

## 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>                 | <b>152-0034-TV</b>   |
| <b>Client/Sequence/Town/Premises Numbers</b> | <b>8880/02/152/8</b> |
| <b>Date Issued</b>                           | October 3, 2024      |
| <b>Revision Date</b>                         | July 30, 2026        |
| <b>Expiration Date</b>                       | October 3, 2029      |

**Corporation:**

*ThermoSafe Technologies Inc.*

**Premises Location:**

*29 Park Road, Putnam, Connecticut 06260*

**Name of Responsible Official and Title:**

*Jim Lassiter, CEO and President*

All the following attached pages, 2 through 20, are hereby incorporated by reference into this Title V permit.

for



Emma Cimino  
Acting Commissioner

July 30, 2026

Date

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## **Title V Operating Permit**

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

## LIST OF ABBREVIATIONS/ACRONYMS

| <i>Abbreviation/Acronym</i> | <i>Description</i>                        |
|-----------------------------|-------------------------------------------|
| CFR                         | Code of Federal Regulations               |
| CGS                         | Connecticut General Statutes              |
| EU                          | Emissions Unit                            |
| EPA                         | Environmental Protection Agency           |
| GEU                         | Grouped Emissions Unit                    |
| HAP                         | Hazardous Air Pollutant                   |
| hr                          | Hour                                      |
| lb                          | Pound                                     |
| MSDS                        | Material Safety Data Sheet                |
| NSR                         | New Source Review                         |
| RCSA                        | Regulations of Connecticut State Agencies |
| SIC                         | Standard Industrial Classification Code   |
| VOC                         | Volatile Organic Compound                 |
| yr                          | Year                                      |

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

### **A. PREMISES INFORMATION**

Nature of Business: Expandable Polystyrene Industry  
Primary SIC: 3086

Facility Mailing Address: ThermoSafe Technologies Inc.  
29 Park Rd  
Putnam, Connecticut 06260

Telephone Number: (219) 670-6375

### **B. PREMISES DESCRIPTION**

ThermoSafe Technologies Inc. operates an expandable polystyrene plant in Putnam, Connecticut. The Putnam plant has been in existence since 1966. The plant produces custom-shape molds of expandable polystyrene (EPS), polystyrene-based polymers called ARCEL, and a copolymer R-MER. ARCEL is a high impact polystyrene/polyethylene copolymer. R-MER is similar to ARCEL but has a lower volatile content.

Polymeric resins are received in bead form and then expanded and fused into molded product through a series of production steps. VOC and primarily pentane are present in the conventional EPS and other polystyrene-based polymer beads up to approximately 6.5% by weight, and in the conventional ARCEL up to approximately 12.5% by weight, as received. Pentane functions as an expansion agent for the beads. Most VOC emissions are released as the raw material is pre-expanded, aged, molded, and stored as finished product. A trace amount of residual VOC remains in finished goods indefinitely.

There are four production phases that comprise the overall process:

1. Pre-Expansion – the raw materials are partially expanded in preparation for molding.
2. Pre-Puff Storage – aging and storage of the pre-expanded beads is completed prior to molding.
3. Molding – fusing of beads into various shapes is performed.
4. Finished Goods Storage – molded product is stored in a warehouse.

Emission loss rate at each of these production phases varies depending on the following factors:

- bead size and volatile content
- density of the expanded bead
- shape and size of the molded product

The plant includes three natural gas-fired Cleaver Brooks boilers and a cold cleaner. Each boiler has a rated heat capacity of less than 10 MMBtu/hr; therefore, ThermoSafe Technologies Inc. is neither subject to 40 CFR 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (NSPS) nor 40 CFR 63 Subpart JJJJJ, Area Source Boiler National Emission Standards for Hazardous Air Pollutants (NESHAP).

Other plant activities and/or equipment such as regrinder, densifier, and polyolefin material molding process are considered insignificant activities. KBM regrinder and densifier are used to grind and densify foam material scraps for reuse in the process. The regrinder emits only particulate matter that is captured by an integrated bag filter before being vented inside the facility.

