



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

BUREAU OF AIR MANAGEMENT TITLE V OPERATING PERMIT

Issued pursuant to Title 22a of the Connecticut General Statutes (CGS) and Section 22a-174-33 of the Regulations of Connecticut State Agencies (RCSA) and pursuant to the Code of Federal Regulations (CFR), Title 40, Part 70.

Title V Permit Number	189-0136-TV
Client/Sequence/Town/Premises Numbers	655/1/189/27
Date Issued	May 19, 2017
Modification Issue Date	April 13, 2020
Expiration Date	May 19, 2022

Corporation:

Allnex USA Inc.

Premises Location:

528 South Cherry Street, Wallingford, CT 06492

Name of Responsible Official and Title:

Frank DiCristina, Site Manager

All the following attached pages, 2 through 50, are hereby incorporated by reference into this Title V permit.

Tracy R. Babbidge
for Betsey C. Wingfield
Deputy Commissioner

4/13/2020

Date

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Title V Operating Permit

All conditions in Sections III, IV, and VI of this Title V permit are enforceable by both the Administrator and the commissioner unless otherwise specified. Applicable requirements and compliance demonstration are set forth in Section III of this Title V permit. The Administrator or any citizen of the United States may bring an action to enforce all permit terms or conditions or requirements contained in Sections III, IV, and VI of this Title V permit in accordance with the Clean Air Act, as amended.

LIST OF ABBREVIATIONS/ACRONYMS

<i>Abbreviation/Acronym</i>	<i>Description</i>
°C	Degrees Celsius
°F	Degrees Fahrenheit
ACT	Available Control Techniques
CFR	Code of Federal Regulations
CGS	Connecticut General Statutes
EU	Emissions Unit
EPA	Environmental Protection Agency
g	gram
GEU	Grouped Emissions Unit
h	Hour
HAP	Hazardous Air Pollutant
l	liter
lb	Pound
MACT	Maximum Achievable Control Technology
MCPU	Miscellaneous Organic Chemical Manufacturing Process Unit
MeOH	Methanol
Mg	Megagram
MMBtu	Million British Thermal Units
mm Hg	Millimeters of Mercury
MON	Miscellaneous Organic NESHAP
NESHAP	National Emissions Standard for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
OHAP	Organic Hazardous Air Pollutants
OOS	Out of Service
PHA	Process Hazard Analysis
ppm	Parts per Million
ppmw	Parts per Million by Weight
psi	Pounds per Square Inch
psia	Pounds per Square Inch Absolute
RACT	Reasonably Available Control Technology
RCSA	Regulations of Connecticut State Agencies
RMP	Risk Management Plan
RTO	Regenerative Thermal Oxidizer
scfm	Standard Cubic Feet per Minute
SIC	Standard Industrial Classification Code
SOS	Standard Operating Scenario
TRE	Total Resource Effectiveness
ULSD	Ultra-Low Sulfur Diesel
U.S.C.	United States Code
VOC	Volatile Organic Compound
VOHAP	Volatile Organic Hazardous Air Pollutant
WWTP	Waste Water Treatment Plant
y	year

Section I: Premises Information/Description

A. PREMISES INFORMATION

Nature of Business: Plastics materials and resins
Primary SIC: 2821

Facility Mailing Address: Allnex USA Inc.
528 South Cherry Street
Wallingford, CT 06492

Telephone Number: (203) 284-4388

B. PREMISES DESCRIPTION

Allnex USA Inc. (Allnex) is a leading supplier of resins and additives for agricultural, industrial, protective, automotive and special purpose coatings and inks. The Allnex product range entails innovative liquid resins & additives, radiation cured powder coating resins & additives and cross linkers for use on wood, metal, plastic, and other surfaces. Allnex and its subsidiaries operate sites in North America, South America, Europe and Asia.

Approximately 125 people are employed at the Allnex Wallingford site. The site is located on 238 acres extending from the railroad main line on the east to the Quinnipiac River on the west. It constitutes 25 buildings, two miles of streets and roads and totals 3.2 miles around its perimeter. The primary activities conducted at the site are classified under the Standard Industrial Classification (SIC) code 2821. Liquid amino and waterborne alkyd resins are manufactured at the site.

Also located at the Wallingford site is a separate thermoplastic manufacturing business conducted by Roehm America, LLC (formerly, Evonik CYRO LLC). The Roehm America, LLC manufacturing operations are subject to permits issued to Roehm America, LLC and therefore are not covered under this Title V permit.

Allnex also operates a wastewater treatment plant that treats effluent from the Allnex and Roehm America, LLC manufacturing areas, as well as a boiler house that supplies steam to all parts of the site.

Allnex exceeds the major source threshold for the following pollutants: VOC and HAPs.

Allnex is a Title V source located in a serious non-attainment area for ozone as defined in RCSA §22a-174-1.

Section II: Emissions Units Information

A. EMISSIONS UNITS DESCRIPTION

Emissions units are set forth in Table II.A. It is not intended to incorporate by reference these Registrations, or Regulations into this Title V permit.

TABLE II.A: EMISSIONS UNITS DESCRIPTION

Emissions Unit	Emissions Unit Description	Control Unit Description	Registration (R) Number or Regulation Cite
Storage Tanks			
EU-R01-2	NMA Product Tank 104-51 - OOS	Scrubber 104-51	
EU-R01-3	Tank 627-1: Acrylamide - OOS	Scrubber 627	
EU-R01-4	CYMEL 323, 325, AND 327 Wash Tank 105-14	Scrubber 105	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-5	CYMEL 1161 AND 1168 Wash Tank 105-16	Scrubber 105	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-6	CYMEL 1130 AND 1133 Wash Tank 105-18	Scrubber 105	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-7	Recovered Methanol Tank 11	Scrubber C-100	40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-8	CYMEL 303 (4% Salt) Storage Tank 111-001		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-9	CYMEL 1168 Storage Tank 111-004		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-10	Recovered Methanol Tank 12	Scrubber C-100	40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-11	Recovered Methanol Tank 20	Scrubber C-100	40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-12	Recovered Methanol Product Tank 203-2		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-13	Distillate Tank 203-3A (Y37)		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-14	8% n-Butanol Wash Tank 203-3B		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-15	80% Iso-Butanol Surge Tank 203-4B	Scrubber 203-4B	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-16	T-502 Methyl Formcel Storage	Scrubber 502	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-17	T-503 Formalin Storage	Scrubber 502	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION

Emissions Unit	Emissions Unit Description	Control Unit Description	Registration (R) Number or Regulation Cite
EU-R01-19	Methanol Raw Material Tank 511	Scrubber 511	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-20	Methanol/Rec Methanol Raw Material Tank 512	Scrubber 511	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-22	Recovered Isobutanol Storage Tank 533	Scrubber 533	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-23	CYTEL 1168 Distillate Tank 534 (Y45)		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-24	CYTEL 1133 Distillate (n-BuOH/MeOH) Tank 551	Scrubber 551	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-25	Tank 553: Formaldehyde Enriched Butanol	Scrubber 551	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-26	CYTEL 1168 Distillate Tank 556 (Y45)	Scrubber 556	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-27	CYTEL 385 Storage Tank 563		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-28	Tank 565: Empty		
EU-R01-33	Tank 101-1 – HCl - OOS	Scrubber 101-1	40 CFR Part 63 Subpart FFFF
EU-R01-34	Tank 101-11: Caustic Soda		40 CFR Part 63 Subpart FFFF
EU-R01-35	Tank 101-12: Nitric Acid	Scrubber 101-12	40 CFR Part 63 Subpart FFFF
EU-R01-40	Tank 104-36: Aerotex M-3		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-41	Tank 104-41: Empty		40 CFR Part 63 Subpart FFFF
EU-R01-42	Tank 10 - Isopropanol		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-43	Tank 130-001: Ethylene Glycol - OOS		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-44	Tank 130-007: Propylene Glycol		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-46	Tank 506: Denatured Alcohol		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-47	Tank 532: Wet Xylene - OOS		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION

Emissions Unit	Emissions Unit Description	Control Unit Description	Registration (R) Number or Regulation Cite
EU-R01-48	Tank 535: Recovered Butanol		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-49	Tank 539: Heat Transfer Fluid		40 CFR Part 60 Subpart Kb RCSA §22a-174-20(a)
EU-R01-50	Tank 552: 100% n-Butanol		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-51	Tank 555-12: n-Butanol Wash	Scrubber 555	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-52	Tank 555-4: Methanol Wash	Scrubber 555	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-53	Tank 555-6: Methanol Wash	Scrubber 555	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-54	Tank 555-8: Isobutanol Wash	Scrubber 555	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-55	Tank 555-10: n-Butanol Wash	Scrubber 555	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-56	Tank 557: 100% Isobutanol		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-57	Tank 558: Xylene		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-58	Tank 561: Cymel 1133 Distillate	Scrubber 561	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-59	Tank 562: 80% n-Butanol	Scrubber 562-4	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-60	Tank 564: Formaldehyde Enriched Butanol	Scrubber 562-4	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-61	Tank 566: 8% n-Butanol/Isobutanol		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-62	Tank 575: Resydrol AZ6300 Product		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-63	Tank 576: ZAY Intermediate	Condenser	40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-64	Tank 577: Resydrol AZ6195 Product	Condenser	40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION

Emissions Unit	Emissions Unit Description	Control Unit Description	Registration (R) Number or Regulation Cite
			RCSA §22a-174-20(a)
EU-R01-65	Tank 579: Tall Oil Fatty Acid		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-66	Tank 590: Ucecryl 3022		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-67	Tank 591: ZAY Intermediate	Condenser	40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-68	Tank 592: ZAF Intermediate	Condenser	40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-69	Tank 120-13: Dry Xylene		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-70	Tank 593 Resydrol AY 586 Product		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
EU-R01-71	Tank 596: Wet Xylene		40 CFR Part 60 Subpart Kb 40 CFR Part 63 Subpart FFFF RCSA §22a-174-20(a)
Fuel Burning Equipment			
EU-R02-2	B-37 150 Train Hot Oil Furnace		RCSA §22a-174-22f 40 CFR Part 63 Subpart DDDDD
EU-R02-4	B-13B 200 Train Hot Oil Furnace		RCSA §22a-174-22f 40 CFR Part 63 Subpart DDDDD
Manufacturing Equipment			
EU-R03-1	B-05/TR1012 Product Drums		40 CFR Part 63 Subpart FFFF
EU-R03-2	B-05/TR.101 Filter Press 101-13A		40 CFR Part 63 Subpart FFFF
EU-R03-3	B-05/TR.101 Filter Press 101-13B		40 CFR Part 63 Subpart FFFF
EU-R03-4	B-05/TR.102 Filter Press 102-06		40 CFR Part 63 Subpart FFFF
EU-R03-5	B-05/TR.102 Filter Press 102-11		40 CFR Part 63 Subpart FFFF
EU-R03-6	B-05/TR.102 Hot Well 120-30	Scrubber 101-36	40 CFR Part 63 Subpart FFFF
EU-R03-7	B-05/TR.101 Hot Well 101-50	Scrubber 101-36	40 CFR Part 63 Subpart FFFF
EU-R03-8	B-05/TR.101 Reactor 101-01		40 CFR Part 63 Subpart FFFF
EU-R03-9	B-05/TR.102 Reactor 102-01		40 CFR Part 63 Subpart FFFF
EU-R03-10	B-05/TR.101 Blend Tank 101-11A	Scrubber 150-5	40 CFR Part 63 Subpart FFFF
EU-R03-11	B-05/TR.101 Blend Tank 101-11B	Scrubber 150-5	40 CFR Part 63 Subpart FFFF
EU-R03-12	B-05/TR.101 Decanter 101-04	05CN10126A, Condenser	40 CFR Part 63 Subpart FFFF
EU-R03-13	B-05/TR.102 Decanter 102-41	05CN12023, Condenser	40 CFR Part 63 Subpart FFFF
EU-R03-17	B-05/TR.101 Receiver 101-05	05CN10126A, Condenser	40 CFR Part 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION

Emissions Unit	Emissions Unit Description	Control Unit Description	Registration (R) Number or Regulation Cite
EU-R03-18	B-05/TR.102 Receiver 102-27	05CN12023, Condenser	40 CFR Part 63 Subpart FFFF
EU-R03-19	B-05/TR.101/102 Cartridge Filter		40 CFR Part 63 Subpart FFFF
EU-R03-20	B-05/TR.101/102 Cartridge Filter		40 CFR Part 63 Subpart FFFF
EU-R03-21	B-05/TR.101/102 Cartridge Filter		40 CFR Part 63 Subpart FFFF
EU-R04-1	B-06/TR.65/68 Luwa Evaporator		40 CFR Part 63 Subpart FFFF
EU-R04-4	B-06/TR.65/68 Filter Press		40 CFR Part 63 Subpart FFFF
EU-R04-6	B-06/TR.65/68 Kettle 65	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R04-7	B-06/TR.65/68 Kettle 68	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R04-8	B-06/TR.65/68 Hold Tank 67		40 CFR Part 63 Subpart FFFF
EU-R04-9	B-06/TR.65/68 Hold Tank 68		40 CFR Part 63 Subpart FFFF
EU-R04-10	B-06/TR.65/68 Hold Tank 71	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R04-11	B-06/TR.65/68 Hold Tank 72		40 CFR Part 63 Subpart FFFF
EU-R04-12	B-06/TR.65/68 Hold Tank 73		40 CFR Part 63 Subpart FFFF
EU-R04-13	B-06/TR.65/68 Receiver 65		40 CFR Part 63 Subpart FFFF
EU-R04-14	B-06/TR.65/68 Receiver 69 (aka Tank 101-31)		40 CFR Part 63 Subpart FFFF
EU-R04-15	B-06/TR.65/68 Hot Well		40 CFR Part 63 Subpart FFFF
EU-R04-16	B-06/TR.65/68 Drumming		40 CFR Part 63 Subpart FFFF
EU-R04-17	B-06 TRAIN 65/68 Product/Distillate Drumming		40 CFR Part 63 Subpart FFFF
EU-R04-18	B-06/TR.65/68 Tank Wagon		40 CFR Part 63 Subpart FFFF
EU-R05-2	B-06/TR103467 Buggy		40 CFR Part 63 Subpart FFFF
EU-R05-3	B-06/TR.103 Heinkel Centrifuge 103-60	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-4	B-06/TR.107 Heinkel Centrifuge 107-60 - OOS	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-5	B-06/TR.106 Heinkel Centrifuge 106-60	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-6	B-06/TR103 & 104 Drumming		40 CFR Part 63 Subpart FFFF
EU-R05-7	B-06/TR106 Drumming		40 CFR Part 63 Subpart FFFF
EU-R05-8	B-06/TR.103 Filter Press (A)		40 CFR Part 63 Subpart FFFF
EU-R05-9	B-06/TR.103 Filter Press (B)		40 CFR Part 63 Subpart FFFF
EU-R05-10	B-06/TR.104 Filter Press (C)		40 CFR Part 63 Subpart FFFF
EU-R05-11	B-06/TR.104 Filter Press (D)		40 CFR Part 63 Subpart FFFF
EU-R05-12	B-06/TR.106 Filter Press (E)		40 CFR Part 63 Subpart FFFF
EU-R05-13	B-06/TR.106 Filter Press (F)		40 CFR Part 63 Subpart FFFF
EU-R05-14	B-06/TR.107 Filter Press (G) - OOS		40 CFR Part 63 Subpart FFFF
EU-R05-15	B-06/TR.107 Filter Press (H) - OOS		40 CFR Part 63 Subpart FFFF
EU-R05-16	B-106/TR.103 Reactor 103-01	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-17	B-106/TR.104 Reactor 104-01	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-18	B-106/TR.106 Reactor 106-01	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-19	B-06/TR.107 Reactor 107-01 - OOS	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION

Emissions Unit	Emissions Unit Description	Control Unit Description	Registration (R) Number or Regulation Cite
EU-R05-20	B-06/TR.103 Blend Tank 103-08	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-21	B-06/TR.103 Blend Tank 103-11	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-22	B-06/TR.104 Blend Tank 104-08	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-23	B-06/TR.104 Blend Tank 104-11	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-24	B-06/TR.106 Blend Tank 106-08	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-25	B-06/TR.106 Blend Tank 106-11	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-26	B-06/TR.107 Blend Tank 107-08 - OOS	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-29	B-06/TR.103 Hydrochloric Acid Weigh Tank - OOS		40 CFR Part 63 Subpart FFFF
EU-R05-30	B-06/TR.103 Nitric Acid Weigh Tank	Scrubber 103-100	40 CFR Part 63 Subpart FFFF
EU-R05-31	B-06/TR.103/4/6/7 Solvent Transfer Tank	Scrubber 103-41	40 CFR Part 63 Subpart FFFF
EU-R05-32	B-06/TR.103 33% Caustic Weigh Tank		40 CFR Part 63 Subpart FFFF
EU-R05-33	B-06/TR.104 Acidified Methanol Tank		40 CFR Part 63 Subpart FFFF
EU-R05-34	B-06/TR.104 IMPA Weigh Tank		40 CFR Part 63 Subpart FFFF
EU-R05-35	B-06/TR.106 Nitric Acid Weigh Tank	Scrubber 104-110	40 CFR Part 63 Subpart FFFF
EU-R05-36	B-06/TR.106 Caustic Head Tank		40 CFR Part 63 Subpart FFFF
EU-R05-37	B-06/TR.107 Nitric Acid Weigh Tank - OOS		40 CFR Part 63 Subpart FFFF
EU-R05-38	B-06/TR.107 Caustic Head Tank - OOS		40 CFR Part 63 Subpart FFFF
EU-R05-39	B-06/TR.106/7 Aging Tank #74	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-40	B-06/TR.103/4 Aging Tank #75	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-41	B-06/TR.103 Receiver 103-5	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-42	B-06/TR.107 Receiver 104-5	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-43	B-06/TR.106 Receiver 106-05	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-44	B-06/TR.107 Receiver 107-05 - OOS	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-45	B-06/TR.103/104 Hot Well 103-14	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-46	B-06/TR.106/107 Hot Well 106-14	MON RTO/Scrubber	40 CFR Part 63 Subpart FFFF
EU-R05-47	B-06/TR.103467 Tank Wagon Loading		40 CFR Part 63 Subpart FFFF
EU-R06-2	B-06/TR.104-34 Tank Wagon Loading - OOS		40 CFR Part 63 Subpart FFFF
EU-R07-1	B-05/TR.120 Filter Press - OOS		40 CFR Part 63 Subpart FFFF
EU-R07-2	B-05/TR.120 Hot Well 102-28 - OOS		40 CFR Part 63 Subpart FFFF
EU-R07-3	B-05/TR.120 Reactor 120-03 - OOS		40 CFR Part 63 Subpart FFFF
EU-R07-5	B-05/TR.120 Cutting Kettle 120-07	05WSBT, Wet Scrubber	40 CFR Part 63 Subpart FFFF
EU-R07-6	B-05/TR.120 Drums		40 CFR Part 63 Subpart FFFF
EU-R07-7	Adipic Acid Hopper - OOS		40 CFR Part 63 Subpart FFFF
EU-R08-1	B-05/TR.150 Acrylamide Bag Charging	Scrubber 150-36	40 CFR Part 63 Subpart FFFF
EU-R08-2	B-05/TR.150 Filter Press		40 CFR Part 63 Subpart FFFF
EU-R08-3	B-05/TR.150 Reactor 150-1A	Scrubber 150-5	40 CFR Part 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION

Emissions Unit	Emissions Unit Description	Control Unit Description	Registration (R) Number or Regulation Cite
EU-R08-4	B-05/TR.150 Rolling Storage Tank Wagon Loading		40 CFR Part 63 Subpart FFFF
EU-R08-5	B-05/TR.150 Blend Tank 150-02	Scrubber 150-5	40 CFR Part 63 Subpart FFFF
EU-R08-6	B-05/TR.150 Decanter/Receiver 120-18		40 CFR Part 63 Subpart FFFF
EU-R08-7	B-05/TR.150 Receiver/8% Butanol 120-34		40 CFR Part 63 Subpart FFFF
EU-R08-8	B-05/TR.150 Hot Well 150-23	Scrubber 101-36	40 CFR Part 63 Subpart FFFF
EU-R08-9	B-05/TR.150 Drums		40 CFR Part 63 Subpart FFFF
EU-R08-10	B-05/TR.150 Tank Wagon Loading		40 CFR Part 63 Subpart FFFF
EU-R08-11	B-05/TR. 200 Reactor 200	Scrubber 150-5	40 CFR Part 63 Subpart FFFF
EU-R08-12	B-05/TR. 200 Decanter 200-2		40 CFR Part 63 Subpart FFFF
EU-R08-13	B-05/TR. 200 Receiver 200-3		40 CFR Part 63 Subpart FFFF
EU-R08-14	B-05/TR.200 Cutting Kettle 120-04	Scrubber 150-5	40 CFR Part 63 Subpart FFFF
EU-R08-15	B-05/TR. 200 Vacuum Pump Receiver 200-6		40 CFR Part 63 Subpart FFFF
EU-R09-1	B-06/TR.66 Filter Press - OOS		40 CFR Part 63 Subpart FFFF
EU-R09-2	B-06/TR.66 Reactor Kettle 66 - OOS		40 CFR Part 63 Subpart FFFF
EU-R09-3	B-06/TR.66 Holding Tank 76 - OOS		40 CFR Part 63 Subpart FFFF
EU-R09-4	B-06/TR.66 Holding Tank 77 - OOS		40 CFR Part 63 Subpart FFFF
EU-R09-5	B-06/TR.66 Drumming - OOS		40 CFR Part 63 Subpart FFFF
EU-R09-6	B-06/TR.66 Tank Wagon Loading - OOS		40 CFR Part 63 Subpart FFFF
EU-R10-1	B-06/Reactor 114-01 Phenolic Resins	MON RTO/Scrubber	40 CFR Part 63 Subpart OOO
EU-R10-2	B-06/Tank 114-08 o-Cresol Storage	MON RTO/Scrubber	40 CFR Part 63 Subpart OOO
EU-R10-3	B-06/12.5% Caustic Tank - OOS		
EU-R10-4	B-06/Tank 114-20 - OOS		
EU-R10-5	B-06/Soda Ash Tank 114-23 - OOS		
EU-R10-6	B-06/15% Sulfuric Acid Tank - OOS		
EU-R10-7	B-06/Tank 114-29 - OOS		
EU-R10-8	B-06/Decanter 114-11	MON RTO/Scrubber	40 CFR Part 63 Subpart OOO
EU-R10-9	B-06/Tank 104-34 Recover Butanol Storage		40 CFR Part 63 Subpart OOO
EU-R10-10	B-06/Kettle 61 Butanol Recovery Still	MON RTO/Scrubber	40 CFR Part 63 Subpart OOO
EU-R10-11	B-06/Kettle 63 Butanol Recovery Decanter	MON RTO/Scrubber	40 CFR Part 63 Subpart OOO
EU-R10-12	B-06/Kettle 64 8% Butanol Hold Tank		40 CFR Part 63 Subpart OOO
EU-R10-13	B-06/Phenolic Resins Tank Wagon		40 CFR Part 63 Subpart OOO
EU-R10-14	B-06/TR.107 Tank 107-11 (Empty) - OOS	MON RTO/Scrubber	
EU-R10-15	B-06/TR.107 Tank 107-24 (Empty) - OOS	MON RTO/Scrubber	
EU-R11-1	B-06 MFRS Methanol Column		40 CFR Part 63 Subpart FFFF
EU-R11-2	B-06 MFRS Formaldehyde Column 110-03		40 CFR Part 63 Subpart FFFF
EU-R11-3	B-06 MFRS Methanol Column Receiver (Tank 101-31 East)		40 CFR Part 63 Subpart FFFF

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION

Emissions Unit	Emissions Unit Description	Control Unit Description	Registration (R) Number or Regulation Cite
EU-R11-4	B-06 MFRS Formaldehyde Column Receiver 110-20	Scrubber 074	40 CFR Part 63 Subpart FFFF
EU-R11-5	B-06 MFRS Formaldehyde Column Receiver 110-20		40 CFR Part 63 Subpart FFFF
EU-R12-1	B-05 MARS Methanol Stripper Column C-1	05CPE4, Condenser	40 CFR Part 63 Subpart FFFF
EU-R12-2	B-05 MARS Water Stripper Column C-2	05CPE5, Condenser	40 CFR Part 63 Subpart FFFF
EU-R12-3	B-05 MARS Butanol Column C-4	05CPE19, Condenser	40 CFR Part 63 Subpart FFFF
EU-R12-4	B-05 MARS Decanter D-1		40 CFR Part 63 Subpart FFFF
EU-R12-5	B-05 MARS Decanter D-3		40 CFR Part 63 Subpart FFFF
EU-R12-6	B-05 Methanol Reflux Receiver Tank 3	05CPE4, Condenser	40 CFR Part 63 Subpart FFFF
EU-R12-7	B-05 MARS Feed Tank 4 (MeOH Column)		40 CFR Part 63 Subpart FFFF
EU-R12-8	B-05 MARS Feed Tank 5 (Water Stripper Column)		40 CFR Part 63 Subpart FFFF
EU-R12-9	B-05 MARS Feed Tank 7 (Butanol Column)		40 CFR Part 63 Subpart FFFF
EU-R13-4	B-06 Kettle 62 - OOS		40 CFR Part 63 Subpart FFFF
EU-R13-5	B-06 Train 61/62 Product Drumming - OOS		40 CFR Part 63 Subpart FFFF
EU-R13-6	B-06/TR.61/62 Tank Wagon Loading - OOS		40 CFR Part 63 Subpart FFFF
EU-R15-1	Equipment Leak Fugitives		40 CFR Part 63 Subpart OOO 40 CFR Part 63 Subpart FFFF
EU-R16-1	B-06 Resins Cooling Towers		40 CFR Part 63 Subpart FFFF
EU-R16-2	B-05 Resins Cooling Towers		40 CFR Part 63 Subpart FFFF
EU-R17-2	Building 6 Parts Cleaner		RCSA §22a-174-20(l)
EU-R17-3	Building 6, 2 nd Parts Cleaner		RCSA §22a-174-20(l)
Storage Tanks			
EU-S01-1	Tank 100-76: Diesel		40 CFR Part 60 Subpart Kb RCSA §22a-174-20(a)
EU-S01-10	Tank 559: Gasoline		40 CFR Part 60 Subpart Kb RCSA §22a-174-20(a)
EU-S01-11	Tank 560: Diesel Fuel (for vehicles)		40 CFR Part 60 Subpart Kb RCSA §22a-174-20(a)
Fuel Burning Equipment			
EU-S02-2	B-04 Generator Propane		40 CFR Part 63 Subpart ZZZZ
EU-S02-6	B-15 Generator Propane		40 CFR Part 63 Subpart ZZZZ
EU-S02-9	WWTP Emergency Generator ULSD		RCSA §22a-174-3c RCSA §22a-174-22f
EU-S02-10	No. 4 Well Generator Diesel	Catalytic Converter	RCSA §22a-174-22f 40 CFR Part 63 Subpart ZZZZ
EU-S02-11	B-02 Generator Diesel		RCSA §22a-174-22f 40 CFR Part 63 Subpart ZZZZ
EU-S02-12	B23 Emergency Water Pump - Diesel		40 CFR Part 63 Subpart ZZZZ

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS DESCRIPTION

Emissions Unit	Emissions Unit Description	Control Unit Description	Registration (R) Number or Regulation Cite
EU-S02-13	Emergency Diesel Air Compressor Engine		RCSA §22a-174-3c RCSA §22a-174-22f 40 CFR Part 63 Subpart ZZZZ
EU-S03-1	Boiler No. 1 (61.8 MMBtu/h maximum rated capacity)		189-0108-R 40 CFR Part 63 Subpart DDDDD
EU-S03-2	Boiler No. 3		189-0110-R RCSA §22a-174-22f 40 CFR Part 63 Subpart DDDDD
EU-S04-1	Wastewater Treatment Plant		40 CFR Part 63 Subpart FFFF
EU-S05-1	Site Remediation Activities		40 CFR Part 63 Subpart GGGGG

Grouped Emissions Units

GEU-01	40 CFR Part 60 Subpart Kb Organic Liquid Storage Tanks: EU-R01-19, 20, 24, 58	As above	As above
GEU-02	MON Group 1 Organic Liquid Storage Tanks: EU-R01-7, 10, 11, 63, 67, 68	As above	As above
GEU-03	Miscellaneous Organic Liquid Storage Tanks: EU-R01-4, 5, 6, 8, 9, 12-17, 20, 22, 23, 25-27, 40, 42-44, 46-57, 59-62, 64, 65, 66, 69-71 and EU-S01-1, 10, 11	As above	As above
GEU-04	40 CFR Part 63 Subpart ZZZZ Spark Ignition Emergency Engines: EU-S02-2, 6	As above	As above
GEU-05	40 CFR Part 63 Subpart ZZZZ Emergency Diesel Engines: EU-S02-10 through 13	As above	As above
GEU-06	40 CFR Part 63 Subpart DDDDD Natural Gas Fired Boilers and Process Heaters: EU-S03-1 and 2, EU-R02-2 and 4	As above	As above
GEU-07	40 CFR Part 63 Subpart FFFF MON Process Equipment: EU-R01-4 through 17, 19-20, 22-27, 33-35, 40-44, 46-48, 50-70, EU-R03-1 through EU-R09-6, EU-R11-1 through EU-R13-6, EU-R15-1 through EU-R16-2, EU-S04-1	As above	As above
GEU-08	40 CFR Part 63 Subpart OOO Phenolic Resins Process Equipment: EU-R10-1, 2, 8-15	As above	As above
GEU-09	NO _x Emitting Equipment: EU-S02-9, GEU-04, GEU-05 and GEU-06	As above	As above and Order No. 8376

Section II: Emissions Units Information

B. OPERATING SCENARIO IDENTIFICATION

The Permittee shall be allowed to operate under the following Standard Operating Scenarios (SOS) without notifying the commissioner, provided that such operations are explicitly provided for and described in Table II.B

TABLE II.B: OPERATING SCENARIO IDENTIFICATION		
Identification of Operating Scenario	Emissions Units Associated with the Scenario	Description of Scenario
SOS	All units are included in this standard operating scenario.	Resins manufacturing

Section III: Applicable Requirements and Compliance Demonstration

The following contains summaries of applicable regulations and compliance demonstration for each identified Emissions Unit regulated by this Title V permit.

