Clarifications: Title V Minor and Non-Minor Modifications

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Topics

• Non-Minor Mod – definition
• Minor Mod – definition
• Procedural Requirements
• How to deal with new sources/requirements not listed in the current Title V permit?
• Questions?
“Non-minor permit modification” means a change to a permit that is required for the permittee to lawfully engage in any of the activities or proposed activities at a stationary source as identified in 22a-174-2a(d) of the RCSA, namely:

• (A) To incorporate the requirements of any new source review permit issued to the permittee pursuant to former section 22a-174-3(k) or (l) of the Regulations of Connecticut State Agencies or section 22a-174-3a(k) or (l) of the Regulations of Connecticut State Agencies;
• (B) To change a Title V permit term or condition which had prevented a Title V source from being subject to an otherwise applicable requirement;
• (C) To relax the form or type of or any reduction in the frequency of any monitoring, reporting or record keeping required by the Title V permit; or
• (D) To incorporate a change to an applicable requirement not otherwise subject to subsections (e) or (f) of this section or not otherwise allowed as an off-permit change pursuant to 40 CFR 70.4(b)(14), as amended from time to time, or as operational flexibility pursuant to 40 CFR 70.4(b)(12), as amended from time to time.
“Minor permit modification” means a change to a permit that is required for the permittee to lawfully engage in any of the activities or proposed activities at a stationary source as identified in section 22a-174-2a(e) of the Regulations of Connecticut State Agencies, namely:

- (A) Any modification not covered by permit revisions in subsection (f)(2)(A) to (F), inclusive, of this section; and
- (B) Any modification allowed pursuant to the Title V minor permit modification criteria pursuant to 40 CFR 70.7 (e)(2)(i)(A)(1) to (6), inclusive, as amended from time to time.
Procedures and Timelines

• Non-Minor Permit Mod – must apply for and obtain modified Title V permit prior to commencement

• Minor Permit Mod – apply first, 21 days later source may operate in accordance with proposed changes.
Examples: What’s needed and when?

- New emission unit with PTE > 15 tpy at existing Title V source?
- New federally enforceable regulation (for which CT has delegated authority) takes effect?
- A new or modified emission unit that is part of a major modification?
- Removal of opacity CEMS due to converting an oil fired boiler to a natural gas only fired boiler.

Please hover over the questions for the answers.
Questions?

Engineer of the Day Hotline: 860-424-4152