

BUREAU OF AIR MANAGEMENT TITLE V OPERATING PERMIT

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

Title V Permit Number	192-0200-TV
Client/Sequence/Town/Premises Numbers	86/5/192/53
Date Issued	May 31, 2022
Expiration Date	May 31, 2027

Corporation:

Wieland Rolled Products North America, LLC

Premises Location:

215 Piedmont Street, Waterbury, CT 06706

Name of Responsible Official and Title:

Stephen Galullo, Plant Manager

All the following attached pages, 2 through 39, are hereby incorporated by reference into this Title V permit.

for Kather S. Dyk Commissioner May 31, 2022

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

AOS Alternative Operating Scenario
CFR Code of Federal Regulations
CGS Connecticut General Statutes

EU Emissions Unit

EPA Environmental Protection Agency

GEU Grouped Emissions Units HAP Hazardous Air Pollutant

Hp Horse power hr Hour kW Kilowatts lb Pound

MeCl₂ Methylene Chloride

MMBtu Million British Thermal Unit

NO_x Nitrogen Oxides

PM₁₀ Particulate Matter less than 10 microns

ppm Parts per million

RCSA Regulations of Connecticut State Agencies
RICE Reciprocating Internal Combustion Engine
SIC Standard Industrial Classification Code

SOS Standard Operating Scenario TSP Total Suspended Particulate

Section I: Premises Information/Description

A. PREMISES INFORMATION

Nature of Business: Re-roll mill of thin gauge strips

Primary SIC Code: 3351

Secondary SIC Code: 3316, 3356

Facility Mailing Address: Wieland Rolled Products North America, LLC

215 Piedmont Street Waterbury, CT 06706

Telephone Number: (203) 597-5000

B. PREMISES DESCRIPTION

Wieland Rolled Products North America, LLC (Wieland) operates an industrial manufacturing facility in Waterbury. Wieland is a secondary re-roll mill engaged in the manufacture of thin gauge stainless steel, copper, copper alloy, nickel, and nickel alloy strips to customers' specifications. Operations performed include cold rolling, annealing, pickling, cutting, electroplating, metal coil surface coating, degreasing, and the operation of boilers to produce hot water and steam for process and comfort use.

Wieland is a Title V source located in a serious ozone non-attainment area defined in RCSA §22a-174-1. Wieland exceeds the major source threshold for HAP emissions, particularly Methylene Chloride.

Emissions units at Wieland include the following: annealing line furnaces, boiler, emergency engines, solvent degreasers, electroplating lines, a pickling line, and miscellaneous processes including lubricating/cleaning, and air make-up units.

Section II: Emissions Units Information

A. EMISSIONS UNITS DESCRIPTION

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

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Registration, or Regulation Number
EU-2	Annealing Furnace No. 21 Construction Date: January 1, 1969	None	Registration No. 192-0917
EU-11	Solvent Degreasing Line No. 4 (continuous web cleaning) Construction Date: April 1, 1960	Carbon Adsorption	Registration No. 192-0813 40 CFR Part 63 Subpart T
EU-27	150 kW (1.52 MMBtu/hr/201 HP) Kohler Emergency Generator Kohler Model: 150RoZJ72 Engine: John Deere – Model: 6081AF001 Construction Date: April 1, 1997	None	RCSA §22a-174-3b(e) 40 CFR Part 63 Subpart ZZZZ
EU-29	1,000 kW (9.0 MMBtu/hr/1341 HP) Cummins Fire Pump Emergency Generator Engine: Cummins – Model:KTA338-G4 Generator: Marathon Electric – 575R5L4044 Construction Date: January 1, 1999	None	RCSA §22a-174-3b(e) RCSA §22a-174-22f 40 CFR Part 63 Subpart ZZZZ
EU-31	Boiler No. 6: Cleaver Brooks 250 Hp Model:CBI-700-250-150 Construction Date: April 1, 2006	None	RCSA §22a-174-3b(c) 40 CFR Part 63 Subpart DDDDD
EU-32	130 kW (2.12 MMBtu/hr/174 HP) Generac Emergency Generator Model QT13068KNSY Construction Date: November 1, 2011	None	RCSA §22a-174-3b(e) 40 CFR Part 60 Subpart JJJJ

Section II: Emissions Units Information

B. OPERATING SCENARIO IDENTIFICATION

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

TABLE II.B: OPERATING SCENARIOS			
Identification of Operating Scenario	Emissions Units Associated with the Scenario	Description of Scenario	
	EU-2	The Permittee operates the annealing furnace firing natural gas.	
sos	EU-11	The Permittee operates degreasing Line No. 4 with the Carbon Adsorber.	
	EU-27 and EU-29	The Permittee operates these emergency engines firing No. 2 fuel oil.	
	EU-31	The Permittee operates the boiler firing natural gas.	
	EU-32	The Permittee operates the emergency engine firing natural gas.	

