



Connecticut Department of

**ENERGY &
ENVIRONMENTAL
PROTECTION**

**BUREAU OF AIR MANAGEMENT
NEW SOURCE REVIEW PERMIT
TO CONSTRUCT AND OPERATE A STATIONARY SOURCE**

Issued pursuant to Title 22a of the Connecticut General Statutes (CGS) and Section 22a-174-3a of the Regulations of Connecticut State Agencies (RCSA).

Owner/Operator	Kimberly-Clark Corporation
Address	58 Pickett District Road, New Milford, CT 06776
Equipment Location	58 Pickett District Road, New Milford, CT 06776
Equipment Description	Solar Titan 130 Combustion Turbine #1 with Eclipse 30FFB-SP Supplemental Burner
Town-Permit Numbers	130-0070
Premises Number	0006
Stack Number	0035
Modification Issue Date	March 20, 2017
Prior Permit Issue Dates	August 15, 2012 March 30, 2010 October 9, 2007
Expiration Date	None

/s/Anne Gobin for
Robert J. Klee
Commissioner

March 20, 2017
Date

This permit specifies necessary terms and conditions for the operation of this equipment to comply with state and federal air quality standards. The Permittee shall at all times comply with the terms and conditions stated herein.

PART I. DESIGN SPECIFICATIONS

A. General Description

The equipment subject to this permit consists of a Solar Titan 130 Combustion Turbine and an Eclipse 30FFB-SP Supplemental Burner. The turbine may be operated with or without the supplemental burner. The supplemental burner cannot be operated without the turbine operating. Control equipment includes low NO_x burners, selective catalytic reduction and oxidation catalyst. This equipment is part of the combined heat and power (CHP) project at the New Milford Mill.

B. Equipment Design Specifications

1. Turbine
 - a. Maximum Natural Gas Firing Rate¹ (Mcf/hr): 171.412
 - b. Maximum Gross Heat Input (MMBtu/hr)¹: 174.84
 - c. Nameplate Capacity (MW): 14.986
2. Supplemental Burner
 - a. Maximum Fuel Firing Rate¹ (Mcf/hr): 24.510
 - b. Maximum Gross Heat Input (MMBtu/hr)¹: 25

¹ at ISO conditions: 288 Kelvin, 60 percent relative humidity and 101.3 kilopascals pressure.

C. Control Equipment Design Specifications

1. Selective Catalytic Reduction (SCR)
 - a. Make and Model: Cormetech CM-21
 - b. Catalyst Type: Homogeneous Honeycomb
 - c. Minimum Gas Flow rate at Maximum Rated Capacity (acfm): 349,386
 - d. Pressure Drop (in. H₂O): 3.4
 - e. Maximum Ammonia Injection at Maximum Rated Capacity (lb/hr): 70 (at dilution)
 - f. Design NO_x Emission Rate (ppmvd @ 15% O₂): ≤2.5
2. Low NO_x Burner
 - a. Make and Model: Solar Turbine Titan 130 Burners
 - b. Guaranteed NO_x Emission Rate (ppmvd @ 15% O₂): 15
3. Oxidation Catalyst
 - a. Make and Model: EmeraChem Modular ADCAT Catalytic Oxidizer
 - b. Design Removal Efficiency: ≥90% (CO), ≥85% (VOC)

D. Stack Parameters

1. Minimum Stack Height (ft): 78

2. Minimum Exhaust Gas Flow Rate at 100% load (acfm): 118,257
3. Minimum Stack Exit Temperature at 100% load (°F): 325
4. Minimum Distance from Stack to Property Line (ft): 308

PART II. OPERATIONAL CONDITIONS

A. Equipment

1. Turbine
 - a. Fuel Type: Natural Gas
 - b. Maximum Natural Gas Consumption over any Consecutive 12 Month Period (MMcf): 1502
2. Turbine and Supplemental Burner
 - a. Fuel Type: Natural Gas
 - b. Maximum Fuel Consumption over any Consecutive 12 Month Period (MMcf): 1717

PART III. ALLOWABLE EMISSION LIMITS

The Permittee shall not cause or allow this equipment to exceed the emission limits stated herein at any time.

