)	Date of Last Stack Test	Date of Next Stack Test
New Haven Aux. Boiler P 117-0021	No. 6	143.4	<0.4	0.4	0.25	2/3/2010	2/3/2015

Table 2: CAIR NO_x Ozone Season Unit Allowable Limits (lbs/MMBtu, unless otherwise noted)			
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu)	Allowable Emission Limit (AEL)
Bridgeport Harbor Unit 2 R-015-0162	No. 6 No.2	1,785	0.15 non-ozone season average, regardless of fuel burned

Table 3 Coal-Fired CAIR NO_x Ozone Season Unit – Allowable Limits (lbs/MMBtu, unless otherwise noted)			
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu)	Allowable Emission Limit (AEL)
Bridgeport Harbor Unit 3 P-015-0089	Coal	4,100	0.38
	No.6		0.25
	No.2		0.20
			0.15 non-ozone season average for all fuels)

Discounts:

- Design Margin- Less 5% from AEL upon DERC use
- Environmental- Less 10% upon DERC Creation

Description of Compliance:

PSEG Power LLC owns and operates the Boilers identified in Tables 1-3. The Boiler listed in Table 1 is subject to the limits specified in RCSA §22a-174-22(d) while The boilers listed in tables 2 and 3 are subject to the limits specified in RCSA §22a-174-22(d) and (e). Emission testing conducted on the date specified in table 1 resulted in a NO_x emission rate that exceeds the corresponding Allowable emission limit (AEL) listed in Table 22-1 of Section 22a-174-22 of the Regulations. NO_x emissions rates from the emission units described in Tables 2 and 3, at times, exceed the corresponding AELs. At such times, in accordance with Section 22a-174-22(j) of the Regulations, PSEG may comply with Section 22a-174-22 of the Regulations through the use of emissions trading.

NO_x emissions from the boilers listed in Tables 2 and 3 are measured with NO_x continuous emissions monitors (CEMs) that meet 40 CFR Part 75 The actual 24-hour, block average NO_x emission rate from the emissions unit described in Table 3, at times, may be less than the corresponding AELs. At such times, PSEG may generate DERCs in accordance with the

provisions of a TAO. On April 30, 2010 TAO 8306 was issued to PSEG to allow for the creation of NO_x DERCs from the boiler listed in Table 3, and the use of NO_x DERCs/Allowances to offset excess NO_x emissions from the boilers listed in tables 1-3 pursuant to RCSA §22a-174-22(j)..

II. SPECIAL REQUIREMENTS

- a. Calculation of creation and use of credits shall be as described in TAO.
- b. The TAO restricts allowance use to CAIR NO_x ozone season allowances that were originally allocated to a source located in Connecticut or the functional equivalent thereof, in anticipation of a revision to the CAIR NO_x Ozone season program. Furthermore, the allowance user must demonstrate that the actual emissions from the source of the allowances are less than the total number of allowances allocated to the source minus the allowances that were sold by the source.
- c. The source shall operate those emission units described in Tables 1-3 during the Ozone Season, while firing or co-firing the lowest NO_x emitting fuel type or combination of fuel types that the units are physically able to burn to achieve the units' rated electricity output, according to the Independent System Operator- New England (ISO NE), and that the Respondents are authorized to burn in accordance with Departmental permit, registration, or applicable regulation
- d. The source shall perform maintenance and tune-up on the subject emissions units within two years of the issuance of the TAO.
- e. All DERCs used during the Ozone Season for the emissions units described in Tables 1 and 2 shall have been generated during an Ozone Season.
- f. The emission units described in Tables 1 and 2 must meet a seven month average limit of 0.15 lbs MMBtu/hr during the Non-Ozone Season (i.e. currently, the period of consecutive months between October 1 of each calendar year and April 30 of the following calendar year).
- g. Not more than 12 months from the date of issuance of this TAO, the Respondents shall submit a control technology evaluation to reduce emissions of NO_x from the emissions units described in Table 1 and 2 to, at a bare minimum, a rate or concentration that complies with the applicable limits of Section 22a-174-22 of the Regulations as may be amended, without using, tendering, or otherwise acquiring Allowances or DERCs

NRG Energy, Inc.
TAO 8300

I. DESCRIPTION OF DERC USE

Source and Identifier:

NRG Energy, Inc.
P.O. Box 1001
1866 River Road
Middletown, CT 06457

Designated Representative:

Cynthia Karlic
Regional Environmental Director
Telephone No. (860) 343-6962

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- May 31, 2014

Method: DERC Use
Water injection (in Sound Shore Drive units 10-14 listed in Table 1 and Devon Units 11-14 listed in Table 2) and emission trading to meet applicable limits.

