

## 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>	192-0314-TV
<b>Client/Sequence/Town/Premises Numbers</b>	253/1/192/065
<b>Date Issued</b>	
<b>Expiration Date</b>	

**Corporation:**

*City of Waterbury, CT – Water Pollution Control Department*

**Premises Location:**

*210 Municipal Road, Waterbury, CT 06708*

**Name of Responsible Official and Title:**

*Michael LeBlanc, WPC Primary Representative*

All the following attached pages, 2 through 45, are hereby incorporated by reference into this Title V permit.

\_\_\_\_\_  
Emma Cimino  
Deputy Commissioner

\_\_\_\_\_  
Date

TABLE OF CONTENTS

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PAGE

List of Abbreviations/Acronyms .....4
Section I. Premises Information/Description
A. Premises Information.....5
B. Premises Description. ....5
Section II. Emissions Units Information
A. Emissions Units Description - Table II.A.....6
B. Operating Scenario Identification - Table II.B .....6
Section III. Applicable Requirements and Compliance Demonstration
A. Grouped Emissions Unit 1 (EU-1 and EU-2) .....7
B. Emissions Unit 3.....14
C. Premises-Wide General Requirements .....36
Section IV. Compliance Schedule - Table IV .....35
Section V. State Enforceable Terms and Conditions .....38
Section VI. Title V Requirements
A. Submittals to the Commissioner & Administrator.....40
B. Certifications [RCSA §22a-174-33(b)].....40
C. Signatory Responsibility [RCSA §22a-174-2a(a)] .....40
D. Additional Information [RCSA §§22a-174-33(j)(1)(X), -33(h)(2)].....41
E. Monitoring Reports [RCSA §22a-174-33(o)(1)] .....41
F. Premises Records [RCSA §22a-174-33(o)(2)] .....41
G. Progress Reports [RCSA §22a-174-33(q)(1)].....42
H. Compliance Certifications [RCSA §22a-174-33(q)(2)].....42
I. Permit Deviation Notifications [RCSA §22a-174-33(p)] .....43
J. Permit Renewal [RCSA §22a-174-33(j)(1)(B)].....43
K. Operate in Compliance [RCSA §22a-174-33(j)(1)(C)] .....43
L. Compliance with Permit [RCSA §22a-174-33(j)(1)(G)] .....43
M. Inspection to Determine Compliance [RCSA §22a-174-33(j)(1)(M)].....43
N. Permit Availability.....44
O. Severability Clause [RCSA §22a-174-33(j)(1)(R)] .....44
P. Need to Halt or Reduce Activity [RCSA §22a-174-33(j)(1)(T)].....44
Q. Permit Requirements [RCSA §22a-174-33(j)(1)(V)] .....44
R. Property Rights [RCSA §22a-174-33(j)(1)(W)] .....44
S. Alternative Operating Scenario Records [RCSA §22a-174-33(o)(3)].....44
T. Operational Flexibility and Off-Permit Changes [RCSA §22a-174-33(r)(2)] .....44
U. Information for Notification [RCSA §22a-174-33(r)(2)(A)] .....45
V. Transfers [RCSA §22a-174-2a(g)] .....45
W. Revocation [RCSA §22a-174-2a(h)] .....45
X. Reopening for Cause [RCSA §22a-174-33(s)] .....45
Y. Credible Evidence.....45

**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

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<i>Abbreviation/Acronym</i>	<i>Description</i>
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
CGS	Connecticut General Statutes
CO	Carbon Monoxide
DEEP	Department of Energy and Environmental Protection
dscf	Dry standard cubic feet
dscm	Dry standard cubic meters
EU	Emissions Unit
EPA	Environmental Protection Agency
FOG	Fats, Oils or Grease
GEU	Grouped Emissions Unit
gpm	Gallons per minute
HAP	Hazardous Air Pollutant
hr	Hour
lb	Pound
MASC	Maximum Allowable Stack Concentration
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standard
NSR	New Source Review
Pb	Lead
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter less than 10 microns
PM <sub>2.5</sub>	Particulate Matter less than 2.5 microns
ppmvd	Parts per million, volumetric basis dry
RCSA	Regulations of Connecticut State Agencies
RICE	Reciprocating Internal Combustion Engine
SIC	Standard Industrial Classification Code
SO <sub>2</sub>	Sulfur Dioxide
SO <sub>x</sub>	Sulfur Oxides
SOS	Standard Operating Scenario
THC	Total Hydrocarbon
tph	Tons per hour
tpy	Tons per year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound

**A. PREMISES INFORMATION**

Nature of Business: Publicly Owned Treatment Works  
Primary SIC: 4952 (WPCF)  
Other SIC: 4953 (SSI)

Facility Mailing Address: City Hall Building  
235 Grand Street, 2<sup>nd</sup> Floor  
Waterbury, CT 06702

Telephone Number: (203) 574-6840

**B. PREMISES DESCRIPTION**

The City of Waterbury, CT – Water Pollution Control Department (WPCD) owns the Water Pollution Control Facility (WPCF), which treats municipal wastewater from the City of Waterbury. A sewage sludge incineration unit (SSI) is located at the site and provides sludge disposal services for sewage sludge generated at the WPCF. The WPCF is operated under contract by Jacobs Engineering Group, Inc. The SSI is operated under contract by Synagro Northeast, LLC, under subcontract with Jacobs Engineering Group, Inc. In addition to the water treatment works and the SSI unit, other emission units that are part of the WPCF include: two (2) diesel-fired emergency generators (permitted), one (1) gas-fired auxiliary boiler, ten (10) dual-fuel (natural gas and No. 2 fuel oil-fired) boilers, two (2) natural gas-fired boilers and thirteen (13) fuel storage tanks.

The majority of these emission units are considered insignificant. Only the permitted emergency generators and the SSI are considered significant and listed in Section II of this Title V permit.

WPCD stated in the Title V application that the insignificant emissions units are subject to the requirements of the appropriate section of RCSA §22a-174-3b (boilers and generators). As these emissions units are below the NSR permitting thresholds, RCSA §22a-174-3b is not applicable. In addition, there are a number of fuel storage tanks below NSR permitting thresholds and the requirements of 40 CFR Part 60 Subpart Kb.

All of these insignificant emissions units are only subject to the applicable premise-wide requirements listed in Section III.C of this Title V permit and are not listed as emissions units in Section II of this Title V permit.

WPCD is subject to the following Federal Regulations:

- 40 CFR Part 60, Subpart O: Standards of Performance for Sewage Treatment Plants
- 40 CFR Part 61, Subpart C: National Emission Standards for Beryllium (Be)
- 40 CFR Part 61, Subpart E: National Emission Standards for Mercury (Hg)
- 40 CFR Part 62, Subpart LLL: Federal Plan Requirements for Sewage Sludge Incineration Units Constructed on or Before October 14, 2010
- 40 CFR Part 63, Subpart ZZZZ: Standards of Performance for Reciprocating Internal Combustion Engines (RICE)

WPCD is a Title V source pursuant to RCSA §22a-174-33(a)(10)(A) and (B), as well as RCSA §22a-174-33(a)(10)(F)(iii) for NO<sub>x</sub> potential emissions of greater than 25 tons per year.

**Section II: Emissions Units Information**

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**A. EMISSIONS UNITS DESCRIPTION**

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

<b>TABLE II.A: EMISSIONS UNITS DESCRIPTION</b>				
<b>Emissions Unit/ Grouped Emissions Unit</b>		<b>Emissions Unit Description</b>	<b>Control Unit Description</b>	<b>Permit or Regulation Number</b>
GEU-1	EU-1	Emergency Generator, Mitsubishi S16r Model # RM2000, Serial # 0850222/01 MRC: 19.317 MMBtu/h Year of Construction: 1997		Permit No. 192-0291 40 CFR Part 63 Subpart ZZZZ
	EU-2	Emergency Generator, Mitsubishi S16r Model # RM2000, Serial # 0850221/01 MRC: 19.317 MMBtu/h Year of Construction: 1997		Permit No. 192-0292 40 CFR Part 63 Subpart ZZZZ
EU-3		Fluidized Bed Incinerator, Dorr-Oliver Model # N-4003-F01 MRC: 3 dry tons/h Year of Construction: 1998	Beltran Rod Deck Venturi and Packed Tower System  Beltran BTP 8x8 Wet ESP  Mercury Control System: Ultra-High Efficiency filter, HEPA filters and Carbon Adsorption Vessels	Permit No. 192-0140 40 CFR Part 60, Subpart O 40 CFR Part 61 Subpart C 40 CFR Part 61 Subpart E 40 CFR Part 62 Subpart LLL

**B. OPERATING SCENARIO IDENTIFICATION**

The Permittee shall be allowed to operate under the following Standard Operating Scenarios (SOS).

<b>TABLE II.B: OPERATING SCENARIO IDENTIFICATION</b>	
<b>Emissions Units Associated with the Scenario</b>	<b>Description of Scenario</b>
All Emissions Units	Publicly Owned Treatment Works Operations

### Section III: Applicable Requirements and Compliance Demonstration

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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. GEU-1 [EU-1 AND 2], EMERGENCY GENERATORS,  $\geq$  500 hp  
Subject to 40 CFR Part 63 Subpart ZZZZ, RCSA §22a-174-18, -19b, -22e, Permit Nos. 192-0291 (EU-1), 192-0292 (EU-2)**

**1. Fuel Use and Hours of Operation**

*a. Limitation or Restriction*

- i. The maximum fuel consumption over any consecutive 12 month period shall not exceed 22,800 gallons of diesel fuel per engine. [P-192-0291, P-192-0292]
- ii. Allowable periods of operation for emergency engines shall include those specified under RCSA §22a-174-22e(a)(14), including:
  - (A) Emergencies;
  - (B) Testing;
  - (C) Scheduled maintenance;
  - (D) When the facility owner or operator interrupts power to the facility to perform construction, maintenance or repair of the power distribution system for the facility or portion of the facility; or
  - (E) When the electricity supplier makes a scheduled interruption of power to the facility so that the electricity supplier may perform construction, maintenance or repair of the primary power distribution system for the facility. [RCSA §22a-174-22e(a)(14)]
- iii. 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 for sensitive groups” or greater, the forecast is revised to “moderate” or lower, the owner or operator is no longer prohibited from operating the engine for routine, scheduled testing or maintenance for the remainder of that day. The Permittee may rely on an ozone forecast 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 from RCSA §22a-174-22e(d) if such emergency engine is unattended and the testing is automated and cannot be modified from a remote location. [RCSA §22a-174-22e(d)(14)]
- iv. The Permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in 40 CFR Part 63 Subpart ZZZZ, Table 2d apply. [40 CFR §63.6625(h)]
- v. The Permittee shall operate the emergency stationary RICE according to the requirements in 40 CFR §63.6640(f)(1-4). In order for the engine to be considered an emergency stationary RICE under 40 CFR Part 63 Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in 40 CFR §63.6640(f)(1-4), is prohibited. If the Permittee does not operate the engine according to the requirements in 40 CFR §63.6640(f)(1-4), the engine will not be considered an emergency engine under 40 CFR Part 63 Subpart ZZZZ and shall meet all requirements for non-emergency engines. [40 CFR §63.6640(f)]
  - (A) There is no time limit on the use of emergency stationary RICE in emergency situations.