The plant also processes polyolefin raw material. The polyolefin material uses air as its expansion agent. Therefore, the polyolefin operation is not a source of VOC emissions. Some manufacturing units in the

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

facility are dedicated exclusively to the expansion of polyolefins.

There is a drying and curing room for curing polyolefin products and speed-drying certain finished products made from EPS and other similar bead types. All VOC emissions released from EPS parts either in the tunnel or curing room are already accounted for in the emissions from the facility operations.

ThermoSafe Technologies Inc. is not subject to Reasonably Available Control Technology (RACT) for VOC because RCRA §22a-174-32(b)(3) excludes sources that implement Best Available Control Technology (BACT) when calculating potential VOC emissions for affected facilities.

The plant is a major stationary source of VOC, not a major source of Hazardous Air Pollutants (HAPs).

## 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 the NSR Permit into this Title V permit.

| TABLE II.A: EMISSIONS UNITS DESCRIPTION |      |                                                                                                    |                          |                         |
|-----------------------------------------|------|----------------------------------------------------------------------------------------------------|--------------------------|-------------------------|
| Emissions Unit/ Grouped Emissions Unit  |      | Emissions Unit Description                                                                         | Control Unit Description | Permit Number           |
| GEU-1                                   | EU-1 | Two Pre-Expansion Units                                                                            | None                     | NSR Permit No. 152-0017 |
|                                         | EU-2 | ≤60 Pre-Puff Storage Bags<br>Aging and storage of pre-expanded beads in mesh bags prior to molding |                          |                         |
|                                         | EU-3 | Molding Presses<br>Fusing of beads into various shapes                                             |                          |                         |
|                                         | EU-4 | Finished Goods Storage<br>Warehousing of molded product                                            |                          |                         |
|                                         | EU-5 | Curing Room                                                                                        |                          |                         |
|                                         | EU-6 | Drying Tunnel                                                                                      |                          |                         |

### B. OPERATING SCENARIO IDENTIFICATION

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

| TABLE II.B: OPERATING SCENARIO IDENTIFICATION |                                                                                                         |
|-----------------------------------------------|---------------------------------------------------------------------------------------------------------|
| Emissions Units Associated with the Scenario  | Description of Scenario                                                                                 |
| GEU-1<br>(EU-1 through EU-6)                  | The standard operating scenario covers the custom shape expandable polystyrene (EPS) foam molding line. |

### 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 EMISSIONS UNIT 1 (GEU-1) CUSTOM SHAPE EXPANDABLE POLYSTYRENE (EPS) FOAM MOLDING LINE (EU-1 THROUGH EU-6)

##### 1. Material Usage

###### a. Limitation or Restriction

- i. The Permittee shall limit the annual material throughput based on the following equation:  
[NSR Permit No. 152-0017]

$$\sum x(U_x)(V_x)(LE) + \sum y(U_y)(V_y)(LA) \leq 131,600 \text{ lb VOC/yr} \quad \text{Equation (1)}$$

where,

$U_x$  = Pounds of EPS beads from lot x used during the 12-month period

$V_x$  = VOC content of EPS beads from lot x, in percent by weight expressed as a decimal

$LE$  = Overall emission loss rate for EPS beads, in percent by weight expressed as a decimal

$U_y$  = Pounds of ARCEL beads from lot y used during the 12-month period

$V_y$  = VOC content of ARCEL beads from lot y, in percent by weight expressed as a decimal

$LA$  = Overall emission loss rate for ARCEL beads, in percent by weight expressed as a decimal

- ii. The weighted average VOC content of the beads in each calendar month shall not exceed:  
[NSR Permit No. 152-0017]

(A) Expandable Polystyrene (EPS) Beads: 4.2%

(B) ARCEL Beads: 8.5%

###### b. Monitoring Requirements

- i. The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations. [NSR Permit No. 152-0017]
- ii. Record keeping specified in Section III.A.1.c of this Title V permit shall be sufficient to meet Monitoring Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(l)(K)(ii)]

###### c. Record Keeping Requirements

- i. The Permittee shall maintain records of each bead shipment. Such records shall include: a shipping receipt and a certification from a bead supplier certifying the percentage of VOC in the bead shipment. The shipping receipt and/or certification shall include the date of delivery, the name of the bead supplier, the percentage of VOC, by weight, in the beads and the lot number or identifier.  
[NSR Permit No. 152-0017]
- ii. Within 15 days of the end of the calendar month, the Permittee shall record the monthly throughput in lb/month of EPS and ARCEL beads by type and lot identifier for the prior month.