Table 1
CAIR NOx Ozone Season Units
NOx Stack Test Rates, FLERs and Allowable Limits (lbs/MMBtu, unless otherwise noted)

UNIT- Registration or Permit no.	Fuel	Heat Input (MMBtu)	Stack Test Rate	FLER	AEL	Date of Last Stack Test	Date of Next Stack Test
Boston Post Road Branford -10 Reg#-014-0008	other oil	256	0.726	0.8	0.29 0.15 (non-ozone season average, regardless of fuel burned)	8/10/06	8/10/11
Sound Shore Drive Greenwich-10 R-067-0052	other oil	256	0.192	0.22	0.15 (non-ozone season average, regardless of fuel burned)	11/19/08	11/19/13
Sound Shore Drive Greenwich-11 R-067-0053	other oil	256	0.185	0.22	0.15 (non-ozone season average, regardless of fuel burned)	11/19/08	11/19/13
Sound Shore Drive Greenwich-12 R-067-0054	other oil	256	0.194	0.22	0.15 (non-ozone season average, regardless of fuel burned)	11/19/08	11/19/13
Sound Shore Drive Greenwich-13 P 067-0097	other oil Nat gas	256	0.194	0.22	0.15 (non-ozone season average, regardless of fuel burned)	11/19/08	11/19/13
Sound Shore Drive Greenwich-14 P 067-0098	other oil Nat gas	256	0.171	0.22	0.15 (non-ozone season average, regardless of fuel burned)	11/19/08	11/19/13
Franklin Drive Torrington-10 R-183-0049	other oil Nat gas	256	0.76	0.8	0.29 0.15 (non-ozone season average, regardless of fuel burned)	10/25/05	10/25/10
South Main Street Torrington-10 R-183-0059	other oil	256	0.68	0.8	0.29 0.15 (non-ozone season average, regardless of fuel burned)	01/02/06	01/02/11
Middletown-10 R-105-0102	other oil	256	0.57	0.67	0.29 0.15 (non-ozone season average, regardless of fuel burned)	06/20/06	06/20/11
Norwalk-10 R-137-0032	other oil	256	0.514	0.52	0.29 0.15 (non-ozone season average, regardless of fuel burned)	01/26/10	01/26/15
Devon-10 R-105-0026	other oil	256	0.67	0.74	0.29 0.15 (non-ozone season average, regardless of fuel burned)	03/31/06	03/31/11

Table 2: CAIR NOx Ozone Season Unit, equipped with CEMS Allowable Limits (lbs/MMBtu, unless otherwise noted)			
UNIT- reg. or permit no.	Fuel	Heat Input (MMBTU/hr)	Allowable Emission Limit (AEL)
Devon Unit-11 P-105-0040	other oil Nat gas	394	0.15 non-ozone season average, regardless of fuel burned
Devon Unit-12 P-105-0041	other oil Nat gas	394	0.15 non-ozone season average, regardless of fuel burned
Devon Unit-13 P-105-0042	other oil Nat gas	394	0.15 non-ozone season average, regardless of fuel burned
Devon Unit-14 P-105-0043	other oil Nat gas	394	0.15 non-ozone season average, regardless of fuel burned

Table 3: Non CAIR NOx Ozone Season Unit NOx Emission Rates, FLERs and Allowable Limits (lbs/MMBtu, unless otherwise noted)							
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu/hr)	Stack Test Rate	FLER (lb/mmbtu)	Allowable Emission Limit (AEL)	Date of Last Stack Test	Date of Next Stack Test
Montville-10	other oil	29	3.09	3.11	2.35	03/24/06	03/24/11
Montville-11	other oil	29	1.93	2.96	2.35	08/23/06	08/23/11