A. Short Term Emission Limits

These short term emission limits do not apply during periods of startup and shutdown, unless otherwise noted.

1. Criteria Pollutants
 - a. Turbine Only

Pollutant	lb/hr	ppmvd @ 15% O₂	lb/MMBtu
PM	1.55		0.0089
PM ₁₀	1.55		0.0089
PM _{2.5}	1.55		0.0089
SO ₂	0.245		0.0014
NO _x ¹	1.62	2.5	0.0093
VOC ¹	0.161		
CO ¹	0.982		

b. Turbine and Supplemental Burner

Pollutant	lb/hr	ppmvd @ 15% O ₂	lb/MMBtu
PM	1.76		0.0088
PM ₁₀	1.76		0.0088
PM _{2.5}	1.76		0.0088
SO ₂	0.259		0.0013
NO _x ¹	2.03	2.5	0.0102
VOC ¹	0.181		
CO ¹	1.19		

¹ - Except during periods of startup and shutdown, when the event based emission limits apply.

B. Startup and Shutdown Emission Limits

Pollutant	Startup (lb/event)	Shutdown (lb/event)
NO _x	13.80	6.00
VOC	6.57	3.56
CO	74.07	40.53

1. Startup: The period of time from initiation of combustion firing until the combustion turbines reaches steady-state operation and until the control equipment attains its normal operating temperature and steady-state operation. Duration of startup shall not exceed 75 minutes.
2. Shutdown: The period of time from the initiation of the shutdown process of the combustion turbine until the point at which the combustion process has stopped. Duration of shutdown shall not exceed 45 minutes.
3. The Permittee shall minimize emissions during periods of startup and shutdown by the following work practices and time constraints:
 - a. Start the ammonia injection as soon as minimum catalyst temperature is reached;
 - b. The oxidation catalyst shall not be bypassed during startup or shutdown; and
 - c. Emissions during these periods shall be counted towards the annual emission limits stated herein.

C. Annual Emission Limits

Pollutant	tons per 12 consecutive months
PM	7.71
PM ₁₀	7.71
PM _{2.5}	7.71
SO ₂	1.14
NO _x ¹	8.87
VOC ¹	0.8
CO ¹	5.66

¹ - Includes steady-state, startup and shutdown emissions.

D. Hazardous Air Pollutants

This equipment shall not cause an exceedance of the Maximum Allowable Stack Concentration (MASC) for any hazardous air pollutant (HAP) emitted and listed in RCSA Section 22a-174-29. [STATE ONLY REQUIREMENT]

E. Demonstration of compliance with the above emission limits may be met by calculating the emission rates using stack test data for this source or, if none is available, emission factors from the following sources:

- VOC and CO: Manufacturer's data
- PM, PM₁₀, PM_{2.5}, SO₂: Compilation of Air Pollutant Emission Factors, AP-42, fifth edition, Section 3.1, April 2000
- NO_x: CEM data
- NO_x, VOC and CO (during startup/shutdown): Part III.B of this permit

The commissioner may require other means (e.g. stack testing) to demonstrate compliance with the above emission limits, as allowed by state or federal statute, law or regulation.

PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS

A. Monitoring

1. The Permittee shall comply with the CEM requirements as set forth in RCSA §22a-174-4. CEM shall be required for the following pollutant and enforced on the following basis, except during periods of startup and shutdown:

Pollutant/Operational Parameter	Averaging Times	Emission Limit	Units
NO _x	24 hour rolling	2.5	ppmvd @ 15% O ₂

2. The Permittee shall use individual non-resettable totalizing fuel metering devices or billing meters to continuously monitor fuel feed to the turbine and supplemental burner.

3. The Permittee shall continuously monitor and continuously record the SCR aqueous ammonia/urea injection rate (lb/hr), operating temperature (°F) and pressure drop (inches of water) across the catalyst bed. The Permittee shall maintain these parameters within the ranges recommended by the manufacturer to achieve compliance with the emission limits in this permit.
4. The Permittee shall continuously monitor and continuously record the oxidation catalyst inlet temperature (°F). The Permittee shall maintain this parameter within the range recommended by the manufacturer to achieve compliance with the emission limits in this permit.
5. The Permittee shall perform inspections of the SCR and oxidation catalysts as recommended by the manufacturer.
6. The Permittee may elect not to monitor the total sulfur content of the natural gas, in accordance with 40 CFR §60.4365 Subpart KKKK, if the potential emissions do not exceed 0.060 lb SO₂/MMBtu. This demonstration may be made using the purchase contract specifying that the fuel sulfur content for the natural gas is less than or equal to 20 grains of sulfur/100 standard cubic feet and results in potential emissions not exceeding 0.060 lb SO₂/MMBtu. This determination shall be done on an annual basis pursuant to 40 CFR §60.4415 Subpart KKKK.
7. The Permittee shall install and operate a NO_x CEMS in accordance with 40 CFR §60.4345 Subpart KKKK.

B. Record Keeping

1. The Permittee shall keep records of monthly and consecutive 12 month fuel consumption of the turbine and supplemental burner. The consecutive 12 month fuel consumption shall be determined by adding the current month's fuel consumption to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of the previous month.
2. The Permittee shall calculate and record the monthly and consecutive 12 month PM, PM₁₀, PM_{2.5}, SO₂, NO_x, VOC, and CO emissions in units of tons. The consecutive 12 month emissions shall be determined by adding (for each pollutant) the current month's emissions to that of the previous 11 months. Such records shall include a sample calculation for each pollutant. The Permittee shall make these calculations within 30 days of the end of the previous month.

Emissions during startup and shutdown shall be counted towards the annual emission limitation in Part III.C of this permit.

3. The Permittee shall keep records of all exceedances of any emissions limitation or operating parameter. Such records shall include:
 - a. the date and time of the exceedance;
 - b. a detailed description of the exceedance; and
 - c. the duration of the exceedance.

4. The Permittee shall keep records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the turbine and supplemental burner; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. [40 CFR §60.7(b)]

Such records shall contain the following information:

- a. type of event (startup, shutdown or malfunction);
 - b. equipment affected;
 - c. date of event;
 - d. duration of event (minutes); and
 - e. total NO_x, VOC and CO emissions emitted (lb) during the event.
5. The Permittee shall keep records of each delivery of aqueous ammonia. The records shall include:
 - a. the date of delivery;
 - b. the name of the supplier;
 - c. the quantity of aqueous ammonia delivered; and
 - d. the percentage of ammonia in solution, by weight.
 6. The Permittee shall keep records of the inspection and maintenance of the turbine, supplemental burner, SCR and oxidation catalysts. The records shall include:
 - a. the name of the person;
 - b. the date;
 - c. the results or actions; and
 - d. the date any parts or catalyst is replaced.
 7. The Permittee shall keep all records required by this permit for a period of no less than five years and shall submit such records to the commissioner upon request.

C. Reporting

1. The Permittee shall notify the commissioner in writing of any exceedance of an emissions limitation or operating parameter, and shall identify the cause or likely cause of such exceedance, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows:
 - a. For any hazardous air pollutant, no later than 24 hours after such exceedance commenced; and
 - b. For any other regulated air pollutant or operating parameter, no later than ten days after such exceedance commenced.
2. The Permittee shall notify the commissioner in writing of any malfunction of the turbine/supplemental burner, the air pollution control equipment or the CEMS. The Permittee shall submit such notification within ten days of the malfunction. The notification shall include the following:
 - a. a description of the malfunction and a description of the circumstances surrounding the cause or likely cause of such malfunction; and
 - b. a description of all corrective actions and preventive measures taken and/or planned with respect to such malfunction and the dates of such actions and measures.
3. The Permittee shall submit all reports to the commissioner as required pursuant to RCSA §22a-174-22(l) and 40 CFR §60.4375(a).