A. GEU-01, GEU-02, GEU-03: ORGANIC LIQUID STORAGE TANKS Subject to RCSA §22a-174-20(a), 40 CFR Part 60 Subpart Kb

1. RCSA §22a-174-20(a) Requirements

a. Limitation or Restriction

- i. The Permittee shall not place, store or hold in any above ground storage tank of more than 40,000 gallons (150,000 liters) capacity or greater any volatile organic compound with a vapor pressure of 0.75 psi or greater under actual storage conditions unless the tank, reservoir or other container is a pressure tank capable of maintaining working pressures sufficient at all time to prevent vapor or gas loss to the atmosphere or is designed, and equipped, with one of the vapor loss control devices listed below. [RCSA §22a-174-20(a)(2)]
 - (A) A vapor recovery system which collects all volatile organic compound vapors and gases discharged from the tank and a vapor return or disposal system which is designed to process such vapors so as to reduce their emission to the atmosphere by at least 95% by weight. [RCSA §22a-174-20(a)(2)(C)]
 - (B) Other equipment or means with an efficiency equal to that required under RCSA §22a-174-20(a)(2)(C) for purposes of air pollution control as may be approved by the commissioner by permit or order. [RCSA §22a-174-20(a)(2)(D)]
- ii. For any tank subject to RCSA §22a-174-20(a)(2), if any piping, valves, vents, seals, gaskets or covers of roof openings are found to have defects or visible gaps or the VOC control requirements of this subsection are not met, the Permittee shall: [RCSA §22a-174-20(a)(4)]
 - (A) If the tank is not storing liquid, complete repairs or replacements prior to filling the tank;
 - (B) If the tank is storing liquid, complete repairs or replacements or remove the tank from service within 45 days after discovery of the defect or visible gap. If the Permittee anticipates that a repair or replacement cannot be completed or the tank cannot be emptied within such 45 day period, the Permittee shall notify the commissioner prior to the end of such 45 day period. The Permittee shall make repairs or completely empty the tank as soon as possible; and
 - (C) Any evidence of leakage as described in Section III.A.1 of this Title V permit shall also be treated as a malfunction of control equipment as described in RCSA §22a-174-7.
- iii. The Permittee shall not place, store or hold in any stationary storage vessel of more than 250 gallon (950 liter) capacity any volatile organic compound with a vapor pressure of 0.75 psi or greater under actual storage conditions unless such vessel is equipped with a permanent submerged fill pipe with a discharge point 18 inches or less from the bottom of the storage vessel or is a pressure tank as described in RCSA §22a-174-20(a)(2). [RCSA §22a-174-20(a)(5)]
- iv. The provisions of RCSA §22a-174-20(a)(5) shall not apply to loading of volatile organic compounds into any storage vessel having a capacity of less than 1,000 gallons which was installed prior to June 1, 1972, nor to any underground storage vessel installed prior to June 1, 1972, where the fill pipe between the fill connection and the storage vessel is an offset fill pipe. [RCSA §22a-174-20(a)(6)]
- v. The external surfaces of any storage tank containing VOCs with a vapor pressure of 0.75 pounds per square inch or greater under standard conditions that has a maximum capacity of 2,000 gallons (7,570 liters) or greater and is exposed to the rays of the sun shall be either mill-finished aluminum or painted and maintained white upon the next painting of the tank or by March 7, 2024, whichever is sooner. The external surfaces of any storage tank that is brought into service after the effective date of RCSA §22a-174-20(a)(7), that has a maximum capacity of 2,000 gallons or greater and that is

Section III: Applicable Requirements and Compliance Demonstration

exposed to the rays of the sun shall be either mill-finished aluminum or painted and maintained white prior to being filled with any VOC with a vapor pressure of 0.75 pounds per square inch or greater under standard conditions. The requirement to use mill-finished aluminum or white paint shall not apply to words and logograms applied to the external surface of the storage tank for purposes of identification provided such symbols do not cover more than 20 percent of the external surface area of the tank's sides and top or more than 200 square feet (18.6 square meters), whichever is less. [RCSA §22a-174-20(a)(7)]

- vi. Degassing and cleaning of aboveground tanks shall be performed as follows:
[RCSA §22a-174-20(a)(9)]
 - (A) The Permittee shall not perform degassing of any above ground storage tank subject to RCSA §22a-174-20(a)(2) during the period from June 1 through August 31 of any calendar year, except as provided in Section III.A.1.a.vi(B) of this Title V permit.
 - (B) Notwithstanding Section III.A.1.a.vi(A) of this Title V permit, the Permittee may degas an above ground storage tank at any time for the purpose of performing a repair that is necessary for safe and proper function of the tank. The Permittee shall notify the commissioner when a tank is emptied and degassed under this subparagraph within 72 hours of completing the degassing and repair. Such notification shall be submitted to the Compliance Assistance and Coordination Unit of the Bureau of Air Management and shall include the following information:
 - (1) Identification of the facility and the tank degassed;
 - (2) Identification of the VOC stored;
 - (3) An explanation of the need to degas the tank during the period from June 1 through August 31;
 - (4) The date the Permittee determined that degassing and repair would be necessary;
 - (5) The days that degassing commenced and was completed; and
 - (6) The date that inspection, repair and refilling was or is anticipated to be completed.
- vii. The Permittee shall clean an aboveground storage tank subject to RCSA §22a-174-20(a)(2) using one or more of the following methods:
 - (A) Using any of the following cleaning agents:
 - (1) Diesel fuel;
 - (2) A solvent with an initial boiling point of greater than 302°F;
 - (3) A solvent with a vapor pressure less than 0.5 psi;
 - (4) A solvent with 50 g/l VOC content or less; or
 - (5) Another cleaning agent approved by the commissioner and the Administrator; or
 - (6) Steam cleaning.

b. Monitoring Requirements

Record keeping specified in Section III.A.1.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Record Keeping Requirements

The Permittee shall make and maintain the following records: [RCSA §22a-174-20(a)(10)(B)]

- i. Documentation of control device efficiency and capture efficiency, if applicable, using an applicable EPA reference method or alternate method as approved by the commissioner and the Administrator;

Section III: Applicable Requirements and Compliance Demonstration

- ii. Date and type of maintenance performed on air pollution control equipment, if applicable;
- iii. Documentation of any leak detected pursuant to RCSA §22a-174-20(a)(4) including, but not limited to, the date the leak was detected, location of the leak, type of repair made and the date of repair and explanation of the reason for delaying repair, if applicable;
- iv. Dates of all tank degassing activities performed pursuant to Section III.A.1.a.vi of this Title V permit;
- v. Date, cleaning methods and cleaning agents used for any cleaning performed pursuant to Section III.A.1.a.vii of this Title V permit; and
- vi. Any approval by the commissioner or Administrator issued pursuant to RCSA §22a-174-20(a).

d. Reporting Requirements

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

2. 40 CFR Part 60 Subpart Kb Requirements, VOC Emissions (GEU-01 Only)

a. Limitation or Restriction

- i. Allowable Emission Limit for VOC: \leq 500 ppm above background [40 CFR Part 60 Subpart Kb]
- ii. Minimum VOC Control Efficiency: 95% [40 CFR Part 60 Subpart Kb]

b. Monitoring and Testing Requirements

- i. The Permittee shall maintain a closed vent system designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by a reading of less than 500 ppm above background and visual inspections, as determined in 40 CFR Part 60 Subpart VV, 40 CFR §60.485(b). [40 CFR §60.112b(a)(3)(i)]
- ii. The control device shall be designed and operated to reduce inlet VOC emissions by 95% or greater. [40 CFR §60.112b(a)(3)(ii)]
- iii. The Permittee shall operate the closed vent system and control device and monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to the Administrator in accordance with 40 CFR §60.113b(c)(1). [40 CFR §60.113b(c)(2)]

c. Record Keeping Requirements

The Permittee shall make and maintain the following records:

- i. A copy of the operating plan. [40 CFR §60.115b(c)(1)]
- ii. The measured values of parameters in Section III.A.2.b.iii of this Title V permit. [40 CFR §60.115b(c)(2)]

d. Reporting Requirements

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

3. 40 CFR Part 60 Subpart Kb Requirements, Tank Information (GEU-01 & GEU-03 Only)

a. Limitation or Restriction

The tanks do not have any limitations or restrictions, however, there are record keeping requirements.

b. Monitoring Requirements

Record keeping specified in Section III.A.3.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

Section III: Applicable Requirements and Compliance Demonstration

c. Record Keeping Requirements

- i. The Permittee shall keep readily accessible records showing the dimension of each tank and an analysis showing the capacity of each tank for the life of each tank. [40 CFR §60.116b(b)]
- ii. The Permittee shall keep records of the volatile organic liquid stored in each tank as applicable in accordance with 40 CFR §60.116b(c).

d. Reporting Requirements

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

B. EU-S02-9, GEU-04, GEU-05: EMERGENCY ENGINES

Subject to RCSA §§22a-174-19b, -22f (EU-S02-9, EU-S02-10, EU-S02-11 & EU-S02-13 Only), RCSA §22a-174-3c (EU-S02-9 & EU-S02-13 Only), CGS §16a-21a and 40 CFR Part 63 Subpart ZZZZ (GEU-04 & GEU-05 Only)

1. RCSA §22a-174-22f Requirements, NO_x RACT

a. Limitation or Restriction

The Permittee shall not operate EU-S02-9, EU-S02-10, EU-S02-11 or EU-S02-13 for routine, scheduled testing or maintenance on any day for which the commissioner has forecast that ozone levels will be "moderate to unhealthy for sensitive groups" or greater. If, subsequent to the initial forecast of "moderate to unhealthy for sensitive groups" or greater, the forecast is revised to "moderate" or lower, the Permittee is no longer prohibited from operating EU-S02-9, EU-S02-10, EU-S02-11 or EU-S02-13 for routine, scheduled testing or maintenance for the remainder of that day. The Permittee may rely on an ozone forecast of "moderate" or lower obtained after 3 p.m. on the preceding day. Subsequent changes to the ozone forecast after 3 p.m. that forecast ozone levels of "moderate to unhealthy for sensitive groups" or greater shall not obligate the Permittee to refrain from operation of EU-S02-9, EU-S02-10, EU-S02-11 or EU-S02-13 on the following day. [RCSA §22a-174-22f(d)(2)]

b. Monitoring Requirements

Record keeping specified in Section III.B.1.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Record Keeping Requirements

The Permittee shall make and maintain the following records:

- i. The Permittee shall keep records of total monthly operating hours of EU-S02-9, identifying the dates and operating hours of non-emergency use and the reason for non-emergency operation. For an emergency engine subject to 40 CFR 63 Subpart ZZZZ, records shall be those required by 40 CFR §63.6655. [RCSA §22a-174-22f(g)(3)(A)]
- ii. The Permittee shall keep records of all tune-ups, repairs, replacement of parts and other maintenance. [RCSA §22a-174-22f(g)(3)(B)]
- iii. The Permittee shall copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22f. [RCSA §22a-174-22f(g)(3)(C)]

d. Reporting Requirements

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

Section III: Applicable Requirements and Compliance Demonstration

2. Fuel Sulfur Content

a. Limitation or Restrictions for Each Unit

The sulfur content of ULSD shall not exceed 15 ppm. [CGS §16a-21a and RCSA §22a-174-19b]

b. Monitoring Requirements

Record keeping specified in Section III.B.2.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Record Keeping Requirements

The Permittee shall make and maintain the following records:

- i. Maintain records of the sulfur content and quantity purchased for combustion. A written certification or a written contract with a fuel supplier is sufficient to satisfy these requirements if the certification or contract identifies: [RCSA §22a-174-19b(g)(3)]
 - (A) The name of the fuel seller;
 - (B) The type of fuel purchased;
 - (C) The sulfur content of the fuel purchased; and
 - (D) The method used to determine the sulfur content of the fuel purchased.

d. Reporting Requirements

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

3. 40 CFR Part 63 Subpart ZZZZ Requirements (GEU-04 & GEU-05 Only)

a. Limitations and Restrictions

The Permittee shall comply with the applicable emissions limitations contained in Table 2c of 40 CFR Part 63 Subpart ZZZZ for each engine. [40 CFR §63.6602]

b. Monitoring Requirements

Record keeping specified in Section III.B.3.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Record Keeping Requirements

The Permittee shall make and maintain the following records:

- i. The Permittee shall keep records of the required maintenance conducted. [40 CFR §63.6655(e)]
- ii. The Permittee shall keep records of the hours of operation of the engine that is recorded through a non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [40 CFR §63.6655(f)]

d. Reporting Requirements

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

Section III: Applicable Requirements and Compliance Demonstration

4. RCSA §22a-174-3c Requirements (EU-S02-9 & EU-S02-13 Only)

a. Limitations and Restrictions

The Permittee shall limit distillate oil purchased for the premises, inclusive of blends of distillate oil and biodiesel fuel, to equal to or less than 21,000 gallons in any calendar year. [RCSA §22a-174-3c(b)(6)]

b. Monitoring Requirements

Record keeping specified in Section III.B.4.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Record Keeping Requirements

The Permittee shall make and maintain records of all distillate oil, inclusive of blends of distillate oil and biodiesel fuel, purchased for the premises. [RCSA §22a-174-33(o)(2)]

d. Reporting Requirements

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

C. GEU-06: BOILERS, 150 TRAIN AND 200 TRAIN HOT OIL FURNACES

Subject to RCSA §22a-174-22f (EU-S03-2 only) and 40 CFR Part 63 Subpart DDDDD

1. NO_x Emissions (EU-S03-2 Only)

a. Limitations and Restrictions for each unit

- i. If EU-S03-2 emits equal to or greater than 274 lb of NO_x on any day from May 1 to September 30, inclusive, the Permittee shall thereafter operate EU-S03-2 in compliance with RCSA §22a-174-22e. [RCSA §22a-174-22f(e)(2)]
- ii. The Permittee shall conduct an inspection and tune-up of EU-S03-2 at least once every 60 months. The inspection and tune-up of EU-S03-2 shall be conducted according to the manufacturer's recommended procedures or, if the manufacturer's recommendations are not available, according to best available practices. [RCSA §22a-174-22f(f)]

b. Monitoring and Testing Requirements

Record keeping specified in Section III.C.1.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(K)(ii)]

c. Record Keeping Requirements

The Permittee shall make and maintain the following records:

- i. Records and report produced pursuant to Section III.C.1 of this Title V permit. Such records and reports shall be available for inspection at reasonable hours by the commissioner or Administrator. [RCSA §22a-174-22f(g)(1)]
- ii. During the period from May 1 to September 30, inclusive, records sufficient to determine the NO_x emissions (lb) per day. [RCSA §22a-174-22f(g)(2)(A)]
- iii. A calculation of NO_x emission on each day of operation, performed no later than the last day of the month for every day of operation in the preceding month. [RCSA §22a-174-22f(g)(2)(B)]
- iv. The method used to calculate daily NO_x emissions and the information used to determine the NO_x emissions based on the most recent stack test conducted in accordance with protocols approved in writing by the commissioner in advance of testing. [RCSA §22a-174-22f(g)(2)(C)]

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- v. The date and work performed for repairs, replacement of parts and other maintenance. [RCSA §22a-174-22f(g)(2)(D)]
- vi. Records of each tune-up conducted pursuant to RCSA §22a-174-22f(f) containing the date the tune-up occurred, the name, title and affiliation of the person performing the tune-up, description of the work performed and procedure used. [RCSA §22a-174-22f(g)(2)(E)]
- vii. Copies of all documents submitted to the commissioner pursuant to Section III.C.1 of this Title V permit. [RCSA §22a-174-22f(g)(2)(F)]

d. Reporting Requirements

- i. The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]
- ii. If EU-S03-2 emits equal to more than 274 pounds of NO_x on any day from May 1 to September 30, inclusive, the Permittee shall submit a notification to the Compliance Analysis and Coordination Unit, Bureau of Air Management at the Department. Such notification shall be submitted not later than 60 days after the date on which the daily NO_x emissions threshold was exceeded and shall include the following information [RCSA §22a-174-22f(h)]:
 - (A) Legal name(s), address(es) and telephone number(s) of the Permittee. Provide the exact name as registered with the Secretary of the State;
 - (B) Location address of the premises where EU-S03-2 is located;
 - (C) Make and model of EU-S03-2;
 - (D) Each fuel type combusted in EU-S03-2;
 - (E) NO_x emissions data for EU-S03-2;
 - (F) If EU-S03-2 is operated pursuant to a new source review permit or a registration, the type of license and license number;
 - (G) The longitude and latitude of EU-S03-2, in decimal degrees format;
 - (H) The location address in Connecticut where records required to demonstrate compliance with this section are maintained;
 - (I) The date on which NO_x emissions exceeded the threshold;
 - (J) A statement that EU-S03-2 will be operated pursuant to the applicable requirements of section 22a-174-22e of the Regulations of Connecticut State Agencies; and
 - (K) A certification, as follows, signed by a person authorized by the owner or operator to execute and deliver such a submission on behalf of the owner or operator:

"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 other applicable statute."