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

[NSR Permit No. 152-0017]

- iii. Within 15 days of the end of the calendar month, the Permittee shall make and keep records of the 12-month aggregate throughput of EPS and ARCEL beads in lb/yr for EPS beads and lb/yr for ARCEL beads. The 12-month aggregate for each type of bead (EPS and ARCEL) shall be calculated by adding the monthly throughput for each of the most recent 12-consecutive months as determined in accordance with Section III.A.1.c.ii of this Title V permit. [NSR Permit No. 152-0017]
- iv. Within 15 days of the end of the calendar month, the Permittee shall calculate and record the monthly weighted average VOC content of EPS bead throughput and ARCEL bead throughput in % by weight for the prior month. Such records shall include a sample calculation for each bead type and all supporting documentation, including lot numbers, bead weights by lot, and bead VOC content by lot for the calculation. [NSR Permit No. 152-0017]
- v. Within 30 days of the end of each calendar month, the Permittee shall make and keep records of actual stack concentrations and maximum allowable stack concentrations for each pollutant listed in RCSA Section 22a-174-29 of the RCSA and emitted from a discharge point listed in Part I.C Stack Parameters of NSR Permit No. 152-0017 during the prior month. Such records shall include a sample calculation including all assumptions and data used in the calculation.  
[STATE REQUIREMENT ONLY] [NSR Permit No. 152-0017]
- vi. The Permittee shall keep records of the number of molding presses in operation.  
[RCSA §22a-174-33(j)(l)(K)(ii)]
- vii. The Permittee shall keep material safety data sheets (MSDS), technical data sheets (TDS) or Safety Data Sheets (SDS) for the beads used. Such information shall include the quantity and type of each hazardous air pollutant contained in the beads. For paperwork reduction, these sheets may be kept in electronic form; access to above paperwork requirement may also be allowed via internet on-demand.  
[NSR Permit No. 152-0017]
- viii. The Permittee shall keep all records required by all of the above conditions for a period of no less than five years and shall submit such records to the commissioner upon request.  
[NSR Permit No. 152-0017]

#### *d. Reporting Requirements*

The permittee shall notify the commissioner in writing, of any exceedance from an emissions limitation or operational condition of this permit, and shall identify the cause or likely cause of such violation, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures, as follows:

[NSR Permit No. 152-0017]

- i. For any hazardous air pollutant, no later than twenty-four (24) hours after such violation commenced; and
- ii. For any other regulated air pollutant, no later than ten (10) days after such violation commenced.

## **2. VOC**

#### *a. Limitation or Restriction*

The Permittee shall not exceed VOC (Pentane) emission limits stated herein at any time.

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

[NSR Permit No. 152-0017]

- i. 12 tons/month
- ii. 65.8 tons/year

#### *b. Monitoring Requirements*

- i. The Permittee shall demonstrate compliance with the emissions limits in Section III.A.2.a of this Title V permit by calculating the emission rates using a material balance of the raw materials used. [NSR Permit No. 152-0017]
- ii. The commissioner may require other means (e.g. stack testing) to demonstrate compliance with the above emission limits in Section III.A.2.a of this Title V permit, as allowed by state or federal statute, law or regulation. [NSR Permit No. 152-0017]

#### *c. Record Keeping Requirements*

- i. Within 15 days of the end of the calendar month, the Permittee shall calculate and record the monthly and consecutive 12-month VOC emissions in units of tons. The consecutive 12-month emissions shall be determined by adding the current month's VOC emissions to that of the previous 11 months. Such records shall include a sample calculation. [NSR Permit No. 152-0017]
- ii. The Permittee shall keep all records required by all of the above conditions for a period of no less than five years and shall submit such records to the commissioner upon request. [NSR Permit No. 152-0017]

#### *d. Reporting Requirements*

The permittee shall notify the commissioner in writing, of any exceedance from an emissions limitation or operational condition of this permit, and shall identify the cause or likely cause of such violation, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures, as follows:

[NSR Permit No. 152-0017]

- i. For any hazardous air pollutant, no later than twenty-four (24) hours after such violation commenced; and
- ii. For any other regulated air pollutant, no later than ten (10) days after such violation commenced.

