



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

BUREAU OF AIR MANAGEMENT TITLE V 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	044 -0121-TV
Client/Sequence/Town/Premises Numbers	3050-1-044-226
Date Issued	January 21, 2021
Expiration Date	January 21, 2026

Corporation:

Kingswood Kitchens Co., Inc.

Premises Location:

70 Beaver Street, Danbury, CT 06810

Name of Responsible Official and Title:

Hank Blevio, Jr., President

All the following attached pages, 2 through 27, are hereby incorporated by reference into this Title V permit.

for Betsey C. Wingfield
Deputy Commissioner

January 21, 2021
Date

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Title V 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

CFR	Code of Federal Regulations
CGS	Connecticut General Statutes
CPDS	Certified Product Data Sheet
CTG	Control Technique Guideline
EU	Emission Unit
EPA	Environmental Protection Agency
gal	Gallon
GEU	Grouped Emissions Unit
HAPs	Hazardous Air Pollutants
hr	Hour
lb	Pound
kg	Kilogram
MSDS	Material Safety Data Sheet
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSR	New Source Review
P	Permit
PM10	Particulate Matter less than 10 microns
PM2.5	Particulate Matter less than 2.5 microns
RACT	Reasonably Available Control Technology
RCSA	Regulations of Connecticut State Agencies
SIC	Source Identification Code
SOS	Standard Operating Scenario
tpy	Tons per Year
VOC	Volatile Organic Compound
VHAP	Volatile Hazardous Air Pollutant
WFM	Wood Furniture Manufacturing

Section I: Premises Information/Description

A. PREMISES INFORMATION

Nature of Business: Kitchen cabinet maker
SIC: 2434

Facility Mailing Address: Kingswood Kitchens Co., Inc.
70 Beaver Street
Danbury, CT 06810

Telephone Number: (203) 792-8700

B. PREMISES DESCRIPTION

Kingswood Kitchens Co, Inc. (Kingswood Kitchens) is a kitchen cabinet maker. Wood stock is cut and sanded to form a variety of kitchen cabinet styles. The cabinets are coated in one of seven spray booths. Each of the seven spray booths (EU-2, EU-9, EU-5, EU-8, EU-6, EU-4 and EU-10) is permitted under Connecticut's New Source Review (NSR) program and operating in accordance with Permit Nos. 044-0173, 044-174, 044-0080, 044-0078, 044-0079, 044-0083 & 044-0084, respectively. The coatings may consist of stains or lacquer paints. Fugitive emissions come from gluing operations (EU-3) and solvent cleaning operations (EU-7) that are conducted throughout the premises. Filters are used in the spray booths to control particulate emissions. Wood dust generated by woodworking processes (EU-11) is collected by a ducting system, which vents to a fabric filter (jet pulse baghouse) which is located at the rear of the facility. The spray booths, gluing operations and solvent cleaning operations, collectively, are GEU-1. A boiler (EU-1) provides heat for comfort, which is exempted from permitting. The wood working and cutting operations (EU-11) are only subject to premises-wide general requirements.

GEU-1 is subject to 40 CFR Part 63, Subpart JJ, "*National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturers.*" Gluing operations (EU-3) are also subject to RCSA§22a-174-44 and 40 CFR Part 59 for adhesives.

Since Kingswood Kitchens is a major source of HAP emissions, the boiler (EU-1) is subject to the *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*, 40 CFR Part 63 Subpart DDDDD. The boiler is subcategorized under the units designed to burn light liquid. The compliance date for 40 CFR Subpart DDDDD is January 31, 2016.

Kingswood Kitchens exceeds the major source threshold for the following pollutants: HAPs & VOC

Kingswood Kitchens is a Title V source located in a severe ozone non-attainment area defined in RCSA §22a-174-1(104).

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 NSR Permits or Regulations into this Title V permit.

TABLE II.A: EMISSIONS UNITS DESCRIPTION						
Emissions Unit/ Grouped Emissions Unit		Emissions Unit Description		Control Unit Description	Permit Number or Regulation	
EU-1		No. 2 fuel oil fired boiler Make: HB Smith 28A Series Maximum Rated Capacity: 29 gal/hr Installation Date: July, 2004		None	RCSA §§22a-174-18, -19b 40 CFR Part 63 Subpart DDDDD	
GEU-1	EU-2	Spray Booth No. 3 Installation Date: January, 1992		Dry Media Filter	RCSA §22a-174-20 40 CFR Part 63 Subpart JJ	P-044-0173
	EU-4	Spray Booth No. 4 Installation Date: January, 1990				P-044-0083
	EU-5	Spray Booth No. 5 Installation Date: January, 1990				P-044-0080
	EU-6	Spray Booth No. 7 Installation Date: January, 1980				P-044-0079
	EU-8	Spray Booth No. 1 Installation Date: January, 1980				P-044-0078
	EU-9	Spray Booth No. 2 Installation Date: June, 1995				P-044-0174
	EU-10	Spray Booth, White Room Installation Date: January, 1985				P-044-0084
	EU-3	Gluing (Fugitive)				None
	EU-7	Solvent Cleaning (Fugitive)		None	Exempt	
EU-11		Wood Working/Cutting Operations (Fugitive)		Pulse Jet Bag House	RCSA §22a-174-18	

