

**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>	213-0069-TV
<b>Client/Sequence/Town/Premises Numbers</b>	7897/01/213/01
<b>Date Issued</b>	
<b>Expiration Date</b>	

**Corporation:**

Ahlstrom Nonwoven LLC – Ahlstrom Power Windsor Locks LLC

**Premises Location:**

Ahlstrom Nonwoven LLC: 11 Canal Bank Road, Windsor Locks, CT 06096  
 Ahlstrom Power Windsor Locks LLC: 26 Canal Bank Road, Windsor Locks, CT 06096

**Name of Responsible Official and Title:**

Randall Feher, Plant Manager

All the following attached pages, 2 through 75, are hereby incorporated by reference into this Title V permit.

\_\_\_\_\_  
 Katherine S. Dykes  
 Commissioner

\_\_\_\_\_  
 Date

**TABLE OF CONTENTS**

	<b>PAGE</b>
<b>List of Abbreviations/Acronyms</b> .....	5
<b>Section I. Premises Information/Description</b>	
A. Premises Information.....	6
B. Premises Description. ....	6
<b>Section II. Emissions Units Information</b>	
A. Emissions Units Description - Table II.A.....	7
B. Operating Scenario Identification - Table II.B .....	9
<b>Section III. Applicable Requirements and Compliance Demonstration</b>	
A. Emissions Unit 103.....	11
B. Emissions Unit 104.....	17
C. Emissions Unit 105.....	19
D. Emissions Unit 116.....	25
E. Emissions Unit 118.....	26
F. Emissions Unit 120.....	30
G. Grouped Emissions Unit 2.....	31
H. Emissions Unit 374.....	32
I. Emissions Unit 1.....	34
J. Grouped Emissions Unit 1 .....	47
K. Emissions Unit 7.....	55
L. Premises Wide Caps for VOC and HAPs.....	62
M. Premises-Wide General Requirements .....	64
<b>Section IV. Compliance Schedule - Table IV</b> .....	66
<b>Section V. State Enforceable Terms and Conditions</b> .....	67
<b>Section VI. Title V Requirements</b>	
A. Submittals to the Commissioner & Administrator.....	69
B. Certifications [RCSA §22a-174-33(b)].....	69
C. Signatory Responsibility [RCSA §22a-174-2a(a)] .....	69
D. Additional Information [RCSA §§22a-174-33(j)(1)(X), -33(h)(2)].....	70
E. Monitoring Reports [RCSA §22a-174-33(o)(1)] .....	70
F. Premises Records [RCSA §22a-174-33(o)(2)] .....	71
G. Progress Reports [RCSA §22a-174-33(q)(1)].....	71
H. Compliance Certifications [RCSA §22a-174-33(q)(2)].....	72
I. Permit Deviation Notifications [RCSA §22a-174-33(p)] .....	72
J. Permit Renewal [RCSA §22a-174-33(j)(1)(B)].....	72
K. Operate in Compliance [RCSA §22a-174-33(j)(1)(C)] .....	72
L. Compliance with Permit [RCSA §22a-174-33(j)(1)(G)] .....	72
M. Inspection to Determine Compliance [RCSA §22a-174-33(j)(1)(M)].....	73
N. Permit Availability.....	73
O. Severability Clause [RCSA §22a-174-33(j)(1)(R)] .....	73
P. Need to Halt or Reduce Activity [RCSA §22a-174-33(j)(1)(T)].....	73
Q. Permit Requirements [RCSA §22a-174-33(j)(1)(V)] .....	73
R. Property Rights [RCSA §22a-174-33(j)(1)(W)] .....	73
S. Alternative Operating Scenario Records [RCSA §22a-174-33(o)(3)].....	73
T. Operational Flexibility and Off-Permit Changes [RCSA §22a-174-33(r)(2)] .....	73
U. Information for Notification [RCSA §22a-174-33(r)(2)(A)].....	74
V. Transfers [RCSA §22a-174-2a(g)] .....	74
W. Revocation [RCSA §22a-174-2a(h)] .....	74