2. 40 CFR Part 63 Subpart DDDDD Requirements (Boiler MACT)

a. Work Practice Standards

- i. The Permittee shall conduct tune-ups of EU-R02-2 annually as specified in 40 CFR

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§§63.7540(a)(10)(i) through (iv).

[40 CFR §63.7540 and Table 3 to Subpart DDDDD of 40 CFR Part 63]

- ii. The Permittee shall conduct biennial tune-ups of EU-R02-4 as specified in 40 CFR §§63.7540(a)(10)(i) through (iv).
[40 CFR §63.7540 and Table 3 to Subpart DDDDD of 40 CFR Part 63]
- iii. The Permittee shall conduct tune-ups of EU-S03-1 and EU-S03-2 every five years as specified in 40 CFR §§63.7540(a)(10)(i) through (iv). Each of these boilers is equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio.
[40 CFR §63.7540 and Table 3 to Subpart DDDDD of 40 CFR Part 63]

b. Monitoring Requirements

Record keeping specified in Section III.C.2.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Record Keeping Requirements

The Permittee shall:

- i. Keep records of the required tune-ups conducted. [40 CFR §63.7555]
- ii. Keep records of the required one-time energy assessment as specified in Table 3 of 40 CFR Part 63 Subpart DDDDD (completed prior to January 31, 2016). [40 CFR §63.7555]

d. Reporting Requirements

- i. The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]
- ii. Submit a notification of compliance to the commissioner and the Administrator by March 31, 2016. [40 CFR §63.7550]
- iii. Submit an annual compliance certification report to the commissioner and the Administrator by January 31, beginning in 2017. [40 CFR §63.7550]

D. GEU-09: NO_x Emitting Equipment Subject to State Order No. 8376

1. Premises-Wide Cap for NO_x Emissions

a. Limitations and Restrictions

The Permittee shall not cause or allow NO_x emissions from all fuel-burning emissions units at the premises, excluding mobile sources as defined in RCSA §22a-174-1 and insignificant sources listed in RCSA §22a-174-33(g)(3), to exceed 40 tons over any consecutive 12 month period.
[Order No. 8376 B.1]

b. Monitoring Requirements

- i. The Permittee shall monitor each fuel-burning emissions unit at the premises, excluding mobile sources as defined in RCSA §22a-174-1 and insignificant sources listed in RCSA §22a-174-33(g)(3), under one of the following options [Order No. 8376 B.2]:
 - (A) Fuel Meter:
 - (1) Using an individual non-resettable fuel meter; or
 - (2) With the written approval of the commissioner, using a non-resettable fuel meter that measures fuel supplied to a group of emissions units.
 - (B) Hourly Meter:

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- (1) Using an individual non-resettable hourly meter; or
- (2) With the written approval of the commissioner, using a non-resettable hourly meter for a group of emissions units.

(C) For non-road engines with a maximum engine power of 25 horsepower or less and rental units, the Permittee may, in the absence of fuel or hourly meters, use purchase records or invoices to monitor fuel usage for such units.

ii. The Permittee shall determine NO_x emissions rates in accordance with the methods specified in RCSA §22a-174-22f(g)(2)(C). [Order No. 8376 B.7]

c. *Record Keeping Requirement*

- i. The Permittee shall make and keep a current record of all stationary fuel burning equipment, excluding insignificant sources listed in RCSA §22a-174-33(g)(3). The record shall include both permanent emission units and temporary emissions units as defined in RCSA §22a-174-22e at the premises. Records shall include, at a minimum, the following information for each fuel burning emissions unit [Order No. 8376 B.3]:
 - (A) A description of the emissions unit including: make, model, location, and EU number or other identification number;
 - (B) The maximum rated capacity;
 - (C) Identification of the fuel(s) used;
 - (D) Monitoring method in accordance with Section III.D.1.b.1 of this Title V permit as well as the basis (e.g. New Source Review, Federal/State Regulation or order number), where applicable;
 - (E) Emission factor for NO_x and source of such factor; and
 - (F) The construction or placement date of temporary units and removal date, as applicable.
- ii. For each emissions unit or group of emissions units identified in Section III.D.1.c.i of this Title V permit as using a fuel meter to monitor fuel consumption, the Permittee shall make and keep records of monthly and consecutive 12 month fuel consumption for each fuel combusted. 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. [Order No. 8376 B.4]
- iii. For each emissions unit, or group of emissions units identified in Section III.D.1.c.i of this Title V permit as using an hourly meter to monitor hours of operation, the Permittee shall make and keep records of monthly and consecutive 12 month hours of operation. The consecutive 12 month hours of operation shall be determined by adding the current month's hours of operation to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of the previous month. [Order No. 8376 B.5]
- iv. For each emissions unit, or group of emission units identified in Section III.D.1.c.i of this Title V permit as using purchase records or invoices, the Permittee shall make and keep records of monthly and consecutive 12 month fuel consumption. The Permittee shall make and keep records of monthly and consecutive 12 month fuel consumption for each fuel combusted. 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. [Order No. 8376 B.6]
- v. The Permittee shall calculate and record the monthly and consecutive 12 month NO_x emissions for the premises. The consecutive 12 month NO_x emissions shall be determined by adding the current month's NO_x emissions to that of the previous 11 months for the premises. The Permittee shall make these calculations within 30 days of the end of the previous month. [Order No. 8376 B.8]

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- vi. The Permittee shall maintain records of all purchase orders, invoices, emissions calculations methodology or other documents necessary to verify the records required by Order No. 8376. [Order No. 8376 B.9]

d. Reporting Requirements

- i. The Permittee shall retain records and supporting documentation for a minimum of five years commencing on the date such records were created. The Permittee shall provide the records to the commissioner within 30 days of receipt of a written request from the commissioner. [Order No. 8376 B.10]
- ii. The Permittee shall use best efforts to submit to the commissioner all documents required by Order No. 8376 in a complete and approvable form. If the commissioner notifies the Permittee that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and the Permittee shall correct the deficiencies and resubmit it within the time specified by the commissioner or, if no time is specified by the commissioner, within 30 days of the commissioner's notice of deficiencies. In approving any document or other action under Order No. 8376, the commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the commissioner deems necessary to carry out the purposes of Order No. 8376. Nothing in this paragraph shall excuse noncompliance or delay. [Order No. 8376 B.11]
- iii. Any document, including but not limited to any notice, which is required to be submitted to the commissioner under Order No. 8376 shall be signed by Allnex's principal executive officer or statutorily authorized official, by Allnex's chief executive officer or a duly authorized representative of such officer, as those terms are defined in RCSA §22a-174-2a, and by the individual(s) responsible for actually preparing such document, and each such individual shall certify in writing as follows [Order No. 8376 B.14]:

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that 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 §53a-157b of the Connecticut General Statutes and any other applicable law."

- iv. Any document required to be submitted to the commissioner under Order No. 8376, unless otherwise specified in Order No. 8376 or in writing by the commissioner, shall be directed to [Order No. 8376 B.25]:

Supervisor, Compliance Analysis and Coordination Unit
Enforcement Division
Bureau of Air Management
Department of Environmental Protection
79 Elm Street, 5th Floor
Hartford, Connecticut 06106-5127

E. EU-R17-2 and EU-R17-3: PARTS CLEANERS Subject to RCSA §22a-174-20(l)

1. VOC Emissions

- a. *Work Practice Standards* [RCSA §22a-174-20(l)(3)]
 - i. Equip the cleaning device with a cover that is easily operated with one hand.

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- ii. Equip the cleaning device with an internal rack or equipment for draining cleaned parts so that parts are enclosed under the cover while draining. Such drainage rack or equipment may be external for applications where an internal type cannot fit into the cleaning system.
- iii. Collect and store waste solvent in closed containers. Closed containers used for storing waste solvent may contain a device that allows pressure relief but does not allow liquid solvent to drain from the container.
- iv. Close the cover if parts are not being handled in the cleaner for two minutes or more, or if the device is not in use.
- v. Drain the cleaned parts for at least 15 seconds or until dripping ceases, whichever is longer.
- vi. If used, supply a degreasing solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure which does not exceed 10 psi measured at the pump outlet and perform such spraying within the confines of the cold cleaning unit.
- vii. Minimize the drafts across the top of the cold cleaning unit such that whenever the cover is open the unit is not exposed to drafts greater than 40 meters per minute, as measured between one and two meters upwind, and at the same elevation as the tank lip.
- viii. Do not operate the unit upon the occurrence of any visible solvent leak until such leak is repaired. Any leaked solvent or solvent spilled during transfer shall be cleaned immediately, and the wipe rags or other sorbent material used to clean the spilled or leaked solvent shall be immediately stored in covered containers for disposal or recycling.
- ix. Provide a permanent, conspicuous label on or posted near the unit clearly summarizing the applicable operating requirements.
- x. Use only solvent that contains less than 5% VOC by weight or has a vapor pressure less than or equal to 1.0 mm Hg at 20°C.
- xi. Sponges, fabric, wood, leather, paper and other absorbent material shall not be cleaned in a cold cleaning machine.

b. Monitoring Requirements

Record keeping specified in Section III.E.1.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Record Keeping Requirements

The Permittee shall make and maintain the following records:

- i. Maintain records of the following information for a minimum of five years after such record is made [RCSA §22a-174-20(1)(3)(J)]:
 - (A) The type of solvent used, including a description of the solvent and the solvent name,
 - (B) The vapor pressure of the solvent in mm Hg measured at 20°C (68°F),
 - (C) The percent VOC content by weight, and
 - (D) The amount of solvent added to each unit on a monthly basis.
- ii. Name and address of any person and his or her company to whom waste degreasing solvent is transferred, and the amount of waste degreasing solvent transferred.
- iii. Records showing compliance with Section III.E.1.a.vii of this Title V permit.

d. Reporting Requirements

The Permittee shall submit additional information in writing, at the commissioner's request, within 30

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days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

F. GEU-07: MON MACT AFFECTED EQUIPMENT

1. In accordance with 40 CFR Part 63 Subpart FFFF, Miscellaneous Organic Chemical Manufacturing, for the subject emission units the Permittee shall meet the requirements of 40 CFR Part 63 Subpart FFFF, including monitoring, reporting and record keeping, by the dates given in 40 CFR Part 63 Subpart FFFF.

2. General Requirements [40 CFR §63.2450]

- a. The Permittee must be in compliance with the emission limits and work practice standards in 40 CFR Part 63 Subpart FFFF, Tables 1 through 7 at all times, except during periods of startup, shutdown, and malfunction. The Permittee must meet the notification, reporting and record keeping requirements specified in 40 CFR §§63.2515, 63.2520 and 63.2525.
- b. The Permittee must determine if an emission stream is a halogenated vent stream, as defined in 40 CFR §63.2550, by calculating the mass emission rate of halogen atoms in accordance with 40 CFR §63.115(d)(2)(v).
- c. Except when complying with 40 CFR §63.2485, if the Permittee reduces organic HAP emissions by venting emissions through a closed-vent system to any combination of control devices (except a flare) or recovery devices, the Permittee must meet the requirements of 40 CFR §63.982(c) and the requirements referenced therein.

