



NAME CHANGED TO:

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Engineer: Olivia Harris

Date: 3/27/26

**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.

<b>Title V Permit Number</b>	026-0114-TV
<b>Client/Sequence/Town/Premises Numbers</b>	0507/001/026/0019
<b>Date Issued</b>	August 22, 2023
<b>Expiration Date</b>	August 22, 2028

**Corporation:**

*Holcim Solutions and Products US, LLC*

**Premises Location:**

*780 James P. Casey Road, Bristol, CT 06010*

**Name of Responsible Official and Title:**

*Michael Gullotta, Plant Manager*

All the following attached pages, 2 through 28, are hereby incorporated by reference into this Title V permit.

Paul E. Tanell for  
Katherine S. Dykes  
Commissioner

August 22, 2023  
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>
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CGS	Connecticut General Statutes
CO	Carbon Monoxide
DE	Destruction Efficiency
EU	Emissions Unit
EPA	Environmental Protection Agency
<sup>o</sup> F	Degrees Fahrenheit
fpm	Feet per Minute
ft <sup>3</sup>	Cubic Feet
HAP	Hazardous Air Pollutant
HC	Hydrocarbon
HEPA	High Efficiency Particulate Air
hr	Hour
lb	Pound
MASC	Maximum Allowable Stack Concentration
MDI	Methylene Di-p-phenylene Isocyanate
MMBtu	Million British Thermal Units
MSDS	Material Safety Data Sheet
NDO	Natural Draft Opening
NO <sub>x</sub>	Nitrogen Oxides
NSR	New Source Review
PID	Photoionization Detector
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter less than 10 microns
PM <sub>2.5</sub>	Particulate Matter less than 2.5 microns
RCSA	Regulations of Connecticut State Agencies
RTO	Regenerative Thermal Oxidizer
scfm	Standard Cubic Feet Per Minute
SIC	Standard Industrial Classification Code
SO <sub>2</sub>	Sulfur Dioxide
SOCMI	Synthetic Organic Chemical Manufacturing Industry
SOS	Standard Operating Scenario
tpy	Tons per year
VOC	Volatile Organic Compound
WC	Water Column

## Section I: Premises Information/Description

### A. PREMISES INFORMATION

Nature of Business:           Plastics Foam Products  
Primary SIC:                 3086  
Other SIC:                   None

Facility Mailing Address:   780 James P. Casey Road, Bristol, CT 06010  
Telephone Number:         860-584-9000

### B. PREMISES DESCRIPTION

Holcim Solutions and Products US, LLC operates a foam insulation board manufacturing line in Bristol, CT (EU-1). The process operates under New Source Review Permit Number 026-0045.

The foam insulation board manufacturing line consists of storage tanks for blowing agents and reactant chemicals, various process vessels, a heated conveyor (Pour Table/Laminator), conveyors and trim and crosscut saws. VOC emissions from manufacturing are controlled by a regenerative thermal oxidizer (RTO) and a zeolite rotary concentrator. VOC emissions during warehouse storage of the insulation board are uncontrolled. Particulate emissions from saw cutting of the insulation board are controlled by a dust collector/baghouse. Dust particles are transferred from the dust collector to the briquetter which compresses the dust particles into small briquettes for disposal.

The process consists of the following: Side A (Methylene Di-p-phenylene Isocyanate (MDI)) and Side B (blowing agent formulation, polyester polyol, flame retardant, surfactant and amine catalysts) (see Figure 1) chemicals are combined just before the exit from the laydown nozzle. Multiple streams of the mixture are deposited on the bottom paper backing located on a conveyor. The bottom paper backing is conveyed into the laminator along with the top paper backing. The paper backing is also referred to as "facer". The foam expands to fill the space between the paper backings to form a continuous length panel. The thickness of the foam insulation board varies depending on the line speed and laminator settings. Sidewalls along the conveyors force the expanding foam to conform to the width of the paper backing. The continuous sheet is cured in the heated section of the laminator, and then the sides are cut by the edge trim saws and crosscut into 16-foot sections and transferred to a gang saw where they are cut into either 4 or 8 foot segments. The cut boards travel on a conveyor to a station where they are stacked and shrink wrapped. The wrapped boards are then stacked and stored in the finished goods warehouse area pending shipment.

At times, the facility will experiment with alternative chemicals that make up Side A and Side B formulations for product development and improvement. Trial chemicals will be tracked in accordance with corresponding permit conditions.

