

## 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>	053-0071-TV
<b>Client/Sequence/Town/Premises Numbers</b>	0130/006/053/0009
<b>Date Issued/Modification Date Issued</b>	May 13, 2021/April 23, 2024
<b>Expiration Date</b>	May 13, 2026

**Corporation:**

*Pratt & Whitney, Division of RTX Corporation*


**Premises Location:**

*400 Main Street, East Hartford, Connecticut 06118*

**Name of Responsible Official and Title:**

*Erich Uhlan, Director of Facilities & Services*

All the following attached pages, 2 through 62, are hereby incorporated by reference into this Title V permit.

  
Katherine S. Dykes  
Commissioner

April 23, 2024  
Date

for

# TABLE OF CONTENTS

	PAGE
<b>List of Abbreviations/Acronyms</b> .....	4
<b>Section I. Premises Information/Description</b>	
A. Premises Information.....	6
B. Premises Description. ....	6
<b>Section II. Emissions Units Information</b>	
A. Emissions Units Description - Table II.A.....	9
B. Operating Scenario Identification - Table II.B .....	11
<b>Section III. Applicable Requirements and Compliance Demonstration</b>	
A. Grouped Emissions Unit 1 .....	12
B. Emission Unit 2 .....	19
C. Grouped Emissions Unit 3 .....	28
D. Grouped Emissions Unit 4.....	29
E. Grouped Emissions Units 4 & 5 Subject to 40 CFR Part 60 III .....	32
F. Grouped Emissions Units 4 & 5 Subject to 40 CFR Part 63 ZZZZ.....	34
G. Grouped Emissions Unit 11.....	37
H. Grouped Emissions Units 12 .....	45
I. Grouped Emissions Unit 13.....	46
J. Grouped Emissions Unit 14.....	49
K. Grouped Emissions Unit 15 .....	50
L. CAIR NOx Ozone Season Trading.....	51
M. Premises-Wide General Requirements.....	51
<b>Section IV. Compliance Schedule - Table IV</b> .....	54
<b>Section V. State Enforceable Terms and Conditions</b> .....	55
<b>Section VI. Title V Requirements</b>	
A. Submittals to the Commissioner & Administrator.....	57
B. Certifications [RCSA §22a-174-33(b)].....	57
C. Signatory Responsibility [RCSA §22a-174-2a(a)] .....	57
D. Additional Information [RCSA §§22a-174-33(j)(1)(X), -33(h)(2)].....	58
E. Monitoring Reports [RCSA §22a-174-33(o)(1)] .....	58
F. Premises Records [RCSA §22a-174-33(o)(2)] .....	58
G. Progress Reports [RCSA §22a-174-33(q)(1)].....	59
H. Compliance Certifications [RCSA §22a-174-33(q)(2)].....	59
I. Permit Deviation Notifications [RCSA §22a-174-33(p)] .....	60
J. Permit Renewal [RCSA §22a-174-33(j)(1)(B)] .....	60
K. Operate in Compliance [RCSA §22a-174-33(j)(1)(C)] .....	60
L. Compliance with Permit [RCSA §22a-174-33(j)(1)(G)] .....	60
M. Inspection to Determine Compliance [RCSA §22a-174-33(j)(1)(M)].....	60
N. Permit Availability.....	61
O. Severability Clause [RCSA §22a-174-33(j)(1)(R)] .....	61
P. Need to Halt or Reduce Activity [RCSA §22a-174-33(j)(1)(T)].....	61
Q. Permit Requirements [RCSA §22a-174-33(j)(1)(V)] .....	61
R. Property Rights [RCSA §22a-174-33(j)(1)(W)] .....	61
S. Alternative Operating Scenario Records [RCSA §22a-174-33(o)(3)].....	61
T. Operational Flexibility and Off-Permit Changes [RCSA §22a-174-33(r)(2)] .....	61
U. Information for Notification [RCSA §22a-174-33(r)(2)(A)].....	62
V. Transfers [RCSA §22a-174-2a(g)] .....	62
W. Revocation [RCSA §22a-174-2a(h)] .....	62
X. Reopening for Cause [RCSA §22a-174-33(s)].....	62
Y. Credible Evidence.....	62

## **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>
ASTM	American Society of Testing and Materials
bhp	Break Horsepower
BTU	British Thermal Units
CAIR	Clean Air Interstate Rule
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
CGS	Connecticut General Statutes
CO	Carbon Monoxide
CTDEEP	Connecticut Department of Energy & Environmental Protection
CTG	Control Technology Guidelines
DOD	Department of Defense
EH&S	Environmental, Health, and Safety
EU	Emissions Unit
EPA	Environmental Protection Agency
Gal	Gallon
GEU	Grouped Emissions Unit
H <sub>2</sub> SO <sub>4</sub>	Sulfuric Acid
HAP	Hazardous Air Pollutant
HCl	Hydrochloric Acid
HEPA	High Efficiency Particulate Air
hr	Hour
HVOF	High Velocity Oxygen Fuel
lb	Pound
MMBTU	Million British Thermal Units
mmHg	Millimeters Mercury
MFR	Maximum Firing Rate
MSDS	Material Safety Data Sheet
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
No.	Number
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standard
NSR	New Source Review
O <sub>2</sub>	Oxygen
P	Permit
P&W	Pratt & Whitney
Pb	Lead
PM	Particulate Matter
PM-10	Particulate Matter less than 10 microns
Ppm	Parts per Million
ppmvd	Parts per million, volumetric basis dry

## LIST OF ABBREVIATIONS/ACRONYMS, continued

<i>Abbreviation/Acronym</i>	<i>Description</i>
R	Registration
R&D	Research and Development
RACT	Reasonably Available Control Technology
RCSA	Regulations of Connecticut State Agencies
SCR	Selective Catalytic Reduction
SIC	Standard Industrial Classification Code
SIMS	Site Information Management System
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
SOS	Standard Operating Scenario
tpy	Tons per year
TSM	Total Suspended Matter
TSP	Total Suspended Particulate
TV	Title V
ULSD	Ultra Low Sulfur Diesel (0.0015% sulfur by weight, dry basis, AKA Distillate Oil)
ULSF	Ultra Low Sulfur Fuel (<15 ppm sulfur)
VOC	Volatile Organic Compound
wt%	Weight Percent

## Section I: Premises Information/Description

### A. PREMISES INFORMATION

Nature of Business: Uninstalled engine manufacturing, assembly, and testing  
Primary SIC: 3724  
NAICS: 336412

Facility Mailing Address: Pratt & Whitney, Division of RTX Corporation  
400 Main Street, Mail Stop 102-21  
East Hartford, CT 06108

Telephone Number: (860) 565-7929

### B. PREMISES DESCRIPTION

The Pratt & Whitney (P&W) East Hartford facility engages in development, manufacturing processes, assembly and testing of experimental and production aircraft engines, ground based gas turbine engines and components, as well as overhaul and repair of these engines. Facility operations include processes such as tank lines, welding operations, thermal spray, small ovens, furnaces, washers, laser drilling and welding, surface coating, miscellaneous machining, sub-slab ventilation, small engines, ceramic and chemical vapor deposition coating, facility heating, ventilating, and air conditioning and waste treatment operations. P&W stipulated that it exceeds the major source threshold for TSP, PM-10, SO<sub>2</sub>, NO<sub>x</sub>, VOC, CO and HAP emissions and is located in a serious ozone non-attainment area defined in RCSA §22a-174-1(105).

#### Powerhouse

Three powerhouse boilers (GEU-1) provide steam for process and building heating and cooling. The three boilers are registered (R 053-0039, 41 & 42) and are designated as EU-6, EU-8, and EU-9. All three boilers use flue gas recirculation as well low NO<sub>x</sub> Burner Technology to help lower NO<sub>x</sub> emissions, and in addition EU-8 and EU-9 utilize water injection.

A gas turbine based cogeneration system (EU-2) provides a portion of the electrical power required by the facility and also provides steam for process and building heating and cooling. The cogeneration system was issued a permit to construct (Permit No. 053-0049) on 10/10/1991 and a permit to operate on 7/28/1995. The permit was last modified/revised on 3/30/2023. NO<sub>x</sub> emissions are controlled by selective catalytic reduction (SCR) and water injection. The turbine is equipped with a NO<sub>x</sub> continuous emission monitor (CEM). The turbine is subject to the New Source Performance Standard (NSPS) - Standards for Stationary Gas Turbines (40 CFR Part 60 Subpart GG) and the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines (40 CFR Part 63 Subpart YYYY). However, per 40 CFR §63.6090(b)(4), existing turbines do not have to meet the requirements of 40 CFR Part 63 Subparts YYYY and A. The turbine is subject to RCSA §22a-174-22e, RCSA §22a-174-31 (RGGI), as well as RCSA §22a-174-22c (CAIR).

#### Emergency Engines

Currently, two diesel fired emergency engines and one natural gas fired emergency engine are subject to RCSA §22a-174-3b(e). Additional units may be brought on site as required. They have been grouped into GEU-4. One unit in this grouping EU-7 is a generator in Building M, and has a rating higher than 500 brake horsepower and was constructed prior to December 19, 2002; therefore, it does not need to meet the requirements of 40 CFR Part 63 Subparts A and ZZZZ.

All diesel and natural gas fired emergency engines that are not required to be registered or permitted and are not covered under RCSA §22a-174-3b(e) have been grouped into GEU-5. These units are all subject to 40 CFR 63 Subpart ZZZZ, except for EU-11, which is a fire pump that runs on ULSD. EU-11 is listed

## Section I: Premises Information/Description

in this Title V permit under Section III.E with GEU-4 emergency engine EU-10. Both of these engines are subject to 40 CFR Part 60 Subpart III.

### Engine Testing Operations

Vitiated Inlet Air Heaters X-7 and X-8 (GEU-3) are used to preheat the inlet air for uninstalled aircraft engine test programs. They both have maximum rated capacities of greater than five MM btu/hr and are thereby subject to RCSA §22a-174-22e in accordance with RCSA §22a-174-22e(b)(1)(G). However, since they are used as test stands or test cells they are exempt from emission limits, tune-ups or testing requirements in accordance with RCSA §22a-174-22e(c)(6). They are still subject to record keeping in accordance with RCSA §22a-174-22e(j). The two inlet air heaters are registered (R-053-0019 & 20).

The X-Test Burner Rigs (GEU-7) are used in conducting performance evaluation tests. The Burner Rigs are not required to be registered or permitted.

Test Cells X-7 and X-8 (GEU-8) are used to house uninstalled aircraft engines while they are being tested. The two Test Cells are not required to be registered or permitted.

### Spray Booths

The facility has a number of permitted spray booths that apply both VOC and non-VOC based specialty coatings, R&D, DOD and fixture/facilities coatings.

The Kayco Deluxe 140 (EU-19) and the ATI 3000 (EU-20) spray booths in the Overhaul & Repair Operations were issued Permit No. 053-0055 to construct and operate on 3/30/1993. The Hollow Fan Blade coating booth (EHRO), (EU-21) was issued Permit No. 053-0121 to construct and operate on 4/30/2008. The Global Finishing Solutions booth (EU-24) was installed in March of 2016 and operated under RCSA §22a-174-3b until it was issued permit No. 053-0145 on 7/31/2017. The CANMC STC PB02 spray booth (EU-23) was issued Permit No. 053-0133 to construct and operate on 10/31/2003. Permit Nos. 053-055, 053-0121, 053-0133, and 053-0145 were most recently modified on 8/15/2022. The MERL STC PB spray booth (EU-22) was issued Permit No. 053-0124 to construct and operate on 9/18/2003. These spray booths have been grouped into GEU-11. Dry panel filters control particulate emissions for all these booths.

The facility is subject to the NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63 Subpart GG). However, P&W does not currently apply any primers or topcoats subject to the Aerospace NESHAP limits. P&W conducts spray applications of aerospace specialty coatings subject to the Aerospace NESHAP as well as specialty coatings, R&D coatings, Classified National Security Information coatings, and otherwise exempt coatings, which are not subject to the Aerospace NESHAP. The facility is subject to the premises-wide VOC emission limit of 1,666 pounds in any one month from all miscellaneous metal parts surface coating operations.

Spray booths that do not require registration or permitting have been grouped into GEU-12, and spray booths and plasma spray operations subject to RCSA §22a-174-3b(g) have been grouped into GEU-13.

### Noble Gas Furnaces

Four Noble gas Furnaces have been grouped in GEU-17. The furnaces are used to remove wax from turbine blades and vanes following a laser drilling process or other machining processes. Noble Gas Furnaces No. 1 (EU-25) and 2 (EU-26) were issued Permit Nos. 053-0141 and 053-0142 respectively on January 16, 2015 and modified on May 24, 2016. Permit Nos. 053-0143 and 053-0144 were also issued on January 16, 2015 and modified on May 26, 2016 for Furnaces No. 3 and 4. However to date these units have not been installed or even ordered by P&W. Permit Nos. 053-0141 through 053-0144 were revoked as requested by P&W on 04/16/2021. With the revisions to Sections 22a-174-1 and 22a-174-3a, that became effective on March 5, 2021 exempting burn-off ovens with potential emissions of less than

## **Section I: Premises Information/Description**

15 tons per year of any individual air pollutant from New Source Review permitting requirements, these units, if installed, would not require permits.