3. OHAP Emissions from Continuous Process Vents [40 CFR §63.2455]

a. Limitations and Restrictions for each unit

- i. Reduce Group 1 Continuous Process Vent Emissions by $\geq 98\%$.
[40 CFR Part 63 Subpart FFFF, Table 1]

b. Monitoring and Testing Requirements

- i. Except for continuous process vents combined with Group 1 batch process vents, the Permittee shall calculate the Total Resources Effectiveness (TRE) value of each continuous process vent per the procedure specified in 40 CFR §63.115(d). [40 CFR §63.2455(b)]
- ii. The Permittee shall designate any continuous process vent with a TRE value of 1.9 or less as a Group 1 continuous process vent. [40 CFR §63.2550(i)(3)]
- iii. The Permittee shall measure the parameters needed to calculate the TRE value of each continuous process vent with a TRE value of 5.0 or less as specified in 40 CFR §63.115(d)(2).
[40 CFR §§63.115(d)(1)(ii) and 63.2455(b)(2)]

c. Record Keeping Requirements

The Permittee shall keep a record of each continuous process vent TRE value determination.
[40 CFR §63.2525(B)]

d. Reporting Requirements

- i. The Permittee shall include a change in the status from Group 2 to Group 1 of any continuous process vent in the semi-annual compliance report. [40 CFR §63.2520(e)(10)]
- ii. The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

4. OHAP Emissions from Batch Process Vents [40 CFR §63.2460]

a. Limitations and Restrictions for each unit

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Reduce Group 1 Batch Process Vent Emissions by $\geq 98\%$. [40 CFR Part 63 Subpart FFFF, Table 2]

b. Monitoring and Testing Requirements

- i. Except for batch process vents combined with Group 1 batch process vents, the Permittee shall calculate monthly uncontrolled HAP emissions from each batch process vent per the procedure specified in 40 CFR §63.1257(d). [40 CFR §63.2460(b)]
- ii. Calculations of 12 month rolling uncontrolled HAP emissions shall be made by adding the uncontrolled HAP emissions of the current month with those of the preceding 11 months. [40 CFR §63.2460(b)]
- iii. The Permittee shall determine whether each batch manufactured was standard or nonstandard for each Miscellaneous Manufacturing Unit (MCPU) for which the combined HAP emissions from Group 2 batch process vents equals or exceeds 1,000 pounds per 12 months. [40 CFR §63.2525(e)]
- iv. For each batch that is determined to be nonstandard, the Permittee shall calculate uncontrolled HAP emissions from batch process vents per the procedure specified in 40 CFR §63.1257(d). [40 CFR §63.2525(e)]

c. Record Keeping Requirements

- i. The Permittee shall keep a record of the date each batch is manufactured and the associated HAP emissions from batch process vents. [40 CFR §63.2525(b)]
- ii. The Permittee shall keep a record of whether each batch manufactured was a standard batch and the estimated emissions for each batch considered to be a nonstandard batch. [40 CFR §63.2525(d)]
- iii. The Permittee shall keep a record of the rolling 12 month uncontrolled HAP emissions from batch process vents for each MCPU with Group 2 batch process vents that are not combined with Group 1 batch process vents. [40 CFR §63.2525(b)]

d. Reporting Requirements

- i. The Permittee shall include a change in status from Group 2 to Group 1 of any batch process vent in the semi-annual compliance report. [40 CFR §63.2520(e)(10)]
- ii. The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

5. OHAP Emissions from Storage Tanks [40 CFR §63.2470]

a. Limitations and Restrictions for each unit

Reduce Group 1 Storage Tanks Vent Emissions by $\geq 95\%$. [40 CFR Part 63 Subpart FFFF, Table 4]

b. Monitoring and Testing Requirements

The Permittee shall designate any storage tank having a HAP vapor pressure of 1.0 psia or greater as a Group 1 storage tank. [40 CFR §63.2550(i)(3) and Table 4]

c. Record Keeping Requirements

- i. The Permittee shall keep a record of the dimensions, capacity and contents of each storage tank. [40 CFR §§63.1065(a) and 63.2520(d)(2)(i)]
- ii. For each Group 1 storage tank vented to a control device in order to achieve the 95% reduction of HAP emissions required by Table 4, record the time of day and date each period of planned maintenance results in uncontrolled HAP emission. [40 CFR §63.998(d)(2)(ii)]

d. Reporting Requirements

- i. The Permittee shall include a change in status of any storage tank from Group 2 to Group 1 in the

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semi-annual compliance report. [40 CFR §63.2520(e)(10)]

- ii. The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

6. OHAP Emissions from Transfer Racks [40 CFR §63.2475]

a. Limitations and Restrictions for each unit

Reduce Group 1 Transfer Rack Emissions by \geq 95%. [40 CFR Part 63 Subpart FFFF, Table 5]

b. Monitoring and Testing Requirements

The Permittee shall designate any transfer rack loading more than 0.65 million liter per year of material having a HAP vapor pressure of 1.5 psia or greater as a Group 1 storage tank. [40 CFR §63.2550(i)(3) and Table 5]

c. Record Keeping Requirements

The Permittee shall keep a record of the material throughput, weight percent of HAP and annual rack-weighted average HAP partial pressure for each transfer rack. [40 CFR §63.2525(b)]

d. Reporting Requirements

- i. The Permittee shall include a change in status of any transfer rack from Group 2 to Group 1 in the semi-annual compliance report. [40 CFR §63.2520(e)(10)]
- ii. The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

7. OHAP Emissions from Equipment Leaks [40 CFR §63.2480]

a. Limitations and Restrictions

Employ leak detection and repair work standard per 40 CFR Part 63 Subpart UU, except as qualified by 40 CFR Part 63 Subpart FFFF [40 CFR Part 63 Subpart FFFF, Table 6]

b. Monitoring and Testing Requirements

- i. The Permittee shall identify equipment subject to 40 CFR 63 Subpart FFFF. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, by designation of process unit or affected facility boundaries by some form of weatherproof identification or by other appropriate methods. [40 CFR §63.1022(a)]
- ii. In addition to the general identification required in Section III.F.7.b.i of this Title V permit, the Permittee shall specifically identify equipment subject to any of the provisions in 40 CFR §§63.1023 through 63.1034 as required in paragraphs (b)(1) through (b)(5) of 40 CFR §63.1022, as applicable. [40 CFR §63.1022(b)]
- iii. The Permittee shall monitor valves to detect leaks by the method specified in 40 CFR §63.1023(b) and, as applicable, 40 CFR §63.1023(c). The instrument reading that defines a leak is 500 parts per million or greater. The Permittee shall monitor valves for leaks at the intervals specified in paragraphs (b)(3)(i) through (b)(3)(v) of 40 CFR §63.1025. [40 CFR §63.1025(b)]
- iv. The Permittee shall monitor pumps monthly to detect leaks by the method specified in 40 CFR §63.1023(b) and, as applicable, 40 CFR §63.1023(c). The instrument reading that defines a leak is 5,000 parts per million or greater for pumps handling polymerizing monomers and 1,000 parts per million or greater for all other pumps. [40 CFR §63.1026(b)]
- v. The Permittee shall check each pump by visual inspection each calendar week for indications of

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liquids dripping from the pump seal. The Permittee shall document that the inspection was conducted and the date of the inspection. If there are indications of liquids dripping from the pump seal at the time of the weekly inspection, the Permittee shall follow the procedure specified in either paragraph (b)(4)(i) or (b)(4)(ii) of 40 CFR §63.1026. [40 CFR §63.1026(b)]

- vi. The Permittee shall monitor agitator seals monthly to detect leaks by the method specified in 40 CFR §63.1023(b) and, as applicable, 40 CFR §63.1023(c), except as provided in 40 CFR §63.1021(b), 40 CFR §63.1036, 40 CFR §63.1037 or paragraph (e) of 40 CFR §63.1028. The instrument reading that defines a leak is 10,000 parts per million or greater. [40 CFR §63.1028(c)]
- vii. The Permittee shall check each agitator seal by visual inspection each calendar week for indications or liquids dripping from the agitator seal. The Permittee shall document that the inspection was conducted and the date of the inspection. If there are indications of liquids dripping from the agitator seal at the time of the weekly inspection, the Permittee shall follow the procedure specified in either paragraph (c)(3)(ii)(A) or (c)(3)(ii)(B) or 40 CFR §63.1028. [40 CFR §63.1028(c)]
- viii. The Permittee shall monitor each pressure relief device no later than five calendar days after a pressure release to confirm the condition indicated by an instrument reading of less than 500 parts per million above background, as measured by the method specified in 40 CFR §63.1023(b) and, as applicable, 40 CFR §63.1023(c). [40 CFR §63.1030(c)(2)]
- ix. Monitoring shall comply with Method 21 of 40 CFR Part 60, Appendix A, except as otherwise provided in 40 CFR §63.1023. [40 CFR §63.1023(b)(1)]
- x. The detection instrument shall be calibrated before use on each day of its use by the procedures specified in Method 21 of 40 CFR Part 60, Appendix A. [40 CFR §63.1023(b)(3)]
- xi. Monitoring shall be performed when the equipment is in regulated material service or is in use with any other detectable material. [40 CFR §63.1023(b)(5)]
- xii. Sensory monitoring consists of visual, audible, olfactory or any other detection method used to determine a potential leak to the atmosphere. [40 CFR §63.1023(d)]

c. Work Practice Requirements

- i. The Permittee shall repair each leak detected as soon as practical, but not later than 15 calendar days after it is detected, except as provided in paragraph (d) and (e) of 40 CFR §63.1024. A first attempt at repair as defined in this subpart shall be made no later than five calendar days after the leak is detected. First attempt at repair for pumps includes, but is not limited to, tightening the packing gland nuts, and/or ensuring that the seal flush is operating at design pressure and temperature. First attempt at repair for valves includes, but is not limited to tightening the bonnet bolts, and/or replacing the bonnet bolts, and/or tightening the packing gland nuts, and/or injecting lubricant in the lubricated packing. [40 CFR §63.1024(a)]
- ii. Delay of repair is allowed for any of the conditions specified in paragraphs (d)(1) through (d)(5) of 40 CFR §63.1024. The Permittee shall maintain a record of the facts that explain any delay of repairs and, when appropriate, why the repair was technically infeasible without a process unit shutdown. [40 CFR §63.1024(d)]
- iii. Any connector that is designated, as described in 40 CFR §63.1022(d), as an unsafe-to-repair connector is exempt from the requirements of 40 CFR §63.1027(d) and paragraph (a) of 40 CFR §63.1024. [40 CFR §63.1024(e)]

d. Record Keeping Requirements

- i. As specified in 40 CFR §§63.1022(a) and (b), the Permittee shall keep general and specific equipment identification if the equipment is not physically tagged and the Permittee is electing to identify the equipment subject to this subpart through written documentation such as a log or other

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designation. [40 CFR §63.1038(b)(1)]

- ii. The Permittee shall keep a written plan as specified in 40 CFR §63.1022(c)(4) for any equipment that is designated as unsafe- or difficult-to-monitor. [40 CFR §63.1038(b)(2)]
- iii. The Permittee shall maintain a record of the identify and an explanation as specified in 40 CFR §63.1022(d)(2) for any equipment that is designated as unsafe-to-repair. [40 CFR §63.1038(b)(3)]
- iv. The Permittee shall keep records associated with the determination that equipment is in heavy liquid service as specified in 40 CFR §63.1022(f). [40 CFR §63.1038(b)(5)]
- v. The Permittee shall keep records for leaking equipment as specified in 40 CFR §63.1023(e)(2). [40 CFR §63.1038(b)(6)]
- vi. The Permittee shall keep records for leak repair as specified in 40 CFR §63.1024(f) and records for delay of repair as specified in 40 CFR §63.1024(d). [40 CFR §63.1038(b)(7)]
- vii. For pumps, the Permittee shall maintain documentation of pump visual inspection as specified in 40 CFR §63.1024(d). [40 CFR §63.1038(c)(2)]
- viii. For agitator seals, the Permittee shall maintain documentation of agitator seal visual inspections as specified in 40 CFR §63.1028. [40 CFR §63.1038(c)(4)]
- ix. For pressure relief devices in gas and vapor or light liquid service, the Permittee shall keep records of the dates and results of monitoring following a pressure release, as specified in 40 CFR §63.1030(c)(3). [40 CFR §63.1038(c)(5)]

e. Reporting Requirements

- i. The Permittee shall, as specified in paragraphs (b)(1)(i) through (b)(1)(v) of 40 CFR §63.1039, report in a summary format by equipment type, the number of components for which leaks were detected and for valves, pumps and connectors show the percent leakers and the total number of components monitored. Also include the number of leaking components that were not repaired as required by 40 CFR §63.1024 and for valves and connectors, identify the number of components that are determined by 40 CFR §63.1025(c)(3) to be nonrepairable. [40 CFR §63.1039(b)(1)]
- i. The Permittee shall, where any delay of repair is utilized pursuant to 40 CFR §63.1024(d), report that delay of repair has occurred and report the number of instances of delay of repair. [40 CFR §63.1039(b)(2)]
- ii. For pressure relief devices in gas and vapor service pursuant to 40 CFR §63.1030(b) that are to be operated at a leak detection instrument reading of less than 500 parts per million, the Permittee shall report the results of all monitoring to show compliance conducted within the semiannual reporting period. [40 CFR §63.1039(b)(4)]

8. OHAP Emissions from Wastewater Streams [40 CFR §63.2485]

a. Limitations and Restrictions

- i. The Permittee shall control Group 1 wastewater stream per 40 CFR Part 63 Subpart G, except as qualified by 40 CFR Part 63 Subpart FFFF. [40 CFR Part 63 Subpart FFFF, Table 7]
- ii. The Permittee must meet each requirement in 40 CFR Part 63 Subpart FFFF, Table 7 that applies to the Permittee's wastewater streams and liquid streams in open systems within an MCPU, except as specified in paragraphs (b) through (o) of 40 CFR §63.2485.

9. OHAP Emissions from Heat Exchange Systems [40 CFR §63.2490]

a. Limitations and Restrictions

The Permittee shall comply with the requirements of 40 CFR §63.104 and the requirements referenced therein, except as specified in paragraphs (b) and (c) of 40 CFR §63.2490

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[40 CFR §63.2490 and 40 CFR Part 63 Subpart FFFF, Table 10]

b. Monitoring and Testing Requirements

- i. Unless one or more of the conditions specified in paragraphs(a)(1) through (a)(6) of 40 CFR §63.104 are not, the Permittee shall monitor each heat exchange system used to cool process equipment according to the provisions in either paragraph (b) or (c) of 40 CFR §63.104. [40 CFR §63.104(a)]
- ii. The Permittee shall determine the concentration of the monitored substance(s) in the cooling water using any EPA-approved method listed in 40 CFR Part 136 of this chapter as long as the method is sensitive to concentrations as low as 10 parts per million and the same method is used for both entrance and exit samples. Alternative methods may be used upon approval by the Administrator. [40 CFR §63.104(b)(3)]
- iii. The Permittee shall collect samples either at the entrance and exit of each heat exchange system or at locations where the cooling water enters and exits the heat exchanger or any combination of heat exchangers. [40 CFR §63.104(b)(4)]
- iv. The Permittee shall make a minimum of three sets of samples at each entrance and exit as defined in 40 CFR §63.104(b)(4). The average entrance and exit concentrations shall then be calculated. The concentration shall be corrected for the addition of any makeup water or for any evaporative losses, as applicable. A leak is detected if the exit mean concentration is found to be greater than the entrance mean using a one-sided statistical procedure at the 0.05 level of significance and the amount by which it is greater is at least one part per million or 10 percent of the entrance mean, whichever is greater. [40 CFR §63.104(b)(5) and (6)]

c. Work Practice Requirements

- i. Except as provided in paragraph (e) of 40 CFR §63.104, the Permittee shall repair leaks as soon as practical but not later than 45 calendar days after receiving results of monitoring tests indicating a leak. The leak shall be repaired unless the Permittee demonstrated that the results are due to a condition other than a leak. [40 CFR §63.104(d)(1)]
- ii. Once a leak has been repaired, the Permittee shall confirm that the heat exchanger system has been repaired within seven calendar days of the repair or startup, whichever is later. [40 CFR §63.104(d)(2)]

d. Record Keeping Requirements

- i. The Permittee shall retain the following records [40 CFR §§63.103(c)(1) and 63.104(f)(1)]:
 - (A) Monitoring date required by 40 CFR §63.103 indicating a leak and the date when the leak was detected and, if demonstrated not to be a leak, the basis for that determination;
 - (B) Records of any leaks detected by procedures subject to 40 CFR §63.104(c)(2) and the date the leak was discovered;
 - (C) The dates of efforts to repair leaks; and
 - (D) The method or procedure used to conform repair of a leak and the date repair was confirmed.

e. Reporting Requirements

- i. If the Permittee invokes the delay of repair provisions for a heat exchanger system, the following information shall be submitted in the next semi-annual periodic report. If the leak remains unrepaired, the information shall be submitted in each subsequent periodic report, until repair of the leak is reported. [40 CFR §63.104(f)(2)]
 - (A) Monitoring date required by 40 CFR §63.104 indicating a leak and the date when the leak was detected and, if demonstrated not to be a leak, the basis for that determination;

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- (B) Records of any leaks detected by procedures subject to 40 CFR §63.104(c)(2) and the date the leak was discovered;
- (C) The dates of efforts to repair leaks; and
- (D) The method or procedure used to confirm repair of a leak and the date repair was confirmed.

