



ANTHONY D. CORTESE, Sc. D.
Commissioner

The Commonwealth of Massachusetts

Executive Office of Environmental Affairs

Department of Environmental Quality Engineering

One Winter Street, Boston 02108

November 8, 1982

Mr. Lester Sutton
Regional Administrator
Environmental Protection Agency
J.F. Kennedy Federal Building
Boston, MA 02203

Re: Massachusetts Set I SIP Revision
PVAPCD - 310 CMR 7.05(1)(e)3
Esleek Manufacturing Company
Turners Falls
SIP #8206

Dear Mr. Sutton:

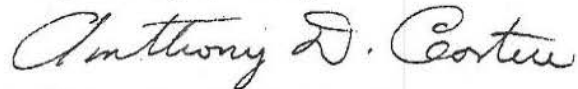
The Department of Environmental Quality Engineering hereby submits a State Implementation Plan (SIP) revision which will allow the Esleek Manufacturing Company fossil fuel utilization facility located in Turners Falls to burn 2.2% sulfur content fuel oil. Under the present State Implementation Plan the subject facility is limited to 1.0% sulfur content fuel oil. The Department has determined that the subject facility is eligible to be considered for approval to burn 2.2% sulfur content fuel oil as provided for under Regulation 7.05(1)(e)3 of the Regulations for the Control of Air Pollution in the Pioneer Valley Air Pollution Control District. To ensure compliance with NAAQS the subject facility will be limited to 137.5 gallons per hour when burning this higher sulfur content fuel.

Accordingly, the following (enclosed) items are being submitted for your review:

1. Three copies of the DEQE Decision Memorandum approving this action.
2. Three copies of the letter referencing the notice for public comment in Franklin and Hampshire Counties.
3. Three copies of a technical support document entitled Technical Support for the Proposed Conversion from 1.0% to 2.2% Sulfur Content Fuel Oil at the Esleek Manufacturing Company Fuel Utilization Facility in Turners Falls (Montague) Massachusetts.

The Department of Environmental Quality Engineering is of the opinion that this proposed SIP revision is in conformance with the provisions of the Clean Air Act and will not interfere with the attainment or maintenance of National Ambient Air Quality Standards. It is, therefore, recommended that it be approved.

Very truly yours,



Anthony D. Cortese, Sc.D.
Commissioner

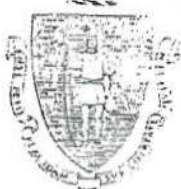
ADC/fjm/yw

C-DAQC

C-PVAPCD (2)

C-Secretary Bewick

C-Willard R. Pope



The Commonwealth of Massachusetts
Pioneer Valley Air Pollution Control District
1414 State Street, Springfield 01109

TEL. 413-785-5327

October 25, 1982

Esleek Manufacturing Company
Turners Falls, Massachusetts 01376

Attention: William C. Blanker, President

Re: PVAPCD - Turners Falls
Regulation 310 CMR 7.05
(1) (e) 3
Amended

Dear Sir:

The Department of Environmental Quality Engineering on March 21, 1980 adopted Regulation 310 CMR 7.05 (1) (e) (3) of the "Regulations for the Control of Air Pollution in the Pioneer Valley Air Pollution Control District". This Regulation allows for the burning of fuel oil having a sulfur content not to exceed 1.21 pounds per million B.t.u. heat release potential (approximately equal to 2.2% sulfur fuel oil) at certain facilities in the Hampshire and Franklin Counties.

On January 19, 1981 the United States Environmental Protection Agency (EPA) published in the Federal Register its final rule regarding the Massachusetts State Implementation Plan (SIP) which permanently amended Regulation 310 CMR 7.05 (1) (e) "Sulfur Content of fuels and Control Thereof". This action specifically disapproved Esleek Manufacturing Company because mathematical modeling analysis predicted Esleek Manufacturing would violate ambient air quality standards if allowed to burn 2.2% sulfur fuel oil.