The chemicals that make up Side A and Side B formulations are contained in process and storage tanks, all of which are subject to change due to the ongoing product development and improvement.

#### **Foam Insulation Board Manufacturing Line (EU-1)**

The process is not subject to any New Source Performance Standards. The VOC emissions from the laminator are ducted directly to the RTO. VOC and particulate emissions from the board sawing are ducted first to a dust collector/fabric filter (baghouse) and then to a HEPA filter for final polishing of the gas stream before being ducted to the zeolite rotary concentrator (concentrator) and then directly to the RTO. The zeolite rotary concentrator clean side exhausts indoors to the building truck loading bay.



**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.

<b>TABLE II.A: EMISSIONS UNITS DESCRIPTION</b>			
<b>Emissions Unit</b>	<b>Emissions Unit Description</b>	<b>Control Unit Description</b>	<b>Permit or Regulation Number</b>
EU-1	Foam Insulation Board Manufacturing Line Maximum Rated Capacity: 15,670 lb/hr Construction Date: 1997	RTO/Rotary Concentrator  PM/PM <sub>10</sub> : Baghouse	P 026-0045 RCSA §22a-174-20(f)(4) 40 CFR Part 64  RCSA §22a-174-18(f)(3)

**B. OPERATING SCENARIO IDENTIFICATION**

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

<b>TABLE II.B: OPERATING SCENARIO IDENTIFICATION</b>	
<b>Emissions Units Associated with the Scenario</b>	<b>Description of Scenario</b>
EU-1	SOS shall be EU-1 operated in accordance with applicable permit terms and conditions and best management practices for foam insulation board manufacturing.

### Section III: Applicable Requirements and Compliance Demonstration

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

#### A. EMISSIONS UNIT 1 (EU-1): Foam Insulation Board Manufacturing Line:

**Subject to: Permit No. 026-0045, RCSA §§22a-174-20(f)(4) and 22a-174-18(f)(3), 40 CFR Part 64**

##### 1. Operational Conditions

###### a. Limitation or Restriction

- i. Foam Board Chemical Usage [P 026-0045]
  - (A) Side A:  
Less than or equal to 9,045 lb/hr
  - (B) Side B:  
Less than or equal to 6,625 lb/hr
  - (C) Total Side A & B:  
Less than or equal to 15,670 lb/hr
- ii. Maximum Annual Foam Board Chemicals Used, does not include face weight: [P 026-0045]
  - (A) Less than or equal to 25,900 tons/consecutive 12 months
- iii. Blowing Agent formulation shall not exceed: [P 026-0045]
  - (A) 1,254 lb/hr, based on a 12 consecutive month rolling average; and
  - (B) 8% of total foam board chemicals used, based on a 12 consecutive month rolling average.
- iv. The Permittee may use pentane, acetone or other chemicals in the blowing agent formulation. The emissions from any new compounds, for production or trial runs, shall be counted toward any applicable emissions limit found in Section III.A.2.a of this Title V permit. [P 026-0045]
- v. The Permittee shall operate and maintain EU-1 in accordance with the manufacturer's specifications and written recommendations. [P 026-0045]

###### b. Monitoring Requirements

- i. The Permittee shall monitor the hourly material usage for Side A, Side B and blowing agent formulation. [P 026-0045]
- ii. The Permittee shall monitor the monthly chemicals used in foam board production including the following: [P 026-0045]
  - (A) Total weight of each board thickness produced; and
  - (B) Total weight of chemicals used in foam board production during the month.

###### c. Record Keeping Requirements

- i. The Permittee shall keep a record of the following: [P 026-0045]
  - (A) Board thickness in inches;
  - (B) Total weight in tons for all chemicals used in foam board production during each calendar month. Such records shall show the dates and time for each period of operation of the laminator; and
  - (C) Total weight of each board thickness produced.