Section III: Applicable Requirements and Compliance Demonstration

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	EU-1	The Permittee operates boiler firing No. 2 fuel oil. The sulfur content of No. 2 fuel oil shall not exceed 0.3% (dry weight basis).
	EU-2, EU-4, EU-5, EU-6, EU-8, EU-9, & EU-10	The Permittee operates the spray booths to manually apply coatings.
	EU-3	The Permittee operates various VOC-based gluing operations throughout the premises. EU-3 designates fugitive emissions from all gluing operations.
	EU-7	The Permittee operates various solvent cleaning operations throughout the premises to remove paint overspray from products and to clean spray gun equipment. EU-7 designates fugitive emissions from all solvent cleaning operations.
	EU-11	The Permittee operates various cutting and sanding activities that generate particulate emissions throughout the premises. Local ducts vent to a baghouse at rear of premises. EU-11 designates fugitive emissions from all cutting and sanding operations.

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. EMISSIONS UNIT 1 (EU-1): HB SMITH BOILER (Subject to RCSA §§22a-174-18, -19, 40 CFR Part 63 Subpart DDDDD)

1. Fuel Sulfur Content

a. Limitations or Restrictions

The Permittee shall burn No. 2 fuel oil with sulfur content no greater than 0.0015% (dry weight basis). [CGS §16a-21a, RCSA §§22a-174-19b]

b. Monitoring and Testing Requirements

i. The Permittee shall monitor fuel merchant certifications from the fuel supplier certifying the type of fuel, the weight percent of sulfur (dry basis) in the fuel, name of fuel supplier, and the method used to determine the sulfur content of fuel for each shipment of liquid fuel. [RCSA §§22a-174-4(d)(1) & -19b(g)(3)]

ii. Analysis for the sulfur content of liquid fuels shall be done according to the American Society for Testing and Materials method D 4294, or the most current methods approved by the American Society for Testing and Materials for the analysis of sulfur content of liquid fuels. [RCSA §22a-174-5(b)(1)]

c. Record Keeping Requirements

The Permittee shall maintain records of fuel merchant certifications from the fuel supplier certifying the type of fuel, the weight percent of sulfur (dry basis) in the fuel, name of fuel supplier, and the method used to determine the sulfur content of fuel for each shipment. [RCSA §§22a-174-4(d)(1) & -19b(g)(3)]

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. Opacity

a. Limitations or Restrictions

i. The Permittee shall not permit visible emissions to exceed the following limitations: [RCSA §22a-174-18(b)(1)]

(A) 20 percent during any six-minute block average as measured by 40 CFR Part 60, Reference Method 9, Appendix A; or

(B) 40 percent as measured by 40 CFR Part 60, Reference Method 9, Appendix A, reduced to a one-minute block average.

b. Monitoring and Testing Requirements

i. The Permittee shall demonstrate compliance with the visible emissions standard by maintaining good operational practices, and by performing burner maintenance and cleaning at least once per year. [RCSA §22a-174-4(d)(1)]

ii. If required by the commissioner, the Permittee shall measure visible emissions using 40 CFR Part 60, Reference Method 9. [RCSA §22a-174-5(e)(2)]

iii. The Permittee shall ensure qualified personnel perform boiler maintenance per the manufacturers recommended practices. [RCSA §22a-174-33(j)(1)(K) & 40 CFR §70.6(a)(3)(i)]

c. Record Keeping Requirements

i. The Permittee shall maintain records of all tune-ups, repairs, replacement of parts and other maintenance to verify boilers are being properly maintained. [RCSA §22a-174-4(d)(1)]

ii. The Permittee shall maintain records of the opacity tests required in Section III.A.2.b.ii of this Title V permit. Such records shall contain the dates, times, and places of all visible emission observations,

Section III: Applicable Requirements and Compliance Demonstration

persons performing the observations, test methods used, the operating conditions at the time of observation, and the results. [RCSA §22a-174-4(c)(1)]

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. Work Practice Standards

a. Limitations or Restrictions

- i. The Permittee shall conduct a tune-up of the boiler every five years as specified in 40 CFR §63.7540. The initial tune-up is required by the compliance date specified in 40 CFR Part 63 Subpart DDDDD, which is January 31, 2016. [40 CFR §63.7540(a)(12)]
- ii. The Permittee shall conduct a one-time energy assessment by a qualified energy assessor by the compliance date specified in 40 CFR Part 63 Subpart DDDDD. The on-site energy assessment will be conducted for a maximum of one day (8 hours) and shall include the following: [40 CFR §63.7575 & Table 3 of 40 CFR Part 63 Subpart DDDDD]
 - (A) A visual inspection of the boiler system;
 - (B) An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures and unusual operating constraints;
 - (C) An inventory of major energy consuming systems;
 - (D) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs and fuel usage;
 - (E) A review of the facility's energy management practices and provide recommendations for improvements consistent with the definition of energy management practices;
 - (F) A list of major energy conservation measures;
 - (G) A list of the energy savings potential of energy conservation measures identified; and
 - (H) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits and the time frame for recouping those investments.

b. Monitoring and Testing Requirements

Record keeping specified in Section III.A.3.c of this Title V permit shall be sufficient to meet other Monitoring 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 [40 CFR §63.7555(a)]

- i. Records of the dates and results of all required boiler tune-ups.
- ii. Records of the results of the one-time energy assessment.
- iii. Records of compliance status reports submitted to the Administrator.

d. Reporting Requirements

The Permittee shall submit compliance status reports indicating that required boiler tune-ups were conducted. [40 §CFR 63.7550]

B. GROUPED EMISSIONS UNIT 1 (GEU-1): Spray Booths, Gluing and Solvent Cleaning Operations (Subject to P-044-0078, -0079, -0080, -0083, -0084, -0173, -0174; RCSA §§22a-174-20; 40 CFR Part 63 Subpart JJ; EU-3 Only: RCSA §22a-174-44 and 40 CFR Part 59)

1. VOC

a. Limitations or Restrictions

- i. The Permittee shall not exceed the coating application rate and VOC emissions limits stated herein at any time (for each Spray Booth):
 - (A) Coating application rate, for each Spray Booth (gal/hr): 7.2

Section III: Applicable Requirements and Compliance Demonstration

(B) EU-2, EU-5, EU-6 [P-044-0173, -0080, -0079]

- (1) 25.0 lb/hr
- (2) 600.0 lb/day
- (3) 9.0 tpy

(C) EU-4 [P-044-0083]

- (1) 25.0 lb/hr
- (2) 600.0 lb/day
- (3) 8.0 tpy

(D) EU-8, EU-9 [P-044-0078, -0174]

- (1) 8.0¹ or 18.0² lb/hr
- (2) 40.0¹ or 600.0² lb/day
- (3) 8.0 tpy

(E) EU-10 [P-044-0084]

- (1) 8.0 lb/hr
- (2) 40.0 lb/day
- (3) 750 lb/month
- (4) 4.5 tpy

¹ - Emissions Limits for any solvent that is defined as highly photochemically reactive pursuant to RCSA §22a-174-20(i)(1) or (2).

² - Emissions Limits for any solvent that is defined as non-highly photochemically reactive pursuant to RCSA §22a-174-20(i)(4).

b. Monitoring and Testing Requirements

The Permittee shall demonstrate compliance with the emission limitations in Section III.B.1.a.i of this Title V permit by maintaining sufficient records specified in Section III.B.1.c.i of this Title V permit. [RCSA §22a-174-4(d)(1)]

c. Record Keeping Requirements

- i. The Permittee shall make and maintain the following daily records for each coating, solvent and glue used: [P-044-0173,-0174, -0080, -0078, -0079, -0083 & -0084; & RCSA §22a-174-4(d)(1)]
 - (A) Date and length of time coating is used;
 - (B) Classification of each coating and mixture used as either highly photochemically reactive or non-highly photochemically reactive pursuant to RCSA §§22a-174-20(i) and -20(i)(2) prior to use;
 - (C) Description of the coatings including name and the density in lb/gallon;
 - (D) Certified Product Data Sheets (CPDS) or Material Safety Data Sheets (MSDS) of each coating, solvent (cleaning solvents and diluents) and glue used which summarize volatile and non-volatile components and associated weight percentage of the coatings/solvents in lb/gallons;
 - (E) List of volatile and non-volatile components and associated weight percentage of the coating as listed in the MSDS/CPDS;
 - (F) Quantity of coatings used in gallons/hour and gallons/day;
 - (G) Quantity of diluent used in pounds and gallons;
 - (H) Daily records of the type and quantity (in gallons/hour and gallons/day) of any solvent that is used to clean the spray guns and booth; in addition, accurate records must be kept of the quantity and type of the solvents spilled, evaporated, or manifested as waste materials;
 - (I) Daily record of each glue used and quantity of glue used in gallons/hour and gallons/day [RCSA §22a-174-4(d)(1)];
 - (J) VOC emissions in lb/hour and lb/day based on the information above;
 - (K) Cumulative year to date record of coating usage in gallons and VOC emissions in tpy; and
 - (L) Data used for the determination of VOC content and VOC emissions.

