



OCT 25 2016

Mr. Frank DiCristina
Wallingford Site Manager
Allnex USA Inc,
528 South Cherry Street
Wallingford, CT 06492

RE: Modification of Registration No. 189-0108 (Boiler #1) at Allnex USA Inc. in Wallingford, CT

Dear Mr. DiCristina:

The Commissioner of the Department of Energy and Environmental Protection (DEEP) may modify any license at the request of the licensee in accordance with Section 22a-3a-5(d) of the Regulations of Connecticut State Agencies (RCSA), and any other applicable law. Any modification at the request of the licensee shall comply with the requirements of RCSA Section 22a-3a-5(a).

As requested and supported in your letter dated December 12, 2014, the DEEP Bureau of Air Management Registration for the above mentioned equipment is hereby modified unless within 30 days of issuance of this notice a request for hearing is filed. Such request shall conform with the provisions of RCSA Section 22a-3a-6(i). The registration has been modified by reducing the maximum heat input from 80 MMBtu/hr to 61.8 MMBtu/hr as requested. The DEEP will update its emissions inventory to reflect this modification.

This letter in no way grants immunity from legal action resulting from the failure of this source to remain in compliance with existing air pollution regulations, nor does it provide an exemption from compliance with future Federal, State or local laws.

If you have any questions concerning this notice, please contact Mr. David LaRiviere of my staff at (860) 424-3549.

Sincerely,

Robert J. Klee
Commissioner

RJK:DPL:srj

cc: Rick Rodrigue, Air Technical Services
Robert Girard, Air Enforcement

Certified Mail



All About Resins

Allnex USA Inc.
528 South Cherry Street
Wallingford, CT 06492

BUREAU OF AIR MANAGEMENT
NEW SOURCE REVIEW / TITLE V

DEC 17 2014

December 12, 2014

Mr. Gary Rose
Director, Engineering & Enforcement Division
Bureau of Air Management
Compliance and Field Operations
CT Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06109

BUREAU OF AIR MANAGEMENT
NEW SOURCE REVIEW / TITLE V

DEC 17 2014

Subject: Request to Derate Boiler #1 (R-189-0108)

Dear Mr. Rose,

Please revise the registration (189-0108) for Boiler #1 at our manufacturing site in Wallingford. This boiler operates on natural gas only. During NOx emissions testing on December 4, 2014 we attempted to fire natural gas at or above 90% of the 80 MMBtu/hr maximum firing rate listed on the registration but were unsuccessful despite the best efforts of our boiler operators and our boiler control system expert. While the original burner design may have been able to achieve this firing rate, the boiler is no longer capable of firing above 60,000 cfh, or 61.8 MMBtu/hr, based on a typical fuel heating value 1030 Btu/cf. Therefore, please update the maximum rated capacity for Boiler #1 to reflect this practical limitation. It should be noted the firing rate achieved during the test produced the maximum steam generation that the plant expects to obtain from this boiler.

Please contact either Robert Tyler at (203) 271-0379 or Charlie Cappannari at (203) 284-4210 should you have any questions or comments regarding this matter.

Sincerely,

Frank DiCristina
Wallingford Site Manager

MEMORANDUM

DATE: September 15, 2016

TO: Robert Klee, Commissioner
Michael Sullivan, Deputy Commissioner
Anne Gobin, Bureau Chief

FROM: David LaRiviere, APCE III
Susan Amarello, Supervising APCE
Jaimeson Sinclair, Assistant Director
Gary Rose, Director

SUBJECT: Modification of Registration No. 189-0108 at Allnex USA Inc., Wallingford, CT

DISCUSSION:

Allnex USA Inc. (Allnex) submitted a request to modify Registration No. 189-0108 in a letter dated December 12, 2014. Allnex requested this modification to derate the boiler as is it no longer capable of firing at 80 MMBtu/hr as indicated in the registration. This becomes an issue during NO_x RACT testing as the unit cannot achieve 90% of maximum rated capacity.

Allnex requested that the maximum boiler heat input be reduced to 61.8 MMBtu/hr (natural gas).

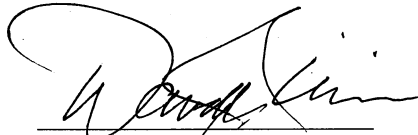
Modifications of registrations issued pursuant to the former RCSA §22a-174-2 have been done in the past (US Army Stratford Army Engine, 2008) pursuant to the Rules of Practice and a process derived from discussions between the Engineering and Enforcement Sections and the Attorney General's office.