### Section III: Applicable Requirements and Compliance Demonstration

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[40 CFR §63.6640(f)(1)]

- (B) The Permittee may operate the emergency stationary RICE for the purpose specified in paragraph 40 CFR §63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by 40 CFR §§63.6640(f)(3) and (4) counts as part of the 100 hours per calendar year allowed by 40 CFR §63.6640(f)(2). [40 CFR §63.6640(f)(2)]
- (1) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The Permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [40 CFR §63.6640(f)(2)(i)]
- (C) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph 40 CFR §63.6640(f)(2). Except as provided in paragraphs 40 CFR §§63.6640(f)(4)(i) and (ii), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [40 CFR §63.6640(f)(4)]
- (1) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [40 CFR §63.6640(f)(4)(ii)]
- (a) The engine is dispatched by the local balancing authority or local transmission and distribution system operator. [40 CFR §63.6640(f)(4)(ii)(A)]
- (b) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [40 CFR §63.6640(f)(4)(ii)(B)]
- (c) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [40 CFR §63.6640(f)(4)(ii)(C)]
- (d) The power is provided only to the facility itself or to support the local transmission and distribution system. [40 CFR §63.6640(f)(4)(ii)(D)]
- (e) The Permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the Permittee. [40 CFR §63.6640(f)(4)(ii)(E)]
- b. Monitoring Requirements*
- i. The Permittee shall continuously monitor fuel consumption to each emission unit in GEU-1 using a non-resettable totalizing fuel meter. [P-192-0291, P-192-0292]
- ii. The Permittee shall install a non-resettable hour meter if one is not already installed. [40 CFR §63.6625(f)]



### Section III: Applicable Requirements and Compliance Demonstration

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#### c. Record Keeping Requirements

- i. The Permittee shall keep records of monthly and consecutive 12 month fuel consumption. The consecutive 12 month fuel consumption shall be determined by adding (for each fuel) the current month's fuel consumption to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of the previous month.  
[P-192-0291, P-192-0292]
- 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 shall 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. If the engine is used for the purpose specified in 40 CFR §63.6640(f)(4)(ii), the Permittee shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [40 CFR §63.6655(f)]

#### d. Reporting Requirements

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

## 2. Operation and Maintenance

#### a. Limitation or Restriction

- i. The Permittee shall meet the following requirements, except during periods of startup.  
[40 CFR §63.6603(a); 40 CFR §63.6640(a) and (b); 40 CFR Part 63 Subpart ZZZZ, Table 2d, Item No. 4(a-c)]
  - (A) Change oil and filter every 500 hours of operation or annually, whichever comes first;
  - (B) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
  - (C) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- ii. The Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in 40 CFR Part 63 Subpart ZZZZ, Table 2d. The oil analysis shall be performed at the same frequency specified for changing the oil in 40 CFR Part 63 Subpart ZZZZ, Table 2d. The analysis program shall at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the Permittee is not required to change the oil. If any of the limits are exceeded, the Permittee shall change the oil within two business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the Permittee shall change the oil within two business days or before commencing operation, whichever is later. The analysis program shall be part of the maintenance plan for the engine.  
[40 CFR §63.6625(i); 40 CFR Part 63 Subpart ZZZZ, Table 2d, Footnote No. 1]
- iii. If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in 40 CFR Part 63 Subpart ZZZZ, Table 2d, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law

### Section III: Applicable Requirements and Compliance Demonstration

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has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. [40 CFR Part 63 Subpart ZZZZ, Table 2d, Footnote No. 2]

- iv. The Permittee shall be in compliance with the applicable emission limitations, operating limitations, and other requirements in 40 CFR Part 63 Subpart ZZZZ at all times. [40 CFR §63.6605(a)]
  - v. At all times the Permittee shall operate and maintain any affected source, 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 this standard 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)]
  - vi. The Permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop the Permittee's own maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §63.6625(e)]
- b. *Monitoring Requirements*
- i. The Permittee shall demonstrate continuous compliance with each applicable emission limitation, operating limitation, and other requirements in 40 CFR Part 63 Subpart ZZZZ, Table 2d according to methods specified in 40 CFR Part 63 Subpart ZZZZ, Table 6. [40 CFR §63.6640(a)]
  - ii. The Permittee shall demonstrate continuous compliance by:  
[40 CFR Part 63 Subpart ZZZZ, Table 6, Item No. 9(i) and (ii)]
    - (A) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
    - (B) Develop and follow the Permittee's own maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- c. *Record Keeping Requirements*
- i. The Permittee's records shall be in a form suitable and readily available for expeditious review according to 40 CFR §63.10(b)(1). [40 CFR §63.6660(a)]
  - ii. As specified in 40 CFR §63.10(b)(1), the Permittee shall keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR §63.6660(b)]
  - iii. The Permittee shall keep each record readily accessible in hard copy or electronic form for at least five years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR §63.10(b)(1). [40 CFR §63.6660(c)]
  - iv. The Permittee shall keep the records required in 40 CFR Part 63 Subpart ZZZZ, Table 6 for each applicable emission or operating limitation. [40 CFR §63.6655(d)]
  - v. The Permittee shall keep records of the maintenance conducted in order to demonstrate GEU-1 was operated and maintained according with the maintenance plan. [40 CFR §63.6655(e)]
  - vi. The Permittee shall keep records of the hours of operation of each EU in GEU-1 that is recorded

### Section III: Applicable Requirements and Compliance Demonstration

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through the non-resettable hour meter. The Permittee shall 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. If the engine is used for the purpose specified in 40 CFR §63.6640(f)(4)(ii), the Permittee shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [40 CFR §63.6655(f)]

- iv. The Permittee shall make and keep records sufficient to show compliance with the applicable General Provisions requirements of 40 CFR §63.6665.  
[40 CFR §63.6665; 40 CFR Part 63 Subpart ZZZZ, Table 8]

#### d. *Reporting Requirements*

- i. The Permittee shall report each instance in which the Permittee did not meet each applicable emission limitation or operating limitation in 40 CFR Part 63 Subpart ZZZZ, Table 2d. These instances are deviations from the emission and operating limitations in 40 CFR Part 63 Subpart ZZZZ. These deviations shall be reported according to the requirements in 40 CFR §63.6650.  
[40 CFR §63.6640(b)]
- ii. The Permittee shall also report each instance in which they did not meet the applicable requirements in 40 CFR Part 63 Subpart ZZZZ, Table 8. [40 CFR §63.6640(e)]
- iii. The Permittee shall submit all of the applicable notifications in 40 CFR §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b-e), and (g) and (h) by the dates specified.  
[40 CFR §63.6645(a)]
- iv. The Permittee shall report any failure to perform the management 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 2d, Footnote No. 2]
- v. The Permittee shall notify the commissioner in writing of any malfunction of the engine. The Permittee shall submit such notification within ten days of the malfunction. The notification shall include the following: [P-192-0291, P-192-0292]
  - (A) a description of the malfunction and a description of the circumstances surrounding the cause or likely cause of such malfunction; and
  - (B) a description of all corrective actions and preventive measures taken and/or planned with respect to such malfunction and the dates of such actions and measures.

### 3. TSP, PM-10, NO<sub>x</sub>, VOC and CO Emissions

#### a. *Limitations or Restrictions per Engine*

[P-192-0291, P-192-0292]

- i. TSP
  - (A)  $\leq 1.93$  lb/h
  - (B)  $\leq 0.10$  lb/MMBtu
  - (C)  $\leq 0.16$  tpy
- i. PM-10
  - (A)  $\leq 1.16$  lb/h
  - (B)  $\leq 0.06$  lb/MMBtu
  - (C)  $\leq 0.09$  tpy

- ii. NO<sub>x</sub>
  - (A) ≤ 61.8 lb/h
  - (B) ≤ 3.2 lb/MMBtu
  - (C) ≤ 4.99 tpy
- iii. VOC
  - (A) ≤ 1.58 lb/h
  - (B) ≤ 0.082 lb/MMBtu
  - (C) ≤ 0.13 tpy
- iv. CO
  - (A) ≤ 16.4 lb/h
  - (B) ≤ 0.85 lb/MMBtu
  - (C) ≤ 1.33 tpy

*b. Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limits by calculating the emission rates using emission factors from the following sources: [P-192-0291, P-192-0292]

- i. Manufacturer's data
- ii. AP-42, Fifth edition

*c. Record Keeping Requirements*

The Permittee shall calculate and record the monthly and consecutive 12 month PM, PM<sub>10</sub>, NO<sub>x</sub>, VOC, and CO emissions in units of tons. The consecutive 12 month emissions shall be determined by adding (for each pollutant) the current month's emissions to that of the previous 11 months. Such records shall include a sample calculation for each pollutant. The Permittee shall make these calculations within 30 days of the end of the previous month. [P-192-0291, P-192-0292]

*d. Reporting Requirements*

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

#### 4. SO<sub>2</sub> and Fuel Sulfur Content

*a. Limitations or Restrictions per Engine*  
[P-192-0291, P-192-0292]

- i. ≤ 2.93e-2 lb/h
- ii. ≤ 1.52e-3 lb/MMBtu
- iii. ≤ 2.37e-3 tpy
- iv. ≤ 0.0015% sulfur by weight, dry basis

*b. Monitoring and Testing Requirements*

- i. The Permittee shall demonstrate compliance with the emission limits by calculating the emission rates using emission factors from the following sources:  
[P-192-0291, P-192-0292]

### Section III: Applicable Requirements and Compliance Demonstration

**DRAFT**

- (A) Manufacturer's data
- (B) AP-42, Fifth edition
- ii. The Permittee shall monitor fuel sulfur content using a shipping receipt and a certification from the fuel supplier certifying the type of fuel in the shipment and weight percent sulfur in the fuel. [P-192-0291, P-192-0292]
- c. *Record Keeping Requirements*
  - i. The Permittee shall calculate and record the monthly and consecutive 12 month SO<sub>2</sub> emissions in units of tons. The consecutive 12 month emissions shall be determined by adding the current month's emissions to that of the previous 11 months. Such records shall include a sample calculation. The Permittee shall make these calculations within 30 days of the end of the previous month. [P-192-0291, P-192-0292]
  - ii. The Permittee shall keep records of the sulfur content of the fuel combusted and the quantity purchased for combustion. A written certification or a written contract with a fuel supplier is sufficient to satisfy this requirement if the certification or contract identifies:  
[P-192-0291, P-192-0292]
    - (A) The name of the fuel seller;
    - (B) The type of fuel purchased;
    - (C) The sulfur content of the fuel purchased; and
    - (D) The method used to determine the sulfur content of the fuel purchased.
- d. *Reporting Requirements*

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

## 5. HAP

### a. *Limitation or Restriction*

This equipment shall not cause an exceedance of the Maximum Allowable Stack Concentration (MASC) for any hazardous air pollutant (HAP) emitted and listed in RCSA Section 22a-174-29. [STATE ONLY REQUIREMENT] [P-192-0291, P-192-0292]

### b. *Monitoring Requirements*

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

### c. *Record Keeping Requirements*

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

### d. *Reporting Requirements*

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

**6. Opacity**

*a. Limitation or Restriction*

i. The Permittee shall not exceed the following opacity limits: [P-192-0291, P-192-0292]

(A) 10% during any six-minute block average; or

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

*b. Monitoring Requirements*

Record keeping specified in Section III.A.6.c of this Title V permit shall be sufficient to meet other Monitoring Requirements pursuant to RCSA §22a-174-33.