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

A. EMISSIONS UNIT 2 (EU-2): Annealing Furnace No. 21 operating under Registration Nos. 192-0917

1. Fuel Sulfur Content

a. Limitation or Restriction

The Permittee shall not emit sulfur compounds, expressed as sulfur dioxide, in the stack effluent in concentrations that exceed 500 parts per million at standard temperature and pressure. [RCSA §22a-174-19(f)]

b. Monitoring and Testing Requirements

Record keeping requirements specified in Section III.A.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

The Permittee shall maintain records of the monthly fuel meter readings. Such records shall verify that only natural gas is used. [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 $\S 22a-174-33(j)(1)(X)$]

2. TSP/PM_{10}

a. Limitation or Restriction

The Permittee shall not exceed 0.10 lb/MMBtu of heat input when firing natural gas. [RCSA §22a-174-18(e)(2)(C)]

b. Monitoring Requirements

- i. The Permittee shall demonstrate compliance by maintaining Annealing Furnace No. 21 in accordance with the manufacturer's instructions.

 [40 CFR §70.6(a)(3)(i) and RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. If required by the commissioner, the Permittee shall measure emissions using the average of three-1 hour EPA Method 5 in 40 CFR Part 60 stack test. [RCSA §22a-174-5(b)(5)]

c. Record Keeping Requirements

i. The Permittee shall maintain records of all tune-ups, repairs, replacements of parts and other maintenance. [RCSA §22a-174-33(j)(1)(K)(ii)]

ii. The Permittee shall maintain records of monthly fuel meter readings. [RCSA §22a-174-33(j)(1)(K)(ii)]

d. Reporting Requirements

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

B. EMISSIONS UNIT 11 (EU-11): Solvent degreasing Line No. 4 (continuous web cleaning) w/carbon adsorber operating under Registration Nos. 192-0813 and subject to 40 CFR Part 63 Subpart T – National Emission Standards for Halogenated Solvent Cleaning

Note: As an alternative to meeting the requirements of Sections III.B.3.a thru III.B.3.f of this Title V permit, the Permittee can demonstrate an overall cleaning system control efficiency of 70% in accordance with 40 CFR §§63.463(g)(2) and 63.464(d).

1. HAPs from Halogenated Solvents

- a. Design Requirements
 - The Permittee shall ensure that each continuous web cleaning machine conforms to the design requirements specified below: The continuous web cleaning machine shall meet **one** of the following requirements: [40 CFR §63.463(g)(3)(i)(A) & (D)]
 - (A) Have an idling and downtime mode cover, that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects. A continuous web part that completely occupies an entry or exit port when the machine is idle is considered to meet this requirement.
 - (B) Demonstrate to the Administrator's satisfaction to be under negative pressure during idling and downtime and is vented to a carbon adsorption system in accordance with 40 CFR §63.463(g)(3)(i)(D).
 - ii. Have a freeboard ratio of 0.75 or greater unless that cleaning machine is a remote reservoir continuous web-cleaning machine. [40 CFR §63.463(g)(3)(ii)]
 - iii. Have an automated parts handling system (hoist) capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts. [40 CFR §63.463(g)(3)(iii)]
 - iv. If a lip exhaust is used, then it shall be designed and operated to route all collected solvent vapors through a properly operated and maintained carbon adsorber in accordance with 40 CFR §63.463(g)(3)(vii). [40 CFR §63.463(g)(3)(vii)]
- b. Work and Operational Practices
 - i. The Permittee shall comply with the following required work and operational practices specified below:
 - (A) The idling-mode cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine opening when in place.

[40 CFR §63.463(e)(2) (iv)(A)]

- (B) The idling-mode cover is maintained free of cracks, holes, and other effects. [40 CFR §63.463(e)(2)(iv)(B)]
- (C) Control air disturbances across the degreaser openings by incorporating covers on the degreaser which shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the covers to not be in place. A continuous web part that completely occupies an entry or exit port when the machine is idle is considered to meet this requirement.

[40 CFR §§63.463(g)(4)(i)(A)]

- (D) Any spraying operations shall be conducted in a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e. a baffled or enclosed area of the solvent cleaning machine). [40 CFR §§63.463(g)(4)(ii)]
- (E) When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leak-proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface. [40 CFR §§63.463(g)(4)(v)]
- (F) Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the Administrator's satisfaction to achieve the same or better results as those recommended by the manufacturer.[40 CFR §§63.463(g)(4)(vi)]
- (G) Waste solvent, still bottoms, sump bottoms and waste absorbent materials used in the cleaning process shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container. [40 CFR §§63.463(g)(4)(vii)]
- (H) Sponges, fabric, wood, and paper products shall not be cleaned (the prohibition in this paragraph does not apply to absorbent materials that are used as part of the cleaning process of continuous web cleaning machines, including rollers and roller covers).

 [40 CFR §§63.463(g)(4)(viii)]
- c. Monitoring, Specified Requirements and Exceedances
 - i. The Permittee shall comply with the following requirements when using the carbon adsorber in conjunction with a lip exhaust: [40 CFR §63.463(e)(2)(vii)]
 - (A) Ensure that the concentration of organic solvent in the exhaust from this device does not exceed 100 ppm of any halogenated HAP compound as measured using the procedure in 40 CFR §63.466(e). If the halogenated HAP solvent concentration in the carbon adsorber exhaust exceeds 100 ppm, the Permittee shall adjust the desorption schedule or replace the disposable canister, if not a regenerative system, so that the exhaust concentration of halogenated HAP solvent is brought below 100 ppm. [40 CFR §63.463(e)(2)(vii)(A)]
 - (B) An exceedance to Section III.B.c.i.(A) of this Title V permit occurs if the requirement has not been met and is not corrected within 15 days of detection. Adjustments or repairs shall be made to re-establish required levels. The halogenated HAP solvent concentration shall be remeasured immediately upon adjustment or repair and demonstrated to be within the required limits. [40 CFR §63.463(e)(3)(ii)]

- (C) Ensure that the carbon adsorber bed is not bypassed during desorption. An exceedance occurs if this requirement is not maintained. [40 CFR §63.463(e)(2)(vii)(B)]
- (D) Ensure that the lip exhaust, if present, is located above the degreaser cover so that the cover closes below the lip exhaust level. An exceedance occurs if this requirement is not maintained. [40 CFR §63.463(e)(2)(vii)(C)]
- (E) The Permittee shall measure and record on a weekly basis the HAP solvent concentration in exhaust with a colorimetric detector tube. This test shall be conducted while the degreaser is in working mode and is venting to the carbon adsorber. The exhaust concentration shall be determined using the procedures specified below: [40 CFR §§63.466(e)(1) (e)(3)]
 - (i) Use a colorimetric detector tube designed to measure a concentration of 100 ppm by volume of solvent in air to an accuracy of ± 25 ppm by volume.
 - (ii) Use the colorimetric detector tube according to the manufacturer's instructions.
 - (iii) Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least eight stack or duct diameters downstream from any flow disturbance such as a bend, expansion contraction, or outlet; downstream from no other inlet; and two stack or duct diameters upstream from any flow disturbances such as a bend, expansion, contraction, inlet or outlet.
- (F) If a Squeegee System is used, the Permittee shall comply with the requirements specified below [40 CFR §63.463(e)(2)(ix)]:
 - (i) Specified Requirements
 - (1) Determine the appropriate maximum product throughput for the squeegees used in the squeegee system.
 - (2) Calculate the total amount of continuous web product processed since the squeegees were replaced and compare to the maximum product throughput for the squeegees.
 - (3) Ensure squeegees are replaced at or before the maximum product throughput is attained.
 - (4) Re-determine the maximum product throughput for the squeegees if any solvent film is visible on the continuous web part immediately after it exits the cleaning machine.
 - (ii) Monitoring
 - (1) The Permittee shall visually inspect the continuous web part exiting the solvent cleaning machine to ensure that no solvent film is visible on the part. Such inspection shall be conducted weekly [40 CFR §63.466(a)(3)].
- d. Record Keeping Requirements
 - i. The Permittee shall maintain records in written or electronic form specified below for the lifetime

of each continuous web cleaning machine [40 CFR §63.467(a)]:

- (A) Owner's manuals, or if not available, written maintenance and operating procedures, for the degreaser and control equipment.
- (B) The date of installation and all of its control devices. If the exact date for installation is not known, a letter certifying that the degreaser and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1992, may be substituted.
- (C) Records of the halogenated HAP solvent content for each solvent.
- ii. The Permittee shall maintain the following records in written or electronic form specified below for a period of five years [40 CFR §63.467(b)]:
 - (A) The results of control device monitoring required under Section III.B.1.c of this Title V permit (Monitoring, Specified Requirements, and Exceedances).
 - (B) Information on the actions taken to comply with the requirements under Section III.B.1.c of this Title V permit (Monitoring, Specified Requirements, and Exceedances). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.
 - (C) Records of annual halogenated solvent consumption for each degreaser.
 - (D) If a carbon adsorber is used to comply with these standards, records of the date and results of the weekly measurements of the halogenated HAP solvent concentration in the carbon adsorber exhaust.

e. Reporting Requirements

- i. The Permittee shall report all exceedances and all corrections and adjustments made to avoid an exceedance. [40 CFR §63.463(e)(4)]
- ii. The Permittee shall submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include the requirements specified below [40 CFR §63.468(f)]:
 - (A) An estimate of solvent consumption for each degreaser during the reporting period.
- iii. The Permittee shall submit an exceedance report to the Administrator or commissioner semi-annually, except when, the Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information below [40 CFR §63.468(h)]:
 - (A) Information on the actions taken to comply with Section III.B.1.c of this Title V permit (Monitoring, Specified Requirements, and Exceedances). This information shall include

records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.

- (B) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
- (C) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
- iv. The Permittee is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met [40 CFR §63.468(i)]:
 - (A) The source has demonstrated a full year of compliance without an exceedance.
 - (B) The Permittee continues to comply with all relevant record keeping and monitoring requirements specified in Subpart A of the General Provisions (40 CFR Part 63) and 40 CFR Part 63 Subpart T.
 - (C) The Administrator and commissioner do not object to a reduced frequency of reporting for the degreaser.

C. EMISSIONS UNIT 27 (EU-27): Kohler Emergency Generator

EU-27: 150 kW (1.52 MMBtu/hr) fuel oil fired Kohler Generator is operating under RCSA §22a-174-3b(e) and is subject to 40 CFR Part 63 Subpart ZZZZ. This emergency generator is not subject to the requirements of RCSA §22a-174-22f because the maximum rated capacity is lower than RCSA §22a-174-22f(b)(2)(B)(i).