### **Cold Cleaning**

The cold cleaning units (GEU-14) are used to remove soils from metal surfaces of instrumentation and facilities equipment. They are not required to be registered or permitted.

### **Miscellaneous Cleaning Operations**

Miscellaneous cleaning operations subject to the Aerospace NESHAP include miscellaneous hand wiping, spray gun cleaning and flush cleaning.

### **Site Remediation**

The facility is subject to the NESHAP for site remediation (40CFR Part 63 Subpart GGGGG). P&W is able to demonstrate that the total quantity of the HAP listed in Table 1 to 40 CFR Part 63 Subpart GGGGG that is contained in the remediation material excavated, extracted, pumped, or otherwise removed during all of the site remediations conducted at the facility is less than 1 megagram (Mg). P&W will demonstrate compliance through recordkeeping as stated in 63.7881(c) and is otherwise exempt from all other requirements of this subpart.



## 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, Orders, Registrations, or Regulations into this Title V permit.

<b>TABLE II.A: EMISSIONS UNITS DESCRIPTION</b>				
<b>Emissions Unit/ Grouped Emissions Unit</b>		<b>Emissions Unit Description</b>	<b>Control Unit Description</b>	<b>Permit (P), Registration (R), or Regulation Number</b>
GEU-1	EU-6	Union Iron Works Boiler 6 ~ 167 MMBTU/hr – Installed 1958	FGR Low NOx Burner Tech.	R 053-0039 P 053-0049 Part VII RCSA §22a-174-22e 40 CFR Part 63 Subpart DDDDD
	EU-8	Riley WT-VO Boiler 8 ~ 190 MMBTU/hr - Installed 1968	Water Injection FGR Low NOx Burner Tech.	R 053-0041 P 053-0049 Part VII RCSA §22a-174-22e 40 CFR Part 63 Subpart DDDDD
	EU-9	Union WT-VO Boiler 9 ~ 190 MMBTU/hr – Installed 1968	Water Injection FGR Low NOx Burner Tech.	R 053-0042 P 053-0049 Part VII RCSA §22a-174-22e 40 CFR Part 63 Subpart DDDDD
EU-2		32 MW FT-8 Gas Turbine Combined Cycle Cogeneration System with Heat Recovery Steam Generator – Installed 1992	SCR Water Injection	P 053-0049 RCSA §22a-174-22e 40 CFR Part 60 Subpart GG
GEU-3	EU-3	Vitiated Inlet Air Heater X-7, Natural Gas – Maximum Firing Rate of 233 MMBtu/hr - Installed 1971	None	R 053-0019 RCSA §22a-174-22e(j)
	EU-4	Vitiated Inlet Air Heater X-8, Natural Gas – Maximum Firing Rate of 233 MMBtu/hr - Installed 1970	None	R 053-0020 RCSA §22a-174-22e(j)
GEU-4	Emergency Engines covered under RCSA §22a-174-3b(e):			
	EU-5	Cummins G12, BT 470993, Natural Gas – 100 kw – Installed 1992	None	RCSA §22a-174-3b(e) 40 CFR Part 63 Subpart ZZZZ
	EU-7	CAT 3412, BT 474914, ULSD – 558 kw – Installed 2002	None	RCSA §22a-174-3b(e) RCSA §22a-174-22e
	EU-10	Cummins QSL9-G7, BT 482842, ULSD – 300 kw – Installed 2017	None	RCSA §22a-174-3b(e) RCSA §22a-174-22e 40 CFR Part 60 Subpart IIII

## Section II: Emissions Units Information

<b>TABLE II.A: EMISSIONS UNITS DESCRIPTION</b>				
<b>Emissions Unit/ Grouped Emissions Unit</b>	<b>Emissions Unit Description</b>	<b>Control Unit Description</b>	<b>Permit (P), Registration (R), or Regulation Number</b>	
GEU-5	Emergency Engines with PTE < 15TPY:			
	EU-11	Clarke/Deere Fire Pump, BT 480762, ULSD – 175 bhp – Installed 2013	None	40 CFR Part 60 Subpart IIII
	EU-12	Kohler 20RZ, BT 690659, Natural Gas – 20kw – Installed 1992	None	40 CFR Part 63 Subpart ZZZZ
	EU-13	Kohler 60RZ82/Ford, BT 347250, Natural Gas – 60kw – Installed 1989	None	40 CFR Part 63 Subpart ZZZZ
	EU-14	Kohler 45R772/White, BT 448188, Natural Gas – 45 kw – Installed 1982	None	40 CFR Part 63 Subpart ZZZZ
	EU-15	Kohler 45RZ72/White, 447229, Natural Gas – 45 kw - Installed 1981	None	40 CFR Part 63 Subpart ZZZZ
	EU-16	Onan 45EM-4XRB/5490A/Ford, BT 34224, Natural Gas – 45 kw – Installed 1967	None	40 CFR Part 63 Subpart ZZZZ
	EU-17	Kohler 30RH62-9154A/Rupp, BT 406928, - Natural Gas - 30 kw - Installed 1967	None	40 CFR Part 63 Subpart ZZZZ
	EU-18	Kohler 50RZGB, BT 814114, Natural Gas – 50 kw – Installed 2002	None	40 CFR Part 63 Subpart ZZZZ
GEU-11	EU-19	Kayco Deluxe 140 paint spray booth (O&R) BT 539823 – Installed 3/30/1993	Dry panel filters	P 053-0055
	EU-20	ATI Aerospace 3000 paint spray booth (O&R) BT 541382 – Installed 3/30/1993	Dry panel filters	P 053-0055
	EU-21	Hollow Fan Blade coating booth (EHRO) BT 816461 – Installed 4/30/2008	Dry panel filters	P 053-0121
	EU-22	Specialty coating spray booth MERL STC PB BT 244095 – Installed 9/18/2003	Dry panel filters	P 053-0124
	EU-23	Specialty coating spray booth CANMC STC PB02 BT 545255 - Installed 10/31/2003	Dry panel filters	P 053-0133
	EU-24	Global Finishing Systems spray booth BT 546711 – Installed 3/2016	Dry panel filters	P 053-0145
GEU-12	Miscellaneous paint spray booths	Dry Panel Filters	None	
GEU-13	Paint spray booths and plasma spray operations covered under RCSA §22a-174-3b(g)	Dry Panel Filter (SB) Cartridge collector & HEPA filter (Plasma Booth)	RCSA §22a-174-3b(g)	

## Section II: Emissions Units Information

<b>TABLE II.A: EMISSIONS UNITS DESCRIPTION</b>			
<b>Emissions Unit/ Grouped Emissions Unit</b>	<b>Emissions Unit Description</b>	<b>Control Unit Description</b>	<b>Permit (P), Registration (R), or Regulation Number</b>
GEU-14	Cold Cleaning Units	None	RCSA §22a-174-20(1)(3),(6),(7),(8)
GEU-15	Site Remediation Operations	None	40 CFR Part 63 Subpart GGGGG
<i>All applicable requirements for the following units are listed in the premises-wide general requirements portion of this Title V permit:</i>			
GEU-7	Burner Rigs – X-Test	None	None
GEU-8	Test Cells X-7 & X-8	None	None

### 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. There are no Alternate Operating Scenarios for the premises.

<b>TABLE II.B: OPERATING SCENARIO IDENTIFICATION</b>	
<b>Emissions Units Associated with the Scenarios</b>	<b>Description of Scenarios</b>
GEU-1	Boilers operate to produce steam using ULSD or natural gas and use water injection, FGR and Low NOx Burner technology for NOx reduction. Boiler No. 6 does not have water injection.
EU-2	Turbine operates using natural gas or ULSD and uses SCR and water injection for NOx reduction.
GEU-3	Heaters operate as needed to support test cell operation through combustion of fuel.
GEU-4	Engines operate using diesel or natural gas for emergency and testing purposes, and for power interruption during construction, facility maintenance, or repairs.
GEU-5	Engines operate using diesel or natural gas for emergency, testing purposes, and for power interruption during construction, facility maintenance, or repairs.
GEU-7	Conducting of performance evaluation tests and research and development.
GEU-8	Housing uninstalled aircraft engines while they are being tested.
GEU-11 & 12 & 13	Spray booths and plasma spray operations apply specialty coatings, R&D coatings, Classified National Security Information, or exempt coatings to uninstalled engine parts, fixtures, parts and products. The spray booths use dry panel filters for PM control and the plasma booths use cartridges and dry filter banks.
GEU-14	Cold cleaners operate as prescribed in RCSA 22a-174-20(1)(3), (6), (7), & (8), using cleaning solvents with a vapor pressure less than 4.3 kPa and at a temperature less than 20°C.
GEU-15	Site remediation operations shall be conducted in accordance with all applicable terms and conditions in 40 CFR Part 63 Subpart GGGGG.

### 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. GROUPED EMISSION UNIT 1 (GEU-1) – Union Iron Works Boiler 6 (EU-6), Riley WT-VO Boiler 8 (EU-8) and Riley WT-VO Boiler 9 (EU-9) (Registration Nos. 053-0039, 053-0041 and 053-0042; Permit No. 053-0049 Part VII; RCSA §22a-174-22e; 40 CFR Part 63 Subpart DDDDD)**

##### **1. Fuel Usage**

###### *a. Limitation or Restriction*

- i. The Permittee shall burn an aggregate of no greater than 23,500,000 gallons per year of ULSD over any consecutive 12 month period in GEU-1. [P 053-0049]
- ii. The Permittee shall operate each boiler in GEU-1 as a “unit designed to burn gas 1” as defined in 40 CFR §63.7575. Each boiler shall burn natural gas, except that each boiler may burn distillate oil (ULSD) only for periodic testing of liquid fuel, maintenance, or operator training, not to exceed a combined total for each boiler of 48 hours during any calendar year or during periods of gas curtailment or supply interruption of any duration. [40 CFR §63.7575]
- iii. For EU-6 the Maximum Firing Rate when burning Natural Gas is 150,000 ft<sup>3</sup>/hr. [R 053-0039]
- iv. For EU-8 the Maximum Firing Rate when burning Natural Gas is 157,000 ft<sup>3</sup>/hr. [R 053-0041]
- v. For EU-9 the Maximum Firing Rate when burning Natural Gas is 157,000 ft<sup>3</sup>/hr. [R 053-0042]

###### *b. Monitoring and Testing Requirements*

The Permittee shall install maintain, and operate fuel metering devices for each boiler in GEU-1, unless natural gas utility meters are already used for that purpose. [P 053-0049]

###### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of the monthly and consecutive 12 month fuel usage of the boilers in GEU-1. The consecutive 12 month fuel usage shall be determined by adding the current month’s fuel usage to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of the previous month. [P 053-0049]
- ii. If the Permittee operates a unit in GEU-1 using alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart of 40 CFR Part 63 Subpart DDDDD, other gas 1 fuel, or gaseous fuel subject to another subpart of 40 CFR Part 63 Subpart DDDDD or part 40 CFR Part 60, 61, or 65 the permittee shall keep records of the total hours per calendar year that alternative fuel is burned in each GEU-1 and the total hours per calendar year that each unit in GEU-1 operated during periods of gas curtailment or gas supply emergencies. [40 CFR §63.7555(h)]

###### *d. Reporting Requirements*

- i. If the permittee intends to use a fuel other than natural gas during a period of natural gas curtailment or supply interruption, as defined in 40 CFR §63.7575, the permittee must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or

### Section III: Applicable Requirements and Compliance Demonstration

supply interruption, as defined in 40 CFR §63.7575. The notification must include the following information: [40 CFR §63.7545(f)]

- (A) Company name and address;
- (B) Identification of the affected unit;
- (C) Reason you are unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared or the natural gas supply interruption began;
- (D) Type of alternative fuel you intend to use; and
- (E) Dates when the alternative fuel use is expected to begin and end.

#### 2. Sulfur Content

##### *a. Limitation or Restriction*

The Permittee shall operate the boilers in GEU-1 on fuels with a sulfur content of no greater than 0.0015% by weight, dry basis. [P 053-0049; RCSA §22a-174-19b]

##### *b. Monitoring and Testing Requirements*

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

##### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of the sulfur content of each shipment of liquid fuel received at the 400 Main Street, East Hartford plant, either by: [P 053-0049; 40 CFR 60.355(10)(i)]
  - (A) A shipping receipt and certification from the fuel supplier; or
  - (B) Performing an analysis using the method found in ASTM D129-00, D2622-98, D4294-02, D1266-98, D5453-00, or D1552-01 as applicable or equivalent method approved by the EPA; or
  - (C) A copy of a current fuel supplier contract.
- ii. Records for a fuel certification and analysis shall include the following information: [P 053-0049]
  - (A) The date of delivery;
  - (B) The name of the fuel supplier;
  - (C) Type of fuel delivered;
  - (D) The percentage of sulfur in such fuel, by weight, dry basis, and
  - (E) The method used to determine the sulfur content of such fuel.

