

ACID RAIN & TITLE V PERMIT INTEGRATION PROJECT

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History

14 Permitted Acid Rain Sources in Connecticut:

Bridgeport Harbor
Bridgeport Energy
Capitol District Energy
CMEEC Pierce
Devon Station
Kleen Energy
Lake Road Generating
Milford Power
Middletown Station
Montville Station
New Haven Harbor
Norwalk Harbor
Waterbury Generation
Wallingford Energy

- ◆ ARPs and Title V permits are issued as separate documents, each with its own issuance process
- ◆ Each permit has its own 5 year term, expiring on different dates
- ◆ Acid Rain Permits are issued prior to issuance of Title V permits
- ◆ Expiration dates of the 14 Acid Rain sources range from 2010-2014

What are we going to do?

- ◆ Sync the Acid Rain permit with the Title V permit expiration date
- ◆ Issue a combined Title V permit that includes the Acid Rain permit requirements
- ◆ Both permits will have the same expiration dates and will be one unified document

Unfortunately...

- ◆ ARPs are issued with a 5 year term and the AR rules do not allow a permit mod to reduce a permit's term.

Fortunately...

- ◆ The AR rules do allow for a permit to be issued with a term shorter than 5 years for the sole reason of syncing the expiration date of the ARP with a sources Title V permit.

How are we going to do it?

- ◆ As each existing ARP comes in for its next renewal, the ARP will be issued with the following expiration date language:

"Five years from the date of issuance or until such time this permit is incorporated into the facility's Title V Operating Permit."

How are we going to do it?

- ◆ When the facility's Title V permit comes in for renewal, the source will submit as an attachment to their Title V renewal, an ARP renewal application.
- ◆ The ARP and Title V renewal applications will then be processed concurrently .

How are we going to do it?

- ◆ The Title V permit will include a dedicated section for the Acid Rain Permit and the ARP application will be attached to the Title V permit.
- ◆ The ARP will then be fully incorporated into the Title V permit and the two permits will expire on the same date from that point forward.

How are we going to do it?

- ◆ New Sources will follow the same basic integration procedure
- ◆ Initial ARP will be issued as separate document with new expiration date language
- ◆ When a source submits their initial Title V application, they would also submit another ARP application in order to sync the expiration dates

Title V Form Updates

Attachment L:

Attachment M:

Attachment N:

Attachment O:

Attachment N: If applicable, Acid Rain Permit application.

Submit a completed Acid Rain Permit application as attachment N if you:

- (1) have a unified Title V Operating Permit that includes, by reference and attachment, your Acid Rain Permit; or
- (2) are currently covered by an Acid Rain Permit that expires upon the incorporation into your Title V permit; or
- (3) are currently covered by an Acid Rain Permit that expires within one year of your existing Title V Operating Permit.

A copy of the Acid Rain Permit application shall also be sent to EPA Region 1 at the following address: Mr. Ian Cohen, US EPA 5 Post Office Square, Suite 10, Mail Code Q(o)EP0(zero)5-2, Boston, MA 02109-3912

Acid Rain Permit application forms and instructions can be found at:

www.epa.gov/airmarkets/business/forms.html#airp

plan for emission units with control or above major source thresholds at November 15, 1990 NSPS or stratospheric ozone requirements, Acid Rain those subject to emission caps

DEP-TV-APP-100

Rev. 12/29/09

Title V Permit Updates

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Section I. Pre

Y. FEDERAL ACID RAIN PROGRAM REQUIREMENTS

1. SO₂ Allowance Allocations and NO_x Requirements for Each Affected Unit:

Section II. En

EMU	Unit	SO ₂ Allowances under Tables 2,3, or 4 of 40 CFR Part 73	20	20	20	20	20
		NO _x Limit	Not an Affected Unit under 40 CFR Part 76				

Duplicate the above table for each Acid Rain Unit

Section III. A

2. Phase II Acid Rain Permit Application

The attached Phase II Acid Rain permit application is hereby incorporated by reference into this Title V Operating Permit. If the Title V Operating permit is in conflict with or inconsistent with the Phase II Acid Rain permit application, the Title V Operating Permit requirements including any applicable requirement under 40 CFR Parts 72 through 78, inclusive, shall supersede the Phase II Acid Rain permit application and the Permittee shall be governed by and adhere to the Title V Operating Permit and any applicable requirement under 40 CFR Parts 72 through 78, inclusive.

Section IV. C

Example #1

Milford Power Company

12/31/2010

ARP expires

- ◆ Apply for ARP renewal in 2010
- ◆ DEP issues ARP with new expiration date language

12/29/2013

Title V expires

- ◆ Apply for Title V renewal in 2013, include renewal for ARP with application
- ◆ Title V permit issued with ARP fully integrated

Example #2

Capitol District Energy Center

4/30/2012

ARP expires

9/16/2010

Title V expires

- ◆ Apply for Title V renewal in 2010
- ◆ DEP issues renewed Title V with expiration date in 2015
- ◆ Apply for ARP renewal in 2012
- ◆ DEP issues ARP with new expiration date language
- ◆ Apply for Title V renewal in 2015, include renewal for ARP with application
- ◆ Title V permit issued with ARP fully integrated

Example #3

New Source

N/A

ARP expires

N/A

Title V expires

- ◆ Apply for initial ARP prior to operation
- ◆ DEP issues initial ARP with new expiration date language
- ◆ Apply for initial Title V and include renewal for ARP with application
- ◆ Title V permit issued with ARP fully integrated

Conclusion

- ◆ Benefits
 - ◆ Reduced Costs for sources (one public notice)
 - ◆ Reduced processing for DEP and sources
 - ◆ Simplified Permit tracking for sources
- ◆ Questions?
 - ◆ Email: Louis.Corsino@ct.gov
 - ◆ Phone: (860) 424-3544