### Section III: Applicable Requirements and Compliance Demonstration

#### B. PREMISES-WIDE GENERAL REQUIREMENTS

1. **Annual Emission Statements:** The Permittee shall submit annual emission statements requested by the commissioner as set forth in RCSA §22a-174-4a(b)(1).
2. **Emission Testing:** The Permittee shall comply with the procedures for sampling, emission testing, sample analysis, and reporting as set forth in RCSA §22a-174-5.
3. **Emergency Episode Procedures:** The Permittee shall comply with the procedures for emergency episodes as set forth in RCSA §22a-174-6.
4. **Reporting of Malfunctioning Control Equipment:** The Permittee shall comply with the reporting requirements of malfunctioning control equipment as set forth in RCSA §22a-174-7.
5. **Prohibition of Air Pollution:** The Permittee shall comply with the requirement to prevent air pollution as set forth in RCSA §22a-174-9.
6. **Public Availability of Information:** The public availability of information shall apply, as set forth in RCSA §22a-174-10.
7. **Prohibition Against Concealment/Circumvention:** The Permittee shall comply with the prohibition against concealment or circumvention as set forth in RCSA §22a-174-11.
8. **Violations and Enforcement:** The Permittee shall not violate or cause the violation of any applicable regulation as set forth in RCSA §22a-174-12.
9. **Variances:** The Permittee may apply to the commissioner for a variance from one or more of the provisions of these regulations as set forth in RCSA §22a-174-13.
10. **No Defense to Nuisance Claim:** The Permittee shall comply with the regulations as set forth in RCSA §22a-174-14.
11. **Severability:** The Permittee shall comply with the severability requirements as set forth in RCSA §22a-174-15.
12. **Responsibility to Comply:** The Permittee shall be responsible to comply with the applicable regulations as set forth in RCSA §22a-174-16.
13. **Particulate Emissions:** The Permittee shall comply with the standards for control of particulate matter and visible emissions as set forth in RCSA §22a-174-18.
14. **Fuel Sulfur Content:** The Permittee shall not use No. 2 heating oil that exceeds fifteen parts per million of sulfur by weight as set forth in CGS §16a-21a(a)(2)(B) .
15. **Sulfur Compound Emissions:** The Permittee shall comply with the requirements for control of sulfur compound emissions as set forth in RCSA §§22a-174-19, 22a-174-19a and 22a-174-19b, as applicable.
16. **Organic Compound Emissions:** The Permittee shall comply with the requirements for control of organic compound emissions as set forth in RCSA §22a-174-20.

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

- 17. Nitrogen Oxide Emissions:** The Permittee shall comply with the requirements for control of nitrogen oxide emissions as set forth in RCSA §22a-174-22e and §22a-174-22f.
- 18. Ambient Air Quality:** The Permittee shall not cause or contribute to a violation of an ambient air quality standard as set forth in RCSA §22a-174-24(b).
- 19. Open Burning:** The Permittee is prohibited from conducting open burning, except as may be allowed by CGS §22a-174(f).
- 20. Asbestos:** Should the premises, as defined in 40 CFR §61.145, become subject to the national emission standard for asbestos regulations in 40 CFR Part 61 Subpart M when conducting any renovation or demolition at this premises, then the Permittee shall submit proper notification as described in 40 CFR §61.145(b) and shall comply with all other applicable requirements of 40 CFR Part 61 Subpart M.
- 21. Emission Fees:** The Permittee shall pay an emission fee as set forth in RCSA §22a-174-26(d).