### Section III: Applicable Requirements and Compliance Demonstration

iii. Records for the current fuel contract shall include the following information:  
[P 053-0049]

(A) The name of the fuel supplier; and

(B) Type or grade of fuel delivered.

#### *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. Nitrogen Oxides (NO<sub>x</sub>)

#### *a. Limitation or Restriction*

i. Prior to June 1, 2023 the Permittee shall not cause or allow emission of NO<sub>x</sub> for the boilers in GEU-1 to exceed the following: [RCSA §22a-174-22e(d)(3)(A)]

Note: Pursuant to RCSA §22a-174-22e(a)(1)(B), the boilers in GEU-1 are not "affected units" because each boiler has a maximum heat input capacity of less than 250 MMBtu/hr.

(A) Phase 1 (Beginning June 1, 2018 and ending May 31, 2023)

(1) The following emission limitations, as determined by NO<sub>x</sub> emission testing pursuant to RCSA §22a-174-22e(l) for emission units without a NO<sub>x</sub> CEM system apply to the boilers in GEU-1:

(a) Natural Gas: 0.20 lb/MMBtu

(b) ULSD Fuel Oil: 0.20 lb/MMBtu

ii. On or after June 1, 2023 the Permittee shall not cause or allow emission of NO<sub>x</sub> for the boilers in GEU-1 to exceed the following: [RCSA §22a-174-22e(d)(3)(C)]

(A) Phase 2 (On or after June 1, 2023)

(1) The following emission limitations, as determined by NO<sub>x</sub> emission testing pursuant to RCSA §22a-174-22e(l) for emission units without a NO<sub>x</sub> CEM system apply to the boilers in GEU-1:

(a) Natural Gas: 0.10 lb/MMBtu

(b) ULSD Fuel Oil: 0.15 lb/MMBtu

(B) In accordance with RCSA §22a-174-22e(g)(3)(F)(i) the Permittee may operate each boiler in GEU-1 subject to 40 CFR 63, Subpart DDDDD, as a "unit designed to burn gas 1 subcategory," as defined in 40 CFR §63.7575, and comply with the emissions limitations of RCSA §22a-174-

### **Section III: Applicable Requirements and Compliance Demonstration**

22e(d)(3)(A) for the operation on gas in lieu of complying with the applicable emission limitations of RCSA §22a-174-22e(d). This action shall be implemented no later than June 1, 2023 for a Phase 2 emissions limitation. [RCSA §22a-174-22e(d)(1)(A)]

#### *b. Monitoring and Testing Requirements*

- i. The Permittee shall conduct an emission test of each unit in GEU-1 to demonstrate compliance with the emission limits in Section III.A.3.a of this Title V permit.  
[RCSA §22-174-22e(l)(1)(A)]
- ii. Each emission test shall be conducted in accordance with RCSA §22a-174-5 and compliance with the emission limitations in Section III.A.3.a of this Title V permit shall be determined based on the average of three one-hour tests, each performed over a consecutive 60-minute period.  
[RCSA §22a-174-22e(l)(6)]
- iii. If the commissioner determines that three one-hour test are not reasonable given the location, configuration or operating conditions of an emission unit in GEU-1, the commissioner may approve testing where compliance with the emissions limitations in Section III.A.3.a of this Title V permit shall be determined based on the average of test runs shorter than a one-hour period.  
[RCSA §22a-174-22e(l)(6)(B)]
- iv. For the first time that an emission unit in GEU-1 is tested with a shorter than one-hour test run as provided in RCSA §22a-174-22e(l)(6) approval of the commissioner for a shorter than one-hour test run shall be received prior to testing by submission of a request to the commissioner at least 120 days prior to the scheduled testing. The request shall specify a test run duration and describe why a shorter time period is necessary. [RCSA §22a-174-22e(l)(6)(B)]
- v. The Permittee shall conduct an initial emission test on each emission unit in GEU-1 on a date during Phase 1 that is no more than 63 months following the date of the last emission test performed pursuant to former RCSA §22a-174-22(k). [RCSA §22a-174-22e(l)(4)]
- vi. The Permittee shall conduct the emission tests following the initial emission tests on a date after May 31, 2023 and no later than June 1, 2025. Subsequently, the Permittee shall conduct emission tests within every 63 calendar months following the date the previous emission test was conducted or the date the previous emission test was required to be conducted, whichever is earlier.  
[RCSA §22a-174-22e(l)(5)]

#### *c. Record Keeping Requirements*

- i. The Permittee shall keep the following records for the units each unit in GEU-1:
  - (A) The date and work performed for repairs, replacement of parts and other maintenance;  
[RCSA §22a-174-22e(j)(2)(B)]
  - (B) Records of the dates and times of all emission testing required by Section III.A.3.b of this Title V permit, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing;  
[RCSA §22a-174-22e(j)(2)(C)]
  - (C) For each tune-up, for each emission unit in GEU-1, conducted pursuant to Section III.A.4.a.i of

### Section III: Applicable Requirements and Compliance Demonstration

this Title V operating permit: [RCSA §22a-174-22e(j)(2)(E)]

(1) The date on which the emission unit is tuned-up; the name, title and affiliation of the person performing the tune-up, and a description of work performed; and

(2) The procedures used to inspect and perform adjustments;

(D) Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22e; and [RCSA §22a-174-22e(j)(2)(F)]

(E) Any other records or reports required by an order or permit issued by the commissioner pursuant to RCSA §22a-174-22e. [RCSA §22a-174-22e(j)(2)(G)]

ii. The Permittee shall retain all records and reports produced pursuant to the requirements of RCSA §22a-174-22e for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records and reports shall be retained at the premises where the emission unit is located, unless the commissioner approves in writing the use of another location in the State. [RCSA §22a-174-22e(j)(1)]

#### *d. Reporting Requirements*

i. Not more than 60 days after the completion of emission tests conducted under the requirements of Section III.A.3.b of this Title V permit, the Permittee shall submit a written report of the results of such testing to the commissioner. [RCSA §22a-174-22e(k)(1)]

#### **4. Particulate Matter (PM)**

##### *a. Limitation or Restriction*

Each unit in GEU-1 shall not emit more than 0.10 lbs of particulate matter per million BTU of heat input. [RCSA §22a-174-18(e)(2)(c)]

##### *b. Monitoring and Testing Requirements*

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

##### *c. Recordkeeping Requirements*

The Permittee shall maintain records sufficient to determine compliance with the limitation or restriction in Section III.A.4.a of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]

##### *d. Reporting Requirements*

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



### Section III: Applicable Requirements and Compliance Demonstration

#### 5. Opacity

##### *a. Limitation or Restriction*

- i. During any six-minute block average, opacity shall not exceed 20% as measured by 40 CFR 60, Appendix A, Reference Method 9. [RCSA §22a-174-18(b)(1)(A)]
- ii. During any one-minute block average, opacity shall not exceed 40% as measured by 40 CFR 60, Appendix A, Reference Method 9. [RCSA §22a-174-18(b)(1)(B)]

##### *b. Monitoring and Testing Requirements*

Record keeping specified in Section III.A.5.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [§22a-174-33(j)(1)(K)(ii)]

##### *c. Recordkeeping Requirements*

The Permittee shall maintain records sufficient to determine compliance with the limitation or restriction in Section III.A.5.a of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]

##### *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. Work Practice Standards

##### *a. Limitation or Restriction*

- i. The Permittee shall conduct tune ups of each boiler in GEU-1 every five years as specified in Section III.A.6.a.ii of this Title V permit as each boiler is equipped with an oxygen trim system. [40 CFR §63.7540(a)(12)]
- ii. Each tune up of the boiler units in GEU-1 shall include the following: [40 CFR §63.7540(a)(10)]
  - (A) An inspection of the burner, cleaning and replacement of any components of the burner, as necessary;
  - (B) An inspection of the flame pattern and adjustment of the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
  - (C) An inspection of the system controlling the air-to fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly;
  - (D) Optimization of total emissions of CO. This optimization should be consistent with the manufacturer's specification, if available, and with the boiler's NOx limitation; and
  - (E) Measurement of the concentrations in the effluent stream of CO in parts per million, by

### **Section III: Applicable Requirements and Compliance Demonstration**

volume (ppmv), and oxygen in volume percent, before and after the adjustments are made.

- iii. The Permittee shall operate and maintain the boiler including associated air pollution control equipment and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions. [40 CFR §63.7500(a)(3)]

#### *b. Monitoring and Testing Requirements*

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

#### *c. Recordkeeping Requirements*

- i. The Permittee shall make and keep records of all tune-ups including the following information [40 CFR §63.7540(a)(10)(vi)]:
  - (A) The concentrations of CO in the effluent stream in ppmv and oxygen in vol % measured at high fire or typical operating load, before and after the tune-up of the boiler;
  - (B) A description of any corrective action taken as part of the tune-up; and
  - (C) The type and amount of fuel used over the 12 months prior to the tune-up.
- ii. The Permittee shall keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any initial Notification or Notification of Compliance Status or 5-year compliance report submitted in accordance with 40 CFR §63.10(b)(2)(xiv). [40 CFR §63.7555(a)(1)]
- iii. The Permittee shall keep records required by 40 CFR Part 63, Subpart DDDDD for a period of 5 years from the date that each record was created and must be made available upon request. Such records shall be kept or readily accessible from on site for at least 2 years after the record was created. Records may be kept off-site for the remaining 3 years. [40 CFR §§63.7560(b) and (c)]

#### *d. Reporting Requirements*

- i. The Permittee shall submit a 5-year compliance report covering the period from January 31, 2016 through December 31, 2021. The report must be postmarked or submitted no later than January 31, 2022. Each subsequent 5-year compliance report shall cover the 5-year period beginning on January 1 and ending on December 31 and be postmarked or submitted no later than January 31, [40 CFR §§63.7550(b)(1) through (4)]
- ii. The compliance report must contain the following information: [40 CFR §63.7550(c)(1)]
  - (A) Company and facility name address;
  - (B) Process unit information, emission limitations, and operating parameter limitations;
  - (C) Date of report and beginning and ending dates of the reporting period;

### Section III: Applicable Requirements and Compliance Demonstration

- (D) Include the date of the most recent tune-ups for each unit and the date of the most recent burner inspection if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown; and
- (E) Statement by a responsible official with that official's name, title and signature, certifying the truth, accuracy, and completeness of the content of the report.

#### **B. EMISSIONS UNIT 2 (EU-2) – FT-8 Stationary Gas Turbine Cogeneration System (Permit No. 053-0049)**

##### **1. Fuel Consumption**

###### *a. Limitation or Restriction*

Maximum fuel consumption over any consecutive 12 month period: 6,145,400 gallons of ULSD. There are no restrictions on the consumption of natural gas. [P 053-0049]

###### *b. Monitoring and Testing Requirements*

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

###### *c. Record Keeping Requirements*

The Permittee shall keep records of the monthly and consecutive 12 month natural gas and ULSD consumption. The consecutive 12 month fuel consumption shall be determined by adding (for each fuel) the current month's fuel consumption to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of the previous month. [P 053-0049]

###### *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. Fuel Sulfur Content**

###### *a. Limitation or Restriction*

Maximum ULSD Sulfur Content (% by weight, dry basis): 0.0015 [P 053-0049]

###### *b. Monitoring and Testing Requirements*

- i. The Permittee shall monitor the total sulfur content of all liquid fuel being fired in EU-2. The sulfur content of the fuel must be determined using the total sulfur methods described in 40 CFR §60.335(b)(10) ) as required by 40 CFR §60.334(h)(1), and RCSA section 22a-174-19b(f)(3) and (4). [40 CFR §60.334(h)(1); P 053-0049]
- ii. The fuel sampling frequency shall be conducted as described in sections 2.2.3, 2.2.4.1, 2.2.4.2, and 2.2.4.3 of 40 CFR Part 75 Appendix D.

### **Section III: Applicable Requirements and Compliance Demonstration**

[40 CFR §60.334(i)(1); P 053-0049]

- iii. The fuel analyses required under 40 CFR §60.335(b)(10) may be performed by the Permittee, a service contractor retained by the Permittee, the fuel vendor, or any other qualified agency. [40 CFR §60.335(b)(11); P 053-0049]

#### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of the sulfur content of liquid fuel being fired in EU-2, either by: [P 053-0049]
  - (A) A shipping receipt and certification from the fuel supplier; or
  - (B) Performing an analysis using the total sulfur monitoring methods described in Part III.B.2.b.i-iii. of this Title V Permit; or
  - (C) A copy of a current fuel supplier contract.
- ii. Records for a fuel certification and analysis shall include the following information: [P 053-0049]
  - (A) The date of delivery;
  - (B) The name of the fuel supplier;
  - (C) Type of fuel delivered;
  - (D) The percentage of sulfur in such fuel by weight, dry basis; and
  - (E) The method used to determine the sulfur content of such fuel.
- iii. Records for the current fuel contract shall include the following information: [P 053-0049]
  - (A) The name of the fuel supplier; and
  - (B) Type or grade of fuel delivered.