10. Notifications [40 CFR §63.2515]

- a. The Permittee must submit all of the notifications in 40 CFR §§63.6(h)(4) and (5), 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply to the Permittee by the dates specified.
- b. If the Permittee is required to conduct a performance test, the Permittee must submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required in 40 CFR §63.7(b)(1). For any performance test required as part of the initial compliance procedures for batch process vents in 40 CFR Part 63 Subpart FFFF, Table 2, the Permittee must also submit the test plan required by 40 CFR §63.7(c) and the emission profile with the notification of the performance test.

11. Reports [40 CFR §63.2520]

The Permittee must submit a compliance report containing the information in 40 CFR §63.2520(e) on a semiannual basis. Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Each compliance report must be postmarked or delivered no later than August 31 or February 28, whichever date is the first date following the end of the semiannual reporting period.

12. Records [40 CFR §63.2525]

The Permittee must keep the records specified in paragraphs (a) through (k) of 40 CFR §63.2525.

13. Compliance Options [40 CFR §63.2535]

- a. In accordance with 40 CFR §63.2535(c), the Permittee is in compliance with 40 CFR Part 63 Subpart FFFF for those storage tanks with a fixed roof, closed-vent system, and control device in compliance with the provisions of 40 CFR Part 60, Subpart Kb, except that the Permittee must comply with the monitoring, record keeping, and reporting requirements in 40 CFR Part 63 Subpart FFFF. This applies to EU-R01-19, 20, 24, and 58.
- b. In accordance with 40 CFR §63.2535(c), if the Permittee has a storage tank assigned to an MCPU that is subject to control under 40 CFR Part 60 Subpart Kb, the Permittee may elect to comply only with the requirements for Group 1 storage tanks in 40 CFR Part 63 Subpart FFFF. This applies to EU-R01-63, 67, and 68.

G. GEU-08: PHENOLIC RESINS MACT AFFECTED EQUIPMENT

1. The Permittee shall meet the requirements of 40 CFR Part 63 Subpart OOO for a new affected source, including monitoring, reporting and record keeping, by the dates given in 40 CFR Part 63 Subpart OOO.

2. General Duty [40 CFR §63.1400(k)(4)]

At all times, the Permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records and inspection of the source.

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3. OHAP Emissions from Non-Reactor Batch Process Vents [40 CFR §63.1406]

a. Limitation and Restrictions for each unit

Reduce organic HAP emissions for the batch cycle by 95 weight percent using a control device or control technology. [40 CFR §63.1406(a)(2)(ii)]

4. OHAP Emissions from Non-Reactor Batch Process Vents [40 CFR §63.1407]

a. Limitations and Restrictions for each unit

- i. For the collection of non-reactor process vents within the affected source, reduce organic HAP emissions for the batch cycle by 76 weight percent using a control device or control technology. [40 CFR §63.1407(a)(2)(ii)]
- ii. The Permittee shall determine uncontrolled organic HAP emissions from the collection of non-reactor batch process vents within the affected source based on an engineering assessment as described in 40 CFR §63.1414(d)(6).

5. OHAP Emissions from Heat Exchange Systems [40 CFR §63.1409]

a. Limitations and Restrictions

- i. Employ heat exchange system requirements per 40 CFR §63.1409(b), except as qualified by 40 CFR §63.1409(a). [40 CFR §63.1409]
- ii. The Permittee shall prepare and implement a monitoring plan that documents the procedures that will be used to detect leaks of process fluids into the cooling water. The plan shall include monitoring of one or more surrogate indicators or monitoring of one or more process parameters or other conditions that indicate a leak. [40 CFR §63.1409(c)(1)]
- iii. The Permittee shall maintain, at all times, the monitoring plan that is currently in use. The current plan shall be maintained on-site, or shall be accessible from a central location by computer or other means that provides access within two hours after a request. If the monitoring plan is superseded, the Permittee shall retain the most recent superseded plan at least until five years from the date of its creation. The superseded plan shall be retained on-site (or accessible from a central location by computer or other means that provides access within two hours after a request) for at least six months after its creation. [40 CFR §63.1409(c)(3)]
- iv. The Permittee shall repair any heat exchanger system leak detected as soon as practical but not later than 45 calendar days after monitoring tests indicate a leak. The leak shall be repaired unless the Permittee demonstrates that the results are due to a condition other than a leak. [40 CFR §63.1409(d)(1)]
- v. The Permittee shall confirm that the heat exchange system has been repaired within seven calendar days of the repair or startup, whichever is later. [40 CFR §63.1409(d)(2)]

6. OHAP Emissions from Equipment Leaks [40 CFR §63.1410]

a. Limitations and Restrictions

- i. Unless exempt per the production threshold criterion described by 40 CFR §63.1400(f), the Permittee shall comply with the requirements of 40 CFR Part 63 Subpart UU for all equipment, as defined under 40 CFR §63.1402, that contains or contacts five weight percent HAP or greater and operates 300 hours per year or more, with exceptions allowed under 40 CFR §63.1030. The weight percent HAP is determined for equipment using the organic HAP concentration measurement methods specified in 40 CFR §63.1414(a). [40 CFR §63.1410]
- ii. Except as provided by 40 CFR Part 63 Subpart OOO for difficult and unsafe to monitor components, the Permittee shall monitor regulated equipment as specified in 40 CFR §63.1023(a)(1) for instrument monitoring and 40 CFR §63.1023(a)(2) for sensory monitoring. [40 CFR §63.1023]

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- iii. Except as provided by 40 CFR Part 63 Subpart OOO for delay of repair, the Permittee shall repair each leak detected as soon as practical, but not later than 15 calendar days after it is detected, except as provided in paragraphs (d) and (e) of 40 CFR §63.1024. A first attempt at repair as defined in 40 CFR Part 63 Subpart UU shall be made no later than five calendar days after the leak is detected. [40 CFR §63.1024]
- iv. The Permittee shall comply with the pressure release requirements described by 40 CFR §§63.1411(b)(1) and (2), as applicable, for each pressure relief device in organic HAP gas or vapor service. [40 CFR §63.1411(b)]
- v. The Permittee shall equip each pressure relief device in organic HAP service with a device(s) or parameter monitoring system that is capable of:
 - (A) Identifying the pressure release;
 - (B) Recording the time and duration of each pressure release; and
 - (C) Notifying operators immediately that a pressure release is occurring. [40 CFR §63.1411(c)]
- vi. If any pressure relief device in organic HAP service releases to the atmosphere as a result of a pressure release event, the Permittee shall calculate the quantity of organic HAP released during each pressure release event and report this quantity as required in 40 CFR §63.1417(f)(13)(iii). [40 CFR §63.1411(c)(2)]

7. Performance Test [40 CFR §63.1413]

For each large control device relied upon to comply with 40 CFR Part 63 Subpart OOO, the Permittee conduct a performance test in accordance with the requirements described in 40 CFR §§63.1413(a) and (e).

8. Monitoring [40 CFR §63.1415]

- a. The Permittee shall install, calibrate, maintain and operate all monitoring equipment used to demonstrate continuous compliance with the emissions reduction requirements specified by 40 CFR §§63.1406 and 63.1407 in accordance with the provisions of 40 CFR §63.1415.
- b. The Permittee shall monitor each bypass line that could divert emissions away from a control device or control technology used to comply with emissions reduction requirements specified by 40 CFR §§63.1406 and 63.1407 in accordance with the provisions of 40 CFR §63.1415(d).

9. Record Keeping [40 CFR §63.1416]

The Permittee shall keep copies of all applicable records and reports as required by 40 CFR §63.1416.

10. Reports [40 CFR §63.1417]

The Permittee shall prepare and submit reports as required by 40 CFR §63.1417 per the schedule contained in Table 5 to 40 CFR Part 63 Subpart OOO.

H. EU-S05-1: SITE REMEDIATION ACTIVITIES Subject to 40 CFR Part 63 Subpart GGGGG

1. Site Remediation Activities

a. Limitation or Restriction

- i. The Permittee shall comply with all applicable requirements of 40 CFR Part 63 Subpart GGGGG. In addition, the Permittee shall comply with all applicable sections of 40 CFR Part 63 Subpart A. [40 CFR Part 63 Subpart GGGGG]
- ii. If the total quantity of HAP listed in Table 1 to 40 CFR Part 63 Subpart GGGGG that is contained in the remediation material excavated, extracted, pumped or otherwise removed during all of the site remediation conducted is equal to or greater than 1 Mg annually, the Permittee shall comply with the

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applicable requirements specified under 40 CFR §63.7886 for all affected remediation material management units. [40 CFR §63.7884]

- iii. If the total quantity of the HAP listed in Table 1 to 40 CFR Part 63 Subpart GGGGG that is contained in the remediation material excavated, extracted, pumped or otherwise removed during all of the site remediation conducted is equal to or greater than 1 Mg annually, and if the Permittee transfers to another facility remediation material having an average total VOHAP concentration equal to or greater than 10 ppmw (as determined using the procedures specified in 40 CFR §63.7943), then the receiving facility must meet the requirements in 40 CFR §63.7935(b). [40 CFR §63.7935(a)]

b. Monitoring and Testing Requirements

- i. The Permittee shall determine whether the total quantity of the HAP listed in Table 1 to 40 CFR Part 63 Subpart GGGGG that is contained in the remediation material excavated, extracted, pumped or otherwise removed during all of the site remediation conducted is less than 1 Mg annually. [40 CFR §63.7881(c)(1)]
- ii. If the total quantity of the HAP listed in Table 1 to 40 CFR Part 63 Subpart GGGGG that is contained in the remediation material excavated, extracted, pumped or otherwise removed during all of the site remediation conducted is equal to or greater than 1 Mg annually, the Permittee may satisfy control requirements for each remediation material management unit for which the VOHAP concentration of the remediation is demonstrated to be less than 500 ppmw. The VOHAP concentration of the remediation material shall be determined by following the requirements in 40 CFR §63.7943. [40 CFR §63.7884]

c. Record Keeping Requirements

- i. The Permittee shall prepare and maintain written documentation to support a determination that the total HAP quantity in removed remediation materials for the year is less than 1 Mg. The documentation must include a description of the methodology and data used for determining the total HAP content of the remediation material. [40 CFR §63.7881(c)(2)]
- ii. If the total quantity of the HAP listed in Table 1 to 40 CFR Part 63 Subpart GGGGG that is contained in the remediation material excavated, extracted, pumped or otherwise removed during all of the site remediation conducted is equal to or greater than 1 Mg annually, and if the Permittee transfers to another facility remediation material having an average total VOHAP concentration equal to or greater than 10 ppmw (as determined using the procedures specified in 40 CFR §63.7943), then record the name, address and telephone number of the facility where the remediation material is sent. [40 CFR §63.7936(a)]
- iii. If the total quantity of the HAP listed in Table 1 to 40 CFR Part 63 Subpart GGGGG that is contained in the remediation material excavated, extracted, pumped or otherwise removed during all of the site remediation conducted is equal to or greater than 1 Mg annually, the Permittee shall keep records of initial and ongoing determinations for affected sources that are exempt from control requirements. [40 CFR §63.7952(a)(4)]

d. Reporting Requirements

- i. If the total quantity of the HAP listed in Table 1 to 40 CFR Part 63 Subpart GGGGG that is contained in the remediation material excavated, extracted, pumped or otherwise removed during all of the site remediation conducted is equal to or greater than 1 Mg annually, the Permittee shall submit a Notification of Compliance Status according to 40 CFR §63.9(h)(2)(ii). [40 CFR §63.7950(e)]
- ii. If the total quantity of the HAP listed in Table 1 to 40 CFR Part 63 Subpart GGGGG that is contained in the remediation material excavated, extracted, pumped or otherwise removed during all of the site remediation conducted is equal to or greater than 1 Mg annually, the Permittee shall submit semiannual compliance reports according to the requirements of 40 CFR §63.7951(a).

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I. PREMISES-WIDE GENERAL REQUIREMENTS

1. **Annual Emission Statements:** The Permittee shall submit annual emission statements requested by the commissioner as set forth in RCSA §22a-174-4(d)(1).
2. **Emission Testing:** The Permittee shall comply with the procedures for sampling, emission testing, sample analysis, and reporting as set forth in RCSA §22a-174-5.
3. **Emergency Episode Procedures:** The Permittee shall comply with the procedures for emergency episodes as set forth in RCSA §22a-174-6.
4. **Reporting of Malfunctioning Control Equipment:** The Permittee shall comply with the reporting requirements of malfunctioning control equipment as set forth in RCSA §22a-174-7.
5. **Prohibition of Air Pollution:** The Permittee shall comply with the requirement to prevent air pollution as set forth in RCSA §22a-174-9.
6. **Public Availability of Information:** The public availability of information shall apply, as set forth in RCSA §22a-174-10.
7. **Prohibition Against Concealment/Circumvention:** The Permittee shall comply with the prohibition against concealment or circumvention as set forth in RCSA §22a-174-11.
8. **Violations and Enforcement:** The Permittee shall not violate or cause the violation of any applicable regulation as set forth in RCSA §22a-174-12.
9. **Variances:** The Permittee may apply to the commissioner for a variance from one or more of the provisions of these regulations as set forth in RCSA §22a-174-13.
10. **No Defense to Nuisance Claim:** The Permittee shall comply with the regulations as set forth in RCSA §22a-174-14.
11. **Severability:** The Permittee shall comply with the severability requirements as set forth in RCSA §22a-174-15.
12. **Responsibility to Comply:** The Permittee shall be responsible to comply with the applicable regulations as set forth in RCSA §22a-174-16.
13. **Particulate Emissions:** The Permittee shall comply with the standards for control of particulate matter and visible emissions as set forth in RCSA §22a-174-18.
14. **Fuel Sulfur Content:** The Permittee shall not use No. 2 heating oil that exceeds fifteen parts per million of sulfur by weight as set forth in CGS §16a-21a(a)(2)(B).
15. **Sulfur Compound Emissions:** The Permittee shall comply with the requirements for control of sulfur compound emissions as set forth in RCSA §§22a-174-19, 22a-174-19a and 22a-174-19b, as applicable.
16. **Organic Compound Emissions:** The Permittee shall comply with the requirements for control of organic compound emissions as set forth in RCSA §22a-174-20.
17. **Nitrogen Oxide Emissions:** The Permittee shall comply with the requirements for control of nitrogen oxide emissions as set forth in RCSA §22a-174-22f.
18. **Ambient Air Quality:** The Permittee shall not cause or contribute to a violation of an ambient air quality standard as set forth in RCSA §22a-174-24(b).
19. **Open Burning:** The Permittee is prohibited from conducting open burning, except as may be allowed by CGS §22a-174(f).
20. **Asbestos:** Should the premises, as defined in 40 CFR §61.145, become subject to the national emission standard for asbestos regulations in 40 CFR Part 61 Subpart M when conducting any renovation or demolition at this premises, then the Permittee shall submit proper notification as described in 40 CFR

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§61.145(b) and shall comply with all other applicable requirements of 40 CFR Part 61 Subpart M.