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- ii. The Permittee shall make and keep records as described, for a minimum of five years commencing on the date such records were created. [Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]
- d. *Reporting Requirements*
 - i. The Permittee shall submit reports of any exceedances of the material usage or emission limitations to the commissioner in writing within 30 days of the date of such exceedance. Such report shall at a minimum, include a description of the nature of the exceedance, the duration and magnitude of the exceedance, the steps taken to reestablish compliance and the success of such steps, and the steps taken to assure that compliance is maintained in the future. [P-044-0078, -0079, -0080, -0083, -0173, -0174]
 - 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)]

2. VOC Content

a. *Limitations or Restrictions*

- i. The Permittee shall not exceed the coating application rates and VOC content limit in lb/gallon, as applied, stated herein at any time: [P-044-0173, -0174, -0080, -0078, -0079, -0083 & -0084]
 - (A) EU-2, EU-9 [P-044-0173, P-044-0174]
7.82 lb/gallon
 - (B) EU-4, EU-5, EU-6, EU-8, EU-10
[P-044-0083, -0080, -0079, -0078 & -0084]
6.044 lb/gallon
- ii. The Permittee shall limit the VOC emissions from finishing operations by the following: [P-044-0173, -0174, -0080, -0078, -0079, -0083 & -0084]
 - (A) Using topcoats with a VOC content no greater than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied; or
 - (B) Using a finishing system of sealers with a VOC content no greater than 1.9 kg VOC/kg solids (1.9 lb VOC/lb solids), as applied, and topcoats with a VOC content no greater than 1.8 kg VOC/kg solids (1.8 lb VOC/lb solids), as applied; or
 - (C) Using acid-cured alkyd amino vinyl sealers or acid-cured alkyd amino conversion varnish topcoats, using sealers and topcoats based on the following criteria:
 - (1) Vinyl sealers shall contain no more than 2.3 kg VOC/kg solids (2.3 lb VOC/lb solids), as applied, and the varnish topcoats shall contain no more than 2.0 kg VOC/kg solids (2.0 lb VOC/lb solids), as applied; or
 - (2) A sealer other than an acid-cured alkyd amino vinyl sealer shall contain no more than 1.9 kg VOC/kg solids (1.9 lb VOC/lb solids), as applied, and the topcoat shall contain no more than 2.0 kg VOC/kg solids (2.0 lb VOC/lb solids), as applied; or
 - (3) Acid-cured sealer shall contain no more than 2.3 kg VOC/kg solids (2.3 lb VOC/lb solids), as applied, and a topcoat other than an acid-cured alkyd amino conversion varnish topcoat shall contain no more than 1.8 kg VOC/kg solids (1.8 lb VOC/lb solids).
 - (D) Meeting the provisions established in the WFM CTG §B.10 (Model Rule) when using an averaging approach and demonstrating that actual emissions from the affected source are less than or equal to the lower of the actual versus allowable emissions using one of the following inequalities:
Inequality 1 applies if the emissions standard set forth in Section III.B.2.a.ii.(A) of this Title V permit is selected.

Inequality 1

$$0.9 (0.8(TC_1+TC_2+\dots)) \geq (ER_{TC1})(TC_1)+ER_{TC2}(TC_2)+\dots$$

Inequality 2 applies to all other averaging scenarios. The Permittee may use Inequality 2 to average among stains, sealers, topcoats, basecoats, and washcoats or among sealers and topcoats only.

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Inequality 2

$$0.9 \{ [1.8 (TC_1 + TC_2 + \dots)] + [1.9 (SE_1 + SE_2 + \dots)] + [9.0 (WC_1 + WC_2 + \dots)] + [1.2 (BC_1 + BC_2 + \dots)] + [0.791 (ST_1 + ST_2 + \dots)] \} \\ \geq [ER_{TC1} (TC_1) + ER_{TC2} (TC_2) + \dots] + [ER_{SE1} (SE_1) + ER_{SE2} (SE_2) + \dots] + [ER_{WC1} (WC_1) + ER_{WC2} (WC_2) + \dots] + [ER_{BC1} (BC_1) + ER_{BC2} (BC_2) + \dots] + [ER_{ST1} (ST_1) + ER_{ST2} (ST_2) + \dots]$$

Where:

TC _i	= kilograms of solids of topcoat "i" used;
SE _i	= kilograms of solids of sealer "i" used;
WC _i	= kilograms of solids of washcoat "i" used;
BC _i	= kilograms of solids of basecoat "i" used;
ST _i	= liters of stain "i" used;
ER _{TC_i}	= VOC content of topcoat "i" in kg VOC/kg solids, as applied;
ER _{SE_i}	= VOC content of sealer "i" in kg VOC/kg solids, as applied;
ER _{WC_i}	= VOC content of washcoat "i" in kg VOC/kg solids, as applied;
ER _{BC_i}	= VOC content of basecoat "i" in kg VOC/kg solids, as applied; and
ER _{ST_i}	= VOC content of stain "i" in kg VOC/liter (kg/l), as applied.

In Inequalities 1 and 2, above, the Permittee shall use the actual VOC content of the finishing materials used before they were subject to RACT if the VOC content is less than the allowed VOC content.

- (E) Using a combination of the methods stated in Section III.B.2.a.ii.(A), (B), (C) & (D) of this Title V Permit.
- (F) The Permittee shall limit VOC emissions from cleaning operations when using a strippable booth coating. A strippable booth coating shall contain no more than 0.8 kg VOC/kg solids, as applied (0.8 lb VOC/lb solids).

b. *Monitoring and Testing Requirements*

- i. The Permittee shall demonstrate continuous compliance by using compliant materials, maintaining records that demonstrate the materials are compliant, and submitting a compliance certification with the semiannual report required by WFM CTG §B.9(c). [Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]
 - (A) The compliance certification shall state that compliant sealers and/or topcoats and strippable booth coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. The Permittee is in violation of the standard whenever a noncompliant material, as determined by records or by a sample of the finishing material, is used. Use of a noncompliant material is a separate violation for each day the noncompliant material is used.
 - (B) The compliance certification shall be signed by a responsible official of the company.

c. *Record Keeping Requirements*

- i. Permittee shall maintain records of the following: [WFM CTG §B.8]: [Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]
 - (A) A certified product data sheet for each finishing material and strippable booth coating;
 - (B) The VOC content, kg VOC/kg solids (lb VOC/lb solids), as applied, of each finishing material and strippable booth coating; and

d. *Reporting Requirements*

- i. The Permittee shall submit a semiannual report covering the previous six months of wood furniture manufacturing operations according to the following schedule: [Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]
 - (A) The reports shall be submitted within 30 calendar days after the end of each 6-month period.
 - (B) Each semiannual report shall include a compliance certification as specified in Sections III.B.2.b.i.(A) & (B) of this Title V permit, a statement of whether the affected source was in

Section III: Applicable Requirements and Compliance Demonstration

compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.

3. VHAP

a. Limitations or Restrictions

- i. The Permittee shall limit VHAP emissions at the following emissions points: [40 CFR §63.802]

(A) Finishing Operations

- (1) Averaging Approach: Achieve a maximum weighted average VHAP content across all coatings, as applied (kg VHAP/kg solids)

1.0

- (2) Compliant Materials: Use compliant finishing materials with the following maximum VHAP contents (kg VHAP/kg solids), as applied:

- (a) Stains: 1.0
- (b) Washcoats: 1.0
- (c) Topcoats: 1.0
- (d) Basecoats: 1.0
- (e) Enamels: 1.0
- (f) Thinners : 10.0

- (3) Use any combination of (1) & (2)

(B) Cleaning Operations

- (1) Strippable spray booth material (maximum VHAP content, kg VHAP/kg solids): 0.8

(C) Contact Adhesives: Use compliant adhesives (maximum VHAP content, kg VHAP/kg solids, as applied) based on the following criteria:

- (1) For foam adhesives used in products that meet flammability requirements: 1.8
- (2) For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements): 1.0

b. Monitoring and Testing Requirements

- i. The Permittee shall demonstrate compliance with the emissions limits specified in Section III.B.3.a.i.(A) of this Title V permit by using any of the following methods:

(A) Finishing Operations:

- (1) Averaging Approach: The Permittee shall calculate the average VHAP content for all finishing materials used at the facility using Equation (1) and maintain a value of E no greater than 1.0. [40 CFR §63.804(a)(1)]

$$E = \frac{(Mc_1 Cc_1 + Mc_2 Cc_2 + \dots + Mc_n Cc_n + S_1 W_1 + S_2 W_2 + \dots + S_n W_n)}{(Mc_1 + Mc_2 + \dots + Mc_n)} \quad (1)$$

Where,

- E = Emission limit in lb VHAP/lb solids (shall not exceed 1.0);
- Mc = Mass of solids in the finishing material “c” in kg or lb solids/month;
- Cc = VHAP content of the finishing material “c” in kg VHAP/kg solids or lb VHAP/lb solids;
- S = VHAP content of solvent added to finishing materials expressed as a weight fraction;
- W = Amount of solvent added to finishing materials during the monthly averaging period in kg or lbs;
- n = Number of finishing materials used.

- (2) Compliant Materials: [40 CFR §63.804(a)(2)]

- (a) The Permittee shall demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner

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contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;

- (b) The Permittee shall demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and
- (c) The Permittee shall demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 kg VHAP/ kg solids (1.0 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent VHAP by weight.

- (3) The Permittee shall use any combination of an averaging approach and compliant finishing materials, as described in Sections III.B.3.b.i(A)(1)- (A)(2) of this Title V permit.
[40 CFR §63.804(a)(4)]

- (B) Adhesives: The Permittee shall demonstrate that each foam adhesive and contact adhesives VHAP content as specified in Section III.B.3.a.i(C) of this Title V permit are not exceeded by maintaining CPDS or MSDS for each adhesive. [40 CFR §§63.804(b) & (c)]

c. Record Keeping Requirements

- i. The Permittee shall maintain the following records:
 - (A) a certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating; [40 CFR §63.806(b)(1)]
 - (B) VHAP content (lb VHAP/lb solids, as applied or kg VHAP/kg solids as applied) for each finishing material and contact adhesive; and [40 CFR §63.806(b)(2)]
 - (C) VOC content (lb VOC/lb solids as applied) for strippable spray booth coatings where applicable. [40 CFR §63.806(b)(3)]
- ii. In addition, the Permittee shall maintain the following records when complying with the averaging approach: [40 CFR §63.806(c)]
 - (A) Copies of the averaging calculation each month following the compliance date;
 - (B) The data on the quantity of coatings and thinners used that is necessary to support the calculation of "E" in Section III.B.3.b.i(A)(1) Equation (1).
- iii. The Permittee shall maintain records of the compliance certifications for each semiannual period following the compliance date. [40 CFR §§63.10 & 63.806(a)]
- iv. The Permittee shall maintain records of all other information submitted with the compliance status report and the semiannual (continuous) reports. [40 CFR §63.806(h)(i)]

d. Reporting Requirements

- i. The Permittee shall submit compliance status report that shall indicate compliance with all requirements of 40 CFR Part 63 Subpart JJ for each month reporting period. Reports are due within 30 days of the six-month period following the compliance date (July 30, 1999) and shall include a compliance certification. Subsequent reports are due within 30 days after each six-month reporting period. [40 CFR §63.807(c)]
- ii. The Permittee shall include a compliance certification with the semiannual report and the certification shall be signed by a responsible official of the company. [40 CFR §63.804(g)(1)(ii)]
- iii. The Permittee shall include the following in the semiannual report:
 - (A) When Using the Averaging Approach: [40 CFR §63.804(g)(1)]
 - (1) Results of the averaging calculation for each month within that semiannual reporting period.
 - (2) The compliance certification submitted with the semiannual report shall state that the value of "E", as calculated using Equation 1 in Section III.B.3.b.i(A)(1), is no greater than 1.0. A violation of the monthly average is a separate violation of the standard for each day of operation during the month unless the Permittee can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.
 - (B) When Using Compliant Coatings: [40 CFR §63.804(g)(2)]

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- (1) The Permittee shall demonstrate continuous compliance by using compliant coatings and thinners, maintaining records that demonstrate the coatings and thinners are compliant and submitting a compliance certification with the semiannual report.
 - (2) The compliance certification shall state that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance.
- (C) When Using Compliant Adhesives: [40 CFR §63.804(g)(5)]
The compliance certification submitted with the semiannual report shall state that the compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used.
- (D) When Using Strippable Spray Booth Coatings: [40 CFR §63.804(g)(7)]
The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used.

4. Work Practice and Maintenance

a. Limitations or Restriction

- i. The Permittee shall comply with any stipulation and recommendations set by the manufacturer for maintaining and operating the spray gun, spray booth, and particulate filter in order to achieve their guaranteed transfer and capture efficiencies. The control equipment shall be in place at all times. In addition, methods used to increase transfer efficiency and minimize VOC emissions shall include, but not be limited to, the following: [P-044-0078, -0079, -0080, -0083, -0084, -0173 & -0174]
 - (A) Minimize the distance from the spray gun to the object being coated;
 - (B) Minimize the air velocity in the spray booth (but not below health-based requirements);
 - (C) Keep the atomizing air pressure to a minimum level, as recommended by the spray gun manufacturer;
 - (D) The spray booth, spray guns, and filter media shall comply with any supplied warranties, recommendations and stipulations set by the manufacturer of the equipment;
 - (E) All control equipment used in spray booths shall be properly installed and in good operating condition before the spray booth is operated; and
 - (F) Rags containing solvent shall be kept in closed containers and disposed of or recycled according to applicable state and federal law.
- ii. The Permittee shall cover all open drums and vessels that contain solvents, cleaners, coatings, or cleaning rags so as to minimize the amount of VOCs emitted to the atmosphere. Empty containers shall be disposed of in a manner consistent with handling techniques for hazardous materials, as applicable. [P-044-0078, -0079, -0080, -0083, -0084, -0173 & -0174]
- iii. The Permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards detailed below:
 - (A) Operator Training Course: The Permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel shall be trained upon hiring. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:
[40 CFR §63.803(b); Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]
 - (1) A list of all current personnel by name and job description that are required to be trained;
 - (2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;

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- (3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - (4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
- (B) Leak Inspection and Maintenance Plan: The Permittee shall prepare a written leak inspection and maintenance plan that specifies the following: [40 CFR §63.803(c); Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]
- (1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives or organic solvents;
 - (2) An inspection schedule;
 - (3) Methods for documenting the date and results of each inspection and any repairs that were made; and
 - (4) The timeframe between identifying a leak and making the repair, which adheres to the following schedule:
 - (a) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - (b) Final repairs shall be made within 15 calendar days, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.
- (C) Cleaning and Wash-Off Solvent Accounting System: The Permittee shall develop an organic solvent accounting form to record the following: [40 CFR §63.803(d); Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]
- (1) The quantity and type of organic solvent used each month for wash-off and cleaning;
 - (2) The number of pieces washed off, and the reason for the wash-off; and
 - (3) The net quantity of spent organic solvent generated from each activity. The net quantity of spent solvent is equivalent to the total amount of organic solvent that is generated from the activity minus any organic solvent that is reused onsite for operations other than cleaning or wash-off and any organic solvent that was sent offsite for disposal.
- (D) Chemical Composition of Cleaning and Washoff Solvents: The Permittee shall not use any cleaning or wash-off solvents that contain any of the pollutants listed in Table 4 to 40 CFR Part 63 Subpart JJ. [40 CFR §63.803(e)]
- (E) Spray Booth Cleaning: The Permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, and/or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic solvent to prepare the booth prior to applying the booth coating. [40 CFR §63.803(f); Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]
- (F) Storage Requirements: The Permittee shall use normally closed containers for storing finishing, cleaning, and wash-off materials. [40 CFR §63.803(g); Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]
- (G) Application Equipment Requirements: The Permittee shall not use conventional air spray guns for applying finishing materials except under any of the following circumstances: [40 CFR §63.803(h); Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]
- (1) To apply finishing materials that have a VOC content no greater than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied;
 - (2) For touch-up and repair under the following circumstances:
 - (a) Touch-up and repair occurs after completion of the finishing operation; or
 - (b) Touch-up and repair occurs after the stain and before any other type of finishing material is applied, and the materials used for touch up and repair are applied from a container that has a volume of no more than 2.0 gallons.

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- (3) If spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
 - (4) If emissions from the finishing application station are directed to a control device;
 - (5) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5% of the total gallons of finishing material used during that semiannual reporting period; or
 - (6) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The Permittee shall demonstrate technical or economic infeasibility by submitting to the administrator and commissioner a videotape, a technical report, or other documentation that supports the Permittee's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:
 - (a) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - (b) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- (H) Line Cleaning: The Permittee shall pump or drain all organic solvent used for line cleaning into a normally closed container. [40 CFR §63.803(i); Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]
- (I) Gun Cleaning: The Permittee shall collect all organic solvent used to clean spray guns into a normally closed container. [40 CFR §63.803(j); Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]
- (J) Wash-Off Operations: The Permittee shall control emissions from wash-off operations by:
[40 CFR §63.803(k); Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]
 - (1) Using normally closed tanks for wash-off; and
 - (2) Minimizing dripping by tilting or rotating the part to drain as much organic solvent as possible.
- (K) Formulation Assessment Plan for Finishing Operations: The Permittee shall prepare and maintain with the work practice assessment plan a formulation assessment plan as specified in 40 CFR §63.803(l). [40 CFR §63.803(l)]
- iv. The Permittee shall comply with each provision of the work practice implementation plan. The written work practice implementation plan shall be available for inspection by the administrator and/or commissioner, upon request. If the administrator and/or commissioner determines that the work practice implementation plan does not adequately address each of the topics specified in subsections (A) to (K) of Section III.B.4.a.ii of this Title V permit, the administrator and/or commissioner may require the Permittee to modify the plan. [40 CFR §63.803(a) ; Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]
- b. *Monitoring and Testing Requirements*
Record keeping specified in Section III.B.4.c of this Title V permit shall be sufficient to meet other Monitoring Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]
- c. *Record Keeping Requirements*
 - i. The Permittee shall also maintain onsite, the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including but not limited to, the following:
[40 CFR §63.806(e); Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]
 - (A) Records demonstrating that the operator training program is in place;
 - (B) Records collected in accordance with the inspection and maintenance plan;
 - (A) Records associated with the cleaning solvent accounting system;
 - (D) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period;
 - (E) Records associated with the formulation assessment plan [40 CFR § 63.806(e)(5)];

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- (F) Records showing the VOC content of compounds used for cleaning booth components, except for solvent used to clean conveyors, continuous coaters and their enclosures, and or metal filter [Permit Nos. 044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]; and
- (G) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

d. Reporting Requirements

- i. The Permittee shall submit a continuous (semiannual) compliance status report along with a compliance certification. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation. [40 CFR §63.804(g)(8)]
- ii. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source. [40 CFR §63.804(g)(8)(ii)]

5. PM_{2.5}/PM₁₀

a. Limitations or Restrictions

- i. The Permittee shall not exceed the PM₁₀/ PM_{2.5} emissions limit stated herein at any time for EU-2, EU-4, EU-5, EU-6, EU-8, & EU-9): [P-044-0173,-0174, -0080, -0078, -0079, & -0083]
(A) 0.50 lb/hr
(B) 2.2 tpy

b. Monitoring and Testing requirements

The Permittee shall demonstrate compliance with the emission limitations in Section III.B.5.a.i of this Title V permit by calculating the emission rates using material balance and assuming an overall transfer efficiency of 60% and a dry filter control efficiency of 97%.
[P-044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]

c. Record Keeping Requirements

- i. The Permittee shall keep all required records in order to demonstrate compliance with the emission limits specified in Section III.B.5.a.i of this Title V permit. [RCSA §22a-174-4(d)(1)]
- ii. The Permittee shall keep all the records for a period of no less than five years.
[P-044-0173,-0174, -0080, -0078, -0079,-0083 & -0084]