Subsequently, the Pioneer Valley Air Pollution Control District has received support documentation from Esleek Manufacturing which would limit the maximum allowable emission rate when burning 2.2% sulfur fuel oil so that ambient air quality standards will be maintained. A review by Department engineers of the modeling study by Dufresne-Henry, Inc. and the operational limitation plan by King-Gage Engineering Corporation indicates that a fuel feed limitation of 1375 gallons per hour while burning 2.2% sulfur fuel oil would not violate the ambient air quality standards. The power plant has the capability of firing 320 gallons per hour.

Therefore, the Department under the authority of Regulation 310 CMR 7.05 (1) (e) (3) grants approval to Esleek Manufacturing Company to burn fuel oil with a sulfur content not to exceed 1.21 pounds per million B.t.u. heat release potential at your facility located in Turners Falls, Massachusetts subject to the following provisos:

- OK - 1. that the oil firing rate at the facility be limited to 1375 gallons per hour while burning 2.2% sulfur fuel oil.
- JK - 2. that positive displacement type oil meters equipped with flow

OK — indicators and a 30 day strip chart recorders be installed on the delivery and return fuel lines servicing the plant.

OK — 3. that the oil meter be equipped with an audible automatic alarm system to alert plant personnel that the fuel firing rate is approaching the maximum limit of 137 gallons per hour.

OK — 4. that the load shedding program be implemented when the fuel firing rate exceeds 137 gallons per hour.

OK — 5. that a calibration report on meter accuracy be developed by a certified technician and submitted to the PVAPCD within 30 days after the installation of the metering system.

6. that stack testing to determine compliance with the particulate emission limitation be conducted in accordance with a time schedule developed by the Department.

7. that records be maintained showing the sulfur contents of fuel oil deliveries and that they be made available to the Department upon request.

OK — 8. that the Department be notified in writing the date on which the burning of higher sulfur fuel commences.

9. that the facility operate in conformance with the particulate emission limitations, visible emissions regulations, nuisance regulations and ambient air quality standards.

10. that affirmation is made to comply with all applicable air pollution control regulations and provisions of this approval by executing the attached agreement.

This approval can be suspended, modified or revoked at any time by the Department if the facility is violating or contributing to any violations of the Pioneer Valley Air Pollution Control Regulations or the Massachusetts Ambient Air Quality Standards.

Please be advised that the Federal Environmental Protection Agency has not yet approved a revision to the Massachusetts State Implementation Plan which would allow for the use of higher sulfur fuel oil at this facility.

This approval will become effective immediately upon receipt by the Department of the attached agreement, signed by an officer duly authorized by law to act on behalf of your firm.

Sincerely,

Stephen F. Joyce, Deputy
Regional Environmental Engineer
for Air and Hazardous Materials

STATEMENT OF AGREEMENT

I am in receipt of the Department's letter dated October 25, 1982 stating that approval to burn higher sulfur content fuel under the provisions of Regulation 310 CMR 7.05 (1) (e) 3 of the "Regulations for the Control of Air Pollution in the Pioneer Valley Air Pollution Control District" had been granted to Esleeck Manufacturing Company for the fossil fuel utilization facility located at Turners Falls, Massachusetts.

As a corporate officer I hereby agree that Esleeck Manufacturing will abide by all the requirements of Regulation 7.05 (1) (e) 3, provisions of this approval and all other applicable air pollution control "Regulations".

If there is a violation of Ambient Air Quality Standards within the area of impact of the fossil fuel utilization facility located at Turner Falls, Massachusetts, this approval will be revoked immediately.

This approval could be suspended, modified or revoked by the Department at any time if in the opinion of the Department, the facility is violating or contributing to or violation a violation of air quality standards or applicable regulations.

Name: *James D. Bunker*

Title: Vice President & Treasurer

Company: Esleeck Mfg. Co., Inc.

Date: Dec. 9, 1982

Received for the Department by: *David Hufant*
Division of Air Quality Control

December 10, 1982

Date: