



BUREAU OF AIR MANAGEMENT
NEW SOURCE REVIEW PERMIT
TO CONSTRUCT AND OPERATE A STATIONARY SOURCE

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Issued pursuant to Title 22a of the Connecticut General Statutes (CGS) and Section 22a-174-3a of the Regulations of Connecticut State Agencies (RCSA).

Owner/Operator	Elite Containers, LLC
Address	65 Main Street, Danbury, CT 06810
Equipment Location	211 Brookside Road, Waterbury, CT 06708
Equipment Description	Spray Booth No. 1
Collateral Conditions	Maximum Coating/Primer Usage and Annual Emission Limitations for Booth No. 1 and Booth No. 2 combined are included in Parts II and III of this permit. (NSR Permit Nos. 192-0315 and 192-0316)
Town-Permit Numbers	192-0315
Premises Number	20
Stack Number	3
Permit Issue Date	
Expiration Date	None

Emma Cimino
Deputy Commissioner

Date

This permit specifies necessary terms and conditions for the operation of this equipment to comply with state and federal air quality standards. The Permittee shall at all times comply with the terms and conditions stated herein.

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PART I. DESIGN SPECIFICATIONS

A. General Description

Elite Containers manufactures waste containers (dumpsters). The manufacturing of dumpsters consists of cutting pieces of steel plate to size, assembling, and welding the pieces together to make the containers. The assembled containers are manually wiped to remove any grease or dirt prior to spray painting at the spray booth. This is one of two spray booths operated by Elite Containers for the purposes of painting the dumpsters manufactured. The painted containers are air dried as finished product ready to be shipped to the customer.

B. Equipment Design Specifications

1. Type of Spray Gun: Airless
2. Number of Spray Guns per Booth: 2
3. Number of Spray Guns in Operation at Any Time: 1
4. Maximum Rated Spray Gun Throughput (gallons per hour): 22.8
5. Minimum Transfer Efficiency (%): 60

C. Control Equipment Design Specifications

1. Particulate Filter
 - a. Make and Model: Andreae HE⁺ Filters
 - b. Filtering Material: Heavy Paper and Polyester Fiber
 - c. Air/Cloth Ratio (acfm/ft²): 150
 - d. Minimum Particulate Matter Filter Removal Efficiency (%): 97.8

D. Stack Parameters

1. Minimum Stack Height (ft): 35
2. Minimum Exhaust Gas Flow Rate (acfm): 17,000
3. Minimum Stack Exit Temperature (°F): Ambient
4. Minimum Distance from Stack to Nearest Property Line (ft): 154

PART II. OPERATIONAL CONDITIONS

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A. Equipment

1. Maximum VOC Content per Gallon of Coating, as Applied (lb/gal): 1.24
2. Maximum Solids Content per Gallon of Coating, as Applied (lb/gal): 4.26
3. Maximum Hourly Coating Usage, as Applied (gal): 22.8
4. Maximum Daily Coating Usage:
 - a. paints: 153.9 gallons in an 8-hour period; or,
 - b. primer: 102.6 gallons in an 8-hour period
5. Maximum Annual Coating Usage, as Applied, for Booths 1 and 2 combined (gal): 25,000

The coating usage limits apply to any of the following components or mixtures of the following components: Paint, Enamel, Lacquer, Catalyst, Primer, Reducer, Sealer, Diluent, Additive, or other Coating Material or Preparation.

B. Control Equipment

1. Particulate Matter Filter Control Efficiency (%): 97.8

PART III. ALLOWABLE EMISSION LIMITS

The Permittee shall not cause or allow this equipment to exceed the emission limits stated herein at any time.

A. Criteria Pollutants

Pollutant	lb/hr	TPY Booth 1 and Booth 2 Combined
PM/ PM ₁₀ / PM _{2.5}	0.85	0.47
VOC	28.3	15.5

B. Hazardous Air Pollutants

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]

C. Demonstration of compliance with the above emission limits may be met by calculating the emission rates using emission factors from the following sources:

- VOC: Material Balance
- PM/PM₁₀/PM_{2.5}: Material Balance. Calculations may assume a transfer efficiency of 60% and an overall particulate control efficiency of 97.8%.

The commissioner may require other means (e.g. stack testing) to demonstrate compliance with the above emission limits, as allowed by state or federal statute, law or regulation.

PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS

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A. Monitoring

1. The Permittee shall inspect, and replace, the particulate filters as recommended by the manufacturer to achieve compliance with the minimum overall particulate control efficiency and emission limits in this permit.

B. Record Keeping

1. The Permittee shall keep daily records for each coating and diluent used, such records shall include:
 - a. Date coating used;
 - b. Description of coating, including name and density (lb/gal);
 - c. Volatile organic compound content by weight (lb VOC/gal);
 - d. Water and exempt VOC content by weight (lb/gal);
 - e. VOC content per amount of solids applied (lb VOC/ lb solids applied);
 - f. Quantity of coating used (gal/day); and
 - g. Quantity of diluent used for each coating (lb, gallons).
2. The Permittee shall calculate and record the monthly and consecutive 12 month VOC, PM, PM₁₀, and PM_{2.5} emissions in units of tons. The consecutive 12 month VOC, PM, PM₁₀, and PM_{2.5} 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.
3. The Permittee shall keep annual records of the type and quantity of any material used to clean the guns and booth. In addition, accurate annual records must be kept of the quantity and type of solvents spilled, evaporated, or manifested as waste material.
4. The Permittee shall keep records of the dates the particulate filters were inspected and replaced.
5. The Permittee shall keep material safety data sheets (MSDS) or technical data sheets (TDS) or Safety Data Sheets (SDS) for each paint and solvent used. Such information shall include the quantity and type of each hazardous air pollutant contained in the paint or solvent. For paperwork reduction, these sheets may be kept on computer file in electronic form, access to above paperwork requirement may also be allowed via internet on-demand.
6. Daily records shall clearly display, at a minimum, compliance with all materials usage and emissions limitations set forth in this permit.
7. The Permittee shall keep all records required by this permit for a period of no less than five years and shall submit such records to the commissioner upon request.