X. Reopening for Cause [RCSA §22a-174-33(s)] .....75  
Y. Credible Evidence.....75

**Title V Operating Permit**

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

## LIST OF ABBREVIATIONS/ACRONYMS

<i>Abbreviation/Acronym</i>	<i>Description</i>
acfm	Actual Cubic Feet per Minute
ASC	Actual Stack Concentration
CAIR	Clean Air Interstate Rule
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
CGS	Connecticut General Statutes
CMS	Continuous Monitoring System
CO	Carbon Monoxide
DERC	Discrete Emission Reduction Credit
EU	Emissions Unit
EPA	Environmental Protection Agency
°F	Degree Fahrenheit
ft <sup>3</sup>	Cubic feet
gal	Gallons
GEU	Grouped Emissions Unit
GHG	Green House Gases
gr	Grain
H <sub>2</sub> O	Water
H <sub>2</sub> SO <sub>4</sub>	Sulfuric Acid
HAP	Hazardous Air Pollutant
Hg	Mercury
ISO	Independent System Operator
hr	Hour
lb	Pound
MASC	Maximum Allowable Stack Concentration
MMBtu	Million British Thermal Units
MMcf	Million cubic feet
MMscf	Million standard cubic feet
MW	Megawatts
NO <sub>x</sub>	Nitrogen Oxides
NSR	New Source Review
O <sub>2</sub>	Oxygen
P.O.	Postal Office
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
scf	Standard cubic feet
SIC	Standard Industrial Classification Code
SCR	Selective Catalytic Reduction
SO <sub>2</sub>	Sulfur Dioxide
TA&O	Trading Agreement and Order
TBD	To be determined
VOC	Volatile Organic Compound
yr	Year

## Section I: Premises Information/Description

### A. PREMISES INFORMATION

Nature of Business:

1. Ahlstrom Nonwoven LLC: Manufacturing of nonwovens and specialty papers.
2. Ahlstrom Power Windsor Locks LLC: Electricity/steam generation

Primary SIC: 2621

Other SIC: 4931

Facility Mailing Address: Ahlstrom Nonwoven LLC - Ahlstrom Power Windsor Locks LLC  
11 Canal Bank Road and 26 Canal Bank Road  
Windsor Locks, CT 06096

Telephone Number: (860) 654-8300

### B. PREMISES DESCRIPTION

Ahlstrom Nonwoven LLC (Ahlstrom) located at 11 Canal Bank Road and Ahlstrom Power Windsor Locks LLC (APWL) located at 26 Canal bank Road are considered a single stationary source. The premises is located in a serious ozone non-attainment area as defined in RCSA §22a-174-1. The premises is a Title V source as emissions are greater than the major source thresholds levels for NO<sub>x</sub> and CO. The premises operates under a premises wide cap for VOC via a collateral condition in Permit No. 213-0113. The following is a description of each one of the facilities:

1. Ahlstrom manufactures high quality nonwovens and specialty papers from natural and synthetic fibers for use in the food, medical, and automotive industries. The paper mill has the following equipment:
  - Four traditional commercial paper machines with dryers (paper machine Nos. 10, 11, 12 and 15),
  - A research and development-sized paper machine (Paper machine No. 4),
  - Two spunbond extruder lines (Extruder lines No. 14 and 18),
  - A pulper machine, wire mesh screens and traveling screen,
  - Eight natural gas heaters,
  - A cold cleaner, and
  - A foam applicator.
2. APWL is a combined-cycle cogeneration plant producing electricity and steam. The facility consists of a General Electric model MS6001(B) stationary gas turbine (EU-1) generator with a two pressure waste heat boiler, two Nebraska Modified Type A package boilers (EU-2 and EU-3) and a 15 MW Solar Titan 130 gas turbine (EU-7) with a lean premix combustor, a non-fired heat recovery steam generator, a Selective Catalytic Reactor (SCR) system and an oxidation catalyst.

The facility also includes two 180,000 gallon No. 2 fuel oil storage tanks, for which there are no source specific applicable requirements. The facility produces and sells electricity to ISO New England as well as electricity and steam to the adjacent paper mill owned and operated by Ahlstrom.

## Section II: Emissions Units Information

## A. EMISSIONS UNITS DESCRIPTION

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

<b>TABLE II.A: EMISSIONS UNITS DESCRIPTION</b>			
<b>Ahlstrom Nonwovens LLC</b>			
<b>Emissions Unit/ Grouped Emissions Unit</b>	<b>Emissions Unit Description</b>	<b>Control Unit Description</b>	<b>Permit or Regulation Number</b>
EU-103	Paper Manufacturing Machine No. 10 with two direct fired dryers Mill Building  Construction date: 1963  Natural gas: Eight Foot Dryer 1: 15 MMBtu/hr Six Foot Dryer 2: 9 MMBtu/hr	None	P 213-0007
EU-104	Paper Manufacturing Machine No. 11 Mill Building  Construction date: 1968	None	RCSA §22a-174-20(q)
EU-105	Paper Manufacturing Machine No. 12 with two direct fired dryers and one Spooner oven Mill Building  Construction date: 1979 adding Spooner oven in 1998  Natural gas: Spooner oven: 7 MMBtu/hr First dryer: 15.18 MMBtu/hr Second dryer: 6 MMBtu/hr	None	P 213-0018
EU-116	Paper Manufacturing Machine No. 4 (R&D) with a dryer Mill Building  Construction date: 1954  Natural gas: Dryer: 1.0 MMBtu/hr	None	RCSA §22a-174-20(q)