#### *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. Allowable Emission Limits (Criteria and Non-Criteria Pollutants)**

#### *a. Limitation or Restriction*

- i. The Permittee shall not exceed the emission limits stated herein at any time for EU-2. (Criteria Pollutants) [P 053-0049]

### Section III: Applicable Requirements and Compliance Demonstration

- (A) PM/PM<sub>10</sub>/PM<sub>2.5</sub>: 12.53 tpy (Limit is for each pollutant, as well as the combined limit for all PM)
  - (B) SO<sub>2</sub>: 0.96 tpy
  - (C) NO<sub>x</sub>: (As determined by a 4 hour rolling block average)
    - (1) 9.0 ppmvd @ 15% O<sub>2</sub> (except during periods startup, shutdown or malfunction)
    - (2) 42.62 tpy
  - (D) VOC: 3.36 tpy
  - (E) CO: 77.77 tpy
  - (F) Pb: 0.006 tpy
- ii. The Permittee shall not exceed the emission limits stated herein at any time for EU-2. (Non-Criteria Pollutants) [P 053-0049]
- (A) H<sub>2</sub>SO<sub>4</sub>: 0.753 tpy
  - (B) Ammonia:
    - (1) 10.0 ppmvd @15% O<sub>2</sub>
    - (2) 19.14 tpy

#### *b. Monitoring and Testing Requirements*

- i. The Permittee shall install, certify, maintain, operate, and quality-assure a CEM system consisting of NO<sub>x</sub>, O<sub>2</sub> and opacity monitors. The CEMS shall be installed, certified, maintained, and operated in accordance with 40 CFR §60.334(b) and RCSA Section §22a-174-4a. [P 053-0049]
- ii. All CEM equipment shall be operated in compliance with RCSA §22a-174-4a. The NO<sub>x</sub> CEMS shall include a dual range analyzer capable of measuring during all modes of turbine operation or shall be otherwise capable of measuring the full range of NO<sub>x</sub> emissions from the unit including emissions during startup, shutdown, and malfunctions. NO<sub>x</sub> data will be corrected to a dry basis and 15% O<sub>2</sub> and will be measured using 4 hour rolling average times, calculated as the arithmetic average of the average NO<sub>x</sub> concentration measured by the CEMS for a given hour and the three unit operating hour average NO<sub>x</sub> concentrations immediately preceding that unit operating hour.[P 053-0049]
- iii. Continuous emissions monitoring shall be required during all periods of operation, including periods of start-up, shut-up, shutdown, malfunctions, or emergency conditions. [P 053-0049]
- iv. The Permittee shall install and operate a continuous monitoring system to monitor and record the ammonia injection rate on an hourly basis. [P053-0049]
- v. The Permittee shall inspect the SCR catalyst once per year, at a minimum, and replace it as required through the monitoring of the catalyst test pieces. [P 053-0049]

#### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of the annual emissions for EU-2 using fuel usage and emission factors from the following sources [P 053-0049; RCSA §22a-174-33(j)(1)(K)]:

### **Section III: Applicable Requirements and Compliance Demonstration**

- (A) NO<sub>x</sub>: CEM
  - (B) CO: P&W Power Systems emission test data for FT-8 turbines, operating at base load or higher, as listed below.
    - (A) Natural Gas fired: 0.049 lb/MMBtu
    - (B) ULSD fired: 0.024 lb/MMBtu
  - (C) PM-10, SO<sub>2</sub>, VOC, & Pb (for all fuels): Compilation of Air Pollutant Emission Factors, AP-42, Fifth edition, Table 3.1-2a, page 3.1-11, April 2000.
  - (D) H<sub>2</sub>SO<sub>4</sub> (ULSD): CTDEEP emission factor of 2.45 S lb/1000 gal for liquid fuel, where S is the maximum percent sulfur content by weight.
  - (E) Ammonia: Calculation from 10 ppmvd or from test data.
  - (F) Hazardous Air Pollutants: Compilation of Air Pollutant Emission Factors, AP-42, Fifth edition, Tables 3.1-3 to 5, pages 3.1-13 to 15, April 2000.
- ii. The Permittee shall keep records of the inspection of the SCR catalyst. The records shall include the following: [P 053-0049]
- (A) The name of the person inspecting the SCR catalyst;
  - (B) The date of inspection;
  - (C) The results of the inspection; and
  - (D) The date the catalyst is replaced.

#### *d. Reporting Requirements*

- i. The Permittee shall review all data required by Permit No. 053-0049 daily. The Permittee shall notify the commissioner, in writing of any deviation from an emissions limitation, and shall identify the cause or likely cause of such deviation, all corrective actions and preventative measures taken with respect thereto, and the dates of such actions and measures no later than (10) days after such deviation commenced.  
[P 053-0049]
- ii. The Permittee shall submit reports of excess emissions and monitor downtime to the Administrator/commissioner, in accordance with 40 CFR §60.7(c). For the purpose of reports required under 40 CFR §60.7(c), periods of excess emissions that shall be reported are defined in 40 CFR §60.334(j). The Permittee shall meet this requirement by submitting the Quarterly Report to the commissioner.  
[P 053-0049]
- iii. The Permittee shall furnish the Administrator/commissioner written notification as required by 40 CFR §60.7(a) [P 053-0049]

### Section III: Applicable Requirements and Compliance Demonstration

- iv. 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. Opacity

##### a. Limitation or Restriction

- i. Except during periods of startup, shutdown or malfunction the equipment shall not exceed 10% opacity during any six minute block average as measured by 40 CFR Part 60, Appendix A, Reference Method 9. [P 053-0049]
- ii. During periods of start-up, shutdown, and malfunction opacity shall not exceed 20% during any six-minute block average. [P 053-0049]
- iii. During any one-minute block average opacity shall not exceed 40% as measured by 40 CFR Part 60, Appendix A, Method 9. [RCSA §22a-174-18(b)(2)(B)]

##### b. Monitoring and Testing Requirements

The Permittee shall operate an opacity monitor to continuously monitor visible emissions from EU-2 during any period when ULSD is fired in the turbine. [P 053-0049]

##### c. Record Keeping Requirements

The Permittee shall maintain records sufficient to determine compliance with the limitation or restriction in Section III.B.4.a of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]

##### 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)]

#### 5. Startup, Shutdown, & Malfunction Limits

##### a. Limitation or Restriction

- i. Startup shall be defined as that period of time from which initiation of combustion turbine firing until the unit reaches steady-state operation. This period shall not exceed 60 minutes for a hot start, nor 180 minutes for a cold start. A cold start shall be defined as startup when the turbine has been down for more than 24 hours. [P 053-0049]
- ii. Shutdown shall be defined as that period of time from the initial lowering of the turbine output to the cessation of turbine operation. This period shall not exceed 30 minutes. [P 053-0049]
- iii. Malfunction is defined in 40 CFR §60.2. [P 053-0049]
- iv. The hours of start-up and shutdown, in which NO<sub>x</sub> emissions exceed 9 ppmvd, shall not exceed 250 hours in any consecutive 12 month period. [P 053-0049]

### Section III: Applicable Requirements and Compliance Demonstration

- v. During periods of start-up, and shutdown, NO<sub>x</sub> emissions shall not exceed 66.6 pounds per cold start, 22.2 pounds per hot start, or 11.1 pounds per shutdown, as measured from CEMS data, excluding data collected during monitor calibrations, maintenance, and data reported to and accepted by the Department in quarterly CEM and Quality Assurance Reports as invalid. [P 053-0049]

#### b. *Monitoring and Testing Requirements*

The Permittee shall monitor the hours of start-up, shutdown and malfunction in the operation of EU-2 using the CEM system to continuously count the hours. [RCSA §22a-174-33(j)(1)(K)(ii)]

#### c. *Record Keeping Requirements*

- i. The Permittee shall make and keep records of the occurrence and duration of any startup and shutdown of EU-2. [P 053-0049; 40 CFR §60.7(b)]
- ii. The Permittee shall keep records of the occurrence of each malfunction of the turbine and of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. The records shall include: [P 053-0049]
  - (A) Date of event;
  - (B) Duration of the event;
  - (C) Equipment affected;
  - (D) A description of the event and a description of the circumstances surrounding the cause or likely cause of the event; and
  - (E) Description of corrective actions and preventative measures taken or planned with respect to malfunction.

#### d. *Reporting Requirements*

The Permittee shall report the hours of start-up, shutdown and malfunction, in which NO<sub>x</sub> emissions exceed 9 ppmvd, for the FT-8 Stationary Gas Turbine Cogeneration System in the Quarterly Report to the commissioner. [RCSA §22a-174-33(j)(1)(X);40 CFR §60.7(c)]

### 6. **NO<sub>x</sub> – RCSA §22a-174-22e (Phase 1 & Phase 2 Requirements for EU-2)**

#### a. *Limitations or Restriction*

- i. Prior to June 1, 2023 the Permittee shall not cause or allow emission of NO<sub>x</sub> for EU-2 to exceed the following: [RCSA §22a-174-22e(d)(5)(A) and (B); RCSA §22a-174-22e(d)(16)]

Note: Pursuant to RCSA §22a-174-22e(a)(1)(A), EU-2 is an “affected unit” because it has a nameplate capacity greater than 15 MW.

(A) Phase 1 (Beginning June 1, 2018 and ending May 31, 2023)

- (1) The following emission limitations, based on a daily block average, for an emission unit with a NO<sub>x</sub> CEM system: [RCSA §22a-174-22e(d)(5)(A); RCSA §22a-174-22e(d)(16)]



### **Section III: Applicable Requirements and Compliance Demonstration**

- (a) Natural Gas: 42 ppmvd @ 15% O<sub>2</sub>
- (b) ULSD Fuel Oil: 65 ppmvd @ 15% O<sub>2</sub>
- (2) The following non-ozone season emissions limitations apply to EU-2. The averaging period for the non-ozone season limit is October 1 through April 30 (seven month average): [RCSA §22a-174-22e(d)(5)(B)]
  - (a) Natural Gas: (non-ozone season): 0.15 lb/MMBtu
  - (b) Fuel Oil: (non-ozone season): 0.15 lb/MMBtu
- ii. On or after June 1 , 2023 the Permittee shall not cause or allow emissions of NO<sub>x</sub> for EU-2 to exceed the following: [RCSA §§22a-174-22e(d)(5)(C) and (D); RCSA §22a-174-22e(d)(16)]
  - (A) Phase 2
    - (1) Not cause or allow emission of NO<sub>x</sub> to exceed the following emissions limitations, based on a daily block average, for an emission unit with a NO<sub>x</sub> CEM system: [RCSA §22a-174-22e(d)(5)(C); RCSA §22a-174-22e(d)(16)]
      - (a) Natural Gas: 25 ppmvd @ 15% O<sub>2</sub>
      - (b) Fuel Oil: 42 ppmvd @ 15% O<sub>2</sub>
    - (2) Not cause or allows emissions of NO<sub>x</sub> to exceed the following non-ozone season emission limitation which applies to a combined cycle combustion turbine that is also an affected unit. The averaging period for the non-ozone season is October 1 through April 30 (seven month average): [RCSA §22a-174-22e(d)(5)(D)]
      - (a) Natural Gas: 0.15 lb/MMBtu
      - (b) Fuel Oil: 0.15 lb/MMBtu
  - (B) Operate in accordance with a compliance option approved by the Department in accordance with a compliance option approved by the Department in accordance with RCSA §22a-174-22e(g); or
  - (C) Operates under a case-by-case RACT determination in accordance with RCSA §22a-174-22e(h); or
  - (D) Cease operation in accordance with RCSA §22a-174-22e(f).
- iii. A daily block average includes all periods of operation, except as provided in RCSA §22a-174-22e(m)(3). [RCSA §22a-174-22e(11)(C)]
- iv. The Permittee shall calculate an emission unit's non-ozone season emission rate as the sum of the unit's NO<sub>x</sub> emission during the period October 1 through April 30, inclusive, divided by the sum of the emission unit's input during the period from October 1 through April 30, inclusive. [RCSA §22a-174-22e(d)(19)]

### **Section III: Applicable Requirements and Compliance Demonstration**

#### *b. Monitoring and Testing Requirements*

- i. The Permittee shall calibrate, maintain, operate and certify the CEM system to demonstrate compliance with RCSA §22a-174-22e. [RCSA §22a-174-22e(m)(1)]
- ii. The Permittee shall collect assured CEM data for all emission unit operating conditions. Data collection shall include periods of startup or shutdown, monitoring system malfunction, out-of-control periods, while conducting maintenance or repairs, and periods of required monitoring system quality assurance or quality control activities, such as calibration checks and required zero and span adjustments. [RCSA §22a-174-22e(m)(2)]
- iii. Emissions data used to determine compliance with applicable emissions limitations in Section III.B.3.a of this Title V permit shall not include data collected during the following periods: [RCSA §§22a-174-22e(m)(3)(A) through (D)]
  - (A) When the monitoring system is out-of-control as specified in the facility-specific monitoring plan;
  - (B) While conducting required monitoring system quality assurance or quality control activities, including calibration checks and required zero and span adjustments;
  - (C) While conducting maintenance or repairs of the monitoring system to prevent or correct a malfunction; or
  - (D) When the emission unit is not operating.

#### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep the following records on and after May 1, 2018: [RCSA §22a-174-22e(j)(2)]
  - (A) The date and work performed for repairs, replacement of parts and other maintenance.  
CEM requirements:
    - (1) Records of all performance evaluations, calibrations checks and adjustments on such Monitor;
    - (2) A record of maintenance performed; and
    - (3) All data necessary to complete the quarterly reports required under Section III.B.6.d.i. of this Title V Permit.
    - (4) Charts, electronically stored data, and printed records produced by such CEM system as needed to demonstrate compliance.
  - (B) Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22e.
- ii. The Permittee shall keep any records or reports required by an order or permit issued by the commissioner. [RCSA §22a-174-22e(j)(2)(G)]
- iii. The Permittee shall retain all records and reports produced pursuant to RCSA §22a-174-22e for five

### **Section III: Applicable Requirements and Compliance Demonstration**

years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the administrator. Such records shall be retained at the premises where the emission unit is located, unless the commissioner approves in writing the use of another location in Connecticut [RCSA §22a-174-22e(j)(1)]

#### *d. Reporting Requirements*

- i. The Permittee shall submit, on forms prescribed by the commissioner, written quarterly reports of excess emissions and CEM system malfunctions. Such reports shall be submitted to the commissioner on or before January 30, April 30, July 30, and October 30 of each year. The reports shall have the information required in RCSA §22a-174-22e(k)(3). [RCSA §22a-174-22e(k)(3)]
- ii. Upon written notice, the commissioner may require the Permittee to provide all hourly CEM data, in a format acceptable to the commissioner, for the three calendar month period identified in such written notice. [RCSA §22a-174-22e(k)(4)]

### **7. Work Practice Standards**

#### *a. Limitation or Restriction*

- i. The Permittee shall properly operate and maintain EU-2 in accordance with the manufacturer's specifications and written recommendations. [P 053-0049]
- ii. The Permittee shall operate and maintain the turbine, air pollution control equipment and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunctions events. [P 053-0049]
- iii. The Permittee shall comply with the conditions of Section III.B of this Title V permit when operating either production or R&D engines. [P 053-0049]
- iv. The Permittee shall not supply more than one-third of the cogeneration equipment's potential electric output capacity on an annual basis to any utility power distribution system for sale. [P 053-0049]

#### *b. Monitoring and Testing Requirements*

Record keeping specified in Section III.B.7.c of this Title V Permit shall be sufficient to meet other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

#### *c. Record Keeping Requirements*

- i. The Permittee shall keep records of all manufacturer's specifications and written recommendations and shall make and keep records demonstrating that the turbine and control equipment are operated in accordance with such specifications and recommendations. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall make and keep records of the hours of operation of the turbine and control equipment to ensure they are operating concurrently, except during startups, shutdowns and malfunctions. An hour of operation shall be defined as a full sixty-minute hour of normal operation. [RCSA §22a-174-33(j)(1)(K)(ii)]

### **Section III: Applicable Requirements and Compliance Demonstration**

- iii. The Permittee shall make and maintain records of the amount of electric output supplied to any utility power distribution system. Such record shall clearly show what percentage of the cogeneration equipment's potential electric output has been supplied to any utility power distribution system. [RCSA §22a-174-33(j)(1)(K)(ii)]
- iv. The Permittee shall keep records of when the turbine is changed for routine maintenance, to include the following: [P 053-0049]
  - (A) The date the turbine was changed;
  - (B) The reason for the change;
  - (C) Documentation that the replacement turbine is the same make and model; and
  - (D) Documentation showing that the replacement turbine does not result in an increase in emissions, the emission of any new air pollutants, or increases in electrical output of the turbine.

#### *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)]

### **8. CAIR NOx Ozone Season Trading**

See Section III.L of this Title V permit.

### **C. GROUPED EMISSION UNIT 3 (GEU-3) – Vitiated Inlet Air Heaters X-7 & X-8 (EU-3 & EU-4)**

#### **1. Operating Limitations**

##### *a. Limitation or Restriction*

Since each of the units in GEU-3 have maximum rated capacities greater than five MMBtu/hr they are subject to RCSA §22a-174-22e in accordance with RCSA §22a-174-22e(b)(1)(G). However, since they are equipment associated with the apparatus used for testing uninstalled engines they are exempt from RCSA §22a-174-22e subsections (d) Emissions limitations, (i) Tune-up requirements, (l) Emission testing, and (m) Monitoring in accordance with RCSA §22a-174-22e(c)(6) and therefore are only subject to some of the record keeping requirements of RCSA §22a-174-22e(j). [RCSA §22a-174-22e(b)(1)(G); RCSA §22a-174-22e(c)(6)]

##### *b. Monitoring and Testing Requirements*

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

##### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep the following records on and after May 1, 2018; [RCSA §22a-174-22e(j)(2)]
  - (A) The date and work performed for repairs, replacement of parts and other maintenance;

### **Section III: Applicable Requirements and Compliance Demonstration**

(B) Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22e; and

(C) Any other records or reports required by an order or permit issued by the commissioner pursuant to RCSA §22a-174-22e.

- ii. The Permittee shall retain all records and reports produced pursuant to the requirements of RCSA §22a-174-22e for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records and reports shall be retained at the source, unless the commissioner approves in writing the use of another location in the State. [RCSA §22a-174-22e(j)(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)]

#### **D. GROUPED EMISSION UNIT 4 (GEU-4) – Emergency Engines Subject to RCSA §22a-174-3b(e) (EU-5, EU-7, EU-10)**

##### **1. Hours of Operation**

*a. Limitation or Restriction*

The Permittee shall not cause or allow the emergency engines in GEU-4 to operate except during periods of testing and scheduled maintenance or during an emergency and unless operation of such engine shall not exceed 300 hours during any 12 month rolling aggregate. [RCSA §22a-174-3b(e)(2)(C)]

*b. Monitoring and Testing Requirements*

The Permittee shall monitor hours of operation of each emergency engine in GEU-4 using log entries of the monthly hours run. [RCSA §22a-174-33(j)(1)(K)(ii)]

*c. Record Keeping Requirements*

The Permittee shall make and maintain records of the hours of operation of each emergency engine in GEU-4 for each month and 12 month rolling aggregate. [RCSA §22a-174-3b(e)(4)]

*d. Reporting Requirements*

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

## Section III: Applicable Requirements and Compliance Demonstration

### 2. Sulfur Content

#### a. Limitation or Restriction

Any nongaseous fuel consumed by any engine in GEU-4 shall not exceed the sulfur content of motor vehicle diesel fuel where “motor vehicle diesel fuel” means on-road diesel fuel that meets sulfur limits in 40 CFR §80.29, §80.500(a), and §80.520(a) and (b). [RCSA §22a-174-3b(e)(2)(D); RCSA §22a-174-42]

#### b. Monitoring and Testing Requirements

The Permittee shall demonstrate compliance with fuel sulfur content using any of the following [RCSA §22a-174-3b(h)]:

- i. A fuel certification for a delivery of nongaseous fuel from a bulk petroleum provider;
- ii. A sales receipt for the sale of motor vehicle diesel fuel from a retail location; or
- iii. A copy of a current contract with the fuel supplier supplying the fuel used by the equipment that includes the applicable sulfur content of nongaseous fuel as a condition of each shipment.

#### c. Record Keeping Requirements

The Permittee shall maintain records of the information necessary for the commissioner to determine compliance with the limitation of fuel sulfur content. [RCSA §22a-174-3b(e)(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)]

### 3. Nitrogen Oxides (Applies to EU-7 and EU-10 only)

#### a. Limitation or Restriction

- i. Reciprocating engines with a maximum rated capacity of three MMBtu/hr or more are subject to the applicable operating, recordkeeping and reporting requirements of RCSA §22a-174-22e(d)(14). [RCSA §22a-174-22e(b)(1)(E)]
- ii. The owner or operator of an emergency engine subject to RCSA §22a-174-22e(b)(1)(E) shall adhere to the following operating parameters in accordance with RCSA §22a-174-22e(d)(14): [RCSA §22a-174-22e(d)(14)]
  - (A) The owner or operator of an emergency engine shall not operate the emergency engine for routine scheduled testing or maintenance on any day for which the commissioner has forecast that ozone levels will be “moderate to unhealthy for sensitive groups” or greater.
  - (B) If subsequent to the initial “moderate” or lower, the owner or operator is no longer prohibited from operating the engine for routine, scheduled testing or maintenance for the remainder of that day.

### **Section III: Applicable Requirements and Compliance Demonstration**

- (C) An owner or operator may rely on an ozone forecast of ‘moderate’ or lower obtained after 3 p.m. on the preceding day.
- (D) Subsequent changes to the ozone forecast after 3 p.m. that the forecast ozone levels of “moderate to unhealthy for sensitive groups” or greater shall not obligate the owner or operator to refrain from operation of the emergency engine at the facility on the following day.

#### *b. Monitoring and Testing Requirements*

Record keeping specified in Section III.D.5.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-(j)(1)(K)(ii)]

#### *c. Record Keeping Requirements*

- i. The Permittee shall keep the following records: [RCSA §22a-174-22e(j)(2)]
  - (A) For emergency engines in GEU-4 not subject to 40 CFR Part 63 Subpart ZZZZ, records of total monthly operating hours of such engine, identifying the dates and operating hours of non-emergency use and the reason for non-emergency operation. For emergency engines in GEU-4 subject to 40 CFR Part 63 Subpart ZZZZ, records shall be those required by 40 CFR §63.6655;
  - (B) The date and work performed for repairs, replacement of parts and other maintenance;
  - (C) Records of the dates and times of all emission testing required by this section, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing;
  - (D) Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22e; and
  - (E) Any other records or reports required by an order or permit issued by the commissioner pursuant to RCSA §22a-174-22e.
- ii. The Permittee shall retain all records and reports produced pursuant to the requirements of RCSA §22a-174-22e for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records and reports shall be retained at the source, unless the commissioner approves in writing the use of another location in the State. [RCSA §22a-174-22e(j)(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)]

### Section III: Applicable Requirements and Compliance Demonstration

#### E. GROUPED EMISSION UNITS 4 & 5 – Emergency Engines Subject to 40 CFR Part 60 Subpart III (EU-10 & EU-11)

##### 1. Criteria Pollutants

###### a. Limitation or Restriction

- i. The Permittee shall not cause or allow EU-11 exceed the following emissions limitations [40 CFR §60.4205(c)]:

(A) NO<sub>x</sub> + NMHC: 4.0 g/kW-hr

(B) PM: 0.20 g/kW-hr

- ii. The Permittee shall not cause or allow EU-10 to exceed the following emissions limitations [40 CFR §60.4205(b) and 40 CFR §89.112]

(A) NO<sub>x</sub> + NMHC: 4.0 g/kW-hr

(B) CO: 3.5 g/kW-hr

(C) PM: 0.20 g/kW-hr

###### b. Monitoring and Testing Requirements

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

###### c. Record Keeping Requirements

- i. The Permittee shall comply with the emission limitations in Section III.E.1.a of this Title V Permit according to the following [40 CFR §60.4211(c)]:

(A) For EU-10 the engine must comply with the emission standards specified in §60.4205(b), and for EU-11 the engine must comply with the emission standards specified in §60.4205(c). Both engines must be installed and configured according to the manufacturer's emission-related specifications; and

(B) Keeping records of engine manufacturer data indicating compliance with the standards.

- ii. The Permittee shall keep a record of the engine manufacturer's certification of EU-10 to the emissions standards in 40 CFR Part 60 Subpart III Table 4 for the same model year and NEPA nameplate. [40 CFR §60.4202(d)]

- iii. The Permittee shall keep a record of the engine manufacturer's certification of EU-11 to the emissions standards for new non-road CI engines for the same model year and maximum engine power in 40 CFR §89.112 and 40 CFR §89.113 [40 CFR §60.4202(d)]

- iv. The Permittee shall make and keep records of any purchases made pursuant to Section III.E.1.c.i (A)



### **Section III: Applicable Requirements and Compliance Demonstration**

of this Title V permit. [RCSA §22a-174-33(j)(1)(K)(ii)]

- v. The Permittee shall keep the records required by Section III.E.1.c of this Title V permit for the life of EU-10 and EU-11 and shall provide them upon request. [RCSA §22a-174-33(j)(1)(K)(ii)]

#### *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. Fuel Sulfur Content**

#### *a. Limitation or Restriction*

The Permittee must use diesel fuel in EU-10 and EU-11 that meets the requirements of 40 CFR §80.510(b) for non-road diesel fuel. [40 CFR §60.4207(b)]

#### *b. Monitoring and Testing Requirements*

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

#### *c. Record Keeping Requirements*

The Permittee shall keep any of the following records to demonstrate compliance with the fuel sulfur content limitation of the fuel used in EU-10 and EU-11 [RCSA §22a-174-33(j)(1)(K)(ii)]:

- i. A fuel certification for a delivery of nongaseous fuel from a bulk petroleum provider;
- ii. A sales receipt for the sale of motor vehicle diesel fuel from a retail location; or
- iii. A copy of a current contract with the fuel supplier supplying the fuel used by the equipment that includes the applicable sulfur content of nongaseous fuel as a condition of each shipment.