PART V. STACK EMISSION TEST REQUIREMENTS

A. Stack emission testing shall be performed in accordance with the [Emission Test Guidelines](#) available on the DEEP website.

B. Stack emissions testing shall be required for the following pollutant(s):

☐ PM ☐ PM₁₀ ☐ PM_{2.5} ☐ SO₂ ☐ NO_x ☒ CO
☒ VOC ☐ Opacity ☐ Other (HAPs):

1. During stack emissions testing, the manufacturer's performance data curve may be used to determine the Maximum Heat Input as follows:

Combustion Turbine only

$$\text{MMBtu/hr} = 189.6632 - 0.4229221T - 0.0058248(T-53.5)^2 + 7.4356E-5(T-53.5)^3$$

where T = ambient temperature (°F)

Combustion Turbine with supplemental burner

$$\text{MMBtu/hr} = 194.01729 - 0.2575267T$$

where T = ambient temperature (°F)

C. The Permittee shall submit test results within 60 days after completion of testing.

D. Recurrent stack testing for CO and VOC shall be conducted within five years from the date of the previous stack test to demonstrate compliance with their respective limits. Recurrent NO_x testing is not necessary as CEM is required in accordance with Part IV. A of this permit, however, the commissioner retains the right to require stack testing at any time to demonstrate compliance.

E. Stack test results for all pollutants shall be reported units of lb/hr.

PART VI. OPERATION AND MAINTENANCE REQUIREMENTS

A. The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations.

B. The Permittee shall operate and maintain this equipment, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.

C. The Permittee shall properly operate the control equipment at all times that this equipment is in operation and emitting air pollutants.

PART VII. SPECIAL REQUIREMENTS

- A. The Permittee shall comply with all applicable sections of the following New Source Performance Standard at all times.

Title 40 CFR Part 60, Subparts KKKK and A.

Copies of the Code of Federal Regulations (CFR) are available online at the U.S. Government Printing Office website.

- B. In the event that a malfunction causing either an emission exceedance or a parameter monitored out of recommended range is not corrected within three hours, the Permittee shall immediately institute shutdown of the turbine/supplemental burner.
- C. The Permittee shall operate this facility at all times in a manner so as not to violate or contribute significantly to the violation of any applicable state noise control regulations, as set forth in RCSA Sections 22a-69-1 through 22a-69-7.4. [STATE ONLY REQUIREMENT]
- D. For this CHP Project, the Permittee utilized internal offsets to net out of major NSR requirements. These internal offsets were the result of the decommissioning of seven diaper machines (in 2004), decommissioning of Boiler #1 (Registration No. 130-0017) and Boiler #2 (Registration No. 130-0018), as well as modifications to Tissue Machine Hood Burner #1 (Permit No. 130-0026) and Tissue Machine Hood Burner #2 (Permit No. 130-0014). The diaper machines #1-#4 were registered sources (Registration Nos. 130-0062, -0063, -0064, -0065) and #5-#7 were exempt units. The following is a list of the scheduled milestones and dates completed.
1. Combustion Turbine #2 (Permit No. 130-0071), startup - **April 15, 2008**
 2. Combustion Turbine #1 (Permit No. 130-0070), startup - **June 25, 2008**
 3. Tissue Hood Burner #1 (Permit No. 130-0026), hood and burner upgrade – **June 14, 2008**
 4. Tissue Hood Burner #2 (Permit No. 130-0014), hood and burner upgrade – **July 31, 2008**
 5. Boiler #2, decommissioned – **April 15, 2008**
 6. Boiler #1, decommissioned – **October 14, 2008**

PART VIII. ADDITIONAL TERMS AND CONDITIONS

- A. This permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the regulated activity in compliance with all applicable requirements of any federal, municipal or other state agency. Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B. Any representative of the DEEP may enter the Permittee's site in accordance with constitutional limitations at all reasonable times without prior notice, for the purposes of inspecting, monitoring and enforcing the terms and conditions of this permit and applicable state law.
- C. This permit may be revoked, suspended, modified or transferred in accordance with applicable law.