### Section III: Applicable Requirements and Compliance Demonstration

- ii. The Permittee shall keep a record of the hourly, monthly and consecutive 12 month usage and composition of blowing agent formulation, Side A formulation, Side B formulation, and total chemicals used in foam board production, in pounds. The consecutive 12 month material usage shall be determined by adding the current month's usage to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the previous month. [P 026-0045]
- iii. The Permittee shall keep records of the percentage of blowing agent formulation to total foam board chemicals used for each production run of foam board. [P 026-0045]
- iv. The Permittee shall calculate and record the monthly weighted average board thickness of all foam board produced during the month in inches and the Monthly Blowing Agent release factor in lb/100 lb of chemicals used. The Permittee shall make these calculations with 30 days of the previous month. [P 026-0045]
- v. The Permittee shall keep records of the manufacturer's operation and maintenance requirements for each piece of equipment associated with EU-1. [P 026-0045]
- vi. The Permittee shall keep material safety data sheets (MSDS) or technical data sheets (TDS) or safety data sheets (SDS) for each chemical used. Such information shall include the quantity and type of each hazardous air pollutant contained in the chemicals used. For paperwork reduction, these sheets may be kept on computer file in electronic form, access to above paperwork requirement may also be allowed via internet on-demand. [P 026-0045]

#### 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. VOC Emissions from Foam Board

### a. Limitation or Restriction

- i. Manufacturing Losses (through RTO/Rotary Concentrator) [P 026-0045]
  - (A) Less than or equal to 6.0 lb/hr
  - (B) Less than or equal to 9.5 tpy
- ii. Fugitive Losses from Warehouse [P 026-0045]

Less than or equal to 59.1 tpy
- iii. Total VOC Emissions [P 026-0045]
  - (A) Less than or equal to 68.6 tpy
  - (B) Notwithstanding Section III.A.2.a.ii of this Title V permit, total VOC emissions shall not exceed 68.6 tpy.
- iv. The Permittee shall keep all drums and vessels that contain solvents, cleaners, coatings, or cleaning rags covered when not in use so as to minimize the amounts of VOCs emitted to the atmosphere. [P 026-0045]

### b. Monitoring Requirements

Record keeping specified in Section III.A.2.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)(l)(K)(ii)]

### c. Record Keeping Requirements

- i. The Permittee shall calculate and record the monthly and consecutive 12-month emissions of VOC and

### Section III: Applicable Requirements and Compliance Demonstration

non-VOC regulated air pollutants in tons from each of the following operations: [P 026-0045]

- (A) the laminator (sides A and B); and
  - (B) the warehouse.
- ii. The consecutive 12-month emissions shall be determined by adding the current month's emissions to that of the previous 11 months. Calculations shall be made in accordance with Section III.A.2.c.iii of this Title V permit. The Permittee shall make these records within 30 days of the previous month. [P 026-0045]
- iii. The Permittee shall calculate VOC emissions from the following: [P 026-0045]
- (A) MDI manufacturing losses
    - (1) Manufacturing VOC Loss (tons/month) =  $[W \times [1 - \text{RTO/Concentrator Combined Destruction Efficiency}]] / [453.6 \text{ g/lb}] / [2000 \text{ lb/ton}]$ 
      - (a) Where, W = Evaporation loss from the process as calculated according to "MDI/Polymeric MDI Emissions Reporting Guidelines for the Polyurethane Industry", Alliance for the Polyurethane Industries, 2004.
      - (b) Where, RTO/Concentrator Combined Destruction Efficiency (DE) is as determined by most recent stack test data at the HPS Bristol, CT facility and calculated in Section III.A.4.a of this Title V permit.
  - (B) Total Manufacturing and Sawcutting VOC Loss (including emissions from the manufacturing process, baghouse and concentrator)
    - (1) Total Manufacturing VOC Loss (lb/hr) =  $[\text{Total VOC emissions to RTO/Concentrator}] \times [1 - \text{RTO/Concentrator DE}]$ 
      - (a) Where, VOC emission rates are as determined by the most recent stack test data at the HPS Bristol, CT facility. The VOC emission rate shall be adjusted by the actual VOC fraction of the blowing agent (i.e. lb VOC/lb blowing agent)
      - (b) Where, RTO/Concentrator Combined Destruction Efficiency (DE) as determined by most recent stack test data at the HPS Bristol, CT facility.
      - (c) See Section III.A.4.a.i.(B) and Figure 1 in Section III.A.7.a of this Title V permit for DE equation and sampling locations.
  - (C) Fugitive Warehouse VOC losses
    - (1) VOC Emitted from the Warehouse =  $[\text{Monthly Average Blowing Agent Release Factor (lb blowing agent/100 lb foam board chemicals used)}] \times [\text{VOC content of blowing agent (lb VOC/lb blowing agent)}] \times [\text{total chemicals used (lb)}] / 100$ 
      - (a) Where, the blowing agent release factor equals:
        - (1) 0.2075 lb blowing agent/100 lb foam board chemicals used if the Monthly Weighted Average Board thickness is less than 2"; or
        - (2) The result of linear interpolation based on the Monthly Weighted Average Board Thickness:
          - (i) 0.02075 lb/100 lb of foam board chemicals used in the production of 2" board produced.
          - (ii) 0.2956 lb/100 lb of foam board chemicals used in the production of 3" board produced.