#### *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. Annual Hours of Operation**

#### *a. Limitation or Restriction*

EU-10 and EU-11 may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. [40 CFR §60.4211(f)]

### Section III: Applicable Requirements and Compliance Demonstration

#### *b. Monitoring and Testing Requirements*

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

#### *c. Record Keeping Requirements*

The Permittee shall make and maintain records of the hours of operation of EU-10 and EU-11 for each month and 12 month rolling aggregate. Such records shall indicate the hours of operation for maintenance checks and readiness testing and the hours of operation in emergency situations. [RCSA §22a-174-33(j)(1)(K)(ii)]

#### *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)]

### **F. GROUPED EMISSION UNITS 4 & 5 (GEU-4 & 5) – Emergency Engines Subject to 40 CFR Part 63 Subpart ZZZZ (Emergency compression ignition and spark ignition engines, ≤500 hp, constructed prior to 2006) EU-5, EU-12, EU- 13, EU-14, EU-15, EU-16, EU-17, EU-18**

#### **1. Work Practice Standards**

##### *a. Limitation or Restriction*

- i. The Permittee shall change the oil and filter on each emergency engine every 500 hours of operation or annually, whichever comes first. [40 CFR §63.6602, Table 2c(1)(a)]
- ii. The Permittee shall inspect the air cleaner on each compression ignition emergency engine every 1,000 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR §63.6602, Table 2c(1)(b)]
- iii. The Permittee shall inspect the spark plugs on each spark ignition emergency engine every 1,000 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR §63.6602, Table 2c(6)(b)]
- iv. The Permittee shall inspect all hoses and belts on each emergency engine every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR §63.6602, Table 2c(1)(c)]
- v. The Permittee shall minimize each compression ignition engine's time spent at idle and minimize each compression ignition engine's startup time at startup to a period needed for appropriate and safe loading of each engine, not to exceed 30 minutes, after which time the non-startup emissions limitations apply. [40 CFR §63.6602, Table 2c(1)]
- vi. If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Sections III.F.1.a.i through iv of this Title V permit, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work

### **Section III: Applicable Requirements and Compliance Demonstration**

practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. [40 CFR §63.6602, Table 2c, Footnote 1]

- vii. The Permittee shall, at all times, operate and maintain each emergency engine, including associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [40 CFR §63.6605(b)]
- viii. The Permittee shall operate and maintain each emergency engine according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §63.6625(e)]
- ix. For compression ignition engines, the Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Section III.F.1.a.i. of this Title V permit. The oil analysis must be performed every 500 hours of operation or annually, whichever comes first. The analysis must, at a minimum, analyze the following three parameters: Total Base Number, viscosity, and percent water content. Upon analysis, if the Total Base Number is less than 30 percent of the Total Base Number of the oil when new, the viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new, or the percent water content (by volume) is greater than 0.5, then the Permittee shall change the oil within two business days of receiving the results of the analysis. If the results of the oil analysis indicate that these thresholds are not exceeded, the Permittee is not required to change the oil. If any emergency engine is not in operation when the results of the oil analysis are received, the Permittee shall change the oil within two business days or before commencing operation, whichever is later. This analysis program must be part of the maintenance plan for the emergency engines. [40 CFR §63.6625(i)]
- x. In addition to any restrictions placed on the hours of operation for each engine by RSCA §22a-174-3b or another applicable requirement, the Permittee shall operate each emergency engine according to the following requirements. If the Permittee does not operate each engine in accordance with the following requirements, the engine will not be considered an emergency engine under 40 CFR Part 60 Subpart ZZZZ and must meet all of the requirements for non-emergency engines: [40 CFR §63.6640(f)]
  - (A) There is no time limit on the use of each emergency engine in emergency situations.
  - (B) The Permittee may operate each emergency engine for a maximum of 100 hours per calendar year for the purposes below. Any operation for non-emergency situations as allowed by Section III.F.1.a.x.(C) of this Title V permit is included as part of this 100 hours. [40 CFR §63.6640(f)(2)]
    - (1) Each emergency engine may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of the emergency engine beyond 100 hours per

### Section III: Applicable Requirements and Compliance Demonstration

calendar year. [40 CFR §63.6640(f)(2)(i)]

- (C) Each emergency engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in Section III.F.1.a.x.(B) of this Title V permit. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [40 CFR §63.6640(f)(3)]

*b. Monitoring and Testing Requirements*

The Permittee shall install a non-resettable hour meter on each emergency engine. [40 CFR §63.6625(f)]

*c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of the parameters that are analyzed as part of the oil analysis program, the results of any such analysis, and the oil changes for each emergency engine. [40 CFR §63.6625(i)]
- ii. The Permittee shall keep a copy of each notification and report submitted to comply with 40 CFR Part 63 Subpart ZZZZ, including all documentation supporting any Initial Notification of Compliance Status submitted. [40 CFR §63.6655(a)(1)]
- iii. The Permittee shall make and keep records of the occurrence and duration of any malfunction in operation. [40 CFR §63.6655(a)(2)]
- iv. The Permittee shall make and keep records of any required performance tests and performance evaluations. [40 CFR §63.6655(a)(3)]
- v. The Permittee shall make and keep records of actions taken during periods of malfunction to minimize emissions in accordance with Section III.F.1.a.vii. of this Title V permit, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR §63.6655(a)(5)]
- vi. The Permittee shall make and keep records to show continuous compliance with each applicable work practice standard in 40 CFR Part 63 Subpart ZZZZ, Table 6. [40 CFR §63.6655(d)]
- vii. The Permittee shall make and keep records of the maintenance conducted on each emergency engine in order to demonstrate that the engine was operated and maintained according to the Permittee's maintenance plan. [40 CFR §63.6655(e)]
- viii. The Permittee shall make and keep records of the hours of operation that is recorded through the non-resettable hour meter. The Permittee shall document how many hours are spent for emergency operations, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is operated for the purpose of a deviation in voltage or frequency, the Permittee shall make and keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for this purpose. [40 CFR §63.6655(f)]

### **Section III: Applicable Requirements and Compliance Demonstration**

#### *d. Reporting Requirements*

- i. The Permittee shall report to the Administrator each instance in which a deviation from a work practice standard in Section III.F.1.a. of this Title V permit occurs. [40 CFR §63.6640(b)]
- ii. The Permittee shall report any failure to perform the engine's work practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable. [40 CFR §63.6602, Table 2c, Footnote 1]
- iii. For each deviation from a work practice standard in Section III.F.1.a. of this Title V permit, the Compliance report must contain the following information [40 CFR §63.6650(d)]:
  - (A) The Company name and address;
  - (B) A statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report;
  - (C) Date of report and beginning and ending dates of the reporting period;
  - (D) If a malfunction occurred during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the Permittee during a malfunction to minimize emissions in accordance with Section III.E.1.a.vi. of this Title V permit, including actions taken to correct a malfunction;
  - (E) The total operating time of the emergency engine at which the deviation occurred during the reporting period; and
  - (F) Information on the number duration, and cause of deviations (including unknown cause, if applicable) as applicable and the corrective action taken.

#### **G. GROUPED EMISSION UNIT 11 (GEU-11) – Spray Booths (EU-19, EU-20, EU-21, EU-22, EU-23, and EU-24) (Permit Nos. 053-0055, 053-0121, 053-0124, 053-0133 and 053-0145)**

##### **1. Coating Usage**

###### *a. Limitation or Restriction*

- i. Type of Coatings Allowed:
  - (A) Specialty coatings as defined by the National Emission Standards for Aerospace Manufacturing and Rework Facilities, 40 CFR Part 63, Subpart GG as well as defined by RCSA §22a-174-20(s). [P 053-0055; P 053-0121; P 053-0124; P 053-0133; P 053-0145; 40 CFR §63.745]
  - (B) Research and Development, coatings classified by the Department of Defense as Classified National Security Information by Presidential Executive Order 13526 and other exempt coatings. [P 053-0055; P 053-0121; P 053-0124; P 053-0133; P 053-0145; 40 CFR §63.741(f)]
  - (C) Support equipment coatings are allowed in EU-19, EU-20 and EU-21 (Not subject to 40 CFR

### Section III: Applicable Requirements and Compliance Demonstration

Part 63, Subpart GG) [P 053-0055; P 053-0121]

(D) Any Non-HAP and Non-VOC coatings as defined in 40 CFR §63.742  
[P 053-0145; 40 CFR §63.741(f)]

(E) Other Types of Allowable Applicators allowed in EU-23 and EU-24: Spray cans, Brushes, Cotton Swabs, Tongue depressors and other Non-atomizing applicator techniques.  
[P 053-0133; P053-0145]

(F) The Permittee shall use cleaning solvent in accordance with the requirements of 40 CFR §63.744, inclusive of exemptions. [P 053-0133; P 053-0145; 40 CFR §63.744]

ii. Maximum VOC Content of Specialty Coatings as Applied (excluding water and exempt VOCs): Coatings shall not exceed the VOC content limits specified in section B.3(a)(1) of the Aerospace CTG. These limits are also specified in 40 CFR §63.745.  
[P 053-0055; P053-0121; P 053-0124; P 053-0133; 40 CFR §63.745]

#### *b. Monitoring and Testing Requirements*

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

#### *c. Record Keeping Requirements*

i. The Permittee shall record the information specified in 40 CFR §63.752  
[P 053-0055; P 053-0121; P 053-0124; P 053-0133; 40 CFR §63.752]

ii. The Permittee shall make and keep daily and monthly records of all coatings and spray gun cleaners used in this booth, such records shall include:  
[P 053-0055; P053-0121; P 053-0124; P 053 -0133; P 053-0145]

(A) Date of application;

(B) Name of coating or cleaner used;

(C) MSDS or the manufacturer's technical data sheet;

(D) Density (lb/gal);

(E) VOC content by weight (lb VOC/gal), as applied;

(F) Water, exempt solvent, and non-volatile content by weight (lb/gal), as applied; and

(G) Quantity of each coating and cleaner used (lb, gallons).

iii. The Permittee shall keep daily and monthly records of the HAP content by weight (lb HAP/gal) of each coating and diluent used in the spray booth. [P 053-0133; P 053-0145]

iv. Material Safety Data sheets or technical data sheets must include the quantity and type of each

### Section III: Applicable Requirements and Compliance Demonstration

hazardous air pollutant contained in the coating or diluent.

[P 053-0124; RCSA §22a-174-33(j)(1)(K)]

- v. The Permittee shall keep material safety data sheets (MSDS) or technical data sheets (TDS) or Safety Data Sheets (SDS) for each paint and solvent used. Such information shall include the quantity and type of each hazardous air pollutant contained in the paint or solvent.

[P 053-0133; P 053-0145; RCSA §22a-174-33(j)(1)(K)]

#### 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. Allowable VOC and TSP Emission Limits

### a. Limitation or Restriction

- i. The allowable emission limits for EU-19 and EU-20 are: [P 053-0055]

(A) PM<sub>10</sub>: 0.70 lb/day, and 0.12 tons/year

(B) VOC: 12 lb/day, and 2.2 tons/year

- ii. The allowable emission limits for EU-21 are: [P 053-0121]

(A) PM<sub>10</sub>: 0.067 lb/hr, and 0.007 tons/year

(B) VOC: 7.24 lb/hr, and 2.17 tons/year

- iii. The allowable emission limits for EU-22 are: [P 053-0124]

(A) TSP: 0.022 lb/hr, and 0.011 tons/year

(B) VOC: 59.72 lb/hr, 1,666 lb/month and 14.93 tons/year

- iv. The allowable emission limits for EU-23 are: [P 053-0133]

(A) PM, PM<sub>10</sub>, PM<sub>2.5</sub>: 0.00556 lb/hr and 0.50 tons/year (Limit is for each pollutant, as well as the combined limit for all PM)

(B) VOC: 29.86 lb/hr, 1,666 lb/month, and 0.50 tons/year

- v. The allowable emission limits for EU-24 are: [P 053-0145]

(A) PM, PM<sub>10</sub>, PM<sub>2.5</sub>: 0.098 lb/hr, 72 lb/month, 0.43 tpy (Limit is for each pollutant, as well as the combined limit for all PM)

(B) VOC: 36 lb/hr, 1,666 lb/month, 9.99 tpy

### **Section III: Applicable Requirements and Compliance Demonstration**

- vi. Premises-wide VOC emissions from all miscellaneous metal parts and plastic surface coating operations shall not exceed 1,666 pounds in any calendar month.  
[P 053-0055; P 053-0121; P 053-0124; P 053-0133; P 053-0145]