[RCSA §22a-174-33(j)(1)(K)(ii)]

*c. Record Keeping Requirements*

The Permittee shall maintain records sufficient to determine compliance with the limitation or restriction in Section III.A.6.a of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]

*d. Reporting Requirements*

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

**B. EU-3, Dorr-Oliver N-4003-F01 Fluidized Bed Sewage Sludge Incinerator**

**Subject to Permit No. 192-0140, RCSA §22a-174-18, CGS §22a-191a; 40 CFR Part 60 Subpart O, 40 CFR Part 61 Subparts C and E, 40 CFR Part 62 Subpart LLL**

**1. Allowable Fuels**

*a. Limitation or Restriction*

i. Only sewage sludge (including FOG and biofuels), #2 fuel oil and natural gas may be introduced into this unit. Any substance which is considered "municipal-type solid waste", as defined in 40 CFR §60.15a, or "hazardous waste", as defined in CGS §22a-115, is prohibited from being introduced into this unit. [Permit No. 192-0140]

ii. For the purposes of this permit, sewage sludge is defined as any solid semi-solid or liquid residue removed during the treatment of municipal or private wastewater and domestic sewage. Sewage sludge includes, but is not limited to, solids removed during primary, secondary or advanced wastewater treatment, scum, septage, portable toilet pumpings and sewage sludge products. Sludge generated from the treatment of industrial wastewater in non-biological treatment systems is prohibited. [Permit No. 192-0140]

*b. Monitoring Requirements*

Record keeping specified in Section III.B.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*

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

*d. Reporting Requirements*

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner,



### Section III: Applicable Requirements and Compliance Demonstration

DRAFT

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

#### 2. Sewage Sludge and FOG/Biofuel Charging Rates

##### a. Limitation or Restriction

- i. Maximum Sewage Sludge Charging Rate: 3.0 dry tons/hr, monthly average [Permit No. 192-0140]
- ii. Maximum Annual Sewage Sludge Charging Rate: 26,280 dry tons/yr [Permit No. 192-0140]
- iii. Maximum Annual FOG/Biofuel Component of Sewage Sludge: 4.1 million gallons total of FOG and/or biofuels as measured based on truck weigh scale and tracked based on specific gravity of 7.9 lb/gal. [Permit No. 192-0140]
- iv. Sewage sludge shall cease being introduced into the incinerator if the percent oxygen (O<sub>2</sub>) is less than 2% for a 1-hour block average. Incineration may resume when the percent O<sub>2</sub> is ≥ 2% for a 30-minute block average. [Permit No. 192-0140]

##### b. Monitoring and Testing Requirements

- i. The Permittee shall collect and analyze a grab sample of the sludge fed to the incinerator once per day. Samples shall be collected upstream of the sludge dryer. The dry sludge content and the volatile solids content of the sample shall be determined in accordance with the method specified under 40 CFR §60.154(b)(5), except that the determination of volatile solids, step (3)(b) of the method, shall not be deleted. [Permit No. 192-0140, 40 CFR §60.154]
- ii. The Permittee utilize a flow measuring device which can be used to determine either the mass or volume of sludge charged to the incinerator. The flow device shall be certified by the manufacturer to have an accuracy of ±5 percent over the operating range. [Permit No. 192-0140]
- ii. The Permittee shall monitor FOG/Biofuel charging weight by truck weigh scale. [Permit No. 192-0140]
- iii. The Permittee shall monitor the feed rate and moisture content of the sewage sludge fed to the sewage sludge incinerator, as specified in 40 CFR §§62.15960(f)(1) and (2): [40 CFR §62.15960(f)]
  - (A) Continuously monitor the sewage sludge feed rate and calculate a daily average for all hours of operation during each 24-hour period; and [40 CFR §62.15960(f)(1)]
  - (B) Take at least one grab sample per day of the sewage sludge fed to the sewage sludge incinerator. If The Permittee takes more than one grab sample in a day, calculate the daily average for the grab samples. [40 CFR §62.15960(f)(2)]

##### c. Record Keeping Requirement

- i. The Permittee shall maintain daily records of the total solids and volatile solids content of the sludge charged to the incinerator. [Permit No. 192-0140]
- ii. The Permittee shall calculate the maximum sewage sludge charge rate on a monthly average basis by dividing the total dry tons charged to the incinerator in a calendar month by the number of hours sludge was charged to the incinerator in the same calendar month. Incinerator charge rate shall be determined from samples and weights taken upstream of the sludge dryer. These calculations shall be performed within 30 days of the end of each month and made available to the Bureau upon request. [Permit No. 192-0140]
- iii. The Permittee shall calculate the annual sludge and FOG/Biofuel charge rate on a 12 month rolling average basis obtained by adding the current month's sludge charge rate to that of the previous 11 months. These calculations shall be performed within 30 days of the end of each month and made available to the Bureau upon request. [Permit No. 192-0140]

### Section III: Applicable Requirements and Compliance Demonstration

**DRAFT**

- iv. The Permittee shall make and keep a record of:
  - (A) the daily average feed rate, as specified in 40 CFR §62.16025(f)(3)(ii).  
[40 CFR §62.15960(f)(1)]
  - (B) the daily average moisture content, as specified in 40 CFR §62.16025(f)(3)(ii).  
[40 CFR §62.15960(f)(2)]
- v. The Permittee shall document that the dry sludge burned during the performance test is representative of the sludge burned under normal operating conditions by:  
[40 CFR §62.16015(a)(2)]
  - (A) Maintaining a log of the quantity of sewage sludge burned during the performance test by continuously monitoring and recording the average hourly rate that sewage sludge is fed to the incinerator. [40 CFR §62.16015(a)(2)(i)]
  - (B) Maintaining a log of the moisture content of the sewage sludge burned during the performance test by taking grab samples of the sewage sludge fed to the incinerator for each eight-hour period that testing is conducted. [40 CFR §62.16015(a)(2)(ii)]
- vi. For continuous parameter monitoring systems-All daily average values recorded for the feed rate and moisture content of the sewage sludge fed to the sewage sludge incinerator, monitored and calculated as specified in 40 CFR §62.15960(f). [40 CFR §62.16025(f)(3)(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. Auxiliary Fuels**

#### *a. Limitation or Restriction*

- i. The auxiliary fuels allowed for this unit are No. 2 fuel oil or natural gas. [Permit No. 192-0140]
- ii. The Maximum Auxiliary Fuel Oil Sulfur Content (by weight, dry basis) shall not exceed 0.0015%. [RCSA §22a-174-19b]
- iii. The Maximum Auxiliary Fuel Usage over any consecutive 12 month period shall not exceed: [Permit No. 192-0140]
  - (A) 300,000 gal of No. 2 oil;
  - (B) 176 MMcf of natural gas;

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

The Permittee shall continuously measure each auxiliary fuel flow rate to the incinerator. Each auxiliary fuel flow measuring devices shall be certified by the manufacturer to have an accuracy of  $\pm 5$  percent over its operating range. [Permit No. 192-0140]

#### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of the monthly and consecutive 12 month auxiliary fuel consumption. The consecutive 12 month fuel consumption shall be determined by adding (for each fuel) the current month's fuel consumption to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of each month.  
[Permit No. 192-0140]
- ii. The Permittee shall keep records of the sulfur content of the fuel combusted and the quantity



### Section III: Applicable Requirements and Compliance Demonstration

DRAFT

purchased for combustion. A written certification or a written contract with a fuel supplier is sufficient to satisfy this requirement if the certification or contract identifies:  
[RCSA §22a-174-19b(g)(3)]

- (A) The name of the fuel seller;
- (B) The type of fuel purchased;
- (C) The sulfur content of the fuel purchased; and
- (D) The method used to determine the sulfur content of the fuel purchased.