An inspection of the unit is not deemed necessary as the requested maximum heat input was witnessed during the last NO_x RACT test.

The compliance record was reviewed in accordance with the Environmental Compliance History Policy to evaluate the applicant's compliance history and the relevance of such history to the activity for which authorization is being sought. Additionally, a review of air program compliance was requested from the Enforcement Section of the Engineering and Enforcement Division and that response forms a part of this record.

RECOMMENDATION:

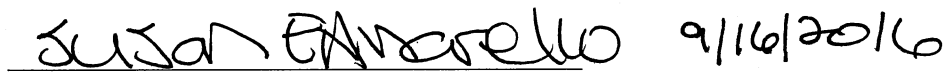
Based on the information submitted by the applicant, this evaluation and the compliance history review, it is recommended that Registration No. 189-0108 be modified as requested.



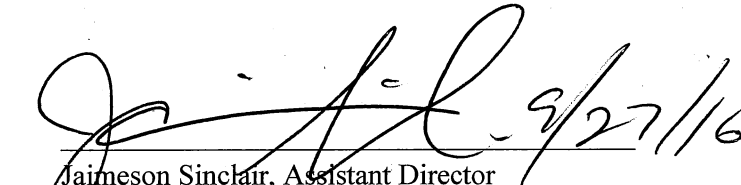
David LaRiviere, APCE III

9, 15, 16
Date

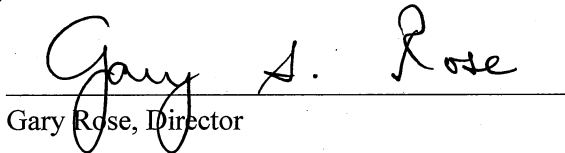
REVIEW:



Susan Amarello, SAPCE



Jaimeson Sinclair, Assistant Director



Gary Rose, Director

10-05-2016

REGISTRATION CERTIFICATE
EPAC-10 REV. 7-73



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



STACK NO. 01891002705

EQUIPMENT CLASSIFICATION			REGISTRATION NO.
<input checked="" type="checkbox"/> FUEL BURNING	<input type="checkbox"/> INCINERATOR	<input type="checkbox"/> PROCESS MFG.	01890108
FIRM NAME			DATE ISSUED
AMERICAN CYANIMID CO			12/05/73
LOCATION OF EQUIPMENT (No. & Street, Town, Zip)			
SOUTH CHERRY STREET		WALLINGFORD CT 06492	
COMMISSIONER OR HIS REPRESENTATIVE			

DEPARTMENT OF ENVIRONMENTAL PROTECTION

FUEL BURNING EQUIPMENT REGISTRATION

EP-6 NEW 5-72

TC Department of Environmental Protection, Air Compliance Section, State Office Bldg., Hartford, Conn. 06115. Tel. 566-2690

189-27-108-05
F P R ST

STATE OF CONNECTICUT

no change

1. APPLICATION NO. Y-6	2. STACK NO. 22
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3. FIRM	LEGAL NAME American Cyanamid Co.	BUSINESS ADDRESS (No. & Street, City, Zip Code)	PHONE
4. DIVISION	Industrial Chemicals & Plastics	South Cherry Street, Wallingford, Conn. 06492	269-4481
5. APPLICANT	R. J. McCaw		
6. INSTALLATION			
7. EQUIPMENT BEING REGISTERED	TYPE OF EQUIPMENT (e.g., Boiler) Boiler #1	AIR POLLUTION CONTROL EQUIPMENT USED (If "Yes," file form EP-7) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

8. MAJOR ACTIVITY OF FIRM

MFG. OFFICE RETAIL OR WHLSE. STORE SCHOOL OR CHURCH HOTEL/MOTEL HOSPITAL OR LAB. WAREHOUSE RESIDENCE OR APTS. OTHER (Specify)