1. Maximum Hours of Operation, Fuel Sulfur Content, Non-Emergency Operation and Operational Conditions

- a. Limitation or Restriction
 - i. The Permittee shall operate the emergency engine only in an emergency as defined in RCSA §22a-174-22e. [RCSA §22a-174-3b(e)(2)]
 - ii. The Permittee shall not allow the emergency engine to operate except during periods of testing and scheduled maintenance or during an emergency and unless the following conditions are met: [RCSA §22a-174-3b(e)(2)]
 - (A) Operation of the engine shall not exceed 300 hours during any 12 month rolling aggregate. [RCSA §22a-174-3b(e)(2)(C)]
 - (B) Any non-gaseous fuel consumed by the engine shall not exceed the sulfur content of motor vehicle diesel fuel where "motor vehicle diesel fuel" is defined in RCSA §22a-174-42 nor the applicable limitations set forth in table 19b-1 of RCSA §22a-174-19b. [RCSA §\$22a-174-3b(e)(2)(D) and 22a-174-19b]

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 maintain records of the following information: [RCSA §22a-174-3b(e)(3) and §22a-174-3b(h)]
 - (A) Hours of operation for each month and each 12 month rolling aggregate. [RCSA §22a-174-3b(e)(4)]
 - (B) The quantity of fuel purchased for combustion. [RCSA §22a-174-19b(g)(3)]
 - (C) Any of the records listed below are sufficient to demonstrate the sulfur content of fuel used: [RCSA §§22a-174-3b(h)(1) thru (3) and 22a-174-19b(g)]
 - (1) A fuel certification for a delivery of non-gaseous fuel from a bulk petroleum provider or a copy of the current contract with the fuel supplier supplying the fuel as a condition of each shipment. The certification or contract should include the items specified in RCSA §22a-174-19b(g)(3)
 - (2) A sales receipt for the sale of motor vehicle diesel fuel from a retail location.
 - ii. All records above shall be maintained for a period of five years and made available to the commissioner to inspect and copy upon request. [RCSA §§22a-174-3b(e)(3)(A) and (B)]

d. Reporting Requirements

- i. The Permittee shall make and maintain records required by Section III.C.1.c. of this Title V permit and provide any such records, or a copy thereof, to the commissioner upon request and shall make such records available to the commissioner to inspect at the location maintained. [RCSA §22a-174-3b(i)(1)]
- ii. Any record requested by Section III.C.1.d.i. of this Title V permit shall be submitted with a certification in accordance with RCSA § 22a-174-2a(a). [RCSA §22a-174-3b(i)(2)]

2. RCSA Section 22a-174-18 - Control of Particulate Matter and Visible Emissions

- a. Limitation or Restriction
 - i. The Permittee shall not exceed the following visible emission limits: [RCSA §§22a-174-18(b)(1)(A) and (B)]
 - (A) Twenty percent (20%) opacity during any six-minute block average as measured by 40 CFR Part 60, Appendix a, Reference Method 9; or
 - (B) Forty percent (40%) opacity as measured by 40 CFR Part 60, Appendix a, Reference Method 9, reduced to a one-minute block average.

b. Monitoring and Testing Requirements

Record keeping specified in Section III.C.2.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

The Permittee shall maintain records of any opacity observations initiated by the Permittee or at the request of the Commissioner. Such records shall include the dates, times, and places of all visible observations, persons performing the observation, test method used, the operating conditions at the time of the observation, and the results of such observations. Records shall be kept for a minimum of five years after such records were created. [RCSA §22a-174-33(o)(2)]

d. Reporting Requirements

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

3. 40 CFR Part 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engine

EU-27: Classification:

- 201.15 HP
- Compression Ignition Engine
- Constructed before 2006 (Construction Date: 1997)
- Compliance date: May 3, 2013
- Certified Engine
- The emergency generator does not operate nor is contractually obligated to be available for purposes of emergency demand response.

a. Limitation or Restriction

- i. The Permittee shall change oil filter every 500 hours of operation or annually, whichever comes first. [40 CFR Part 63, Table 2c, Option 1]
- ii. The Permittee shall inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR Part 63, Table 2c, Option 1]
- iii. The Permittee shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR Part 63, Table 2c, Option 1]
- iv. The Permittee shall minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR Part 63, Table 2c, Option 1]
- v. 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 40 CFR 63 Subpart ZZZZ, Table 2c, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work 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. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

[40 CFR Part 63 Subpart ZZZZ, Table 2c, Option 1, Footnote 1]

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

 [40 CFR §63.6605(b)]
- vii. The Permittee may operate the emergency stationary RICE 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 calendar year. [40 CFR §63.6640(f)(2)(i)]
- vi. The Permittee shall install a non-resettable hour meter if one is not already installed. [40 CFR §63.6625(f)]

b. Monitoring and Testing Requirements

Record keeping specified in Section III.C.3.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 must keep a copy of each notification and report submitted to comply with 40 CFR Part 63 Subpart ZZZZ, by keeping all documentation supporting any initial Notification or Notification of Compliance Status that was submitted, according to the requirements in 40 CFR §63.10(b)(2)(xiv). [40 CFR §863.6655(a)(1)]
- ii. The Permittee must keep records of the occurrence and duration of each malfunction of operation. [40 CFR §63.6655(a)(2)]
- iii. The Permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instruction; or develop and follow their own maintenance plan which must be provided 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 §63.6655(d), 40 CFR Part 63 Subpart ZZZZ, Table 6]
- iv. The Permittee shall make and keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the Permittee operated and maintained the stationary RICE according to the Permittee's own maintenance plan. [40 CFR §63.6655(e)]
- v. The Permittee shall make and keep records of the hours of operation of the engine that is recorded