#### *d. Reporting Requirements*

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

## 4. Operating Temperature

### *a. Limitation or Restriction*

- i. Minimum fluidized bed incinerator freeboard operating temperature shall be established as required in 40 CFR §62.15985(a) and (e) and monitored in accordance with the facility's Site-Specific Monitoring Plan as required in 40 CFR §62.15995. [Permit No. 192-0140]
- ii. Maximum fluidized bed incinerator freeboard operating temperature shall be established as the maximum 4-hour block average freeboard temperature measured during performance testing that demonstrates compliance with the NO<sub>x</sub> emissions limit in Part V. of this permit, in accordance with the facility's EPA approved 40 CFR Part 62, Subpart LLL Control Plan. [Permit No. 192-0140]

### *b. Monitoring and Testing Requirements*

- i. The Permittee shall continuously monitor fluidized bed incinerator freeboard operating temperature. The temperature measuring device shall be certified by the manufacturer to have an accuracy of ±5 percent over its operating range. [Permit No. 192-0140]
- ii. The minimum combustion chamber operating temperature (or minimum afterburner temperature), is equal to the lowest 4-hour average combustion chamber operating temperature (or afterburner temperature) measured during the most recent performance test demonstrating compliance with all applicable emission limits. [40 CFR §62.15985(e)]

### *c. Record Keeping Requirements*

- i. The Permittee shall keep records of fluidized bed incinerator freeboard operating temperature as a 1-hour block average [Permit No. 192-0140]
- ii. For continuous parameter monitoring systems-All 1-hour average values recorded for the following operating parameters, as applicable: Combustion chamber operating temperature (or afterburner temperature). [40 CFR §62.16025(f)(3)(i)(A)]

### *d. Reporting Requirements*

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

## 5. Minimum Percent Oxygen (O<sub>2</sub>)

### *a. Limitation or Restriction*

- i. Minimum Percent O<sub>2</sub>: 2% [Permit No. 192-0140]

### Section III: Applicable Requirements and Compliance Demonstration

DRAFT

- ii. Based on the percent O<sub>2</sub> and ppm CO readings, the source shall show calculated compliance with a minimum combustion efficiency of 99.5% (1-hour block average). [Permit No. 192-0140]

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

- i. The Permittee shall continuously measure the oxygen content of the incinerator exhaust gas. The oxygen monitoring device shall be certified by the manufacturer to have an accuracy of  $\pm 5$  percent over its operating range and shall be calibrated in accordance with the manufacturer's instructions at least once each 24-hour period. [Permit No. 192-0140]
- ii. Method 3A or 3B at 40 CFR Part 60, Appendix A-2, shall be used for gas composition analysis, including measurement of oxygen concentration. [40 CFR §62.16015(a)(5)]
  - (A) During each relative accuracy test run of the continuous emissions monitoring system using the performance specifications in 40 CFR §62.16015(b)(3)(ii), emission data for each regulated pollutant and oxygen (or carbon dioxide as established in 40 CFR §62.16015(b)(5)) shall be collected concurrently (or within a 30- to 60-minute period) by both the continuous emissions monitoring systems and the test methods specified in 40 CFR §§62.16015(b)(4)(i-viii). Relative accuracy testing shall be at representative operating conditions while the SSI unit is charging sewage sludge. For oxygen (or carbon dioxide as established in 40 CFR §62.16015(b)(5)), Method 3A or 3B at 40 CFR Part 60, Appendix A-2, or as an alternative ANSI/ASME PTC 19.10-1981, Flue and Exhaust Gas Analyses [Part 10, Instruments and Apparatus], as applicable, shall be used (see 40 CFR §62.16015(e)). [40 CFR §62.16015(b)(4)(viii)]

#### c. *Record Keeping Requirements*

The Permittee shall keep records of calibration, maintenance, original instrument recordings and block averages for all continuous monitoring instruments and equipment. [Permit No. 192-0140]

#### d. *Reporting Requirements*

- i. The Permittee shall submit to the Administrator semi-annually a report in writing which contains the following: [Permit No. 192-0140; 40 CFR §60.155(a)]
  - (A) A record of average oxygen content in the incinerator exhaust gas for each period of 1-hour duration or more that the oxygen content of the incinerator exhaust gas exceeds the average oxygen content measured during the most recent performance test by more than 3%. [Permit No. 192-0140; 40 CFR §60.155(a)(2)]

## 6. **Ash Handling System**

#### a. *Limitation or Restriction*

The Permittee shall meet the operating requirements in the site-specific fugitive emission monitoring plan, submitted as specified in 40 CFR §62.15995(d) to ensure that the ash handling system will meet the emission standard for fugitive emissions from ash handling. [40 CFR §62.15960(d)]

#### b. *Monitoring Requirements*

The Permittee shall submit a monitoring plan specifying the ash handling system operating procedures that will be followed to ensure that the fugitive emissions limit specified in 40 CFR Part 62 Subpart LLL Table 2 or 3 are met. [40 CFR §62.15995(d)]

#### c. *Record Keeping Requirements*

The Permittee shall maintain records sufficient to determine compliance with the limitation or restriction in Section III.B.6.a of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]

*d. Reporting Requirements*

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

**7. Venturi and Packed Tower System**

*a. Limitation or Restriction*

i. Water Flow Rate

(A) The Permittee shall meet a site-specific operating limit established per 40 CFR §62.15985(a-c). [Permit No. 192-0140; 40 CFR §62.15960(b)]

(B) The scrubber liquid flow rate (measured at the inlet to each wet scrubber), shall be no less than the lowest 4-hour average liquid flow rate measured during the most recent performance test demonstrating compliance with all applicable emission limits. [40 CFR §62.15985(c)]

ii. pH

(A) The Permittee shall meet a site-specific operating limit established per 40 CFR §62.15985(a-c). [40 CFR §62.15960(b)]

(B) The scrubber liquid pH for each wet scrubber used to meet the SO<sub>x</sub> or HCl emission limits in 40 CFR Part 62 Subpart LLL, Table 2, shall be no less than the lowest 1-hour average scrubber liquid pH measured during the most recent performance test demonstrating compliance with the SO<sub>x</sub> and HCl emission limits. [40 CFR §62.15985(d)]

iii. Pressure Drop

(A) The Permittee shall meet a site-specific operating limit established per 40 CFR §62.15985(a-c). [Permit No. 192-0140; 40 CFR §62.15960(b)]

(B) The pressure drop across each wet scrubber used to meet the PM, Pb and Cd emission limits in 40 CFR Part 62 Subpart LLL, Table 2, shall be no less than the lowest 4-hour average pressured drop across each such wet scrubber measured during the most recent performance test demonstrating compliance with the PM, Pb and Cd emission limits. [40 CFR §62.15985(b)]

*b. Monitoring and Testing Requirements*

i. Liquid/Water Flow Rate

(A) The Permittee shall utilize a monitoring device that continuously monitors a minimum of every 15 minutes and at a minimum saved as a 12-hour block average the scrubber water flow rate. This device shall be certified by the manufacturer to be accurate within ±5 percent over its operating range and shall be calibrated on an annual basis in accordance with the manufacturer's instructions. [Permit No. 192-0140]

(B) The Permittee shall install, calibrate and maintain the monitoring device in accordance with the facility's Site Specific Monitoring Plan as required in 40 CFR §62.15995. [Permit No. 192-0140, 40 CFR §62.15995(a)(3)(ii)(A)]

ii. pH

(A) The Permittee shall install a pH sensor in a position that provides a representative measurement of scrubber effluent pH. [40 CFR §62.15995(a)(3)(ii)(C)(1)]

(B) The Permittee shall ensure the sample is properly mixed and representative of the fluid to be measured. [40 CFR §62.15995(a)(3)(ii)(C)(2)]

### Section III: Applicable Requirements and Compliance Demonstration

**DRAFT**

- (C) The Permittee shall conduct a performance evaluation of the pH monitoring system in accordance with the monitoring plan at least once each process operating day. [40 CFR 62.15995(a)(3)(ii)(C)(3)]
- (D) The Permittee shall conduct a performance evaluation (including a two-point calibration with one of the two buffer solutions having a pH within 1 of the operating limit pH level) of the pH monitoring system in accordance with the monitoring plan at the time of each performance test but no less frequently than quarterly. [40 CFR §62.15995(a)(3)(ii)(C)(4)]
- (E) The Permittee shall install, calibrate and maintain the monitoring device in accordance with the facility's Site Specific Monitoring Plan as required in 40 CFR §62.15995. [40 CFR §62.15995]

#### iii. Pressure Drop

- (A) The Permittee shall utilize a monitoring device that continuously monitors a minimum of every 15 minutes and at a minimum saved as a 12-hour block average the wet scrubber gas flow pressure drop. This device shall be certified by the manufacturer to be accurate within  $\pm 1$  inch of water gauge and shall be calibrated on an annual basis in accordance with the manufacturer's instructions. [Permit No. 192-0140]
- (B) The Permittee shall install, calibrate and maintain the monitoring device in accordance with the facility's Site Specific Monitoring Plan as required in 40 CFR §62.15995. [Permit No. 192-0140, 40 CFR §62.15995(a)(3)(ii)(B)]

#### c. Record Keeping Requirements

- i. The Permittee shall keep calibration and maintenance records and original instrument chart recordings for all continuous monitoring instruments and equipment. [Permit No. 192-0140]
- ii. Liquid/Water Flow Rate
  - (A) For continuous parameter monitoring systems-All 1-hour average values recorded for the following operating parameters, as applicable: liquid flow rate to each wet scrubber used to comply with the emission limit in 40 CFR Part 62 Subpart LLL, Table 2 or for particulate matter, cadmium or lead. [Permit No. 192-0140, 40 CFR §62.16025(f)(3)(i)(B)]
- iv. pH
  - (A) For continuous parameter monitoring systems-All 1-hour average values recorded for the following operating parameters, as applicable: scrubber liquid pH for each wet scrubber used to comply with an emission limit in 40 CFR Part 62 Subpart LLL, Table 2 for sulfur dioxide or hydrogen chloride. [40 CFR 62.16025(f)(3)(i)(B)]
- v. Pressure Drop
  - (A) For continuous parameter monitoring systems-All 1-hour average values recorded for the following operating parameters, as applicable: Pressure drop across the wet scrubber system. [Permit No. 192-0140, 40 CFR §62.16025(f)(3)(i)(B)]

#### d. Reporting Requirements

- i. Pressure Drop
  - (A) The Permittee shall submit to the Administrator semi-annually a report in writing which contains the following: [Permit No. 192-0140; 40 CFR §60.155(a)]
    - (1) A record of average scrubber pressure drop measurements for each period of 15 minutes duration or more during which the pressure drop of the scrubber was less than, by a percentage specified in 40 CFR §§60.155(a)(1)(i) or (ii), the average scrubber pressure drop measured during the most recent performance test.