21. Emission Fees: The Permittee shall pay an emission fee as set forth in RCSA §22a-174-26(d).

J. 40 CFR PART 68 REQUIREMENTS, 112(r) ACCIDENTAL RELEASE

This premises is subject to the accidental release prevention regulations in 40 CFR Part 68. The Permittee shall comply with the requirements of 40 CFR Part 68, including but not limited to the following:

1. Develop and Implement a Management System [40 CFR §68.15]

- a. Assign a qualified person or position that has the overall responsibility for the development, implementation and integration of the risk management program elements.
- b. When responsibility for implementing individual requirements of 40 CFR Part 68 is assigned to persons other than the person identified under Section III.J.1.a of this Title V permit, the names or positions of these people shall be documented and the lines of authority defined through an organization chart or similar document.

2. Conduct a Hazardous Assessment [40 CFR §§68.20 through 68.42]

- a. Analyze and report in the Risk Management Plan (RMP) [40 CFR §68.25]:
 - i. One worst-case release scenario that is estimated to create the greatest distance in any direction to an endpoint provided in Appendix A to 40 CFR Part 68 resulting from an accidental release of regulated toxic substances from covered processes under worst-case conditions defined in 40 CFR §68.22;
 - ii. One worst-case release scenario that is estimated to create the greatest distance in any direction to an endpoint defined in 40 CFR §68.22(a) resulting from an accidental release of regulated flammable substances from covered processes under worst-case conditions defined in 40 CFR §68.22;
 - iii. Additional worst-case release scenarios for a hazard class if a worst-case release from another covered process affects public receptors different from those potentially affected by the worst-case release scenario developed under Section III.J.2.i or III.J.2.ii of this Title V permit.
- b. Identify and analyze at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one alternative release scenario to represent all flammable substances held in covered processes. [40 CFR §68.28]
- c. Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 40 CFR §68.22(a). [40 CFR §68.30]
- d. List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 40 CFR §68.22(a). [40 CFR §68.33]
- e. Review and update the offsite consequence analyses at least once every five years. If changes in processes, quantities stored or handled, or any other aspect of the premises might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more, complete a revised analysis within six months of the change and submit a RMP as provided in 40 CFR §68.190. [40 CFR §68.36]
- f. Maintain the following records on the offsite consequence analyses [40 CFR §68.39]:
 - i. For worst-case scenarios, a description of the vessel or pipeline and substance selected as worst case, assumptions and parameters used, and the rationale for selection; assumptions shall include use of any administrative controls and any passive mitigation that were assumed to limit the quantity that could be released. Documentation shall include the anticipated effect of the controls and mitigation on the release quantity and rate.
 - ii. For alternative release scenarios, a description of the scenarios identified, assumptions and

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parameters used, and the rationale for the selection of specific scenarios; assumptions shall include use of any administrative controls and any mitigation that were assumed to limit the quantity that could be released. Documentation shall include the effect of the controls and mitigation on the release quantity and rate.

- iii. Documentation of estimated quantity released, release rate, and duration of release.
- iv. Methodology used to determine distance to endpoints.
- v. Data used to estimate population and environmental receptors potentially affected.
- g. Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries or significant property damage on site or known offsite deaths, injuries, evacuations, sheltering in place, property damage or environmental damage. [40 CFR §68.42]

3. Implement the Prevention Requirements of 40 CFR §§68.65 through 68.87

- a. At least every five years after the completion of the initial process hazard analysis, the process hazard analysis shall be updated and revalidated to assure that the process hazard analysis is consistent with the current process. [40 CFR §68.67(f)]
- b. The process hazard analysis shall be performed by a team with expertise in engineering and process operations, and the team shall include at least one employee who has experience and knowledge specific to the process being evaluated. Also, one member of the team must be knowledgeable in the specific process hazard analysis methodology being used. Updated and revalidated process hazard analyses completed to comply with 29 CFR §1910.119(e) are acceptable to meet the requirements of this paragraph. [40 CFR §68.67(d)]
- c. Promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions. [40 CFR §68.67(e)]
- d. Retain process hazards analyses and updates or revalidations for each process covered by this section, as well as the documented resolution of recommendations described in Section III.J.3.b of this Title V permit for the life of the process. [40 CFR §68.67(g)]
- e. Develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information. [40 CFR §68.69(a)]
- f. Operating procedures shall be readily accessible to employees who work in or maintain a process. [40 CFR §68.69(b)]
- g. The operating procedures shall be reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources. Certify annually that these operating procedures are current and accurate. [40 CFR §68.69(c)]
- h. Develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tagout; confined space entry; opening process equipment or piping; and control over entrance into a stationary source by maintenance, contractor, laboratory, or other support personnel. These safe work practices shall apply to employees and contractor employees. [40 CFR §68.69(d)]
- i. Each employee before being involved in operating a newly assigned process, shall be trained in an overview of the process and in the operating procedures as specified in 40 CFR §68.69. The training shall include emphasis on the specific safety and health hazards, emergency operations including

Section III: Applicable Requirements and Compliance Demonstration

shutdown, and safe work practices applicable to the employee's job tasks. [40 CFR §68.71(a)]

- j. Refresher training shall be provided at least every three years, and more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process. [40 CFR §68.71(b)]
- k. Prepare a record which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training. [40 CFR §68.71(c)]
- l. Establish and implement written procedures to maintain the on-going integrity of process equipment. [40 CFR §68.73(b)]
- m. Train each employee involved in maintaining the on-going integrity of process equipment in an overview of that process and its hazards and in the procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner. [40 CFR §68.73(c)]
- n. Perform mechanical integrity inspections and tests of process equipment. Document each inspection and test that has been performed on process equipment. The documentation shall identify the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test. [40 CFR §68.73(d)]
- o. Correct deficiencies in equipment that are outside acceptable limits (defined by the process safety information in 40 CFR §68.65) before further use or in a safe and timely manner when necessary means are taken to assure safe operation. [40 CFR §68.73(e)]
- p. In the construction of new plants and equipment, follow the quality assurance procedures listed at 40 CFR §68.73(f). [40 CFR §68.73(f)]
- q. Establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, and procedures; and, changes to stationary sources that affect a covered process. [40 CFR §68.75]
- r. Perform a pre-startup safety review for new stationary sources and for modified stationary sources when the modification is significant enough to require a change in the process safety information defined in 40 CFR §68.65. [40 CFR §68.77]
- s. Certify that compliance with the provisions of this subpart have been evaluated at least every three years to verify that procedures and practices developed under this subpart are adequate and are being followed. [40 CFR §68.79]
- t. In accordance with 40 CFR §68.81, investigate each incident which resulted in, or could reasonably have resulted in a catastrophic release of a regulated substance. Prepare a report at the conclusion of the investigation that includes the information specified at 40 CFR §68.81(d). In accordance with 40 CFR 68.81(e), establish a system to promptly address and resolve the incident report findings and recommendations. Resolutions and corrective actions shall be documented. [40 CFR §68.81]
- u. Provide to employees and their representatives access to process hazard analyses and to all other information required to be developed under this rule. [40 CFR §68.83(c)]
- v. In accordance with 40 CFR §68.85(a), issue a hot work permit for hot work operations conducted on or near a covered process. In accordance with 40 CFR §68.85(b), the permit shall document that the fire prevention and protection requirements in 29 CFR §1910.252(a) have been implemented prior to beginning the hot work operations; it shall indicate the date(s) authorized for hot work; and identify the object on which hot work is to be performed. [40 CFR §68.85(a)]
- w. Follow the requirements for work performed by contractors specified at 40 CFR §68.87. [40 CFR §68.87]

Section III: Applicable Requirements and Compliance Demonstration

4. Develop and Implement an Emergency Response Program as Provided in 40 CFR §§68.90 through 68.95.

Such program shall include the following elements:

- a.** An emergency response plan, which shall be maintained and contain at least the following elements. [40 CFR §68.95(a)(1)]:
 - i.** Procedures for informing the public and local emergency response agencies about accidental releases;
 - ii.** Documentation of proper first-aid and emergency medical treatment necessary to treat accidental human exposures; and
 - iii.** Procedures and measures for emergency response after an accidental release of a regulated substance.
- b.** Develop and implement:
 - i.** Procedures for the use of emergency response equipment and for its inspection, testing, and maintenance. [40 CFR §68.95(a)(2)]
 - ii.** Training for all employees in relevant procedures. [40 CFR §68.95(a)(3)], and
 - iii.** Procedures to review and update, as appropriate, the emergency response plan to reflect changes at the premises and ensure that employees are informed of changes.[40 CFR §68.95(a)(4)]
- c.** The emergency response plan shall be coordinated with the community emergency response plan developed under 42 U.S.C. 11003. Upon request of the local emergency planning committee or emergency response officials, promptly provide to the local emergency response officials information necessary for developing and implementing the community emergency response plan.
[40 CFR §68.95(c)]

5. Submit a Single RMP, as Provided in 40 CFR §§68.150 to 68.185

- a.** The RMP shall include a registration that reflects all processes that have a regulated substance present in more than a threshold quantity as determined under 40 CFR §68.115. Submit as part of the RMP the data on prevention program elements for Program 3 processes as provided in 40 CFR §68.175. If the same information applies to more than one covered process, the information may be provided only once, but shall indicate to which processes the information applies. [40 CFR §§68.115 and 68.175]
- b.** Review and update the RMP and submit it in the method and format to the central point specified by EPA as of the date of submission. [40 CFR §68.190(a)]
- c.** The RMP shall be revised and updated [40 CFR §68.190(b)]:
 - i.** At least once every five years from the date of its initial submission or most recent update required by Sections III.J.5.c.ii through vii of this Title V permit, whichever is later. For purposes of determining the date of initial submissions, RMPs submitted before June 21, 1999 are considered to have been submitted on that date.
 - ii.** No later than three years after a newly regulated substance is first listed by EPA;
 - iii.** No later than the date on which a new regulated substance is first present in an already covered process above a threshold quantity;
 - iv.** No later than the date on which a regulated substance is first present above a threshold quantity in a new process;
 - v.** Within six months of a change that requires a revised PHA or hazard review;
 - vi.** Within six months of a change that requires a revised offsite consequence analysis as provided in 40 CFR §68.36;

Section III: Applicable Requirements and Compliance Demonstration

- vii. Within six months of a change that alters the Program level that applied to any covered process;
- d. For any accidental release meeting the five-year accident history reporting criteria of 40 CFR §68.42 and occurring after April 9, 2004, submit the data required under 40 CFR §§68.168, 68.170(j), and 68.175(l) with respect to that accident within six months of the release or by the time the RMP is updated under 40 CFR §68.190, whichever is earlier. [40 CFR §68.195(a)]
- e. Beginning June 21, 2004, within one month of any change in the emergency contact information required in accordance with 40 CFR §68.160(b)(6), submit a correction of that information. [40 CFR §68.195(b)]

K. ASBESTOS REQUIREMENTS

Should the premises, as defined in 40 CFR §61.145, become subject to the national emission standard for asbestos regulations in 40 CFR Part 61 Subpart M when conducting any renovation or demolition at this premises, then the owner or operator shall submit proper notification as described in 40 CFR §61.145(b) and shall comply with all other applicable requirements of, including but not limited to, 40 CFR Part 61 Subpart M.

L. NEW EMISSIONS UNIT POTENTIAL EMISSIONS

For the purposes of determining New Source Review applicability, in accordance with RCSA §22a-174-3a, for a new emissions unit connected to an existing control device, the Permittee may calculate potential emissions of the new emissions unit using the control efficiency of the existing control device. The new emissions unit shall be subject to the monitoring, record keeping and reporting requirements of the emissions unit(s) currently utilizing the existing control device.

M. BATCH PROCESSES ACT REQUIREMENTS

- 1. With the exception of the process vents required to achieve 85% control in accordance with VOC RACT, all process vents will be controlled, as necessary, according to the criteria specified in the Batch Processes ACT information document. The Batch Processes ACT specifies control of VOC emissions from batch process vents in the organic chemicals industry.
- 2. The Batch Process ACT recommends the reduction of VOC emissions by 90% for individual vents, or for vent streams in aggregate, within a batch process, having an actual average flow rate below the maximum cost effective flow rate (FR) as calculated according to the following formulas:

$$FR = 0.07(AE) - 1,821 \text{ (where vapor pressure} \leq 75 \text{ mm Hg)}$$

$$= 0.031(AE) - 494 \text{ (75 mm Hg} < \text{vapor pressure} < 150 \text{ mm Hg)}$$

$$= 0.013(AE) - 301 \text{ (vapor pressure} \geq 150 \text{ mm Hg)}$$

where : FR = the maximum flow rate at which control is cost effective (scfm)

AE = annual mass emissions total (lb/y)

- 3. Currently, none of the emissions units contain batch process vents that, individually or in aggregate, meet the cost effectiveness criteria specified by the Batch Processes ACT. The Permittee shall reevaluate this determination each year based on the prior year's actual VOC emissions. Any batch process vents that, individually or in aggregate, meet the cost effectiveness criteria specified by the Batch Processes ACT will be controlled to achieve at least a 90% reduction of VOC emissions.
- 4. A list of subject sources shall be annually updated and maintained by the Permittee based on records of emission rate and flow rate data.

Section IV: Compliance Schedule

TABLE IV: COMPLIANCE SCHEDULE

Emissions Unit	Applicable Regulations	Steps Required for Achieving Compliance (Milestones)	Date by which Each Step is to be Completed	Dates for Monitoring, Record Keeping, and Reporting
		No Steps are required for achieving compliance at this time		

Section V: State Enforceable Terms and Conditions

Only the Commissioner of the Department of Energy and Environmental Protection has the authority to enforce the terms, conditions and limitations contained in this section.

SECTION V: STATE ENFORCEABLE TERMS AND CONDITIONS

- A.** This Title V permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the emissions units in compliance with all applicable requirements of any other Bureau of the Department of Energy and Environmental Protection or any federal, local or other state agency. Nothing in this Title V permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B.** Nothing in this Title V 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, investigate air 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.
- C. Additional Emissions Units**
 - 1.** The Permittee shall make and submit a written record, at the commissioner's request, within 30 days of receipt of notice from the commissioner, or by such other date specified by the commissioner, of each additional emissions unit or group of similar or identical emissions units at the premises.
 - 2.** Such record of additional emissions units shall include each emissions unit, or group of emissions units, at the premises which is not listed in Section II.A of this Title V permit, unless the emissions unit, or group of emissions units, is:
 - a. an insignificant emissions unit as defined in RCSA §22a-174-33; or
 - b. an emissions unit or activity listed in *White Paper for Streamlined Development of Part 70 Permit Applications, Attachment A* (EPA guidance memorandum dated July 10, 1995).
 - 3.** For each emissions unit, or group of emissions units, on such record, the record shall include, as available:
 - a. Description, including make and model;
 - b. Year of construction/installation or if a group, range of years of construction/installation;
 - c. Maximum throughput or capacity; and
 - d. Fuel type, if applicable.
- D. Odors:** The Permittee shall not cause or permit the emission of any substance or combination of substances which creates or contributes to an odor that constitutes a nuisance beyond the property boundary of the premises as set forth in RCSA §22a-174-23.
- E. Noise:** The Permittee shall operate in compliance with the regulations for the control of noise as set forth in RCSA §§22a-69-1 through 22a-69-7.4, inclusive.
- F. Hazardous Air Pollutants (HAPs):** The Permittee shall operate in compliance with the regulations for the control of HAPs as set forth in RCSA §22a-174-29.
- G.** The Permittee shall comply with the requirements for Architectural and Industrial Maintenance Coatings as set forth in RCSA §22a-174-41.