9. TYPES OF FUELS USED	FUEL	GRADES (x)	SULFUR CONTENT	ASH CONTENT	ANNUAL USAGE (Tons, Gals. or Cu. Ft.)	MAXIMUM FIRING RATE		SEASONAL USE		FUEL SUPPLIER		
						(Lbs., Gals., Cu. Ft./hr.)	(BTU/hr.)	Month	to	Month	Name	City or Town
COAL <input type="checkbox"/>	Bituminous		. %	. %								
		Anthracite	. %	. %								
	OIL <input checked="" type="checkbox"/>	Kerosene		. %	. %							
			2	. %	. %							
			4	. %	. %							
			5	. %	. %							
	6	x 0.5 %	0.03 %	1,200,000gal	545 gals.	80,000,000	Jan	Dec	Wyatt, TAD Jones	New Haven		
NAT. GAS <input type="checkbox"/>												
OTHER <input type="checkbox"/>												

10. BURNER EQUIPMENT

ARE OIL HEATERS USED? YES NO

OIL TEMPERATURE BEFORE INJECTION: 100 to 160 °F

BURNER MANUFACTURER: Peabody

BURNER MODEL No.: FPK-ABT

11. TYPE OF COAL BURNER

HAND FIRED UNDERFEED STOKER TRAVELING GRATE CHAIN GRATE SPREADER STOKER STOKER WITH GAS REINJECTION CYCLONE FURNACE PULVERIZED COAL OTHER (Specify)

12. TYPE OF OIL BURNER

PRESSURE OR GUN ROTARY CUP STEAM ATOMIZER AIR ATOMIZER TANGENTIALLY FIRED OTHER (Specify)

13. COMBUSTION

OVERFIRE AIR CONTROL: YES NO

TYPE: TIME SWITCHED SMOKE INDICATOR MANUAL OTHER (Specify)

TYPE OF DRAFT: 3-element FORCED INDUCED NATURAL

14. POLLUTANTS EMITTED	MATERIAL	RATE OF EMISSIONS (Tons/Yr.)	METHOD USED TO DETERMINE EMISSIONS	15. EQUIPMENT INFORMATION	BREACHING GAS TEMPERATURE (°F)		No. OF IDENTICAL UNITS	
	Particulate	1.3	.03% Ash		550	DATE SOURCE STARTED UP		
	Sulfur Dioxide	47	78.5#/1000		1965	EXHAUST GAS FLOW RATE (ACFM):		
	Sulfur Trioxide	0.6	1#/1000		Emission Factors	NORMAL	MAXIMUM	
	Carbon Monoxide	0.12	.2#/1000			32,800	32,800	
Nitrogen Oxide	30	50#/1000	OPERATING HOURS:	HOURS PER DAY	HOURS PER YEAR			
				24	8500			

16. STACK INFORMATION

STACK EXIT DIRECTION: HORIZ. VERT.

STACK EXIT DIMENSIONS: I.D. 42 in. OR _____ in. X _____ in.

STACK HEIGHT (Feet): 62

IS STACK EQUIPPED WITH RAIN HAT? YES NO

SMOKE INDICATOR IN STACK: YES NO

MAKE AND MODEL NO.: Bailey Bolometer

STACK LINING: METAL REFRACTORY OTHER (Specify)

17. STACK LOCATION

Name of nearest intersecting street: Ball Street

Distance to stack from intersection: 2300 FT.

DIRECTION TO STACK: (Circle one) N, NE, E, SE, (S) SW, W, NW

18. CERTIFICATION

I certify that I have examined the above information and that to the best of my knowledge it is true and complete. (Signature subjects signer to provisions of the General Statutes regarding false and misleading statements).

SIGNED: *RJ McCaw*

TITLE: Plant Manager

DATE: _____

X = 576400 Y = 221700

MAIN FILE

PLEASE DO NOT WRITE IN THIS SPACE

DATE RCV'D FROM APPLICANT 1/1/80 BY South Oregon State University

DATE REVIEWED 1/1/80 BY Washington State University

DATE COPY SENT TO LOCAL AGENCY 1/1/80 BY Washington State University

REGISTRATION NUMBER 189-0108 X

PREMISE NO. 189-027

STACK NO. -05

STATE GRID CO-ORDINATES

X
Y Z 19 600 Z=40

REGISTRATION CARD SENT 1/1/80 BY Washington State University STORED ON COMPUTER

DATE 1/1/80 BY Washington State University

EMERGENCY STANDBY PLANS

PLAN REQUIRED YES NO

DATE PLAN - MANUAL SENT TO APPLICANT 1/1/80 BY Washington State University

DATE FORM RETURNED 1/1/80 BY Washington State University

DATE PLAN APPROVED 1/1/80 BY Washington State University

Handwritten signature