### Section III: Applicable Requirements and Compliance Demonstration

DRAFT

[Permit No. 192-0140; 40 CFR §60.155(a)(1)]

#### 8. Opacity

##### a. Limitation or Restriction

- i. Maximum allowable opacity: 10%, 6-minute average and 40% instantaneous.  
[Permit No. 192-0140]
- ii. The Permittee shall meet the following emission limit: Visible emissions of combustion ash from an ash conveying system (including conveyor transfer points) for no more than 5% of any compliance test hourly observation period. The Permittee shall determine compliance using a visible emission test (40 CFR Part 60, Appendix A-7, Method 22).  
[40 CFR §62.15955; 40 CFR Part 62 Subpart LLL, Table 2]

##### b. Monitoring and Testing Requirements

Record keeping specified in Section III.B.8.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33.  
[RCSA §22a-174-33(j)(1)(K)(ii)]

##### c. Record Keeping Requirements

The Permittee shall maintain records sufficient to determine compliance with the limitation or restriction in Section III.B.8.a of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]

##### d. Reporting Requirements

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

#### 9. PM, SO<sub>2</sub>, NO<sub>x</sub>, VOC

##### a. Limitations or Restrictions

[Permit No. 192-0140, unless otherwise noted]

##### i. PM

- (A)  $\leq 1.09$  lb/hr
- (B)  $\leq 0.015$  gr/dscf @ 7% O<sub>2</sub>
- (C)  $\leq 18$  mg/dscm [40 CFR Part 62 Subpart LLL Table 2]
- (D)  $\leq 4.77$  tpy

##### ii. SO<sub>2</sub>

- (A)  $\leq 7.7$  lb/hr
- (B)  $\leq 75$  ppmvd @ 7% O<sub>2</sub>
- (C)  $\leq 15$  ppmvd @ 7% O<sub>2</sub> [40 CFR Part 62 Subpart LLL Table 2]
- (D)  $\leq 33.73$  tpy

##### iii. NO<sub>x</sub>

- (A)  $\leq 8.33$  lb/hr
- (B)  $\leq 159.69$  ppmvd @ 7% O<sub>2</sub>
- (C)  $\leq 150$  ppmvd @ 7% O<sub>2</sub> [40 CFR Part 62 Subpart LLL Table 2]

### Section III: Applicable Requirements and Compliance Demonstration

DRAFT

(D)  $\leq$  36.5 tpy

iv. VOC

(A)  $\leq$  2.11 lb/hr

(B)  $\leq$  100.00 ppmvd @ 7% O<sub>2</sub> as THC [Permit No 192-0140, CGS §22a-191a(b)]

(C)  $\leq$  9.24 tpy

- v. The Permittee shall cease operation of the incinerator if its PM emissions exceed the equivalent of 0.015 gr/dscf, corrected to 7% O<sub>2</sub>. It will be permitted to restart only after the Department of Energy and Environmental Protection (DEEP), Bureau of Air Management (BAM) has been convinced that the corrected action has been taken. Upon restarting operation under this circumstance, compliance with the PM emissions limits must be demonstrated to the DEEP BAM's satisfaction. [Permit No. 192-0140]

b. *Monitoring and Testing Requirements*

- i. The Permittee shall submit an Intent-to-Test (ITT) proposal consistent with the Emissions Test Guidelines, which specifies the test methodology to be followed and the conditions under which the process and its control equipment will be operated. The process shall be operated at a minimum of 85% of the maximum rated capacity; the Wet Electrostatic Precipitator, Venturi Scrubber and Packed Tower System shall be operated as designed.

All proposed test methods shall comply with appropriate Federal test methods or methods acceptable to the DEEP BAM. The ITT must demonstrate compliance with applicable requirements of the CFR Parts 51, 60, and 61. Any proposed test methods that deviate from those specified in these regulations must be approved by the DEEP BAM prior to stack testing.

An inspection of the source may be required to verify that appropriate instrumentation is available and to determine which source process parameters are indicative of compliant operation and are to be monitored during stack testing. Following source inspection, the DEEP BAM will send an approval letter to the owner/operator listing those parameters which must be monitored and recorded during the stack test. All sampling ports shall be installed and located in compliance with 40 CFR Part 60 Appendix A, Method 1. Final plans showing the location of all sampling ports shall be submitted with the ITT to the DEEP BAM Stack Test Group for approval prior to stack testing.

It is the Permittee's responsibility to conduct preparatory testing for tuning or debugging purposes prior to stack testing. [Permit No. 192-0140]

- ii. Recurrent stack testing for PM, SO<sub>2</sub>, NO<sub>x</sub>, and VOC shall be conducted within five years from the date of the previous stack test. [Permit No. 192-0140]
- iii. Annual stack testing shall be required for total hydrocarbons. [CGS §22a-191a(b)]
- iv. Demonstration of compliance with the PM, SO<sub>2</sub>, NO<sub>x</sub>, and VOC emission limits may be met by calculating the emission rates using emission factors from the following sources: Stack testing. [Permit No. 192-00140]

c. *Record Keeping Requirements*

- i. The Permittee shall maintain records sufficient to determine compliance with the limitation or restriction in Section III.B.9.a of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]
- ii. The Permittee shall keep records of any incinerator performance test results. [Permit No. 192-0140]



### Section III: Applicable Requirements and Compliance Demonstration

# DRAFT

#### 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)]

### 10. CO

#### a. Limitation or Restriction [Permit No. 192-0140, unless otherwise noted]

- i.  $\leq 3.29$  lb/hr
- ii.  $\leq 100.00$  ppmvd @ 7% O<sub>2</sub>
- iii.  $\leq 64$  ppmvd @ 7% O<sub>2</sub> [40 CFR Part 62 Subpart LLL Table 2]
- iii.  $\leq 14.41$  tpy

#### b. Monitoring and Testing Requirements

- i. The Permittee shall install, calibrate, maintain and operate a CO monitor. [Permit No. 192-0140; RCSA §22a-174-4a; 40 CFR §62.16015(b)(3)]
- ii. Demonstration of compliance with the CO emission limits may be met by calculating the emission rates using emission factors from the following sources: Stack testing or as measured by the CEM system (ppmvd @ 7% O<sub>2</sub>). [Permit No. 192-0140]
- iii. For determining compliance with the CO concentration limit using CO CEMS, the correction to 7% O<sub>2</sub> does not apply during periods of startup or shutdown. Use the measured CO concentration without correcting for O<sub>2</sub> concentration in averaging with other CO concentrations (corrected to 7% O<sub>2</sub>) to determine the 24-hour average value. [40 CFR §62.15970; 40 CFR §62.16000(b)(1)(i)]
- iv. The Permittee shall install, operate, calibrate, and maintain an instrument for continuously measuring and recording the emissions to the atmosphere in accordance with the following: [40 CFR §62.16015(b)(3)]
  - (A) 40 CFR §60.13 Subpart A. [40 CFR §62.16015(b)(3)(i)]
  - (B) The following performance specifications of Appendix B of 40 CFR Part 60, as applicable: For CO, Performance Specification 4B of Appendix B of 40 CFR Part 60 with spans appropriate to the applicable emission limit. [40 CFR §62.16015(b)(3)(ii)(C)]
  - (C) For continuous emissions monitoring systems, the quality assurance procedures (*e.g.*, quarterly accuracy determinations and daily calibration drift tests) of Appendix F of 40 CFR Part 60 specified in 40 CFR §§62.16015(b)(3)(iii)(A-G). For each pollutant, the span value of the continuous emissions monitoring system is two times the applicable emission limit, expressed as a concentration. For carbon monoxide, Procedure 1 in Appendix F of 40 CFR Part 60. [40 CFR §62.16015(b)(3)(iii)(C)]
  - (D) During each relative accuracy test run of the continuous emissions monitoring system using the performance specifications in 40 CFR §62.16015(b)(3)(ii), emission data for each regulated pollutant and oxygen (or carbon dioxide as established in 40 CFR §62.16015(b)(5)) shall be collected concurrently (or within a 30- to 60-minute period) by both the continuous emissions monitoring systems and the test methods specified in 40 CFR §§62.16015(b)(4)(i-viii). Relative accuracy testing shall be at representative operating conditions while the SSI unit is charging sewage sludge. For carbon monoxide, Method 10, 10A, or 10B at 40 CFR 40 CFR Part 60, Appendix A-4, shall be used. [40 CFR §62.16015(b)(4)(iii)]
- v. The Permittee shall submit an Intent-to-Test (ITT) proposal consistent with the Emissions Test Guidelines, which specifies the test methodology to be followed and the conditions under which the

### Section III: Applicable Requirements and Compliance Demonstration

**DRAFT**

process and its control equipment will be operated. The process shall be operated at a minimum of 85% of the maximum rated capacity; the Wet Electrostatic Precipitator, Venturi Scrubber and Packed Tower System shall be operated as designed.

All proposed test methods shall comply with appropriate Federal test methods or methods acceptable to the DEEP BAM. The ITT must demonstrate compliance with applicable requirements of the CFR Parts 51, 60, and 61. Any proposed test methods that deviate from those specified in these regulations must be approved by the DEEP BAM prior to stack testing.

An inspection of the source may be required to verify that appropriate instrumentation is available and to determine which source process parameters are indicative of compliant operation and are to be monitored during stack testing. Following source inspection, the DEEP BAM will send an approval letter to the owner/operator listing those parameters which must be monitored and recorded during the stack test. All sampling ports shall be installed and located in compliance with 40 CFR Part 60 Appendix A, Method 1. Final plans showing the location of all sampling ports shall be submitted with the ITT to the DEEP BAM Stack Test Group for approval prior to stack testing.

It is the Permittee's responsibility to conduct preparatory testing for tuning or debugging purposes prior to stack testing. [Permit No. 192-0140]

- vi. Recurrent stack testing for CO shall be conducted within five years from the date of the previous stack test. [Permit No. 192-0140]

#### c. *Record Keeping Requirements*

- i. The Permittee shall maintain records sufficient to determine compliance with the limitation or restriction in Section III.B.10.a of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]
- ii. The Permittee shall keep calibration and maintenance records and original instrument chart recordings for all continuous monitoring instruments and equipment. [Permit No. 192-0140]
- iii. For continuous emissions monitoring systems, all 1-hour average concentrations of carbon monoxide. [40 CFR §62.16025(f)(1)]
- iv. *Other records for continuous monitoring systems*-The Permittee shall keep the following records, as applicable: Keep records of any requests under 40 CFR §62.16015(b)(5) that compliance with the emission limits be determined using carbon dioxide measurements corrected to an equivalent of 7% O<sub>2</sub>. [40 CFR §62.16025(g)(2)]

#### d. *Reporting Requirements*

- i. The Permittee shall submit to the Commissioner, on forms prescribed by the Commissioner, a quarterly report summarizing the excess emissions and the CEMS performance. Such report shall be submitted to the Commissioner not later than 30 days after the end of each calendar quarter in which data was collected. Each quarterly report shall include, at a minimum, the following information: [Permit No. 192-0140; RCSA §22a-174-4a(i)(A-D)]

(A) A list of all periods of excess emissions that includes:

- (1) Date and time of commencement and completion of each period of excess emissions,
- (2) The measured value of excess emissions,
- (3) The cause or likely cause of the excess emissions, and
- (4) Corrective actions and future preventative measures;

(B) A completed excess emissions summary form prescribed by the Commissioner;



### Section III: Applicable Requirements and Compliance Demonstration

**DRAFT**

- (C) A completed CEMS performance form prescribed by the commission, which includes calculation of data availability for each pollutant and diluent, as specified in RCSA §22a-174-4a(g); and
- (D) A list of all periods of malfunctions of the CEMS that includes:
  - (1) Date and time of commencement and completion of each malfunction period,
  - (2) Cause or likely cause of malfunction, and
  - (3) Corrective actions and future preventative measures.