## Section IV: Compliance Schedule

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

## Section V: State Enforceable Terms and Conditions

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

### SECTION V: STATE ENFORCEABLE TERMS AND CONDITIONS

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

## **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-60.

### **W. REVOCATION [RCSA §22a-174-2a(h)]**

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

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

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

### **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

## MEMORANDUM

DATE: June 3, 2026 Application No.: 202607290

TO: Tracy Babbidge, Bureau Chief Date Received: 5/11/2026

FROM: Persida Pandolfi, APCE  
Lakiesha S. Christopher, Supervising APCE  
Jaimeson Sinclair, Director

SUBJECT: Revision (license transfer) to Permit No. 152-0034-TV for Thermosafe Technologies Inc.  
at 29 Park Road, Putnam, CT

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Sonoco Products Co. submitted a license transfer application on May 11, 2026. Specifically, Sonoco Products Co. is requesting the transfer of Permit No. 152-0034-TV for an expandable polystyrene plant, as well as the transfer of Permit No. 152-0017, for a custom shape expandable polystyrene (EPS) foam molding facility & regenerative thermal oxidizer, that will be processed separately under Application No. 202607288. The transfer is being requested due to the change in ownership from Sonoco Products Co. to Thermosafe Technologies Inc. which was completed on November 3, 2025.

The transfer of Permit No. 152-0034-TV is being processed separately under this application (Application no. 202607290) because the transfer in ownership constitutes a revision pursuant to RCSA §§22a-174-2a(g)(2) and (f)(2)(E). The company provided a marked up copy of the cover page of Permit No. 152-0034-TV, which confirms the new responsible official for ThermoSafe Technologies Inc. is Jim Lassiter. Based on the organizational chart submitted with the application, Jim Lassiter is the CEO and President of ThermoSafe Technologies Inc. As the CEO and President of Thermosafe, Jim Lassiter is considered an officer in charge of a principal business function per RCSA section 22a-174-2a(1)(B), therefore, no written authorization form is required.

Public notice, public comment or hearing will not be required for this revision pursuant to RCSA §22a-174-2a(f)(3).

The compliance record was reviewed in accordance with the Environmental Compliance History Policy. The applicant's submitted compliance information form was reviewed along with agency records for information to evaluate the applicant's compliance history and the relevance of such history to the activity for which authorization is being sought. Additionally, a review of air program compliance was requested from the Enforcement Section and that response forms a part of this record.

Based on the information submitted by the applicant, this engineering evaluation and the compliance history review, the revision (license transfer) to Permit No. 152-0034-TV is recommended.

/s/ Persida Pandolfi  
Persida Pandolfi, APCE

7/20/2026  
Date

Approvals:

Lakiesha Christopher  
Lakiesha S. Christopher  
Supervising APCE

7-23/2026  
Date

  
Jaimeson Sinclair  
Director

07/27/2026  
Date



July 30, 2026

Ms. Bella Caballero  
ThermoSafe Technologies Inc.  
3930 N. Ventura Dr. Suite 450  
Arlington Heights, IL 60004  
[Bella.Caballero@Sonoco.com](mailto:Bella.Caballero@Sonoco.com)

Dear Ms. Caballero:

Enclosed is a certified copy of your revised original Title V permit to operate at 29 Park Road Putnam, CT.

This letter does not relieve you of the responsibility to comply with the requirements of other appropriate Federal, State, and municipal agencies. The permit is not transferable from one permittee to another (without prior written notification).

Permit renewal applications must be filed at least 12 months prior to the permit expiration date, if applicable. Pursuant to Section 22a-174-33 of the Regulations of Connecticut State Agencies, ThermoSafe Technologies Inc. must apply for a permit modification in writing if it plans any physical change, change in method of operation, or addition to this source. Any such changes should first be discussed with Ms. Persida Pandolfi of the Bureau of Air Management, at [Persida.Pandolfi@ct.gov](mailto:Persida.Pandolfi@ct.gov) or (860) 424-3569. Such changes shall not commence prior to the issuance of a permit modification.

Sincerely,

Jaimeson Sinclair  
Director  
Engineering Division  
Bureau of Air Management

JS:PP:lev

cc (via electronic mail): Tim Trumbull, Sonoco Products Co.; [tim.trumbull@sonoco.com](mailto:tim.trumbull@sonoco.com)

Enclosure