#### *b. Monitoring and Testing Requirements*

- i. The Permittee shall perform maintenance inspections at least once every calendar year of the spray booth, particulate filter, spray guns, and other non-atomizing applicators used as recommended by the manufacturer to achieve compliance with the emission limits in Section III.G.2.a this Title V permit. [P 053-0133; P 053-0145]
- ii. Record keeping specified in Section III.G.2.c of this Title V permit shall be sufficient to meet other other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33.  
[RCSA §22a-174-33(j)(1)(K)(ii)]

#### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of the monthly and consecutive 12 month VOC, PM10, and PM2.5 emissions from all operations associated with this unit. The consecutive 12 month VOC, PM10, and PM2.5 emissions shall be determined by adding (for each pollutant) the current month's emissions to that of the 11 months. Such records shall include a sample calculation within 30 days of the end of the previous-month.  
[P 053-0055; P 053-0121; P 053-0124; P 053-0133; P 053-0145; RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall make and keep records of the premises-wide total VOC emissions from all miscellaneous metal and plastic parts surface coating operations on a monthly and consecutive 12 month basis. Such records shall be made within 30 days of the end of the previous month.  
[P 053-0055; P 053-0121; P 053-0124; P 053-0133; P 053-0145; RCSA §22a-174-33(j)(1)(K)(ii)]
- iii. The Permittee shall maintain monthly records of all VOC containing cleaning solvents used in EU-23 and EU-24. Such records shall include: [P 053-0133; P 053-0145]
  - (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 used; and
  - (E) A description of the type of cleaning equipment and process.
- iv. Monthly records shall clearly display, at a minimum, compliance with all materials usage and emissions limitations set forth Section III.G.2.a of this Title V permit.  
[P 053-0133; P 053-0145; RCSA §22a-174-33(j)(1)(K)]

#### *d. Reporting Requirements*

- i. The Permittee shall submit to the Department, a report of any exceedances of the material usage or emission limitations set forth in this permit, in writing within 30 days of the date of such



### Section III: Applicable Requirements and Compliance Demonstration

exceedance. Such report shall at a minimum include: [P 053-0133; P 053-0145]

- (A) A description of the nature of the exceedance;
  - (B) The duration and magnitude of the exceedance;
  - (C) The steps taken to reestablish compliance;
  - (D) The success of such steps; and
  - (E) The steps taken to assure that compliance is maintained in the future.
- 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-(j)(1)(X)]

#### 3. Operational Conditions

##### *a. Limitation or Restriction*

- i. Type of Gun Cleaners Used: The Permittee shall clean all spray guns using one or more of the techniques specified in 40 CFR §63.744(c).  
[P 053-0055; P 053-0121; P 053-0124; 40 CFR §63.744(c)]
- ii. Maximum Spray Gun Throughput for EU-23 (lb/hr): 31.75 [P 053-0133]
- iii. Maximum Spray Gun Throughput for EU-24 (lb/hr): 36.0 [P 053-0145]
- iv. Maximum Spray Guns Operating at Any One Time for EU-23 and EU-24 each: 1  
[P 053-0133; P 053-0145]
- v. Aggregate of Coating Applied in Any One Hour of Spray Booth Operation for EU-23 (lb): 31.75  
[P 053-0133]
- vi. Aggregate of Coating Applied in Any One Hour of Spray Booth Operation for EU-24 (lb): 36.0  
[P 053-0145]
- vii. The Permittee shall record the aggregate amount of coating applied through all methods during each hour of spray booth operation, in lb/hr for EU-23 and EU-24, each. [P 053-0133; P 053-0145]

##### *b. Monitoring and Testing Requirements*

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

##### *c. Record Keeping Requirements*

The Permittee shall maintain records sufficient to determine compliance with the limitation or restriction in Section III.G.3.a of this Title V permit. [RCSA §22a-174-33(j)(1)(K)(ii)]

### **Section III: Applicable Requirements and Compliance Demonstration**

#### *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. Work Practice Standards**

##### *a. Limitation or Restriction*

- i. The Permittee shall comply with all supplied warranties, recommendations and stipulations set by the manufacturer for maintaining and operating the spray booth, spray guns, and filter media for EU-19, EU-20, EU-21, EU-22. [P 053-0055; P 053-0121; P 053-0124]
- ii. The Permittee shall ensure that all control equipment is properly installed and in good operating condition before EU-19, EU-20, EU-21 and EU-22 is operated. [P 053-0055; P 053-0121; P 053-0124]
- iii. Housekeeping measures: the Permittee shall comply with the requirements of 40 CFR §63.744(a). [P 053-0055; P 053-0121; P 053-0124; 40 CFR §63.744]
- iv. The Permittee shall clean spray guns using one or more of the techniques, or their equivalent, specified in 40 CFR §63.744(c)(1) through (c)(4). Spray gun cleaning operations using cleaning solvent solutions that contain HAP and VOC below the de Minimis levels specified in 40 CFR 63.741(f) are exempt from the requirements in 40 CFR §63.744(c)(1) through (c)(4) are exempt. [40 CFR §63.744(c)]
- v. Cleaning of nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, shall be exempt from the requirements of 40 CFR §63.744(c). [40 CFR §63.744(c)]
- vi. The Permittee shall use the following work practices in accordance with RCSA §22a-174-20(s)(5): [P 053-0133; P 053-0145; RCSA §22a-174-20(s)(5)]
  - (A) New and used VOC-containing coating, diluent or cleaning solvent, including a coating 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 VOC-containing coating, diluent or cleaning solvent shall be minimized. Any leaked or spilled VOC-containing coating, diluent or cleaning solvent shall be absorbed and removed immediately;
  - (C) Absorbent applicators, such as cloth and paper, which are moistened with a VOC containing coating or solvent, shall be stored in a closed, nonabsorbent, non-leaking container for disposal or recycling;
  - (D) VOC-containing coating, diluent and cleaning solvent shall be conveyed from one location to another in closed container or pipe; and

### **Section III: Applicable Requirements and Compliance Demonstration**

(E) Air pollution control equipment shall be operated and maintained in accordance with the manufacturer's recommendations.

vii. Methods used to increase transfer efficiency shall include, but not be limited to, the following:  
[P 053-0133; P 053-0145]

(A) Operating Equipment (Spray Guns)

(1) A reasonable effort shall be made to minimize the distance from the spray gun or aerosol spray can to the object being coated while still maintaining process requirements.

(2) Keep the atomizing air pressure to a minimum level, as recommended by the spray gun manufacturer while still maintaining process requirements.

(3) Spray gun cleaning shall be done in accordance with 40 CFR §63.744(c).

(B) Control Equipment (Filter System)

(1) The Permittee shall properly operate the particulate filter system at all times that this equipment is in operation and emitting air pollutants.

(2) The Permittee shall maintain and operate the equipment in order to obtain an Overall Particulate Matter Filter Efficiency of 99.95% or greater for EU-23, and 99.2% or greater for EU-24.

(3) The Permittee shall replace the particulate filter material as recommended by the manufacturer and/or employ some other means to demonstrate that the filter system is being properly maintained.

viii. 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 053-0133]

*b. Monitoring and Testing Requirements*

i. The Permittee shall perform maintenance inspections at least once every calendar year of the spray booth, particulate filter, spray guns, and other non-atomizing applicators used as recommended by the manufacturer to achieve compliance with the emission limits in Section III.G.2.a of this Title V permit. [P 053-0133; P 053-0145]

ii. The Permittee, using an enclosed spray gun cleaner under 40 CFR §63.744(c)(1), shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system at least once per month. Each inspection shall occur while the system is in operation [40 CFR §63.751(a)]

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

### **Section III: Applicable Requirements and Compliance Demonstration**

#### *c. Record Keeping Requirements*

- i. The Permittee shall keep records of the annual maintenance inspection required by Section III.G.3.b.i of this Title V permit as well as any other maintenance inspection performed on the spray booth, particulate filter, spray guns, or any other non-atomizing applicators used. At a minimum, such records shall include: Date, person conducting inspection and the outcome of such inspection. [P 053-0133, and P 053-0145]
- ii. The Permittee shall keep records of any maintenance performed on the spray booth, spray guns, filter media, or control equipment for each unit in GEU-11. [RCSA §22a-174-33(j)(K)(ii)]
- iii. The Permittee shall make a record of all leaks from enclosed spray gun cleaners that includes for each leak found: [P 053-0155; P 053-0121; 40 CFR §63.752(b)(5)]
  - (A) Source identification;
  - (B) Date leak was discovered; and
  - (C) Date leak was repaired.
- iv. The Permittee shall record the following information for the spray gun cleaning operations: [40 CFR §63.752(b)(1)]
  - (A) The name of each cleaning solvent used;
  - (B) The vapor pressure of each cleaning solvent used; and
  - (C) Documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility.
- v. The Permittee shall keep a record of the manufacture's guarantee for the minimum particulate removal (control) efficiency for any filter used in EU-23 and EU-24. [P 053-0133; P 053-0145; RCSA §22a-174-33(j)(1)(K)(ii)]

#### *d. Reporting Requirements*

- i. The Permit shall submit semiannual reports for the spray gun cleaning operation occurring six months from the date of notification of compliance status that identify any of the following: [40 CFR §63.753(b)]
  - (A) Any instance where a noncompliant spray gun cleaning method is used;
  - (B) Any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days; and
  - (C) If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards. Sources shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements.
- 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

### Section III: Applicable Requirements and Compliance Demonstration

commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

#### H. GROUPED EMISSION UNITS 12 (GEU-12) – Miscellaneous Paint Spray Booths Spray Operations

##### 1. Work Practice Standards

###### a. Limitation or Restriction

- i. The Permittee shall clean spray guns using one or more of the techniques, or their equivalent, specified in 40 CFR §63.744(c)(1) through (c)(4). Spray gun cleaning operations using cleaning solvent solutions that contain HAP and VOC below the de Minimis levels specified in 40 CFR §63.741(f) are exempt from the requirements in 40 CFR §63.744(c)(1) through (c)(4). [40 CFR §63.744(c)]

- (A) Enclosed system. Clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing the solvent through the gun.
- (B) Non-atomized cleaning. Clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. Direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use.
- (C) Disassembled spray gun cleaning. Disassemble the spray gun and clean the components by hand in a vat, which shall remain closed at all times except when in use. Alternatively, soak the components in a vat, which shall remain closed during the soaking period and when not inserting or removing components.
- (D) Atomizing cleaning. Clean the spray gun by forcing the cleaning solution through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.
- (E) Cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, shall be exempt from the requirements of 40 CFR §63.744(c).

###### b. Monitoring and Testing Requirements

The Permittee, using an enclosed spray gun cleaner under 40 CFR §63.744(c)(1), shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system at least once per month. Each inspection shall occur while the system is in operation [40 CFR §63.751(a)]

###### c. Record Keeping Requirements

- i. The Permittee shall record the following information for the spray gun cleaning operations, excluding those exempted in accordance with §63.741(f): [40 CFR §63.752(b)(1)]

- (A) The name of each cleaning solvent used;

### **Section III: Applicable Requirements and Compliance Demonstration**

- (B) The vapor pressure of each cleaning solvent used; and
  - (C) Documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility.
- ii. A record of all leaks from enclosed spray gun cleaners identified pursuant to 40 CFR §63.751(a) that includes for each leak found: [40 CFR §63.752(b)(5)]
- (A) Source identification;
  - (B) Date leak was discovered; and
  - (C) Date leak was repaired.

#### *d. Reporting Requirements*

- i. The Permittee shall submit semiannual reports for the spray gun cleaning operation occurring every six months from the date of notification of compliance status that identify: [40 CFR §63.753(b)]
- (A) Any instance where a noncompliant spray gun cleaning method is used;
  - (B) Any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days; and
  - (C) If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards. Sources shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements.

### **I. GROUPED EMISSION UNITS 13 (GEU-13) Spray Booths and Plasma Spray Operations operating under RCSA §22a-174-3b(g)**

#### **1. Coating Usage:**

##### *a. Limitation or Restriction*

- i. Spray Booth Coating Allowed
- (A) VOC content of any coating used shall not exceed 6.3 pounds per gallon, as applied. [RCSA §22a-174-3b(g)(1)(A)]
  - (B) HAP content of any coating used shall not exceed 6.3 pounds per gallon, as applied. [RCSA §22a-174-3b(g)(1)(B)]
  - (C) Coating and solvent usage, including diluents and cleanup solvents but excluding water, shall not, in any twelve (12) month period rolling aggregate, exceed 3,000 gallons. [RCSA §22a-174-3b(g)(1)(C)]
- ii. Plasma Spray Operations

### **Section III: Applicable Requirements and Compliance Demonstration**

(A) Any electrostatic dry powder coating operation or plasma spray operation shall be operated only with particulate control equipment that meets the following requirements: [RCSA §22a-174-3b(g)(1)(D)]

(1) Includes a minimum collection efficiency of 90%; and

(2) Is operated and maintained in good working condition.