#### 11. HAP

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

- i. This equipment shall not cause an exceedance of the Maximum Allowable Stack Concentration (MASC) for any hazardous air pollutant (HAP) emitted and listed in RCSA §22a-174-29. [Permit No. 192-0140] [STATE ONLY REQUIREMENT]
- ii. The Permittee shall not exceed the following limits: [Permit No. 192-0140, unless otherwise noted]
  - (A) Lead (Pb):
    - (1)  $\leq 1.04\text{e-}2$  lb/hr
    - (2)  $\leq 0.0074$  mg/dscm, [40 CFR Part 62 Subpart LLL Table 2]
  - (B) Hydrogen Chloride (HCl):
    - (1)  $\leq 0.62$  lb/hr or 90% scrubber removal efficiency whichever is less stringent at maximum rated capacity when operating on sewage sludge.
    - (2)  $\leq 0.51$  ppmvd [40 CFR Part 62 Subpart LLL Table 2]
  - (C) Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>):  $\leq 2.78$  lb/hr at maximum rated capacity when operating on sewage sludge. If a State or Federal Ambient Air Quality Standard (AAQS) is developed for sulfuric acid, the owner/operator of this facility shall demonstrate compliance through ambient air quality modeling.

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

- i. The Permittee shall submit an Intent-to-Test (ITT) proposal consistent with the Emissions Test Guidelines, which specifies the test methodology to be followed and the conditions under which the process and its control equipment will be operated. The process shall be operated at a minimum of 85% of the maximum rated capacity; the Wet Electrostatic Precipitator, Venturi Scrubber and Packed Tower System shall be operated as designed.

All proposed test methods shall comply with appropriate Federal test methods or methods acceptable to the DEEP BAM. The ITT must demonstrate compliance with applicable requirements of the CFR Parts 51, 60, and 61. Any proposed test methods that deviate from those specified in these regulations must be approved by the DEEP BAM prior to stack testing.

An inspection of the source may be required to verify that appropriate instrumentation is available and to determine which source process parameters are indicative of compliant operation and are to be monitored during stack testing. Following source inspection, the DEEP BAM will send an approval letter to the owner/operator listing those parameters which must be monitored and recorded during the stack test. All sampling ports shall be installed and located in compliance with 40 CFR Part 60 Appendix A, Method 1. Final plans showing the location of all sampling ports shall be submitted with the ITT to the DEEP BAM Stack Test Group for approval prior to stack testing.

### Section III: Applicable Requirements and Compliance Demonstration

**DRAFT**

It is the Permittee's responsibility to conduct preparatory testing for tuning or debugging purposes prior to stack testing. [Permit No. 192-0140] [Permit No. 192-0140]

- ii. Recurrent stack testing shall be conducted within five years from the date of the previous stack test for the following HAPs. [Permit No. 192-0140]
    - (A) Acrylonitrile, Benzene, Carbon Tetrachloride, Chlorobenzene, Chloroform, Di(2-Ethyl Hexyl) Phthalate, 1,2, Dichlorobenzene, Dioxin equivalent (TCDD equivalent using 40 CFR 60 Subpart MMMM, Table 5 factors), Ethyl Benzene, HCl, H<sub>2</sub>SO<sub>4</sub>, Methylene Chloride, Perchloroethylene, Phenol, Polychlorinated Biphenyls, 2,3,7,8, TCDF, Toluene, 1,1,1 Trichloroethane, Trichloroethylene
  - iv. The Permittee shall stack test annually for metals (As, Cd, Cr, Cu, Pb, Mn, Ni, Se, Zn and hydrocarbons) in the incinerator exhaust gas. [Permit No. 192-0140; CGS §22a-191a(b)]
  - iv. To demonstrate compliance with the dioxins/furans toxic equivalency emission limit in 40 CFR §§62.16000 (a) or (b), the Permittee shall determine dioxins/furans toxic equivalency as follows: [40 CFR §62.16000(c)]
    - (A) Measure the concentration of each dioxin/furan tetra- through octachlorinated-isomer emitted using Method 23 at 40 CFR Part 60, Appendix A-7. [40 CFR §62.16000(c)(1)]
    - (B) For each dioxin/furan (tetra- through octachlorinated) isomer measured in accordance with 40 CFR §62.16000(c)(1), multiply the isomer concentration by its corresponding toxic equivalency factor specified in 40 CFR Part 62 Subpart LLL, Table 5. [40 CFR §62.16000(c)(2)]
    - (C) Sum the products calculated in accordance with 40 CFR §62.16000(c)(2) to obtain the total concentration of dioxins/furans emitted in terms of toxic equivalency. [40 CFR §62.16000(c)(3)]
  - v. The option to use a continuous emissions monitoring system for hydrogen chloride, dioxins/furans, cadmium, or lead takes effect on the date a final performance specification applicable to hydrogen chloride, dioxins/furans, cadmium or lead is published in the Federal Register. The option to use a continuous automated sampling system for dioxins/furans takes effect on the date a final performance specification for such a continuous automated sampling system is published in the Federal Register. [40 CFR §62.16015(b)]
- c. Record Keeping Requirements*
- The Permittee shall keep records of any incinerator performance test results. [Permit No. 192-0140]
- 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)]

#### 12. Beryllium (Be)

*a. Limitation or Restriction*

The Permittee shall not exceed the beryllium limit of 0.022 lb/24-hr period. [Permit No. 192-0140; 40 CFR §61.32(a)]

*b. Monitoring and Testing Requirements*

- i. The Permittee shall submit an Intent-to-Test (ITT) proposal consistent with the Emissions Test Guidelines, which specifies the test methodology to be followed and the conditions under which the process and its control equipment will be operated. The process shall be operated at a minimum of

### Section III: Applicable Requirements and Compliance Demonstration

**DRAFT**

85% of the maximum rated capacity; the Wet Electrostatic Precipitator, Venturi Scrubber and Packed Tower System shall be operated as designed.

All proposed test methods shall comply with appropriate Federal test methods or methods acceptable to the DEEP BAM. The ITT must demonstrate compliance with applicable requirements of the CFR Parts 51, 60, and 61. Any proposed test methods that deviate from those specified in these regulations must be approved by the DEEP BAM prior to stack testing.

An inspection of the source may be required to verify that appropriate instrumentation is available and to determine which source process parameters are indicative of compliant operation and are to be monitored during stack testing. Following source inspection, the DEEP BAM will send an approval letter to the owner/operator listing those parameters which must be monitored and recorded during the stack test. All sampling ports shall be installed and located in compliance with 40 CFR Part 60 Appendix A, Method 1. Final plans showing the location of all sampling ports shall be submitted with the ITT to the DEEP BAM Stack Test Group for approval prior to stack testing.

It is the Permittee's responsibility to conduct preparatory testing for tuning or debugging purposes prior to stack testing. [Permit No. 192-0140] [Permit No. 192-0140]

- ii. Annual stack testing is required to determine compliance with the beryllium (Be) emission limit. [Permit No. 192-0140; 40 CFR §61.33(a)]
- iii. Demonstration of compliance with the Be emission limit may be met by calculating the emission rates using emission factors from the following sources: Most recent stack test. [Permit No. 192-0140]

*c. Record Keeping Requirements*

The Permittee shall keep records of any incinerator performance test results. [Permit No. 192-0140]

*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)]

### 13. Mercury (Hg)

*a. Limitation or Restriction*

- i. The Permittee shall not exceed the following mercury limits:

(A)  $\leq 7.1$  lb/24-hr period [Permit No. 192-0140; 40 CFR §61.52(b)]

(B)  $\leq 3.7E-02$  mg/dscm@ 7 % O<sub>2</sub> [40 CFR Part 62 Subpart LLL, Table 2]

- ii. For the Mercury Adsorber (normal steady state or quasi-steady state operating conditions) the following apply:

[40 CFR §62.15965(b)(2); most recent EPA Approved Site Specific Monitoring Plan]

(A) The pressure drop across the ultra high efficiency filter (UHF) shall be  $\leq 20$  inches water, (12-hour block average).

(B) The pressure drop across the carbon absorber shall be  $\leq 15$  inches water, (12-hour block average).

*b. Monitoring and Testing Requirements*

- i. The Permittee shall submit an Intent-to-Test (ITT) proposal consistent with the Emissions Test Guidelines, which specifies the test methodology to be followed and the conditions under which the process and its control equipment will be operated. The process shall be operated at a minimum of

### Section III: Applicable Requirements and Compliance Demonstration

**DRAFT**

85% of the maximum rated capacity; the Wet Electrostatic Precipitator, Venturi Scrubber and Packed Tower System shall be operated as designed.

All proposed test methods shall comply with appropriate Federal test methods or methods acceptable to the DEEP BAM. The ITT must demonstrate compliance with applicable requirements of the CFR Parts 51, 60, and 61. Any proposed test methods that deviate from those specified in these regulations must be approved by the DEEP BAM prior to stack testing.

An inspection of the source may be required to verify that appropriate instrumentation is available and to determine which source process parameters are indicative of compliant operation and are to be monitored during stack testing. Following source inspection, the DEEP BAM will send an approval letter to the owner/operator listing those parameters which must be monitored and recorded during the stack test. All sampling ports shall be installed and located in compliance with 40 CFR Part 60 Appendix A, Method 1. Final plans showing the location of all sampling ports shall be submitted with the ITT to the DEEP BAM Stack Test Group for approval prior to stack testing.

It is the Permittee's responsibility to conduct preparatory testing for tuning or debugging purposes prior to stack testing. [Permit No. 192-0140] [Permit No. 192-0140]

- ii. The Permittee shall stack test annually for mercury in the incinerator exhaust gas. [Permit No. 192-0140; CGS §22a-191a(b)]
  - iii. Demonstration of compliance with the Hg emission limits may be met by calculating the emission rates using emission factors from the following sources: Most recent stack test. [Permit No. 192-0140]
  - iv. For the Mercury Adsorber the following apply:  
[40 CFR §62.15965(b)(2); most recent EPA Approved Site Specific Monitoring Plan]
    - (A) The Permittee shall monitor continuously the pressure drop across the module, using a differential pressure sensor/transmitter in accordance with the most recent EPA approved Site Specific Monitoring Plan.
    - (B) The Permittee shall monitor, on a quarterly basis, mercury concentrations in the flue gas at the inlet and outlet to the module using a portable mercury analyzer in accordance with the most recent EPA approved Site Specific Monitoring Plan.
- c. *Record Keeping Requirements*
- i. The Permittee shall keep records of any incinerator performance test results. [Permit No. 192-0140]
  - ii. For the Mercury Adsorber the following apply:  
[40 CFR §62.15965(b)(2); most recent EPA Approved Site Specific Monitoring Plan]
    - (A) The Permittee shall record continuously the pressure drop across the module, using a differential pressure sensor/transmitter as described in Table 8 of the most recent EPA approved Site Specific Monitoring Plan.
    - (B) The Permittee shall record, on a quarterly basis, mercury concentrations in the flue gas at the inlet and outlet to the module using a portable mercury analyzer in accordance with the most recent EPA approved Site Specific Monitoring Plan.