Section VI: Title V Requirements

The Administrator of the United States Environmental Protection Agency and the Commissioner of the Department of Energy and Environmental Protection have the authority to enforce the terms and conditions contained in this section.

SECTION VI: TITLE V REQUIREMENTS

A. SUBMITTALS TO THE COMMISSIONER & ADMINISTRATOR

The date of submission to the commissioner of any document required by this Title V permit shall be the date such document is received by the commissioner. The date of any notice by the commissioner under this Title V permit, including, but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is delivered or the date three days after it is mailed by the commissioner, whichever is earlier. Except as otherwise specified in this Title V permit, the word "day" means calendar day. Any document or action which is required by this Title V 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.

Any document required to be submitted to the commissioner under this Title V permit shall, unless otherwise specified in writing by the commissioner, be directed to: Office of the Director; Enforcement Division; Bureau of Air Management; Department of Energy and Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

Any submittal to the Administrator of the Environmental Protection Agency shall be submitted per the procedure required by the applicable requirement or otherwise addressed to: U.S. EPA New England, 5 Post Office Square, Suite 100 (Mailcode: 04-2), Boston, Massachusetts 02109, Attn: Air Clerk.

B. CERTIFICATIONS [RCSA §22a-174-33(b)]

In accordance with RCSA §22a-174-33(b), any report or other document required by this Title V permit and any other information submitted to the commissioner or Administrator shall be signed by an individual described in RCSA §22a-174-2a(a), or by a duly authorized representative of such individual. Any individual signing any document pursuant to RCSA §22a-174-33(b) shall examine and be familiar with the information submitted in the document and all attachments thereto, and shall make inquiry of those individuals responsible for obtaining the information to determine that the information is true, accurate, and complete, and shall also sign the following certification as provided in RCSA §22a-174-2a(a)(4):

"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."

C. SIGNATORY RESPONSIBILITY [RCSA §22a-174-2a(a)]

For purposes of signing any Title V-related application, document, report or certification required by RCSA §22a-174-33, any corporation's duly authorized representative may be either a named individual or any individual occupying a named position. Such named individual or individual occupying a named position is a duly authorized representative if such individual is responsible for the overall operation of one or more manufacturing, production or operating facilities subject to RCSA §22a-174-33 and either:

1. The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding 25 million dollars in second quarter 1980 dollars; or
2. The delegation of authority to the duly authorized representative has been given in writing by an officer of the corporation in accordance with corporate procedures and the following:

Section VI: Title V Requirements

- i. Such written authorization specifically authorizes a named individual, or a named position, having responsibility for the overall operation of the Title V premises or activity;
- ii. Such written authorization is submitted to the commissioner and has been approved by the commissioner in advance of such delegation. Such approval does not constitute approval of corporate procedures, and
- iii. If a duly authorized representative is a named individual in an authorization submitted under subclause ii. of this subparagraph and a different individual is assigned or has assumed the responsibilities of the duly authorized representative, or, if a duly authorized representative is a named position in an authorization submitted under subclause ii. of this subparagraph and a different named position is assigned or has assumed the duties of the duly authorized representative, a new written authorization shall be submitted to the commissioner prior to or together with the submission of any application, document, report or certification signed by such representative.

D. ADDITIONAL INFORMATION [RCSA §22a-174-33(j)(1)(X), RCSA §22a-174-33(h)(2)]

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier, including information to determine whether cause exists for modifying, revoking, reopening, reissuing, or suspending this Title V permit or to determine compliance with this Title V permit.

In addition, the Permittee shall submit information to address any requirements that become applicable to the subject source and shall submit correct, complete, and sufficient information within 15 days of the applicant's becoming aware of any incorrect, incomplete, or insufficient submittal, during the pendency of the application, or any time thereafter, with an explanation for such deficiency and a certification pursuant to RCSA §22a-174-2a(a)(5).

E. MONITORING REPORTS [RCSA §22a-174-33(o)(1)]

A Permittee, required to perform monitoring pursuant to this Title V permit, shall submit to the commissioner, on forms prescribed by the commissioner, written monitoring reports on March 1 and September 1 of each year or on a more frequent schedule if specified in such permit. Such monitoring reports shall include the date and description of each deviation from a permit requirement including, but not limited to:

1. Each deviation caused by upset or control equipment deficiencies; and
2. Each deviation of a permit requirement that has been monitored by the monitoring systems required under this Title V permit, which has occurred since the date of the last monitoring report; and
3. Each deviation caused by a failure of the monitoring system to provide reliable data.

F. PREMISES RECORDS [RCSA §22a-174-33(o)(2)]

Unless otherwise required by this Title V permit, the Permittee shall make and keep records of all required monitoring data and supporting information for at least five years from the date such data and information were obtained. The Permittee shall make such records available for inspection at the site of the subject source, and shall submit such records to the commissioner upon request. The following information, in addition to required monitoring data, shall be recorded for each permitted source:

1. The type of monitoring or records used to obtain such data, including record keeping;
2. The date, place, and time of sampling or measurement;
3. The name of the individual who performed the sampling or the measurement and the name of such individual's employer;
4. The date(s) on which analyses of such samples or measurements were performed;
5. The name and address of the entity that performed the analyses;

Section VI: Title V Requirements

6. The analytical techniques or methods used for such analyses;
7. The results of such analyses;
8. The operating conditions at the subject source at the time of such sampling or measurement; and
9. All calibration and maintenance records relating to the instrumentation used in such sampling or measurements, all original strip-chart recordings or computer printouts generated by continuous monitoring instrumentation, and copies of all reports required by the subject permit.

G. PROGRESS REPORTS [RCSA §22a-174-33(q)(1)]

The Permittee shall, on March 1 and September 1 of each year, or on a more frequent schedule if specified in this Title V permit, submit to the commissioner a progress report on forms prescribed by the commissioner, and certified in accordance with RCSA §22a-174-2a(a)(5). Such report shall describe the Permittee's progress in achieving compliance under the compliance plan schedule contained in this Title V permit. Such progress report shall:

1. Identify those obligations under the compliance plan schedule in this Title V permit which the Permittee has met, and the dates on which they were met; and
2. Identify those obligations under the compliance plan schedule in this Title V permit which the Permittee has not timely met, explain why they were not timely met, describe all measures taken or to be taken to meet them and identify the date by which the Permittee expects to meet them.

Any progress report prepared and submitted pursuant to RCSA §22a-174-33(q)(1) shall be simultaneously submitted by the Permittee to the Administrator.

H. COMPLIANCE CERTIFICATIONS [RCSA §22a-174-33(q)(2)]

The Permittee shall, on March 1 of each year, or on a more frequent schedule if specified in this Title V permit, submit to the commissioner a written compliance certification certified in accordance with RCSA §22a-174-2a(a)(5) and which includes the information identified in 40 CFR §§70.6(c)(5)(iii)(A) to (C), inclusive.

Any compliance certification prepared and submitted pursuant to RCSA §22a-174-33(q)(2) shall be simultaneously submitted by the Permittee to the Administrator.

I. PERMIT DEVIATION NOTIFICATIONS [RCSA §22a-174-33(p)]

Notwithstanding Section VI.E. of this Title V permit, the Permittee shall notify the commissioner in writing, on forms prescribed by the commissioner, of any deviation from an emissions limitation, and shall identify the cause or likely cause of such deviation, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows:

1. For any hazardous air pollutant, no later than 24 hours after such deviation commenced; and
2. For any other regulated air pollutant, no later than ten days after such deviation commenced.

J. PERMIT RENEWAL [RCSA §22a-174-33(j)(1)(B)]

All of the terms and conditions of this Title V permit shall remain in effect until the renewal permit is issued or denied provided that a timely renewal application is filed in accordance with RCSA §§22a-174-33(g), -33(h), and -33(i).

K. OPERATE IN COMPLIANCE [RCSA §22a-174-33(j)(1)(C)]

The Permittee shall operate the source in compliance with the terms of all applicable regulations, the terms of this Title V permit, and any other applicable provisions of law. In addition, any noncompliance constitutes a violation of the Clean Air Act and Chapter 446c of the Connecticut General Statutes and is grounds for federal and/or state enforcement action, permit termination, revocation and reissuance, or modification, and denial of a permit renewal application.

Section VI: Title V Requirements

L. COMPLIANCE WITH PERMIT [RCSA §22a-174-33(j)(1)(G)]

This Title V permit shall not be deemed to:

1. Preclude the creation or use of emission reduction credits or allowances or the trading thereof in accordance with RCSA §§22a-174-33(j)(1)(I) and -33(j)(1)(P), provided that the commissioner's prior written approval of the creation, use, or trading is obtained;
2. Authorize emissions of an air pollutant so as to exceed levels prohibited pursuant to 40 CFR Part 72;
3. Authorize the use of allowances pursuant to 40 CFR Parts 72 through 78, inclusive, as a defense to noncompliance with any other applicable requirement; or
4. Impose limits on emissions from items or activities specified in RCSA §§22a-174-33(g)(3)(A) and -33(g)(3)(B) unless imposition of such limits is required by an applicable requirement.

M. INSPECTION TO DETERMINE COMPLIANCE [RCSA §22a-174-33(j)(1)(M)]

The commissioner may, for the purpose of determining compliance with this Title V permit and other applicable requirements, enter the premises at reasonable times to inspect any facilities, equipment, practices, or operations regulated or required under such permit; to sample or otherwise monitor substances or parameters; and to review and copy relevant records lawfully required to be maintained at such premises in accordance with this Title V permit. It shall be grounds for permit revocation should entry, inspection, sampling, or monitoring be denied or effectively denied, or if access to and the copying of relevant records is denied or effectively denied.

N. PERMIT AVAILABILITY

The Permittee shall have available at the facility at all times a copy of this Title V permit.

O. SEVERABILITY CLAUSE [RCSA §22a-174-33(j)(1)(R)]

The provisions of this Title V permit are severable. If any provision of this Title V permit or the application of any provision of this Title V permit to any circumstance is held invalid, the remainder of this Title V permit and the application of such provision to other circumstances shall not be affected.

P. NEED TO HALT OR REDUCE ACTIVITY [RCSA §22a-174-33(j)(1)(T)]

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Title V permit.

Q. PERMIT REQUIREMENTS [RCSA §22a-174-33(j)(1)(V)]

The filing of an application or of a notification of planned changes or anticipated noncompliance does not stay the Permittee's obligation to comply with this Title V permit.

R. PROPERTY RIGHTS [RCSA §22a-174-33(j)(1)(W)]

This Title V permit does not convey any property rights or any exclusive privileges. This Title V 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 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, including CGS §4-181a(b) and RCSA §22a-3a-5(b). This Title V permit shall neither create nor affect any rights of persons who are not parties to this Title V permit.

S. ALTERNATIVE OPERATING SCENARIO RECORDS [RCSA §22a-174-33(o)(3)]

The Permittee shall, contemporaneously with making a change authorized by this Title V permit from one alternative operating scenario to another, maintain a record at the premises indicating when changes are made from one operating scenario to another and shall maintain a record of the current alternative operating scenario.

Section VI: Title V Requirements

T. OPERATIONAL FLEXIBILITY AND OFF-PERMIT CHANGES [RCSA §22a-174-33(r)(2)]

The Permittee may engage in any action allowed by the Administrator in accordance with 40 CFR §§70.4(b)(12)(i) to (iii)(B), inclusive, and 40 CFR §§70.4(b)(14)(i) to (iv), inclusive, without a Title V non-minor permit modification, minor permit modification or revision and without requesting a Title V non-minor permit modification, minor permit modification or revision provided such action does not:

1. Constitute a modification under 40 CFR Part 60, 61 or 63;
2. Exceed emissions allowable under the subject permit;
3. Constitute an action which would subject the Permittee to any standard or other requirement pursuant to 40 CFR Parts 72 to 78, inclusive; or
4. Constitute a non-minor permit modification pursuant to RCSA §22a-174-2a(d)(4).

At least seven days before initiating an action specified in RCSA §22a-174-33(r)(2)(A), the Permittee shall notify the Administrator and the commissioner in writing of such intended action.

U. INFORMATION FOR NOTIFICATION [RCSA §22a-174-33(r)(2)(A)]

Written notification required under RCSA §22a-174-33(r)(2)(A) shall include a description of each change to be made, the date on which such change will occur, any change in emissions that may occur as a result of such change, any Title V permit terms and conditions that may be affected by such change, and any applicable requirement that would apply as a result of such change. The Permittee shall thereafter maintain a copy of such notice with the Title V permit. The commissioner and the Permittee shall each attach a copy of such notice to their copy of the Title V permit.

V. TRANSFERS [RCSA §22a-174-2a(g)]

No person other than the Permittee shall act or refrain from acting under the authority of this Title V permit unless such permit has been transferred to another person in accordance with RCSA §22a-174-2a(g).

The proposed transferor and transferee of a permit shall submit to the commissioner a request for a permit transfer on a form provided by the commissioner. A request for a permit transfer shall be accompanied by any fees required by any applicable provision of the general statutes or regulations adopted thereunder. The commissioner may also require the proposed transferee to submit with any such request, the information identified in CGS §22a-60.

W. REVOCATION [RCSA §22a-174-2a(h)]

The commissioner may revoke this Title V permit on his own initiative or on the request of the Permittee or any other person, in accordance with CGS §4-182(c), RCSA §22a-3a-5(d), and any other applicable law. Any such request shall be in writing and contain facts and reasons supporting the request. The Permittee requesting revocation of this Title V permit shall state the requested date of revocation and provide evidence satisfactory to the commissioner that the subject source is no longer a Title V source.

Pursuant to the Clean Air Act, the Administrator has the power to revoke this Title V permit. Pursuant to the Clean Air Act, the Administrator also has the power to reissue this Title V permit if the Administrator has determined that the commissioner failed to act in a timely manner on a permit renewal application.

This Title V permit may be modified, revoked, reopened, reissued, or suspended by the commissioner, or the Administrator in accordance with RCSA §22a-174-33(r), CGS §22a-174c, or RCSA §22a-3a-5(d).

Section VI: Title V Requirements

X. REOPENING FOR CAUSE [RCSA §22a-174-33(s)]

This Title V permit may be reopened by the commissioner, or the Administrator in accordance with RCSA §22a-174-33(s).

Y. CREDIBLE EVIDENCE

Notwithstanding any other provision of this Title V permit, for the purpose of determining compliance or establishing whether a Permittee has violated or is in violation of any permit condition, nothing in this Title V permit shall preclude the use, including the exclusive use, of any credible evidence or information.