through the non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation (maintenance and readiness testing). [40 CFR §63.6655(f)]

d. Reporting Requirements

- i. The Permittee shall report each instance in which they did not meet each operating limitation in 40 CFR Part 63 Subpart ZZZZ, Table 2c. These instances are deviations from the operating limitations in 40 CFR Part 63 Subpart ZZZZ. These deviations must be reported according to the requirements in 40 CFR §63.6650. [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 Part 63 Subpart ZZZZ, Table 2c, Footnote 1]

D. EMISSIONS UNIT 29 (EU-29): Cummins Fire Pump

EU-29: 1,000 kW (9.0 MMBtu/hr) fuel oil fired Cummins Fire Pump is operating under RCSA §22a-174-3b(e) and is subject to RCSA §22a-174-22f and 40 CFR Part 63 Subpart ZZZZ.

1. Maximum Hours of Operation, Fuel Sulfur Content, Non-Emergency Operation and Operational Conditions

- a. Limitation or Restriction
 - i. The Permittee shall operate the emergency engine only in an emergency as defined in RCSA §22a-174-22e. [RCSA §22a-174-3b(e)(2)]
 - ii. The Permittee shall not allow the emergency engine to operate except during periods of testing and scheduled maintenance or during an emergency and unless the following conditions are met: [RCSA §22a-174-3b(e)(2)]
 - (A) Operation of the engine shall not exceed 300 hours during any 12 month rolling aggregate. [RCSA §22a-174-3b(e)(2)(C)]
 - (B) Any non-gaseous fuel consumed by the engine shall not exceed the sulfur content of motor vehicle diesel fuel where "motor vehicle diesel fuel" is defined in RCSA §22a-174-42 nor the applicable limitations set forth in table 19b-1 of RCSA §22a-174-19b. [RCSA §\$22a-174-3b(e)(2)(D) and 22a-174-19b]
- b. Monitoring and Testing Requirements

Record keeping specified in Section III.D.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 maintain records of the following information: [RCSA §22a-174-3b(e)(3) and §22a-174-3b(h)]
 - (A) Hours of operation for each month and each 12 month rolling aggregate.

[RCSA §22a-174-3b(e)(4)]

- (B) The quantity of fuel purchased for combustion. [RCSA §22a-174-19b(g)(3)]
- (C) Any of the records listed below are sufficient to demonstrate the sulfur content of fuel used: [RCSA §§22a-174-3b(h)(1) thru (3) and 22a-174-19b(g)]
 - (1) A fuel certification for a delivery of non-gaseous fuel from a bulk petroleum provider or a copy of the current contract with the fuel supplier supplying the fuel as a condition of each shipment. The certification or contract should include the items specified in RCSA §22a-174-19b(g)(3);
 - (2) A sales receipt for the sale of motor vehicle diesel fuel from a retail location.
- ii. All records above shall be maintained for a period of five years and made available to the commissioner to inspect and copy upon request. [RCSA §§22a-174-3b(e)(3)(A) and (B)]

d. Reporting Requirements

- i. The Permittee shall make and maintain records required by Section III.D.1.c. of this Title V permit and provide any such records, or a copy thereof, to the commissioner upon request and shall make such records available to the commissioner to inspect at the location maintained. [RCSA §22a-174-3b(i)(1)]
- ii. Any record requested by Section III.D.1.d.i of this Title V permit shall be submitted with a certification in accordance with RCSA § 22a-174-2a(a). [RCSA §22a-174-3b(i)(2)]

2. RCSA Section 22a-174-18 – Control of Particulate Matter and Visible Emissions

- a. Limitation or Restriction
 - i. The Permittee shall not exceed the following visible emission limits: [RCSA §\$22a-174-18(b)(1)(A) and (B)]
 - (A) Twenty per cent (20%) opacity during any six-minute block average as measured by 40 CFR Part 60, Appendix a, Reference Method 9; or
 - (B) Forty percent (40%) opacity as measured by 40 CFR Part 60, Appendix a, Reference Method 9, reduced to a one-minute block average.
- b. Monitoring and Testing Requirements

Record keeping specified in Section III.D.2.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

The Permittee shall maintain records of any opacity observations initiated by the Permittee or at the request of the Commissioner. Such records shall include the dates, times, and places of all visible observations, persons performing the observation, test method used, the operating conditions at the time of the observation, and the results of such observations. Records shall be kept for a minimum of five

years after such records were created. [RCSA §22a-174-33(o)(2)]

d. Reporting Requirements

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

3. RCSA §22a-174-22f – High Daily NOx Emitting Units at Non-major Sources of NOx

EU-29: This emergency engine is subject to RCSA §22a-174-22f because it has a maximum rated capacity greater than 2 MMBtu/hr. [RCSA §22a-174-22f(b)(2)(B)(i)]