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)]

**14. Wet Electrostatic Precipitator (WESP)***a. Limitation or Restriction*

- i.  $\leq 30^{\circ}\text{F}$  temperature increase between WESP outlet temperature and the Mercury Absorber outlet temperature, 12 hour block average. [40 CFR §62.15985; most recent EPA Approved Site Specific Monitoring Plan]
- ii. The Permittee shall meet the minimum WESP power input value established as required in 40 CFR §62.15985(a) and (f) and monitored in accordance with the facility's Site-Specific Monitoring Plan as required in 40 CFR §62.15995. [Permit No. 192-0140]
- iii. The Permittee shall meet the minimum inlet water flow rate established as required in 40 CFR §62.15985 and monitored in accordance with the facility's Site Specific Monitoring Plan. The minimum inlet water flow rate is based on the lowest 4 hour block average measured during the most recent performance test demonstrating compliance with the PM, lead and cadmium emission limits. [40 CFR §62.15985(g)]

*b. Monitoring and Testing Requirements*

- i. The Permittee shall continuously monitor a minimum of every 15 minutes and at a minimum saved as a 12-hour block average the secondary voltage and current (amperage) of the wet electrostatic precipitator collection plates. Each device shall be certified by the manufacturer to have an accuracy of  $\pm 5$  percent over its operating range. [Permit No. 192-0140, most recent EPA Approved Site Specific Monitoring Plan]
- ii. The Permittee shall monitor WESP inlet water flow rate on an hourly basis. The device shall be certified by the manufacturer to have an accuracy of  $\pm 5$  percent over its operating range. [40 CFR §62.15995(e), most recent EPA Approved Site Specific Monitoring Plan]

*c. Record Keeping Requirements*

- i. The Permittee shall record all 1-hour block averages of the secondary voltage of the electrostatic precipitator collection plates and secondary amperage of the electrostatic precipitator collection plates r. [Permit No. 192-140, 40 CFR §62.16025(f)(3)(i)(C)]
- ii. The Permittee shall record WESP inlet water flow rate on an hourly basis and at a minimum saved as a 12-hour block average. [40 CFR Part 62 Subpart LLL, Table 4.]

*d. Reporting Requirements*

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

**15. Operation and Maintenance (O & M)***a. Limitation or Restriction*

- i. The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations or pursuant to site-specific O&M schedule. [Permit No. 192-0140]
- ii. The Permittee shall perform inspections of the control devices as recommended by the manufacturer or site specific inspection schedule. [Permit No. 192-0140]
- iii. The Permittee shall properly operate the control equipment at all times that this equipment is in operation and emitting air pollutants. [Permit No. 192-0140]
- iv. *Air pollution control device inspections*-The Permittee shall conduct air pollution control device

### Section III: Applicable Requirements and Compliance Demonstration

**DRAFT**

inspections that include, at a minimum, the following: [40 CFR §§62.16015(c) 1-3]

- (A) Inspect air pollution control device(s) for proper operation;
  - (B) Generally observe that the equipment is maintained in good operating condition; and
  - (C) Develop a site-specific monitoring plan according to the requirements in 40 CFR §62.15995.  
This requirement also applies to the Permittee if the Permittee petitions the EPA Administrator for alternative monitoring parameters under 40 CFR §60.13(i).
- v. Ash from the incineration of sewage sludge shall be disposed of in accordance with the requirements of 40 CFR Parts 257, 258, and 261 through 268, as appropriate. [Permit No. 192-0140]
  - vi. The facility will only be allowed to operate during shutdown of air pollution control equipment for a period of not to exceed the burnout of the unit's charge at the time of the shutdown. No sewage sludge may be injected into the unit following the shutdown until after the air pollution controls have been brought back online. [Permit No. 192-0140]
  - vii. The Permittee must comply with all applicable local regulations. [Permit No. 192-0140]
  - viii. Malfunction means any sudden, infrequent and not reasonably preventable failure of air pollution control equipment or process equipment to operate in a normal manner. Failures that are caused in part by poor maintenance or operation are not malfunctions. The facility shall only be allowed to operate during the malfunction of air pollution control equipment for a period not to exceed the burnout of the unit's charge at the time of the malfunction. [Permit No. 192-0140]
    - (A) An exception is made for the malfunction of the wet electrostatic precipitator (WESP). The WESP has two separate fields that may operate independently if one malfunctions. One field is capable of handling twice its normal operating load and still comply with the permitted emission rates.
    - (B) If one of the WESP fields malfunctions, the source may continue operating. If the period of operating under the malfunction of the WESP exceeds 24 hours, the source shall notify the BAM of the nature of the malfunction and the proposed course of action for repair. In no event shall the source be operated for more than ten continuous days under a malfunction of the WESP.

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

- i. The Permittee shall conduct an air pollution control device inspection according to 40 CFR §62.16015(c) by the final compliance date as specified in 40 CFR §62.15875. For air pollution control devices installed after the final compliance date, the Permittee shall conduct the air pollution control device inspection within 60 days after installation of the control device. [40 CFR §62.15990(a)]
- ii. Within ten operating days following the air pollution control device inspection under 40 CFR §62.15990(a), all necessary repairs shall be completed unless the Permittee obtains written approval from the Administrator establishing a date whereby all necessary repairs of the SSI unit shall be completed. [40 CFR §62.15990(b); 40 CFR §62.16010(b)]
- iii. The Permittee shall conduct an annual inspection of each air pollution control device used to comply with the emission limits, according to 40 CFR §62.16015(c), no later than 12 months following the previous annual air pollution control device inspection. [40 CFR §62.16010(a)]

#### *c. Record Keeping Requirements*

- i. The Permittee shall maintain the items (as applicable) specified in 40 CFR §§62.16025(a-n) for a period of at least five years. All records shall be available on site in either paper copy or computer-readable format that can be printed upon request, unless an alternative format is approved by the



### Section III: Applicable Requirements and Compliance Demonstration

**DRAFT**

Administrator: [40 CFR §62.16025]

- (A) *Air pollution Control Device Inspections*-Records of the results of initial and annual air pollution control device inspections conducted as specified in 40 CFR §§62.15990 and 62.16015(c), including any required maintenance and any repairs not completed within 10 days of an inspection or the timeframe established by the Administrator. [40 CFR §62.16025(d)]
- (B) *Equipment specifications and operation and maintenance requirements*-Equipment specifications and related operation and maintenance requirements received from vendors for the incinerator, emission controls and monitoring equipment. [40 CFR §62.16025(i)]
- (C) *Inspections, calibrations and validation checks of monitoring devices*-Records of inspections, calibration and validation checks of any monitoring devices as required under 40 CFR §§62.16015 and 62.16020. [40 CFR §62.16025(j)]

#### 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)]

### 16. Operator Training

#### a. Limitation or Restriction

- i. The Permittee shall only allow personnel who have been trained in the proper operation of the incinerator to operate the incinerator. [Permit No. 192-0140]
- ii. An SSI unit cannot be operated unless a fully trained and qualified SSI unit operator is accessible, either at the facility or can be at the facility within one hour. The trained and qualified SSI unit operator may operate the SSI unit directly or be the direct supervisor of one or more other plant personnel who operate the unit. If all qualified SSI unit operators are temporarily not accessible, the Permittee shall follow the procedures in 40 CFR §62.15945. [40 CFR §62.15920(a)]
- iii. Operator training and qualification shall be obtained through a state approved program or by completing the requirements included in 40 CFR §62.15920(c). [40 CFR §62.15920(b); 40 CFR §62.15930(a)]
- iv. Training shall be obtained by completing an incinerator operator training course that includes, at a minimum, the three elements described in 40 CFR §§62.15920(c)(1) through (3): [40 CFR §62.15920(c)]

(A) Training on the ten subjects listed in 40 CFR §§62.15920(c)(1)(i) through (x): [40 CFR §62.15920(c)(1)]

- (1) Environmental concerns, including types of emissions;
- (2) Basic combustion principles, including products of combustion;
- (3) Operation of the specific type of incinerator to be used by the operator, including proper startup, sewage sludge feeding and shutdown procedures;
- (4) Combustion controls and monitoring;
- (5) Operation of air pollution control equipment and factors affecting performance (if applicable);
- (6) Inspection and maintenance of the incinerator and air pollution control devices;
- (7) Actions to prevent malfunctions or to prevent conditions that may lead to malfunctions;

### Section III: Applicable Requirements and Compliance Demonstration

**DRAFT**

- (8) Bottom and fly ash characteristics and handling procedures;
  - (9) Applicable federal, state and local regulations, including Occupational Safety and Health Administration workplace standards; and
  - (10) Pollution prevention.
- (B) An examination designed and administered by the state-approved program or instructor administering the subjects in 40 CFR §62.15920(c)(1). [40 CFR §62.15920(c)(2)]
  - (C) Written material covering the training course topics that may serve as reference material following completion of the course. [40 CFR §62.15920(c)(3)]
- v. The operator training course shall be completed by the later of the three dates specified in 40 CFR §§62.15925(a-c): [40 CFR §62.15925]
    - (A) The final compliance date;
    - (B) Six months after the SSI unit startup; and
    - (C) Six months after an employee assumes responsibility for operating the SSI unit or assumes responsibility for supervising the operation of the SSI unit.
  - vi. Qualification is valid from the date on which the training course is completed and the operator successfully passes the examination required under 40 CFR §62.15920(c)(2). [40 CFR §62.15930(b)]
  - vii. To maintain qualification, the operator shall complete an annual review or refresher course covering, at a minimum, the five topics described in 40 CFR §§62.15935(a-e): [40 CFR §62.15935]
    - (A) Update of regulations;
    - (B) Incinerator operation, including startup and shutdown procedures, sewage sludge feeding and ash handling;
    - (C) Inspection and maintenance;
    - (D) Prevention of malfunctions or conditions that may lead to malfunction; and
    - (E) Discussion of operating problems encountered by attendees.
  - viii. The operator shall renew a lapsed operator qualification before they begin operation of an SSI unit by one of the two methods specified in 40 CFR §§62.15940(a) and (b): [40 CFR §62.15940]
    - (A) For a lapse of less than three years, the operator shall complete a standard annual refresher course described in 40 CFR §62.15935; and
    - (B) For a lapse of three years or more, the operator shall repeat the initial qualification requirements in 40 CFR §62.15920.
  - ix. If a qualified operator is not at the facility and cannot be at the facility within one hour, the Permittee shall meet the criteria specified in either 40 CFR §§62.15945(a) or (b), depending on the length of time that a qualified operator is not accessible. [40 CFR §62.15945]
  - x. When a qualified operator is not accessible for more than eight hours, the SSI unit may be operated for less than two weeks by other plant personnel who are familiar with the operation of the SSI unit and who have completed a review of the information specified in 40 CFR §62.15950 within the past 12 months. [40 CFR §62.15945(a)]