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)]

6. Spray Application Equipment Cleaning

a. Limitations or Restrictions

- i. The Permittee shall clean spray application equipment in accordance with the requirements of one of the following:
 - (A) Using an enclosed gun cleaner that is maintained and operated in accordance with the manufacturer's recommendations and the following practices: [RCSA §22a-174-20(jj)(4)(A)]
 - (1) Operate using an automated cycle, if applicable,
 - (2) Inspect hoses regularly for leaks,
 - (3) If a leak is discovered, repair as soon as practicable but no later than 15 days after the discovery, and
 - (4) Ensure the cover is properly closed.
 - (B) Using only cleaning solvent with an as-applied VOC content that does not exceed 50 grams per liter (0.417 lb/gal) by placing cleaning solvent in the pressure pot and forcing the solvent through the gun with the atomizing cap in place, without the use of atomizing air. Used cleaning solvent shall be directed into a vat, drum or other waste container that is closed when not in use.
[RCSA §22a-174-20(jj)(4)(B)]
- ii. The Permittee shall use the following work practices: [RCSA §22a-174-20(jj)(5)]

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- (A) New and used cleaning solvent, including those mixed on the premises, shall be stored in a nonabsorbent, non-leaking container. Such a container shall be kept closed at all times except when the container is being filled, emptied or is otherwise actively in use;
- (B) Spills and leaks of cleaning solvent shall be minimized. Any leaked or spilled cleaning solvent shall be absorbed and removed immediately;
- (C) Absorbent applicators, such as cloth and paper that are moistened with cleaning solvent shall be stored in a closed, nonabsorbent, non-leaking container for disposal or recycling; and
- (D) Cleaning solvent shall be conveyed from one location to another in a closed container or pipe.

b. Monitoring and Testing requirements

Record keeping specified in Section III.B.6.c of this Title V permit shall be sufficient to meet other Monitoring Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Record Keeping Requirements

- i. The Permittee shall maintain daily records of all cleaning solvents used, as follows:
[RCSA §22a-174-20(jj)(6)(B)]
 - (A) Name and description of each cleaning solvent,
 - (B) VOC content of each cleaning solvent, as-applied, and the associated calculations,
 - (C) VOC content of each cleaning solvent, as supplied,
 - (D) The amount of each cleaning solvent,
 - (E) A Material Safety Data Sheet for each cleaning solvent,
 - (F) A description of the type of cleaning equipment and process, and
 - (G) Date and type of maintenance performed on air pollution control equipment, if applicable.
- ii. The Permittee shall maintain all required records for five years from the date such record is created and make available to the commissioner to inspect and copy upon request. [RCSA §22a-174-20(jj)(6)(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)]

C. EMISSION UNIT-11 (EU-11): Woodworking/Cutting Operations (Subject to RCSA §22a-174-18)

1. Work Practice and Maintenance

a. Limitations or Restrictions

- i. The Permittee shall ensure that the air pollution control equipment (including ducting, ventilation, and baghouse) is in operation at all times woodworking activities are conducted on the premises.
[RCSA §22a-174-7(b)]
- ii. Woodworking operations shall cease whenever fabric filters are removed for testing, maintenance, or other purposes unless that filter is replaced with an equivalent filter. [RCSA §22a-174-7(b)]
- iii. The Permittee shall establish a pressure differential range representative of optimal daily baghouse operations, which ensure a pollution control efficiency of 97% or greater, in accordance with the manufacturers recommended operating parameters.
[RCSA §22a-174-33(j)(1)(K) & 40 CFR §70.6(a)(3)(i)(B)]
- iv. The Permittee shall conduct daily monitoring of pressure differential across the baghouse. This can be done by daily use of ink recorders to record continuous reading of the pressure differential.
[RCSA §22a-174-33(j)(1)(K) & 40 CFR §70.6(a)(3)(i)(B)]

b. Monitoring and Testing requirements

If required by the commissioner, the Permittee shall conduct stack test using method 5 of 40 CFR Part 60, Appendix A. Such stack tests shall be conducted at such intervals as the commissioner may specify and in such a manner satisfactory to the commissioner. [RCSA §22a-174-5(e)(1) & -5(e)(2)]

c. Record Keeping Requirements

- i. The Permittee shall maintain records of pressure differential and preventative maintenance on a daily basis. [RCSA §22a-174-33(o)(1) & 40 CFR §70.6(a)(3)(iii)]
- iii. The Permittee shall keep all the records for a period of no less than five years. [RCSA §22a-174-4(d)(3)]

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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)]

D. 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-174-22e.
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 §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).

Section IV: Compliance Schedule

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 Adhesives and Sealants as set forth in RCSA §22a-174-44.

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 in a computer-readable format and 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:
 - 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,

Section VI: Title V Requirements

- 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;
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

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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.

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;

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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.

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

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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-6o.

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).

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.