a. Operation and Maintenance

i. The Permittee shall not operate the emergency engines for routine, scheduled testing, or maintenance on any day for which the commissioner has forecast that ozone levels will be "moderate to unhealthy for sensitive groups" or greater. If, subsequent to the initial forecast of "moderate to unhealthy sensitive groups" or greater, is revised to "moderate" or lower, the Permittee is no longer prohibited from operating the engine for routine, scheduled testing or maintenance for the remainder of that day. The Permittee may rely on a forecast ozone level of "moderate" or lower obtained after 3 p.m. on the preceding day. Subsequent changes to the ozone forecast after 3 p.m. that forecast ozone levels of "moderate to unhealthy for sensitive groups" or greater shall not obligate the Permittee to refrain from operation of the emergency engine at the facility on the following day. The commissioner may exempt, by permit or order, the Permittee of an emergency engine form RCSA §22a-174-22f if such emergency engine is unattended and the testing is automated and cannot be modified from a remote location. [RCSA §22a-174-22f(d)(2)]

b. Monitoring and Testing Requirements

Record keeping specified in Section III.D.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 retain all records and reports 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 emergency engine is located, unless the commissioner approves in writing the use of another location in Connecticut. [RCSA §22a-174-22f(g)(1)]
- ii. The Permittee shall make and keep the following records: [RCSA §22a-174-22f(g)(3)(A) through (C)]
 - (A) The Permittee shall make and keep records as required by 40 CFR §63.6655.
 - (B) The Permittee shall make and keep records of the work performed for repairs, replacement of parts and other maintenance; and
 - (C) Copies of all documents submitted to the commissioner.

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 $\S 22a-174-33(j)(1)(X)$]

4. 40 CFR Part 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engine

EU-29: Classification:

- 1,341 HP
- Compression Ignition Engine
- Constructed before 2006 (Construction date: 1999)
- Compliance date: June 15, 2007
- Certified engine
- The emergency generator does not operate nor is contractually obligated to be available for purposes of emergency demand response.

a. Limitation or Restriction

- i. At all times, the Permittee must operate and maintain any affected sources, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by applicable standards have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR §63.6605(b)]
- ii. The Permittee may operate the emergency stationary RICE 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 calendar year. [40 CFR §63.6640(f)(2)(i)]
- iii. The Permittee shall install a non-resettable hour meter if one is not already installed. [40 CFR §63.6625(f)]
- iv. The Permittee shall change oil filter every 500 hours of operation or annually, whichever comes first. [40 CFR Part 63, Table 2c, Option 1]
- v. The Permittee shall inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR Part 63, Table 2c, Option 1]
- vi. The Permittee shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR Part 63, Table 2c, Option 1]
- vii. The Permittee shall minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR Part 63, Table 2c, Option 1]

viii. 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 40 CFR 63 Subpart ZZZZ, Table 2c, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work 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. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable. [40 CFR Part 63 Subpart ZZZZ, Table 2c, Option 1, Footnote 1]

b. Monitoring and Testing Requirements

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

c. Record Keeping Requirements

- i. The Permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's own maintenance plan. [40 CFR §63.6655(e)]
- ii. The Permittee shall make and keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation (maintenance and readiness testing).

 [40 CFR §63.6655(f)]
- iii. The Permittee must keep a copy of each notification and report submitted to comply with 40 CFR Part 63 Subpart ZZZZ, by keeping all documentation supporting any initial Notification or Notification of Compliance Status that was submitted, according to the requirements in 40 CFR §63.10(b)(2)(xiv). [40 CFR §863.6655(a)(1)]
- iv. The Permittee must keep records of the occurrence and duration of each malfunction of operation. [40 CFR §63.6655(a)(2)]
- v. The Permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instruction; or develop and follow their own maintenance plan which must be provided 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 §63.6655(d), 40 CFR Part 63 Subpart ZZZZ, Table 6]

d. Reporting Requirements

i. The Permittee shall report each instance in which they did not meet each operating limitation in 40 CFR Part 63 Subpart ZZZZ, Table 2c. These instances are deviations from the operating limitations in 40 CFR Part 63 Subpart ZZZZ. These deviations must be reported according to the requirements in 40 CFR §63.6650. [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 Part 63 Subpart ZZZZ, Table 2c, Footnote 1]
- iii. 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)]

E. EMISSIONS UNIT 31 (EU-31): Boiler No. 6: 10.21 MMBtu/hr Industrial Natural Gas boiler operating under RCSA §22a-174-3b(c) and subject to 40 CFR Part 63 Subpart DDDDD

1. Operational Conditions

- a. Limitation or Restriction
 - i. The maximum rated heat input shall not exceed 50 MMBtu/hr. [RCSA §22a-174-3b(c)(1)(A)(i)]
 - ii. Natural gas usage shall not exceed 214 million cubic feet in any 12 month rolling aggregate. [RCSA §22a-174-3b(c)(1)(B)(i)]
 - iii. The height of any stack associated with the unit shall be the greater of 10 meters or the lesser of 1.3 times the building height or maximum building width. [RCSA §\$22a-174-3b(c)(1)(D)(i) and (ii)]
 - iv. A tune-up of the external combustion unit shall be performed on an annual basis. [RCSA §22a-174-3b(c)(1)(E)]
- b. Monitoring and Testing Requirements

Record keeping requirements specified in Section III.E.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)(1)(K)(ii)]

- c. Record Keeping Requirements
 - i. The Permittee shall make and keep records of the fuel type and quantity used, in million cubic feet, for each month and each 12 month rolling aggregate. [RCSA §22a-174-3b(c)(3)(A)]
 - ii. The Permittee shall make and keep records of the date each annual tune-up is performed. [RCSA §22a-174-3b(c)(3)(D)]
 - iii. The Permittee shall maintain the records for five years from the date such record is created. [RCSA §22a-174-3b(c)(2)(B)]
- d. Reporting Requirements
 - i. The Permittee shall make and maintain records required by Section III.E.1.c. of this Title V permit and provide any such records, or a copy thereof, to the commissioner upon request and shall make such records available to the commissioner to inspect at the location maintained.