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

NRG Energy Inc and its subsidiaries, Devon Power LLC NRG Devon Operations Inc., Middletown Power LLC, NRG Middletown Operations Inc., Montville Power LLC, NRG Montville Operations Inc., Norwalk Power LLC, NRG Norwalk Harbor Operations Inc. Connecticut Jet Power LLC own and operate the combustion turbines identified in Tables 1 and 2 and the diesel engines identified in Table 3 above. The diesel engines are subject to RCSA §22a-174-22(d) while the combustion turbines, as CAIR (NOx Budget sources), are subject to RCSA §22a-174-22(d) and (e). NOx emissions from the Devon units listed in Table 2 are measured with NOx continuous emissions monitors (CEMs) that meet 40 CFR Part 75. The

turbines listed in Table 2 meet the limit RCSA §22a-174-22(d) and (e) when firing natural gas. However, the turbines listed in Table 2 may, at times, exceed the seven month average non-ozone season limit of 0.15 lbs/MMBtu specified in RCSA §22a-174-22(e) when firing #2 oil. Emission testing conducted on the dates specified in Tables 1 and 3 resulted in NO_x emission rates that exceed the corresponding Allowable emissions limits (AELs). On April 23, 2010 TAO 8300 superseded TAO's 8180-8184 for the combustion units listed in Tables 1 and 3 and TAO 8251 for the Devon nits listed in Table 2 and allows NRG to use emission trading until May 31, 2014.

II. SPECIAL REQUIREMENTS

- a. Calculation of credit use shall be as described in TAO.
- b. The TAO restricts allowance use to CAIR NO_x ozone season allowances that were originally allocated to a source located in Connecticut or the functional equivalent thereof, in anticipation of a revision to the CAIR NO_x Ozone season program. Furthermore, the allowance user must demonstrate that the actual emissions from the source of the allowances are less than the total number of allowances allocated to the source minus the allowances that were sold by the source.
- c. The source shall operate those emission units described in Tables 1-3 during the Ozone Season, while firing or co-firing the lowest NO_x emitting fuel type or combination of fuel types that the units are physically able to burn and that the Respondents are authorized to burn in accordance with Departmental permit, registration, or applicable regulation
- d. The source shall perform maintenance and tune-up on the emission units described in Table 1 not more than two years from the issuance of the TAO.
- e. All DERCs used during the Ozone Season for the emission units described in Tables 1 and 3 shall have been generated during an Ozone Season.
- f. The source shall deduct an additional 6 tons for each ton emitted by the emission unit described in Table 1 on any day that the Connecticut eight hour ozone levels were forecasted to be “moderate to unhealthy for sensitive groups”, “unhealthy for sensitive groups”, “unhealthy”, or “very unhealthy” during the previous Ozone Season.
- g. The emission units described in Tables 1 and 2 must meet a seven month average limit of 0.15 lbs MMBtu/hr during the Non-Ozone Season (i.e. currently, the period of consecutive months between October 1 of each calendar year and April 30 of the following calendar year).

- h. Not more than 12 months from the date of issuance of this TAO, the Respondents shall submit a control technology evaluation to reduce emissions of NO_x from the emissions units described in Table 1-3 to, at a bare minimum, a rate or concentration that complies with the applicable limits of Section 22a-174-22 of the Regulations as may be amended, without using, tendering, or otherwise acquiring Allowances or DERCs

**PSEG Power LLC
TAO 8301**

I. DESCRIPTION OF DERC USE

Source and Identifier:

PSEG Power LLC
1 Atlantic Street
Bridgeport, Connecticut 06604

Designated Representative:

Mr. Robert Sylvestri
Senior Environmental Engineer
Telephone No. (203)-551-6032

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- May 31, 2014
Method: DERC Use

Table 1 CAIR NOx Ozone Season Units NOx Emission Rates, FLERs and Allowable Limits (lbs/MMBtu, unless otherwise noted)								
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu)	Stack Test Rates		AEL (ppmvd)	FLER (lb/mmbtu)	Date of Last Stack Test	Date of Next Stack Test
			lb/mmbtu	ppmvd @ 15% O ₂				
FT 4A-8LI Turbine R-0166	Jet Fuel	287	0.709	186.17	75	0.73	1/19/2010	1/19/2015

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

PSEG Power LLC owns and operates the combustion turbine identified in Table 1. The combustion turbine is subject to RCSA §22a-174-22 and RCSA §22a-174-22c (CAIR). Emission testing conducted on the date specified in Table 1 resulted in a NO_x emission rate that exceeds the corresponding allowable emission limit (AEL). On April 30, 2010 TAO 8301 superseded TAO 8244 and allows PSEG Power LLC to use of NO_x DERCS or NO_x Allowances to offset excess NO_x emissions from the combustion turbine pursuant to RCSA §22a-174-22(j) until May 31,2014.