- D.** This permit is subject to and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut and conveys no property rights in real estate or material, nor any exclusive privileges, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby. This permit shall neither create nor affect any rights of persons or municipalities who are not parties to this permit.
- E.** Any document, including any notice, which is required to be submitted to the commissioner under this permit shall be signed by a duly authorized representative of the Permittee and by the person who is responsible for actually preparing such document, each of whom shall certify in writing as follows: "I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under section 22a-175 of the Connecticut General Statutes, under section 53a-157b of the Connecticut General Statutes, and in accordance with any applicable statute."
- F.** Nothing in this permit shall affect the commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the Permittee by the commissioner.
- G.** Within 15 days of the date the Permittee becomes aware of a change in any information submitted to the commissioner under this permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the Permittee shall submit the correct or omitted information to the commissioner.
- H.** The date of submission to the commissioner of any document required by this permit shall be the date such document is received by the commissioner. The date of any notice by the commissioner under this permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three days after it is mailed by the commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" means calendar day. Any document or action which is required by this permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.
- I.** Any document required to be submitted to the commissioner under this permit shall, unless otherwise specified in writing by the commissioner, be directed to: Office of Director; Engineering & Enforcement Division; Bureau of Air Management; Department of Energy and Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.



NSR Engineering Evaluation
CT Department of Energy and Environmental Protection
Bureau of Air Management

Company Name:	Kimberly-Clark Corporation	Permit No.:	130-0070
Equipment Location:	58 Pickett District Road, New Milford, CT 06776	Date App Received:	5/18/2016
Mailing Address:	58 Pickett District Road, New Milford, CT 06776	SIMS No.:	201606592
Contact Person:	Ms. Sonii Kollie	Date Prepared:	9/29/2016
Contact Title:	Environmental Coordinator	Prepared By:	Dave LaRiviere
Contact Phone:	860 354 4481	Single or Multiple Units:	Single
Contact Email:	Sonii.kollie@kcc.com	Permit Type:	Minor Mod (prepaid)
Ozone:	severe non-attainment	Premises Size:	Major
PM2.5:	attainment	Equipment Size:	Minor
Equipment Description	Solar Titan 130 Combustion Turbine #1 with Supplemental Burner	TV/GPLPE Permit No:	130-0050-TV
Step 1: Complete all the fields above Step 2: Generate Eval Step 3: Update Fields			

Introduction

Reason for Application

Kimberly-Clark Corporation (KCC) submitted a minor modification application for Permit No. 130-0070 to add temperature based equations for maximum heat input of the turbine and turbine with supplemental burner and to amend the emissions tables to make it clear that the supplemental burner cannot be fired independently of the turbine. There are no changes to hourly or annual emission rates.

Regulatory Applicability

The proposed changes meet the criteria of RCSA §22a-174-2a(e).

Discussion of Modification

The reason for this minor modification is to address potential compliance issues during periodic performance testing in achieving 90% maximum rated capacity. Temperature based performance equations for maximum heat input will be added for both modes of operation. The equations follow:

Combustion Turbine only

$$\text{MMBtu/hr} = 189.6632 - 0.4229221T - 0.0058248(T-53.5)^2 + 7.4356E-5(T-53.5)^3$$

Combustion Turbine with supplemental burner

$$\text{MMBtu/hr} = 194.01729 - 0.2575267T$$

where T = ambient temperature (°F) in both equations

In addition, the current version of Permit No. 130-0070 has a separate emissions table for the supplemental burner. This gives the impression that the supplemental burner can be operated independently, which it cannot do. The emission tables in the modified permit will be “turbine only” and “turbine and supplemental burner”.

The current permit is in an old format and has been updated to the current format with this modification. Along with this, permit clean up was performed, such as removing initial requirements that have since been met and removing MASC limits, replacing them with the current RCSA §22a-174-29 permit language.