 [RCSA §22a-174-3b(i)(1)]

ii. Any record requested by Section III.E.1.d. of this Title V permit shall be submitted with a certification in accordance with RCSA § 22a-174-2a(a). [RCSA §22a-174-3b(i)(2)]

2. RCSA Section 22a-174-18 – Control of Particulate Matter and Visible Emissions

- a. Limitation or Restriction
 - i. The Permittee shall not exceed the following visible emission limits: [RCSA §\$22a-174-18(b)(1)(A) and (B)]
 - (A) Twenty per cent (20%) opacity during any six-minute block average as measured by 40 CFR Part 60, Appendix a, Reference Method 9; or
 - (B) Forty percent (40%) opacity as measured by 40 CFR Part 60, Appendix a, Reference Method 9, reduced to a one-minute block average.
 - ii. The Permittee shall emit no more than 0.10 pounds of particulate matter per million BTU of heat input. [RCSA §22a-174-18(e)(1)]
- b. Monitoring and Testing Requirements

Record keeping specified in Section III.E.2.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 maintain records of any opacity observations initiated by the Permittee or at the request of the Commissioner. Such records shall include the dates, times, and places of all visible observations, persons performing the observation, test method used, the operating conditions at the time of the observation, and the results of such observations. Records shall be kept for a minimum of five years after such records were created. [RCSA §22a-174-33(o)(2)]
 - ii. The Permittee shall make and maintain records sufficient to demonstrate that the particulate matter emission limitation has not been exceeded. [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)]

3. 40 CFR Part 63 Subpart DDDDD – National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, Institutional Boilers and Process Heaters

Classification:

- Industrial boiler
- Gas 1 Unit
- a. Limitation or Restriction
 - i. The Permittee shall operate each boiler as a Gas 1 Unit. The boiler will not be subject to emission

limits in Table 1, 2 or 11 through 13 or the operating limits in Table 4 of 40 CFR §63 Subpart DDDDD. [40 CFR §63.7500(e)]

- ii. The Permittee shall conduct a tune-up of the boiler annually to demonstrate compliance as specified in 40 CFR §63.7540. [40 CFR §63.7540(a)(12)]
- iii. The Permittee shall comply with the energy assessment requirements of 40 CFR Part 63 Subpart DDDDD Table 3, Option 4. [40 CFR Part 63 Subpart DDDDD Table 3]

b. Monitoring and Testing Requirements

Record keeping requirements 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. [RCSA §22a-174-33(j)(1)(K)(II)]

- c. Record Keeping Requirements
 - i. 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 notification of compliance status or semiannual reports submitted. [40 CFR §63.7555(a)(1)]
 - ii. The Permittee shall keep records for a period of five years from the date that each record was created and must make them available upon request. [40 CFR §§63.7560(b) and (c)]

d. Reporting Requirements

The Permittee must submit all compliance reports electronically to the Environmental Protection Agency in accordance with 40 CFR §63.7550. [40 CFR §63.7550]

F. EMISSION UNIT 32 (EU-32): Generac Emergency Generator

EU-32: 130 kW (2.12 MMBtu/hr) Natural gas fired Generac Emergency Generator is operating under RCSA §22a-1743b(e) and is subject to 40 CFR Part 60 Subpart JJJJ. This emergency generator is not subject to the requirements of RCSA §22a-174-22f because the maximum rated capacity is lower than RCSA §22a-174-22f(b)(2)(A)(i).

1. Maximum Hours of Operation, Fuel Sulfur Content, Non-Emergency Operation and Operational Conditions

- a. Limitation or Restriction
 - i. The Permittee shall operate the emergency engine only in an emergency as defined in RCSA §22a-174-22e. [RCSA §22a-174-3b(e)(2)]
 - ii. The Permittee shall not allow the emergency engine to operate except during periods of testing and scheduled maintenance or during an emergency and unless the following conditions are met: [RCSA §22a-174-3b(e)(2)]
 - (A) Operation of the engine shall not exceed 300 hours during any 12 month rolling aggregate. [RCSA §22a-174-3b(e)(2)(C)]

b. Monitoring and Testing Requirements

Record keeping specified in Section III.F.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 maintain records of the following information: [RCSA §22a-174-3b(e)(3) and §22a-174-3b(h)]
 - (A) Hours of operation for each month and each 12 month rolling aggregate. [RCSA §22a-174-3b(e)(4)]
 - ii. All records above shall be maintained for a period of five years and made available to the commissioner to inspect and copy upon request. [RCSA §§22a-174-3b(e)(3)(A) and (B)]

d. Reporting Requirements

- i. The Permittee shall make and maintain records required by Section III.F.1.c. of this Title V permit and provide any such records, or a copy thereof, to the commissioner upon request and shall make such records available to the commissioner to inspect at the location maintained. [RCSA §22a-174-3b(i)(1)]
- ii. Any record requested by Section III.F.1.d.i of this Title V permit shall be submitted with a certification in accordance with RCSA § 22a-174-2a(a). [RCSA §22a-174-3b(i)(2)]

