



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

5 Post Office Square, Suite 100

Boston, MA 02109-3912

By Email

**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

Dated by electronic signature

Matthew Braitsch, EHS Manager
Aspen Aerogels Rhode Island, LLC
3 Dexter Road,
Providence, RI 02914

Re: Clean Air Act Reporting Requirement

Dear Mr. Braitsch:

The United States Environmental Protection Agency ("EPA") is requiring Aspen Aerogels Rhode Island, LLC ("Aspen Aerogels") to provide information to EPA that was requested by EPA during its January 20, 2023 Clean Air Act ("CAA") inspection of Aspen Aerogels. Specifically, this information relates to the lean burn natural gas-fired Dresser-Rand Guascor engine; Model Number HGM560; Serial Number 350.178; with a rated capacity 1350 kilowatt ("KW") or 1,810 brakehorse-power ("Bhp") (the "Engine"). This information is needed to evaluate Aspen Aerogels' compliance with 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines ("Subpart 4J") and the State of Rhode Island General Permit for a Distributed Generator, No. GPDG-4 and Approval No. 2338.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether such person is in compliance with the CAA and its implementing regulations.

During the EPA inspection, EPA inspectors requested certain information that Aspen Aerogels representatives promised to provide to EPA that has yet to be provided.

EPA is now formally requiring that Aspen Aerogels submit the following information to EPA within thirty (30) days of its receipt of this reporting requirement:

- Documents describing or containing the manufacturer's recommendations for operating and maintaining the selective catalytic reduction system ("SCR") and oxidation catalyst.
- The site-specific monitoring plan ("SSMP") for the air pollution control systems' continuous parameter monitoring system ("CPMS").
- Documents describing or containing information related to the scheduling or performance of the last three annual performance evaluations performed on the CPMS monitors.
- Documents describing or containing information related to the scheduling or performance of preventative maintenance activities performed on the engine and emissions control systems. and
- For the period January 1, 2021, through to April 1, 2023, hourly data for the following engine and control systems monitoring parameters:
 - Engine power (KWh);
 - Temperature at the inlet to the oxidation catalyst (°F);
 - Temperature at the outlet from the oxidation catalyst (°F);
 - Temperature at the inlet to the SCR (°F);
 - Temperature at the outlet from the SCR (°F);
 - Pressure drop across the oxidation catalyst ("H₂O");
 - Pressure drop across the SCR ("H₂O"); and
 - SCR urea injection rate (GPM).

Be aware that if Aspen Aerogels does not provide the information required in a timely manner, EPA may order it to comply and may seek monetary penalties under Section 113 of the Clean Air Act. Federal law establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

Provide the above-required information electronically via email¹ to mccusker.tom@epa.gov. Please provide separate electronic files for each report you submit.

¹ Note that EPA cannot receive email messages with files larger than 25 MB. If your submissions are larger than 25 MB, please contact EPA to discuss submission options.

If you have any questions regarding this Reporting Requirement, please contact Tom McCusker of my staff at (508) 440-5822.

Sincerely,

JAMES CHOW Digitally signed by JAMES
CHOW
Date: 2023.04.18 10:14:15
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James Chow, Acting Director
Enforcement and Compliance Assurance Division

By electronic cc: David Chopy, RIDEM
Laurie Grandchamp, RIDEM
Chris John, RIDEM
Shawna Smith, RIDEM