II. SPECIAL REQUIREMENTS

- a. Calculation of credit use shall be as described in TAO.
- b. The TAO restricts allowance use to CAIR NO_x ozone season allowances that were originally allocated to a source located in Connecticut or the functional equivalent thereof, in anticipation of a revision to the CAIR NO_x Ozone season program. Furthermore, the allowance user must demonstrate that the actual emissions from the source of the allowances are less than the total number of allowances allocated to the source minus the allowances that were sold by the source.
- c. The source shall operate the emission unit described in Table 1 during the Ozone Season, while firing or co-firing the lowest NO_x emitting fuel type or combination of fuel types that the unit is physically able to burn and that the Source is authorized to burn in accordance with a Departmental permit, registration, or applicable regulation.
- d. The source shall perform maintenance and tune-up on the emission unit described in Table 1 within two years of the issuance of the TAO.
- e. All DERCS used during the Ozone Season for the emission unit described in Table 1 shall have been generated during an Ozone Season.
- f. The source shall deduct an additional 6 tons for each ton emitted by the emission unit described in Table 1 on any day that the Connecticut eight hour ozone levels were forecasted to be “moderate to unhealthy for sensitive groups”, “unhealthy for sensitive groups”, “unhealthy”, or “very unhealthy” during the previous Ozone Season.

- g. The emission unit described in Table 1 must meet a seven month average limit of 0.15 lbs MMBtu/hr during the Non-Ozone Season (i.e. currently, the period of consecutive months between October 1 of each calendar year and April 30 of the following calendar year).
- h. Not more than 9 months from the date of issuance of this TAO, the Source shall submit a control technology evaluation to reduce emissions of NO_x from the emissions unit described in Table 1 to, at a bare minimum, a rate or concentration that complies with the applicable limits of Section 22a-174-22 of the Regulations as may be amended, without using, tendering, or otherwise acquiring Allowances or DERCS

**Connecticut Resources Recovery Authority
TAO 8302**

I. DESCRIPTION OF DERC USE

Source and Identifier:

Connecticut Resources Recovery Authority
Reserve-Maxim Road
Hartford, Connecticut 06106

Designated Representative:

Mr. Steven Yates
Air Compliance Manager
Telephone No. (860) 757-7726

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- May 31, 2014
Method: DERC Use

Table 1
CAIR NOx Ozone Season Units
NOx Emission Rates, FLERs and Allowable Limits

UNIT- reg. or permit no.	Fuel	Heat Input in MMBtu/hr	Stack Test Rate in lbs/MMBtu	Stack Test Rate in ppmvd	FLER in lb/MMBtu	Allowable Emission Limit (AEL) in lbs/MMBtu	Allowable Emission Limit (AEL) in ppmvd	Date of Last Stack Test	Date of Next Stack Test
11A Reg.# 075-0260	#2 oil or other distillate oil	256	0.675	132.5	0.81	0.289	75	11/15/09	11/15/14
11B Reg.# 075-0261	#2 oil or other distillate oil	256	0.71	138.4	0.81	0.289	75	11/15/09	11/15/14
12A Reg.# 075-0262	#2 oil or other distillate oil	256	0.744	124.8	0.81	0.289	75	11/14/09	11/14/14
12B Reg.# 075-0263	#2 oil or other distillate oil	256	0.706	114.8	0.81	0.289	75	11/14/09	11/14/14
13A Reg.# 075-0264	#2 oil or other distillate oil	256	0.750	132.5	0.81	0.289	75	11/8/09	11/8/14
13B Reg.# 075-0265	#2 oil or other distillate oil	256	0.733	130.3	0.81	0.289	75	11/8/09	11/8/14
14A Reg.# 075-0266	#2 or other distillate oil	256	0.755	124.0	0.81	0.289	75	11/7/09	11/7/14
14B Reg.# 075-0267	#2 oil or other distillate oil	256	0.771	136.1	0.81	0.289	75	11/7/09	11/7/14

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

CRRA owns and operates the combustion turbines identified in Table 1. The combustion turbines are subject to RCSA §22a-174-22 and RCSA §22a-174-22c (CAIR). Emission testing conducted on the dates specified in Table 1 resulted in NOx emission rates that exceed the corresponding allowable emissions limits (AELs). On April 26, 2010 TAO 8302 superseded TAO 8116B and allows CRRA to use NOx DERCs or NOx Allowances to offset excess emissions from the combustion turbines pursuant to RCSA §22a-174-22(j) until May 31, 2014.

II. SPECIAL REQUIREMENTS

- a. Calculation of credit use shall be as described in TAO.
- b. The TAO restricts allowance use to CAIR NO_x ozone season allowances that were originally allocated to a source located in Connecticut or the functional equivalent thereof, in anticipation of a revision to the CAIR NO_x Ozone season program. Furthermore, the allowance user must demonstrate that the actual emissions from the source of the allowances are less than the total number of allowances allocated to the source minus the allowances that were sold by the source.
- c. The source shall operate the emission units described in Table 1 during the Ozone Season, while firing or co-firing the lowest NO_x emitting fuel type or combination of fuel types that the units are physically able to burn and that the Source is authorized to burn in accordance with a Departmental permit, registration, or applicable regulation.
- d. The source shall perform maintenance and tune-up on the emission units described in Table 1 within two years of the issuance of the TAO.
- e. All DERCs used during the Ozone Season for the emission units described in Table 1 shall have been generated during an Ozone Season.
- f. The source shall deduct an additional 6 tons for each ton emitted by the emission units described in Table 1 on any day that the Connecticut eight hour ozone levels were forecasted to be “moderate to unhealthy for sensitive groups”, “unhealthy for sensitive groups”, “unhealthy”, or “very unhealthy” during the previous Ozone Season.
- g. The emission units described in Table 1 must meet a seven month average limit of 0.15 lbs MMBtu/hr during the Non-Ozone Season (i.e. currently, the period of consecutive months between October 1 of each calendar year and April 30 of the following calendar year).
- h. Not more than 9 months from the date of issuance of this TAO, the Source shall submit a control technology evaluation to reduce emissions of NO_x from the emission units described in Table 1 to, at a bare minimum, a rate or concentration that complies with the applicable limits of Section 22a-174-22 of the Regulations as may be amended, without using, tendering, or otherwise acquiring Allowances or DERCs

**City of Norwich Department of Public Utilities (NDPU)
TAO 8304**

I. DESCRIPTION OF DERC USE

Source and Identifier:

City of Norwich Department of Public Utilities (NDPU)
16 South Golden Street
Norwich, CT 06360

Designated Representative:

Mr. John Bilda
General Manager
Telephone No. (860) 823-4172

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- May 31, 2014
Method: DERC Use

<p align="center">Table 1 CAIR NOx Ozone Season Unit NOx Emission Rates, FLERs and Allowable Limits (lbs/MMBtu, unless otherwise noted)</p>								
UNIT- reg. or permit no.	Fuel	Heat Input (MMBtu)	Stack Test Rates		AEL (ppmvd)	FLER (lb/mmbtu)	Date of Last Stack Test	Date of Next Stack Test
			lb/mmbtu	ppmvd @ 15% O ₂				
Rolls Royce Turbine	#2 oil	249	0.552	103.8	75	0.7	7/31/09	7/31/14

Discounts:

Design Margin- Less 5% from AEL upon DERC use.

Description of Compliance:

NDPU owns and operates the combustion turbine identified in Table 1. The combustion turbine is subject to RCSA §22a-174-22 and RCSA §22a-174-22c (CAIR). Emission testing conducted on the date specified in Table 1 resulted in a NO_x emission rate that exceeds the corresponding allowable emission limit (AEL). On April 29, 2010 TAO 8304 was superseded by TAO 8119A and allows NDPU to use NO_x DERCs or NO_x Allowances to offset excess NO_x emissions from the combustion turbine pursuant to RCSA §22a-174-22(j) until May 31, 2014.

II. SPECIAL REQUIREMENTS

- a. Calculation of credit use shall be as described in TAO.
- b. The TAO restricts allowance use to CAIR NO_x ozone season allowances that were originally allocated to a source located in Connecticut or the functional equivalent thereof, in anticipation of a revision to the CAIR NO_x Ozone season program. Furthermore, the allowance user must demonstrate that the actual emissions from the source of the allowances are less than the total number of allowances allocated to the source minus the allowances that were sold by the source.
- c. The source shall operate the emission unit described in Table 1 during the Ozone Season, while firing or co-firing the lowest NO_x emitting fuel type or combination of fuel types that the unit is physically able to burn and that the Source is authorized to burn in accordance with a Departmental permit, registration, or applicable regulation.
- d. The source shall perform maintenance and tune-up on the emission unit described in Table 1 at least once during the life of the TAO.
- e. All DERCs used during the Ozone Season for the emission unit described in Table 1 shall have been generated during an Ozone Season.
- f. In lieu of deducting an additional 6 tons for each ton emitted by the emission unit described in Table 1 on any day that the Connecticut eight hour ozone levels were forecasted to be “moderate to unhealthy for sensitive groups”, “unhealthy for sensitive groups”, “unhealthy”, or “very unhealthy” during the previous Ozone Season, the Source shall continue to implement the supplemental environmental program (SEP) incorporated by reference into TAO No. 8119 at Exhibit 2
- g. The emission unit described in Table 1 must meet a seven month average limit of 0.15 lbs MMBtu/hr during the Non-Ozone Season (i.e. currently, the period of consecutive months between October 1 of each calendar year and April 30 of the following calendar year).