#### *b. Monitoring Requirements*

Record keeping specified in Section III.B.16.c of this Title V permit shall be sufficient to meet other



### Section III: Applicable Requirements and Compliance Demonstration

**DRAFT**

Monitoring Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

#### c. Record Keeping Requirements

- i. The Permittee shall record the period when a qualified operator was not accessible and include this deviation in the annual report as specified under 40 CFR §62.16030(c). [40 CFR §62.15945(a)]
- ii. The Permittee shall maintain at the facility the documentation of the operator training procedures specified under 40 CFR §62.15920(c)(1) and make the documentation readily accessible to all SSI unit operators. [40 CFR §62.15950(a)]
- iii. The Permittee shall establish a program for reviewing the information listed in 40 CFR §62.15920(c)(1) with each qualified incinerator operator and other plant personnel who may operate the unit according to the provisions of 40 CFR §62.15945(a), according to the following schedule: [40 CFR §§62.15950(b)(1) and (2)]
  - (A) The initial review of the information listed in 40 CFR §62.15920(c)(1) shall be conducted prior to an employee's assumption of responsibilities for operation of the SSI unit; and
  - (B) Subsequent annual reviews of the information listed in 40 CFR §62.15920(c)(1) shall be conducted no later than 12 months following the previous review.
- iv. The Permittee shall maintain the items (as applicable) specified in 40 CFR §§62.16025(a-n) for a period of at least five years. All records shall be available on site in either paper copy or computer-readable format that can be printed upon request, unless an alternative format is approved by the Administrator: [40 CFR §62.16025]
  - (A) *Operator training*-Documentation of the operator training procedures and records specified in 40 CFR §§62.16025(c)(1-4). The Permittee shall make available and readily accessible at the facility at all times for all SSI unit operators the documentation specified in 40 CFR §62.16025(c)(1). Documentation of the following operator training procedures and information: [40 CFR §62.16025(c)(1)(i-x)]
    - (1) Summary of the applicable standards under 40 CFR Part 62 Subpart LLL.
    - (2) Procedures for receiving, handling and feeding sewage sludge.
    - (3) Incinerator startup, shutdown, and malfunction preventative and corrective procedures.
    - (4) Procedures for maintaining proper combustion air supply levels.
    - (5) Procedures for operating the incinerator and associated air pollution control systems within the standards established under 40 CFR Part 62 Subpart LLL.
    - (6) Monitoring procedures for demonstrating compliance with the incinerator operating limits.
    - (7) Reporting and recordkeeping procedures.
    - (8) Procedures for handling ash.
    - (9) A list of the materials burned during the performance test, if in addition to sewage sludge.
    - (10) For each qualified operator and other plant personnel who may operate the unit according to the provisions of 40 CFR §62.15945(a), the phone and/or pager number at which they can be reached during operating hours.
  - (B) Records showing the names of SSI unit operators and other plant personnel who may operate the unit according to the provisions of 40 CFR §62.15945(a), as follows: [40 CFR §62.16025(c)(2)(i) and (ii)]
    - (1) Records showing the names of SSI unit operators and other plant personnel who have

### Section III: Applicable Requirements and Compliance Demonstration

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completed review of the information in 40 CFR §62.16025(c)(1) as required by 40 CFR §62.15950(b), including the date of the initial review and all subsequent annual reviews.

(2) Records showing the names of the SSI unit operators who have completed the operator training requirements under 40 CFR §62.15920, met the criteria for qualification under 40 CFR §62.15930, and maintained or renewed their qualification under 40 CFR §62.15935 or 40 CFR §62.15940. Records shall include documentation of training, including the dates of their initial qualification and all subsequent renewals of such qualifications.

(C) Records showing the periods when no qualified operators were accessible for more than eight hours, but less than two weeks, as required in 40 CFR §62.15945(a). [40 CFR §62.16025(c)(3)]

(D) Records showing the periods when no qualified operators were accessible for two weeks or more along with copies of reports submitted as required in 40 CFR §62.15945(b). [40 CFR §62.16025(c)(4)]

#### *d. Reporting Requirements*

i. When a qualified operator is not accessible for two weeks or more, the Permittee shall take the two actions that are described in 40 CFR §62.15945(b)(1) and (2): [40 CFR §62.15945(b)]

(A) Notify the Administrator of this deviation in writing within ten days. In the notice, state what caused this deviation, what the Permittee is doing to ensure that a qualified operator is accessible, and when the Permittee anticipates that a qualified operator will be accessible; and [40 CFR §62.15945(b)(1)]

(B) Submit a status report to the Administrator every four weeks outlining what the Permittee is doing to ensure that a qualified operator is accessible, stating when the Permittee anticipates that a qualified operator will be accessible and requesting approval from the Administrator to continue operation of the SSI unit. The Permittee shall submit the first status report four weeks after the Permittee notifies the Administrator of the deviation under 40 CFR §62.15945(b)(1): [40 CFR §62.15945(b)(2)]

(1) If the Administrator notifies the Permittee that their request to continue operation of the SSI unit is disapproved, the SSI unit may continue operation for 30 days and then shall cease operation; and [40 CFR §62.15945(b)(2)(i)]

(2) Operation of the unit may resume if a qualified operator is accessible as required under 40 CFR §62.15920(a). the Permittee shall notify the Administrator within five days of having resumed operations and of having a qualified operator accessible. [40 CFR §62.15945(b)(2)(ii)]

ii. The Permittee shall maintain at the facility the documentation of the operator training procedures specified under 40 CFR §62.15920(c)(1) and make the documentation readily accessible to all SSI unit operators. [40 CFR §62.15950(a)]

### **17. Sewage Sludge Incinerator Building Scrubber**

#### *a. Limitation or Restriction* [Permit No. 192-0140]

i. Scrubbing Solution

(A) pH: > 7.5

(B) Oxidation/reduction potential: > 650

ii. Make-up Water flow rate: > 2 gpm

iii. Status of recirculation pump and scrubber fan: on or off

### Section III: Applicable Requirements and Compliance Demonstration

**DRAFT**

*b. Monitoring Requirements*

Record keeping specified in Section III.B.17.c of this Title V permit shall be sufficient to meet other Monitoring Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

*c. Record Keeping Requirements*

The Permittee shall maintain records of the scrubber parameters listed in Part III.B.17.a of this Title V permit once per shift (3 times/day). [Permit No. 192-0140]

*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)]

#### 18. Site Specific Monitoring Plan

*a. Limitation or Restriction*

The Permittee shall update and resubmit the site specific monitoring plan if there are any changes or potential changes in your monitoring procedures or if there is a process change, as defined in 40 CFR §62.16045. [40 CFR §62.15995(h)]

*b. Monitoring Requirements*

Record keeping specified in Section III.B.18.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*

Records of the monitoring plans required under 40 CFR §62.15995, and records of performance evaluations required under 40 CFR §62.16000(b)(5). [40 CFR 62.16025(k)]

*d. Reporting Requirements*

*Annual Compliance Report*-If the Permittee did not make revisions to the site-specific monitoring plan during the reporting period, a statement that the Permittee did not make any revisions to the site-specific monitoring plan during the reporting period. If the Permittee made revisions to the site-specific monitoring plan during the reporting period, a copy of the revised plan. [40 CFR 62.16030(c)(15)]

#### 19. 40 CFR Part 62 Subpart LLL Requirements

*a. Monitoring Requirements*

- i. The Permittee shall demonstrate continuous compliance using performance tests in accordance with 40 CFR §62.16000(a), as applicable.
- ii. The Permittee shall demonstrate continuous compliance using a continuous emissions monitoring system or continuous automated sampling system in accordance with 40 CFR §62.16000(b), as applicable.
- iii. The Permittee shall demonstrate continuous compliance using operating parameters in accordance with 40 CFR §62.16005, as applicable.

*b. Record Keeping Requirements*

The Permittee shall keep the records in accordance with 40 CFR §62.16025(a) through (n), as applicable.

*c. Reporting Requirements*

The Permittee shall submit reports to the Administrator specified in 40 CFR §62.16030(a) through (i), as applicable.

**C. 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

DRAFT

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).

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

## Section V: State Enforceable Terms and Conditions

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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

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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

**DRAFT**

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

**DRAFT**

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

# DRAFT

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

# DRAFT

### **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

**DRAFT**

At least seven days before initiating an action specified in RCSA §22a-174-33(r)(2)(A) the Permittee shall notify the Administrator and the commissioner in writing of such intended action.

### U. INFORMATION FOR NOTIFICATION [RCSA §22a-174-33(r)(2)(A)]

Written notification required under RCSA §22a-174-33(r)(2)(A) shall include a description of each change to be made, the date on which such change will occur, any change in emissions that may occur as a result of such change, any Title V permit terms and conditions that may be affected by such change, and any applicable requirement that would apply as a result of such change. The Permittee shall thereafter maintain a copy of such notice with the Title V permit. The commissioner and the Permittee shall each attach a copy of such notice to their copy of the Title V permit.

### V. TRANSFERS [RCSA §22a-174-2a(g)]

No person other than the Permittee shall act or refrain from acting under the authority of this Title V permit unless such permit has been transferred to another person in accordance with RCSA §22a-174-2a(g).

The proposed transferor and transferee of a permit shall submit to the commissioner a request for a permit transfer on a form provided by the commissioner. A request for a permit transfer shall be accompanied by any fees required by any applicable provision of the general statutes or regulations adopted thereunder. The commissioner may also require the proposed transferee to submit with any such request, the information identified in CGS §22a-6o.

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

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

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

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

### X. REOPENING FOR CAUSE [RCSA §22a-174-33(s)]

This Title V permit may be reopened by the commissioner, or the Administrator in accordance with RCSA §22a-174-33(s).

### Y. CREDIBLE EVIDENCE

Notwithstanding any other provision of this Title V permit, for the purpose of determining compliance or establishing whether a Permittee has violated or is in violation of any permit condition, nothing in this Title V permit shall preclude the use, including the exclusive use, of any credible evidence or information.

# DRAFT

## **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