#### *b. Monitoring and Testing Requirements*

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

#### *c. Recordkeeping Requirements*

##### *i. Spray Booth Coating Records*

(A) The Permittee shall keep records of the type and quantity of coating and solvent used, in gallons, for each month and each twelve (12) month rolling aggregate. [RCSA §22a-174-3b(g)(3)(A)]

(B) The Permittee shall keep records of the hazardous air pollutant and VOC content per gallon of each coating and solvent used, as applied. [RCSA §22a-174-3b(g)(C)]

##### *ii. Plasma Spray Operations Records*

The Permittee shall keep a record of the manufacturer's specification for particulate control efficiency. [RCSA §22a-174-3b(g)(3)(C)]

#### *d. Reporting Requirements*

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 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. Work Practice Standards**

#### *a. Limitation or Restriction*

i. The Permittee shall clean spray guns using one or more of the techniques, or their equivalent, specified in 40 CFR §63.744(c)(1) through (c)(4). Spray gun cleaning operations using cleaning solvent solutions that contain HAP and VOC below the de Minimis levels specified in 40 CFR §63.741(f) are exempt from the requirements in 40 CFR §63.744(c)(1) through (c)(4). [40 CFR §63.744(c)]

ii. Cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, shall be exempt from the requirements of 40 CFR §63.744(c). [40 CFR §63.744(c)]

### **Section III: Applicable Requirements and Compliance Demonstration**

#### *b. Monitoring and Testing Requirements*

The Permittee, using an enclosed spray gun cleaner under 40 CFR §63.744(c)(1), shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system at least once per month. Each inspection shall occur while the system is in operation [40 CFR §63.751(a)]

#### *c. Record Keeping Requirements*

- i. The Permittee shall record the following information for the spray gun cleaning operations, excluding those exempted in accordance with §63.741(f): [40 CFR §63.752(b)(1)]
  - (A) The name of each cleaning solvent used;
  - (B) The vapor pressure of each cleaning solvent used; and
  - (C) Documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility.
- ii. The Permittee shall make a record of all leaks from enclosed spray gun cleaners identified pursuant to 40 CFR §63.751(a) that includes for each leak found: [40 CFR §63.752(b)(5)]
  - (A) Source identification;
  - (B) Date leak was discovered; and
  - (C) Date leak was repaired.

#### *d. Reporting Requirements*

The Permittee shall submit semiannual reports for the spray gun cleaning operation occurring every six months from the date of notification of compliance status that identify the following: [40 CFR §63.753(b)]

- i. Any instance where a noncompliant spray gun cleaning method is used;
- ii. Any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days; and
- iii. If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards. Sources shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements.



### Section III: Applicable Requirements and Compliance Demonstration

#### J. GROUPED EMISSIONS UNIT 14 (GEU-14) – Cold Cleaning Units

##### 1. Solvent Usage

###### a. Limitation or Restriction

- i. The Permittee shall meet the following requirements for any cold cleaning unit with an internal volume greater than one liter and using solvents containing greater than five percent VOCs by weight, except as provided in RCSA §§22a-174-20(1)(6), (7) or (8):  
[RCSA §§22a-174-20(1)(3)(A) to (I), (K) & (L)]
  - (A) Equip the cleaning device with a cover that is easily operated with one hand. Unless it is exempted per RCSA §22a-174-20(1)(6). [RCSA §22a-174-20(1)(3)(A)]
  - (B) Equip the cleaning device with an internal rack or equipment for draining cleaned parts so that parts are enclosed under the cover while draining. Such drainage rack or equipment may be external for applications where an internal type cannot fit into the cleaning system. Unless it is exempted per RCSA §22a-174-20(1)(6). [RCSA §22a-174-20(1)(3)(B)]
  - (C) Collect and store waste solvent in closed containers. Closed containers used for storing waste solvent may contain a device that allows pressure relief but does not allow liquid solvent to drain from the container. [RCSA §22a-174-20(1)(3)(C)]
  - (D) Close the cover if parts are not being handled in the cleaner for two minutes or more, or if the device is not in use. Except if it is exempt per RCSA §22a-174-20(1)(6). [RCSA §22a-174-20(1)(3)(D)]
  - (E) Drain the cleaned parts for at least 15 seconds or until dripping ceases, whichever is longer. [RCSA §22a-174-20(1)(3)(E)]
  - (F) If a degreasing solvent spray is used: (i) Supply a degreasing solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray), (ii) maintain a solvent spray pressure that does not exceed ten pounds per square inch as measured at the pump outlet, and (iii) perform spraying within the confines of the cold cleaning unit. Except if it is exempt per RCSA §22a-174-20(1)(7). [RCSA §22a-174-20(1)(3)(F)]
  - (G) Minimize the drafts across the top of each cold cleaning unit such that whenever the cover is open the unit is not exposed to drafts greater than 40 meters per minute, as measured between one and two meters upwind, at the same elevation as the tank lip. Except if it is exempt per RCSA §22a-174-20(1)(7). [RCSA §22a-174-20(1)(3)(G)]
  - (H) Do not operate the unit upon the occurrence of any visible solvent leak until such leak is repaired. Any leaked solvent or solvent spilled during transfer shall be cleaned immediately, and the wipe rags or other sorbent material used to clean the spilled or leaked solvent shall be immediately stored in covered containers for disposal or recycling. [RCSA §22a-174-20(1)(3)(H)]
  - (I) Provide a permanent, conspicuous label on or posted near each unit summarizing the applicable operating requirements. [RCSA §22a-174-20(1)(3)(I)]

### **Section III: Applicable Requirements and Compliance Demonstration**

- (J) Use only solvent that has a vapor pressure less than or equal to 1.0 mmHg at 20 degrees Celsius. Unless it is exempted per RCSA §22a-174-20(1) (8). [RCSA §22a-174-20(1)(3)(K)]
- (K) Shall not clean sponges, fabric, wood, leather, paper, and other absorbent material in a cold cleaning machine. [RCSA §22a-174-20(1)(3)(L)]

#### *b. Monitoring and Testing Requirements*

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

#### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep the following records for each solvent used: [RCSA §22a-174-20(1)(3)(J)]
  - (A) The type of solvent used, including a description of the solvent and the solvent name;
  - (B) The vapor pressure of the solvent in mmHg measured at 20 degrees Celsius (68 degrees Fahrenheit);
  - (C) The percent VOC content by weight; and
  - (D) The amount of solvent added to each unit on a monthly basis.
- ii. The Permittee shall certify and/or document that the design, operation and work practice standards of RCSA §22a-174-20(1)(3) are adhered to. [RCSA §22a-174-33(j)(1)(K)(ii)]

#### *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-714-33(j)(1)(X)]

### **K. GROUPED EMISSIONS UNIT 15 (GEU-15) – Site Remediation Operations (40 CFR Part 63 Subpart GGGGG)**

#### **1. 40 CFR Part 63 Subpart GGGGG -- National Emission Standards for Hazardous Air Pollutants: Site Remediation**

##### *a. Limitation or Restriction*

The total quantity of the HAP listed in Table 1 to 40 CFR Part 63 Subpart GGGGG that is contained in the remediation material excavated, extracted, pumped, or otherwise removed during all of the site remediations conducted at the facility shall not exceed 1 megagram (Mg) on an annual basis. [40 CFR §63.7881(c)(1)]

### Section III: Applicable Requirements and Compliance Demonstration

#### *b. Monitoring Requirements*

Record keeping specified in Section III.K.1.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*

The Permittee must prepare and maintain at the facility written documentation to support its determination that the total HAP quantity in its remediation materials for the year is less than 1 Mg. The documentation must include a description of the methodology and data used for determining the total HAP content of the remediation material. [40 CFR 63.7881(c)(2)]

#### *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)]

### L. CAIR NO<sub>x</sub> OZONE SEASON TRADING

EU-2 is a CAIR NO<sub>x</sub> Ozone season unit and therefore is subject to RCSA Section 22a-174-22c. The unit shall comply with all applicable requirements stated in RCSA Section 22a-174-22c and the standard requirements of the CAIR permit application (SIMS No. 201207368). [RCSA §22a-174-22c]

### M. PREMISES-WIDE GENERAL REQUIREMENTS

- 1. Permitting Requirements:** The Permittee shall comply with the procedural requirements for new source review and Title V permitting as set forth in RCSA §22a-174-2a.
- 2. Exemptions from Permitting:** The Permittee shall comply with the requirements for exemptions from permitting for construction and operation of emergency engines and surface coating operations as set forth in RCSA §22a-174-3b.
- 3. Annual Emission Statements:** The Permittee shall submit annual emission statements requested by the commissioner as set forth in RCSA §22a-174-4a(b)(1).
- 4. 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.
- 5. Emergency Episode Procedures:** The Permittee shall comply with the procedures for emergency episodes as set forth in RCSA §22a-174-6.
- 6. 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.
- 7. Prohibition of Air Pollution:** The Permittee shall comply with the requirement to prevent air pollution as set forth in RCSA §22a-174-9.
- 8. Public Availability of Information:** The public availability of information shall apply, as set forth in RCSA §22a-174-10.

### Section III: Applicable Requirements and Compliance Demonstration

9. **Prohibition Against Concealment/Circumvention:** The Permittee shall comply with the prohibition against concealment or circumvention as set forth in RCSA §22a-174-11.
10. **Violations and Enforcement:** The Permittee shall not violate or cause the violation of any applicable regulation as set forth in RCSA §22a-174-12.
11. **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.
12. **No Defense to Nuisance Claim:** The Permittee shall comply with the regulations as set forth in RCSA §22a-174-14.
13. **Severability:** The Permittee shall comply with the severability requirements as set forth in RCSA §22a-174-15.
14. **Responsibility to Comply:** The Permittee shall be responsible to comply with the applicable regulations as set forth in RCSA §22a-174-16.
15. **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.
16. **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).
17. **Sulfur Dioxide Emissions:** The Permittee shall comply with the requirements for control of Sulfur Dioxide Emissions from Power Plants and other large stationary sources of air pollution as set forth in RCSA §22a-174-19a.
18. **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.
19. **Organic Compound Emissions:** The Permittee shall comply with the requirements for control of organic compound emissions as set forth in RCSA §22a-174-20.
20. **Nitrogen Oxide Emissions:** The Permittee shall comply with the requirements for control of nitrogen oxide emissions as set forth in RCSA §22a-174-22e and §22a-174-22f.
21. **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).
22. **Open Burning:** The Permittee is prohibited from conducting open burning, except as may be allowed by CGS §22a-174(f).
23. **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.
24. **Emission Fees:** The Permittee shall pay an emission fee as set forth in RCSA §22a-174-26(d).

### Section III: Applicable Requirements and Compliance Demonstration

- 25. VOC RACT:** The Permittee shall comply with the standards for Reasonably Available Control Technology (RACT) for volatile organic compounds as set forth in RCSCA §22a-174-32 by complying with the Control Techniques Guideline: Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations (EPA-453/R-97-004).
- 26. VOC Emissions from Surface Coating Operations:** Premises-wide VOC emissions from all miscellaneous metal and plastic parts surface coating operations shall not exceed 1,666 pounds in any calendar month. The Permittee shall keep records of the coatings and cleaners used, amount of consumption and the VOC emissions on a monthly basis from all miscellaneous metal and plastic parts surface coating operations on the premises. The Permittee shall make total annual VOC emissions from all miscellaneous metal and plastic parts surface coating operations on the premises available to the commissioner upon request. [P 053-0124 & 133 Part IV.B and P 053-0055, 65, 66, 121 & 122 Part VI.B]
- 27. Aerospace NESHAP:** The Permittee shall comply with the National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Facilities as specified in 40 CFR Part 63, Subpart GG.
- 28. Off-Site Waste & Recovery Operation NESHAP:** The Permittee shall keep records that demonstrate that the total annual HAP content in off-site material does not exceed one megagram per year, thereby documenting the facility's exemption from this regulation in accordance with 40 CFR Part 63 Subpart DD.
- 29. Protection of Stratospheric Ozone:** The Permittee shall comply with the standards for recycling and emissions reduction of products using ozone depleting substances pursuant to 40 CFR Part 82 Subpart F.
- 30. Good Housekeeping Practices:** The Permittee shall comply with the following housekeeping measures for the cleaning operation unless the cleaning solvent used is identified in 40 CFR §63.744 Table 1 or contains HAP and VOC below the de Minimis levels specified in 40 CFR §63.741(f) [40 CFR §63.744(a)]:
- a. Place cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers upon completing their use. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton tipped swabs used for very small cleaning operations are exempt from this requirement.
  - b. Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.
  - c. Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.

## **Section IV: Compliance Schedule**

**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.

## **Section V: State Enforceable Terms and Conditions**

- 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 Control of Carbon Dioxide Emissions as set forth in RCSA §22a-174-31.
- H.** The Permittee shall comply with the requirements for Architectural and Industrial Maintenance Coatings as set forth in RCSA §22a-174-41.
- I.** 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: 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.

### **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

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

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.

### **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

## Section VI: Title V Requirements

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.

### 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.

## Section VI: Title V Requirements

### **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
4. Constitute a non-minor permit modification pursuant to RCSA §22a-174-2a(d)(4).

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

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.

## **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.

Print Enforcement Checklist

Print Compliance Certification