### Section III: Applicable Requirements and Compliance Demonstration

(2) Fugitive VOC emissions from leaks in transfer lines and process piping: "Fugitive VOC Emissions in the Synthetic Organic Chemical Manufacturing Industry (SOCMI)" (EPA-625/10-8A-004), 12/84

(D) Sample calculations for each of the above parameters shall be kept on-site and shall be provided to the commissioner on request.

*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. HAP Emissions

*a. Limitation or Restriction*

This equipment shall not cause an exceedance of the MASC for any HAP emitted and listed in RCSA §22a-174-29. [P 026-0045]

[STATE ONLY REQUIREMENT]

*b. Monitoring 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. [RSCA §22a-174-33(j)(1)(K)(ii)]

*c. Record Keeping Requirements*

The Permittee shall keep records of the MASC for any HAP emitted from EU-1 including emissions from trial runs using stack parameters from the latest stack test data. [P 026-0045]

*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)]

### 4. Stack Emission Test Requirements

*a. Limitation or Restriction*

i. Recurring stack testing is required for the following within three years of the previous test:  
[P 026-0045]

(A) VOC/HC at Point C

(B)  $RTO/Concentrator\ Combined\ DE = 1 - [(C + (B - D)) / (A + B)] \times 100\%$

Where,

(1) A = emissions rate measured between the laminator and RTO

(2) B = emissions rate measured between the saw cutting and concentrator

(3) C = emissions rate measured at outlet of RTO

(4) D = emissions rate measured between the concentrator and RTO

(5) See Figure 1 in Section III.A.7.a of this Title V permit for sampling locations.

(6) Emissions rates measured at Points A through D, in Sections III.A.4.a.i.(B)(1) through (4) of this Title V permit, shall be in lb/hr.

### Section III: Applicable Requirements and Compliance Demonstration

*b. Monitoring Requirements*

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

*c. Record Keeping Requirements*

The Permittee shall keep records of all performance tests. [P 026-0045]

*d. Reporting Requirements*

The Permittee shall submit test results within 60 days after completion of testing. [P 026-0045]

#### 5. Lachenmeir Shrink Wrap

*a. Limitation or Restriction*

i. Fuel Type: Natural Gas [P 026-0045]

ii. The Permittee shall perform maintenance and inspections on the Lachenmeir shrink wrapper as recommended by the manufacturer. [P 026-0045]

*b. Monitoring Requirements*

Record keeping specified in Section III.A.5.c of this Title V permit shall be sufficient to meet other Monitoring Requirements pursuant to RCSA §22a-174-33. [RSCA §22a-174-33(j)(l)(K)(ii)]

*c. Record Keeping Requirements*

The Permittee shall record all maintenance and inspections on the Lachenmeir. Such records shall contain the date of any maintenance or inspection and any action taken by the Permittee. [P 026-0045]

*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. RTO/Rotary Concentrator

*a. Limitation or Restriction*

i. Allowable Fuel: Natural Gas [P 026-0045]

(A) Maximum Firing Rate: 2000 ft<sup>3</sup>/hr (2 MMBtu/hr)

ii. Minimum RTO Combustion Temperature (°F): 1,633 (3-hour block average) [P 026-0045]

iii. Minimum RTO Combustion Chamber Retention Time: 1 second [P 026-0045]

iv. Minimum RTO/Concentrator Combined Destruction Efficiency: 90% [P 026-0045]

v. Minimum Rotary Concentrator Desorption Flow Temperature (°F): 347 [P 026-0045]

vi. The Permittee shall properly operate the control equipment at all times that EU-1 is in operation and emitting air pollutants. [P 026-0045]

vii. Natural Gas Combustion Emissions from the RTO (tpy) [P 026-0045]

(A) PM: 0.07

(B) PM<sub>10</sub>: 0.07

(C) PM<sub>2.5</sub>: 0.07

(D) SO<sub>2</sub>: 0.005

### Section III: Applicable Requirements and Compliance Demonstration

(E) NO<sub>x</sub>: 0.88

(F) VOC: 0.05

(G) CO: 0.74

viii. The Permittee shall perform maintenance and inspections on the RTO and rotary concentrator as recommended by their respective manufacturers. [P 026-0045]