2. RCSA Section 22a-174-18 – Control of Particulate Matter and Visible Emissions

- a. Limitation or Restriction
 - i. The Permittee shall not exceed the following visible emission limits: [RCSA §\$22a-174-18(b)(1)(A) and (B)]
 - (A) Twenty per cent (20%) opacity during any six-minute block average as measured by 40 CFR Part 60, Appendix a, Reference Method 9; or
 - (B) Forty percent (40%) opacity as measured by 40 CFR Part 60, Appendix a, Reference Method 9, reduced to a one-minute block average.
- b. Monitoring and Testing Requirements

Record keeping specified in Section III.F.2.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

The Permittee shall maintain records of any opacity observations initiated by the Permittee or at the request of the Commissioner. Such records shall include the dates, times, and places of all visible observations, persons performing the observation, test method used, the operating conditions at the time of the observation, and the results of such observations. Records shall be kept for a minimum of five years after such records were created. [RCSA §22a-174-33(o)(2)]

d. Reporting Requirements

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

3. 40 CFR Part 60 Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

EU-32: Classification:

- 323 HP
- Spark Ignition Internal Combustion Engine
- Commenced construction after June 12, 2006 and was manufactured on or after January 1, 2009
- Certified engine
- The emergency generator does not operate nor is contractually obligated to be available for purposes of emergency demand response.

a. Limitation or Restriction

- i. The emission rate of NOx, CO and VOC discharged to the atmosphere from the stationary internal combustion engine shall not exceed the respective emission limitation specified in 40 CFR 60 Subpart JJJJ, Table 1. [40 CFR §60.4233(e)]
- ii. The Permittee shall operate and maintain the engine to achieve the emission standards as required in 40 CFR §60.4233 over the entire life of the engine. [40 CFR §60.4234]
- iii. The Permittee may operate the emergency stationary RICE 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 calendar year. [40 CFR §60.4243(d)(2)(i)]
- iv. The Permittee shall install a non-resettable hour meter. [40 CFR §60.4237]

b. Monitoring and Testing Requirements

Record keeping specified in Section III.F.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

- i. The Permittee shall keep records of all notifications submitted to comply with 40 CFR Part 60 Subpart JJJJ and all documentation supporting such notification. [40 CFR §60.4245(a)(1)]
- ii. The Permittee shall keep records of maintenance conducted on the engine. [40 CFR §60.4245(a)(2)]
- iii. The Permittee shall keep documentation from the manufacturer that the engine is certified to meet the emission standards and information. [40 CFR §60.4245(a)(3)]

iv. The Permittee shall keep records of the hours of operation of the engine that are recorded using a non-resettable hour meter. [40 CFR §60.4245(b)]

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)]

G. PREMISES-WIDE GENERAL REQUIREMENTS

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

- 17. Nitrogen Oxide Emissions: The Permittee shall comply with the requirements for control of nitrogen oxide emissions as set forth in RCSA §22a-174-22f.
- **18. Ambient Air Quality:** The Permittee shall not cause or contribute to a violation of an ambient air quality standard as set forth in RCSA §22a-174-24(b).
- **19. Open Burning:** The Permittee is prohibited from conducting open burning, except as may be allowed by CGS §22a-174(f).
- **20. Asbestos**: Should the premises, as defined in 40 CFR §61.145, become subject to 40 CFR Part 61 Subpart M National Emission Standard for Asbestos 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 Applicable Unit 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.

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.		

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

SECTION VI: TITLE V REQUIREMENTS

A. SUBMITTALS TO THE COMMISSIONER & ADMINISTRATOR

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

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

Any submittal to the Administrator of the Environmental Protection Agency shall be submitted per the procedure required by the applicable requirement or otherwise in a computer-readable format and addressed to: 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 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:

- 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 sub clause ii. of this subparagraph and a different named position is assigned or has assumed the duties of the duly authorized representative, a new written authorization shall be submitted to the commissioner prior to or together with the submission of any application, document, report or certification signed by such representative.

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

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

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

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

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

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

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

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

- 1. The type of monitoring or records used to obtain such data, including record keeping;
- 2. The date, place, and time of sampling or measurement;
- 3. The name of the individual who performed the sampling or the measurement and the name of such individual's employer;
- 4. The date(s) on which analyses of such samples or measurements were performed;
- 5. The name and address of the entity that performed the analyses;
- 6. The analytical techniques or methods used for such analyses;
- 7. The results of such analyses;
- 8. The operating conditions at the subject source at the time of such sampling or measurement; and
- 9. All calibration and maintenance records relating to the instrumentation used in such sampling or measurements, all original strip-chart recordings or computer printouts generated by continuous monitoring instrumentation, and copies of all reports required by the subject permit.

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

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

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

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

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

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

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

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

Notwithstanding Section VI.D 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.

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).

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-6m.

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