C. Reporting

The Permittee shall notify the commissioner, in writing, of the date of initial startup of this equipment/process. The required written notification shall be submitted to DEEP.CACU@ct.gov and DEEP.BAM.AirPermits@ct.gov no later than 30 days after startup.

PART V. STACK EMISSION TEST REQUIREMENTS

Stack emission testing shall not be required at this time.

PART VI. OPERATION AND MAINTENANCE REQUIREMENTS

- A.** The Permittee shall comply with all written recommendations set forth by the manufacturer(s) for maintaining and operating the spray gun, spray booth, and particulate filter in order to achieve their guaranteed transfer and capture efficiencies. The control equipment shall be place at all times. In addition, methods used to increase transfer efficiency shall include, but not be limited to, the following:
 - 1. Minimize the distance from the spray gun to the object being coated;
 - 2. Minimize the air velocity in the spray booth (but not below health-based requirements); and
 - 3. Keep the atomizing air pressure to a minimum level, as recommended by the spray gun manufacturer.
- B.** The Permittee shall properly operate the control equipment at all times that this equipment is in operation and emitting air pollutants.
- C.** The Permittee shall cover all open drums and vessels that contain solvents, cleaners, coatings, or cleaning rags so as to minimize the amount of VOCs emitted to the atmosphere. Empty containers shall be disposed of in a manner consistent with handling techniques for hazardous materials, as applicable.
- D.** The Permittee shall not, during any one day, dispose of more than one and one half gallons (5.7 liters) of any VOC or of any material containing more than one half gallons (5.7 liters) of any VOC by any means which will permit the evaporation of such solvent into the atmosphere. [RCSA §22a-174-20(j)]

PART VII. SPECIAL REQUIREMENTS**A. Premises Emissions Summary**

- 1. On January 1st of each calendar year, if the potential emissions of NOx or VOC from the premises are equal to or greater than 25 tons per year per pollutant, then for such pollutant(s), the Permittee shall:
 - a. Monitor NOx and/or VOC emissions, as applicable, from the premises for such calendar year.

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- b. Calculate and record annual NOx and/or VOC emissions, as applicable, from the premises for such calendar year, in units of tons. The Permittee shall make these calculations on or before February 1st of the following year with respect to the previous calendar year. Such records shall include a sample calculation(s).
- c. If actual NOx and/or VOC emissions, as applicable, from the premises are equal to or greater than 25 tons for such calendar year, the Permittee shall submit to the commissioner, on or before March 1st of the following year, an annual emissions summary with respect to the premises for the previous calendar year. Such summary shall be submitted on forms prescribed or provided by the commissioner.

2. A Permittee is exempt from Part VII.A.1 requirements of this permit if, on January 1st of the subject year, the premises was operating in accordance with any of the following:

- a. A valid Title V permit issued pursuant to RCSA section 22a-174-33;
- b. RCSA section 22a-174-33a; or
- c. RCSA section 22a-174-33b

B. The Permittee shall not cause or permit the emission of any substance or combination of substances which creates or contributes to an odor beyond the property boundary of the premises that constitutes a nuisance as set forth in RCSA Section 22a-174-23.

[STATE ONLY REQUIREMENT]

PART VIII. ADDITIONAL TERMS AND CONDITIONS

- A. This permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the regulated activity in compliance with all applicable requirements of any federal, municipal or other state agency. Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B. Any representative of the DEEP may enter the Permittee's site in accordance with constitutional limitations at all reasonable times without prior notice, for the purposes of inspecting, monitoring and enforcing the terms and conditions of this permit and applicable state law.
- C. This permit may be revoked, suspended, modified or transferred in accordance with applicable law.
- D. This 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 conveys no property rights in real estate or material, nor any exclusive privileges, 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. This permit shall neither create nor affect any rights of persons or municipalities who are not parties to this permit.

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- E.** Any document, including any notice, which is required to be submitted to the commissioner under this permit shall be signed by a duly authorized representative of the Permittee and by the person who is responsible for actually preparing such document, each of whom shall certify in writing as follows: "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."
- F.** Nothing in this 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, 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.
- G.** Within 15 days of the date the Permittee becomes aware of a change in any information submitted to the commissioner under this permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the Permittee shall submit the correct or omitted information to the commissioner.
- H.** The date of submission to the commissioner of any document required by this permit shall be the date such document is received by the commissioner. The date of any notice by the commissioner under this permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three days after it is mailed by the commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" means calendar day. Any document or action which is required by this 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.
- I.** Any document required to be submitted to the commissioner under this permit shall, unless otherwise specified in writing by the commissioner, be directed to: Office of Director; Enforcement Division; Bureau of Air Management; Department of Energy and Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.