#### b. Monitoring Requirements

- i. The Permittee shall operate a continuous monitoring and record keeping system which continuously measures and continuously records the RTO's combustion temperature. The Permittee shall calibrate or replace the thermocouple annually. If the thermocouple does not agree to within one percent (1%) of the reference, the thermocouple shall be replaced. [P 026-0045]
- ii. The Permittee shall monitor the natural gas usage of the RTO using either fuel purchase receipts or a non-resettable totalizing fuel meter. [P 026-0045]
- iii. The Permittee shall continuously monitor the flow rate from the laminator to the RTO at Point A, Figure 1. See Section III.A.7.a of this Title V permit for monitoring location. [P 026-0045]
- iv. The Permittee shall continuously monitor the desorption temperature of the rotary concentrator using a computer display. [P 026-0045]

#### c. Record Keeping Requirements

- i. The Permittee shall calculate and record the monthly and consecutive 12 month PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, and CO emissions in units of tons for the RTO. The consecutive 12 month emissions shall be determined by adding (for each pollutant) the current month's emissions to that of the previous 11 months. Such records shall include a sample calculation for each pollutant. The Permittee shall make these calculations within 30 days of the end of the previous month. [P 026-0045]
  - (A) Demonstration of compliance with the Combustion Emissions from the RTO may be met by calculating the emission rates using from the following sources:
    - (1) Compilation of Air Pollutant Emission Factors (AP-42), 5<sup>th</sup> Edition, Section 1.4, Tables 1.4-1 & 2 Small boilers less than 100 MMBtu/hr, 7/98
- ii. The Permittee shall keep records of the annual natural gas use for the RTO. [P 026-0045]
- iii. The Permittee shall continuously record the RTO combustion temperature. [P 026-0045]
- iv. The Permittee shall continuously record the flow rate from the laminator to the RTO. [P 026-0045]
- v. The Permittee shall keep records of the manufacturer's operation and maintenance requirements for each piece of equipment associated with this process. [P 026-0045]
- vi. The Permittee shall keep calibration and maintenance records and electronic recordings for all continuous monitoring instruments and equipment. [P 026-0045]
- vii. The Permittee shall record all maintenance and inspections conducted on the laminator total enclosure and duct work to the rotary concentrator/RTO control system. Such records shall contain the date of any maintenance or inspection and any action taken by the Permittee. [P 026-0045]
- viii. The Permittee shall keep detailed operation and maintenance records for the RTO, including the time of operation, the date removed from service, the cause for the removal from service, the date and description of each service performed, and the date put back into service. [P 026-0045]
- ix. The Permittee shall keep detailed records of each RTO thermocouple calibration or replacement, including the date each RTO thermocouple calibration or replacement was performed and the name of

### Section III: Applicable Requirements and Compliance Demonstration

the person conducting that task. [P 026-0045]

- x. The Permittee shall continuously record the desorption temperature of the rotary concentrator.  
[P 026-0045]

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)]

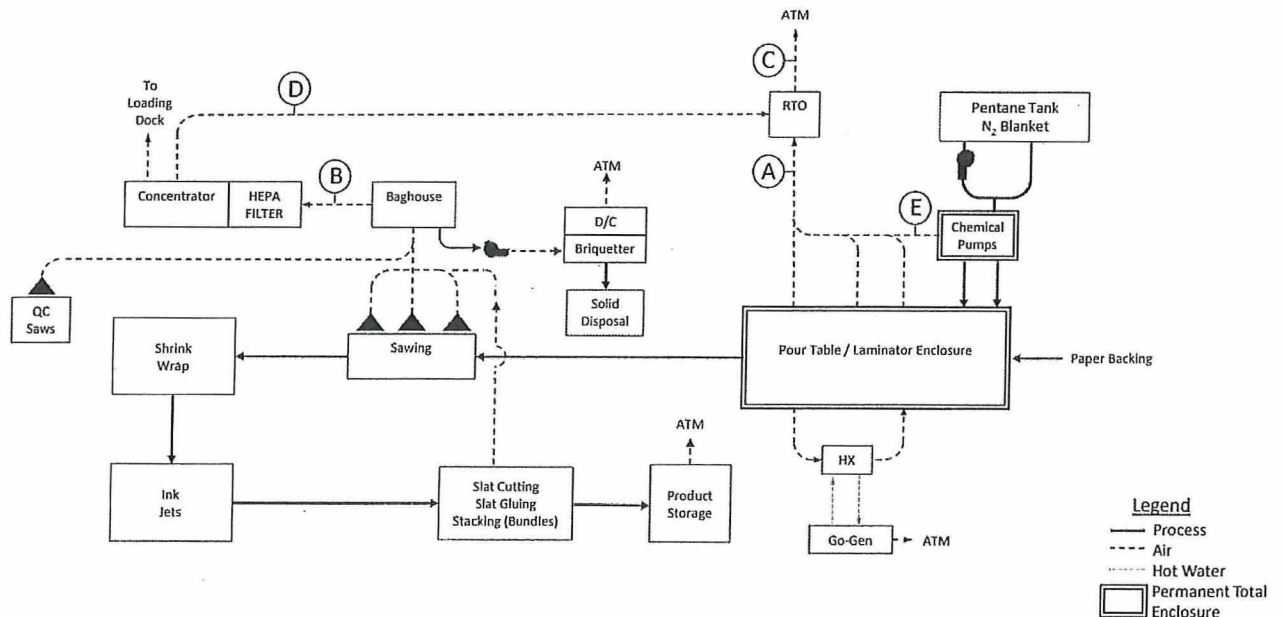
7. **40 CFR Part 64 Compliance Assurance Monitoring (CAM) Plan for VOC Emissions**

a. *CAM Plan Justification*

Notwithstanding the requirements found in Section III.A.7 of this Title V permit, the Permittee shall comply with 40 CFR Part 64 at all times EU-1 is in operation. EU-1 is subject to CAM since the potential uncontrolled volatile organic compound (VOC) emissions exceed major source threshold and are subject to an emissions limitation or standard which is not otherwise exempt under 40 CFR §64.2(b)(1).

EU-1 was last tested in November 2020 to determine compliance with the emissions standard, verify the appropriate indicators and ranges to determine continuous compliance.

Figure 1



- i. The justification for using the proposed CAM approach is based on the principles that the following will assure compliance with the permitted VOC emissions. Indicator ranges and emissions data were determined during stack testing in November 2020.

(A) Monitoring the pressure drop across the baghouse, Flow rate between baghouse and HEPA Filter/Concentrator (Point B), and pressure differential inside the Pour Table room.

(B) Monitoring RTO combustion zone temperature.

### Section III: Applicable Requirements and Compliance Demonstration

- (C) Monitoring Flow Rate between RTO and Pour Table/Laminator (Point A) to achieve a permanent total enclosure, as defined by EPA Reference Method 204.
- (D) Monitoring Concentrator desorption temperature.
- ii. The rationale for monitoring pressure drop across the baghouse and flow rate at Point B as indicators of performance in the ability to collect VOC emissions at the sawing operation relies on the premise that if sufficient and relatively constant flow is maintained to collect the particulate from the sawing operation, there will also be a high level of VOC collection. The VOC emissions at the sawing operation are lighter than the dust that is created by the saw and assures high level of VOC capture.

Increases in pressure drop across the baghouse may indicate that the bags require cleaning, whereas decreases in pressure may indicate compromised bags (i.e. rips in bag material, loose fitting bags, leaks in baghouse structure, etc.)

Maintaining a constant flowrate at Point B assures constant flow at the sawing operation and is an additional indicator of issues with the Baghouse as flow rates in the Baghouse should also remain constant in order to maintain a constant pressure differential in the baghouse. The 3-hour average flow during stack testing was 9,681 scfm and the acceptable value to assure capture is considered to be 8,713 scfm, which is 90% of this value. The entire process is interlocked to shut down if the flow rate falls below 8,700 scfm.

- iii. The rationale for monitoring and maintaining a minimum RTO combustion temperature is based on stack test data which has determined a minimum average temperature to achieve sufficient destruction efficiency. If this minimum RTO temperature is maintained, compliance is assured at all operating loads.

The temperature measurement is taken at least every 15 minutes and averaged hourly. A rolling 3-hour average is then determined. The 3-hour average combustion zone temperature during testing was 1,633°F.

- iv. The rationale for maintaining a permanent total enclosure to capture 100% of the VOC emitted in the Pour Table/Laminator is based on the assumption that flow will remain relatively constant over all operating loads, provided there are no modifications or leaks in the enclosure. EPA Reference Method 204 requires the face velocity at every natural draft opening (NDO) to be at least 3600 m/hr (200 fpm) to demonstrate a permanent total enclosure (PTE). During the most recent round of emissions testing, the facility achieved air velocities much higher than 200 fpm based on an average flowrate of 5,246 scfm (Point A, Figure 1) and 4.92 ft<sup>2</sup> of NDO openings. The average chemical pump enclosure flow rate was 391 scfm (Point E) and the air flow from the laminator during the testing was 4,855 scfm. The calculated average face velocity achieved during the test was 986 fpm, which is much higher than the 200 fpm required to achieve 100% capture according to EPA Reference Method 204. With the proposed NDO minimum face velocity of 250 fpm, the required flow rate from the laminator only needs to be 2,500 scfm. The additional 391 scfm from the pump enclosure needs to be included to ensure total capture. Therefore, a minimum flow rate measured at Point A of 2,891 scfm and a maximum total NDO area of 10 ft<sup>2</sup> assures the room serves as a permanent total enclosure capturing VOC emissions from the laminator/pour table area.

The pressure drop in the Pour Table/Laminator enclosure will also be monitored in accordance with Method 204 as an alternative method of determining the PTE. Since personnel are required to periodically enter the laminator room to observe the laminating process, the averaging period is based on an 8-hour rolling average.

- v. The rationale for monitoring desorption temperature in the rotary concentrator as a performance indicator is based on the premise that sufficient temperature is maintained to allow full VOC desorption and compliance with the 90% combined RTO/Rotary Concentrator VOC destruction efficiency limitation. The rotary concentrator wheel always has some portion of the wheel in desorption mode and

### Section III: Applicable Requirements and Compliance Demonstration

proper temperature and residence time are required to meet overall destruction efficiency. The residence time is a function of the concentrator design and maintained at a constant rate. The desorption temperature therefore is primarily responsible for proper VOC desorption from the wheel to the RTO.

The temperature measurement is taken at least every 15 minutes and averaged hourly. A rolling 3-hour average is then determined. The proposed minimum desorption temperature of 347°F is 15°F below the minimum temperature observed during testing. This methodology is the same as allowed in 40 CFR §63.3167(e)(2), which this source is NOT subject to, but allows for normal fluctuations in temperature. This monitoring methodology would be acceptable for CAM as the rule was promulgated after November 15, 1990 as allowed by 40 CFR §64.2(b)(i).

The temperature measurement is taken at least every 15 minutes and averaged hourly. A rolling 3-hour average is then determined.

#### b. CAM Indicator Ranges

- i. A CAM excursion will occur if the indicators are outside of the following ranges or minimum or maximum values:
  - (A) Pressure Drop across baghouse: 0.5" – 6.0" WC [P 026-0045]
  - (B) Minimum Flow Rates: [P 026-0045]
    - (1) From Pour Table/Laminator and RTO (Point A, Figure 1): 2,891 scfm
    - (2) Between Baghouse and Concentrator (Point B, Figure 1): 8,713 scfm
  - (C) Minimum Pressure Differential of Pour Table/Laminator across NDO's: 0.007" water [P 026-0045]
  - (D) Minimum RTO Combustion Temperature: 1,633 °F [P 026-0045]
  - (E) Maximum NDO in Pour Table/Laminator: 10 ft<sup>2</sup> [P 026-0045]
  - (F) Minimum Rotary Concentrator Desorption Temperature: 347 °F [P 026-0045]
- ii. An excursion occurs anytime the monitored indicators are outside of the prescribed range, or above or below the maximum or minimum value. When an excursion occurs, the Permittee shall: [40 CFR §64.6(c)(2)]
  - (A) Note that there is a problem;
  - (B) Take necessary corrective actions to restore normal operation;
  - (C) Submit required reports pursuant to 40 CFR §64.9; and
  - (D) Submit any additional information in writing, at the commissioner's request, within 30 days of the receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier.

#### c. Monitoring and Record Keeping Requirements

- i. The Permittee shall:
  - (A) Monitor and record the pressure drop across baghouse filter using a manual gauge at least once per shift; [P 026-0045]
  - (B) Continuously monitor and record flow rate between Laminator and RTO (Point A, Figure 1) (3-hour rolling average); [P 026-0045]
  - (C) Continuously monitor and record flow rate from the Baghouse to the Concentrator (Point B, Figure 1) (3-hour rolling average); [P 026-0045]

### Section III: Applicable Requirements and Compliance Demonstration

- (D) Continuously monitor and record RTO combustion temperature (3-hour block average); [P 026-0045]
- (E) Monitor and record the pressure differential of Pour Table/Laminator, taken once per shift; and [P 026-0045]
- (F) Continuously monitor and record the Rotary Concentrator desorption temperature [P 026-0045]

#### d. *Quality Assurance and Quality Control (QA/QC):*

In addition, the Permittee shall conduct the following activities:

- (A) The monitoring equipment operation, installation specifications, and calibrations shall be in accordance with manufacturer written recommendations. [P 026-0045]
- (B) The Permittee shall inspect the total enclosure for the laminator, the duct work for the RTO and rotary concentrator for leaks according to the following: [P 026-0045]
  - (1) Visual inspection monthly;
  - (2) Photoionization Detector (PID) inspections quarterly; and
  - (3) Leaks will be identified as an instrument reading greater than 50 parts per million by volume (as pentane) above background or by visual inspections and shall be repaired as soon as practicable.
- (C) Calibrate or replace the thermocouple annually. [P 026-0045]
  - (1) If the thermocouple does not agree to within one percent of the reference, the thermocouple shall be replaced.
- (D) The Permittee shall keep records of the required monthly and quarterly leak inspections. These records shall include the following: [P 026-0045]
  - (1) Type of inspection and PID readings;
  - (2) Any identified leaks and location; and
  - (3) Any corrective actions taken.
- (E) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). [40 CFR §64.9(b)]

#### e. *Reporting Requirements*

- i. The Permittee shall submit all applicable reports in accordance with 40 CFR §64.9, but not limited to the following: [40 CFR §64.9(a)(2)]
  - (A) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
  - (B) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
  - (C) A description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period. Upon completion of a QIP, the owner or operator will include in the next

### Section III: Applicable Requirements and Compliance Demonstration

summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

#### 8. Baghouse and HEPA Filter

##### a. Limitation or Restriction

- i. Expected PM<sub>10</sub> Collection Efficiency: 99.5% [P 026-0045]
- ii. HEPA filter PM<sub>10</sub> Removal Efficiency: 99.99% [P 026-0045]
- iii. The Permittee shall properly operate the control equipment at all times that EU-1 is in operation and emitting air pollutants. [P 026-0045]
- iv. The Permittee shall perform inspections of the dust collector as recommended by the manufacturer. [P 026-0045]

##### b. Monitoring Requirements

Record keeping specified in Section III.A.8.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)(l)(K)(ii)]

##### c. Record Keeping Requirements

- i. The Permittee shall maintain records sufficient to determine compliance with the limitation or restriction in Section III.A.8.a of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]
- ii. The Permittee shall keep records of the manufacturer's operation and maintenance requirements for the control equipment. [P 026-0045]
- iii. The Permittee shall record all maintenance conducted on the baghouse filter and a description of the condition of the filters upon replacement. [P 026-0045]

##### 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. 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-174-4a(b)(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

### Section III: Applicable Requirements and Compliance Demonstration

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. **Variations:** 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 §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**

<b>TABLE IV: COMPLIANCE SCHEDULE</b>				
<b>Emissions Unit</b>	<b>Applicable Regulations</b>	<b>Steps Required for Achieving Compliance (Milestones)</b>	<b>Date by which Each Step is to be Completed</b>	<b>Dates for Monitoring, Record Keeping, and Reporting</b>
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.

## 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: Compliance Analysis and Coordination Unit, 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: Director, Enforcement and Compliance Assurance Division, U.S. EPA Region I, 5 Post Office Square, Suite 100 (Mailcode: 04-02), Boston, Massachusetts 02109-3912, Attn: Air Compliance 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:

## Section VI: Title V Requirements

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,
  - 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.

## Section VI: Title V Requirements

### 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
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.

## Section VI: Title V Requirements

### 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;
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.

## Section VI: Title V Requirements

### 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-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.

## **Section VI: Title V Requirements**

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.

## **Print for Compliance Certification or Enforcement**

Click the button below to generate the appropriate checklist. Be aware that this macro does not work unless you have access to the DEEP D-Drive.

This macro takes anywhere from 2-5 minutes to run. Your computer will look like it is locked up but it is working. Unfortunately the new DEEP virtual computer system makes this process even slower. Please be patient.

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