Regulatory Analysis

The accepted changes do not trigger any new regulatory requirements.

Public Notification

The applicant will not be required to publish Notice of Tentative Determination in accordance with the E&E Division policy.

Environmental Compliance History Policy

The compliance record was reviewed in accordance with the Environmental Compliance History Policy. The applicant submitted a compliance history of the previous five years and has indicated no violations. Agency records (including the SIMS database) were reviewed for information to evaluate the applicant’s compliance history (see attached). Additionally, a review of air program compliance was requested from the Enforcement Section and that response forms a part of this record.

Recommendation

It is recommended that KCC be granted a minor modification to Permit No. 130-0070 as detailed above.

Emissions Change from Modification/Revision

Pollutant	Existing Permit (tpy)	Modified Permit (tpy)	Change in Emissions (tpy)
PM	7.71	7.71	0
PM ₁₀	7.71	7.71	0
PM _{2.5}	7.71	7.71	0
SO _x	1.14	1.14	0
NO _x	8.87	8.87	0
VOC	0.8	0.8	0
CO	5.66	5.66	0

Ambient Air Quality Impact Analysis (Attachment L of NSR Application)

Review Type	Conduct If...	Emissions/Analysis	Dates
Refined Modeling	...allowable emissions for all equipment being permitted contemporaneously exceed any of the limits to the right →	☐ $PM_{10} \geq 15$ TPY ☐ $SO_x \geq 15$ TPY ☐ $PM_{2.5} \geq 10$ TPY ☐ $NO_x \geq 40$ TPY ☐ $CO \geq 100$ TPY ☐ $Pb \geq 0.6$ TPY ☐ Total Dioxins $\geq 0.6E-7$ TPY	Date Sent: Date Approved:
Screening	...allowable emissions for all equipment being permitted contemporaneously fall into any of the ranges to the right →	☐ $3 \leq PM_{10} < 15$ TPY ☐ $3 \leq SO_x < 15$ TPY ☐ $1 \leq PM_{2.5} < 10$ TPY ☐ $5 \leq NO_x < 40$ TPY ☐ $5 \leq CO < 100$ TPY	Date Sent: Date Approved:
Stack Height Review	...screening and refined modeling are not required.	Stack Height (SH): Building Height(BH): Building Width (BW): The lesser of BH *1.3 or BW*1.3 (BL): The greater of 32.8 feet or BL (MSH): The equipment passes if SH is greater than or equal to MSH.	Date Approved:

Comments: Refined modeling for particulate and NO_x emissions and screening for CO emissions was performed and submitted with the initial permit application. The analyses were approved on Aug 8, 2007. This modification does not change any hourly or annual emission rates.

Permit Fee(s) (Double Click to edit)

Equipment Size ☐ Major ☒ Minor

Permit Type ▼

Permit Fee \$1,750 ea.

Municipality ☐ Yes

of Permits/Applications \$1,750

Application Fee Submitted ☒ Yes -\$940

Was Permit Fee paid with Application Fee? ☒ Yes -810

Additional Application Fees (\$1750 Each)

	Quantity	
BACT Review	0	\$0
LAER Review	0	\$0

Money Owed	\$0
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Compliance History Review

Was the SIMS Enforcement Report run and reviewed for this applicant?	Yes
Were other bureaus contacted to resolve any outstanding enforcement actions shown in the SIMS Report?	N/A
What is the date on the Enforcement Section's review of air compliance email?	9/15/2016
Was the compliance record reviewed in accordance with the Environmental Compliance History Policy?	Yes

Comments:

Approvals

Based on the information submitted by the applicant, this engineering evaluation and the compliance history review, the granting of a permit is recommended for Kimberly-Clark Corporation.

/s/David LaRiviere

David LaRiviere
APCE III

/s/Susan E. Amarello 10/6/2016

Susan E. Amarello
Supervising APCE

/s/Jaimeson Sinclair 3/16/17

Jaimeson Sinclair
Assistant Director