- h. Not more than 12 months from the date of issuance of this TAO, the Source shall submit a control technology evaluation to reduce emissions of NO_x from the emission unit described in Table 1 to, at a bare minimum, a rate or concentration that complies with the applicable limits of Section 22a-174-22 of the Regulations as may be amended, without using, tendering, or otherwise acquiring Allowances or DERCS

**FirstLight Hydro Generating Company
TAO 8303**

I. DESCRIPTION OF DERC USE

Source and Identifier:

FirstLight Hydro Generating Company
Tunnel Road
Preston, CT 06365

Designated Representative:

Ms. Cynthia Vodopivic
Environmental Manager
Telephone No. (860) 895-6961

CT Nonattainment Area Classification: Serious

Summary of Compliance:

Time Period: May 1, 2010- May 31, 2014
Method: DERC Use

Table 1 CAIR NOx Ozone Season Units NOx Emission Rates, FLERs and Allowable Limits (lbs/MMBtu, unless otherwise noted)								
UNIT- reg. or permit no.	Fuel	FLER in lbs/mmbtu	Allowable Emission Limit (AEL) in lbs/mmbtu	AEL in ppmvd	Stack Test Rate in lbs/MMBtu	Stack test rate in ppmvd	Date of Last Stack Test	Date of Next Stack Test
Tunnel Road Preston 10	other oil	0.72	.29	75	0.698	119.6	3/29/2006	3/29/2011

Discounts:

Design Margin- Less 5% from AEL upon DERC use

Description of Compliance:

FirstLight Hydro Generating Company owns and operates the combustion turbine identified in Table 1. The combustion turbine is subject to RCSA §22a-174-22 and RCSA §22a-174-22c (CAIR). Emission testing conducted on the date specified in Table 1 resulted in a NO_x emission rate that exceeds the corresponding allowable emission limit (AEL). On April 29, 2010 TAO 8304 superseded TAO 8272 and allows FirstLight Hydro Generating Company to use NO_x DERCs or NO_x Allowances to offset excess NO_x emissions from the combustion turbine pursuant to RCSA §22a-174-22(j) until May 31, 2014.

II. SPECIAL REQUIREMENTS

- a. Calculation of credit use shall be as described in TAO.
- b. The TAO restricts allowance use to CAIR NO_x ozone season allowances that were originally allocated to a source located in Connecticut or the functional equivalent thereof, in anticipation of a revision to the CAIR NO_x Ozone season program. Furthermore, the allowance user must demonstrate that the actual emissions from the source of the allowances are less than the total number of allowances allocated to the source minus the allowances that were sold by the source.
- c. The source shall operate the emission unit described in Table 1 during the Ozone Season, while firing or co-firing the lowest NO_x emitting fuel type or combination of fuel types that the unit is physically able to burn and that the Source is authorized to burn in accordance with a Departmental permit, registration, or applicable regulation.
- d. The source shall perform maintenance and tune-up on the emission unit described in Table 1 within 1 year of the issuance of the TAO.
- e. All DERCs used during the Ozone Season for the emission unit described in Table 1 shall have been generated during an Ozone Season.
- f. The source shall deduct an additional 6 tons for each ton emitted by the emission unit described in Table 1 on any day that the Connecticut eight hour ozone levels were forecasted to be “moderate to unhealthy for sensitive groups”, “unhealthy for sensitive groups”, “unhealthy”, or “very unhealthy” during the previous Ozone Season.
- g. The emission unit described in Table 1 must meet a seven month average limit of 0.15 lbs MMBtu/hr during the Non-Ozone Season (i.e. currently, the period of consecutive

months between October 1 of each calendar year and April 30 of the following calendar year).

h. Not more than 9 months from the date of issuance of this TAO, the Source shall submit a control technology evaluation to reduce emissions of NO_x from the emissions unit described in Table 1 to, at a bare minimum, a rate or concentration that complies with the applicable limits of Section 22a-174-22 of the Regulations as may be amended, without using, tendering, or otherwise acquiring Allowances or DERCS