## Section II: Emissions Units Information

<b>TABLE II.A: EMISSIONS UNITS DESCRIPTION</b>			
<b>Ahlstrom Nonwovens LLC</b>			
<b>Emissions Unit/ Grouped Emissions Unit</b>	<b>Emissions Unit Description</b>	<b>Control Unit Description</b>	<b>Permit or Regulation Number</b>
EU-118	Paper Manufacturing Machine No. 15 with a dryer Mill Building  Construction date: 2004  Natural gas: Dryer: 11 MMBtu/hr	None	RCSA §22a-174-20(q) RCSA §22a-174-22e
EU-120	Cold Cleaner Degreaser Mill Building  Construction date: unknown	None	RCSA §22a-174-20(l)
GEU-2/ EU-372	Spunbond Extruder Machine No. 14 NGC Building  Construction date: 2000	None	RCSA §22a-174-18
GEU-2/ EU-373	Spunbond Extruder and Laminator Machine No. 18 NGC Building  Construction date: 2000	None	RCSA §22a-174-18
EU-374	Gaston Systems CFS Foam Applicator NGC Building  Construction date: 2000	None	P 213-0113
<b>Ahlstrom Power Windsor Locks LLC</b>			
EU-1	General Electric Turbine Model MS6001(B) Equipment No. G-101  Construction date: 02/15/1988  Natural gas: 555.2 MMBtu/hr No. 2 fuel oil: 529.5 MMBtu/hr	Steam Injection	P 213-0029  RCSA §22a-174-22e 40 CFR Part 60 Subpart GG CAIR
EU-2	Nebraska Modified Type A Boiler Equipment No. H-102A  Construction date: 02/15/1988  Natural gas: 177.6 MMBtu/hr No. 2 fuel oil: 170.1 MMBtu/hr	Low NOx Burner	P 213-0031  RCSA §22a-174-22e  40 CFR Part 60 Subpart Db 40 CFR Part 63 Subpart JJJJJ

## Section II: Emissions Units Information

<b>TABLE II.A: EMISSIONS UNITS DESCRIPTION</b>			
<b>Ahlstrom Nonwovens LLC</b>			
<b>Emissions Unit/ Grouped Emissions Unit</b>	<b>Emissions Unit Description</b>	<b>Control Unit Description</b>	<b>Permit or Regulation Number</b>
EU-3	Nebraska Modified Type A Boiler Equipment No. H-102B  Construction date: 02/15/1988  Natural gas: 177.6 MMBtu/hr No. 2 fuel oil: 170.1 MMBtu/hr	Low NOx Burner	P 213-0032  RCSA §22a-174-22e  40 CFR Part 60 Subpart Db 40 CFR Part 63 Subpart JJJJJ
EU-7	Less than 15 MW Solar Titan 130 gas turbine  Construction date: 04/16/2012  Natural gas: 178 MMBtu/hr	Oxidation Catalyst Selective Catalytic Reduction	P 213-0116  RCSA §22a-174-22e  40 CFR Part 60 Subpart KKKK

**B. OPERATING SCENARIO IDENTIFICATION**

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

<b>TABLE II.B: OPERATING SCENARIO IDENTIFICATION</b>	
<b>Ahlstrom Nonwovens LLC</b>	
<b>Emissions Units Associated with the Scenario</b>	<b>Description of Scenario</b>
EU-103, EU-104, EU-105, and EU-116	Four traditional commercial paper machines with dryers. The standard use of the paper machines is to manufacture high quality nonwovens and specialty paper from natural and synthetic fibers.
EU-118	One paper machine with a dryer. The standard use of the paper machine is for research and development of products.
EU-120	One cold cleaner degreaser. The standard use of the cold cleaner degreaser is for the use of cleaning parts of the manufacturing equipment.
GEU-2 (EU-372 and EU-373)	One extruder machine. The standard use of the extruder machine is the production of spunbond nonwoven fabrics.
	One extruder and laminator. The standard use of the extruder machine and the laminator is the production of spunbond nonwoven fabrics.

## Section II: Emissions Units Information

<b>TABLE II.B: OPERATING SCENARIO IDENTIFICATION</b>	
<b>Ahlstrom Nonwovens LLC</b>	
<b>Emissions Units Associated with the Scenario</b>	<b>Description of Scenario</b>
EU-374	One foam applicator. The standard use of the foam applicator is the application of a coating to the spunbond nonwoven fabrics.
<b>Ahlstrom Power Windsor Locks LLC</b>	
EU-1, GEU-1 (EU-2 and EU-3), and EU-7	<p>Two turbines and two boilers: The standard use of the turbines and two boilers is to produce electricity and steam.</p> <p>GE stationary gas turbine (EU-1- Permit No. 213-0029)  Two Nebraska boilers (EU-2 – Permit No. 213-0031 and EU-3 – Permit No. 213-0032) burn natural gas and No. 2 fuel oil. The turbine and the boilers can be operated by themselves or under the following combinations: turbine and one boiler; or two boilers without the turbine.</p> <p>Solar Titan 130 turbine (EU-7 – Permit No. 213-0116): this turbine burns natural gas only.</p>

### Section III: Applicable Requirements and Compliance Demonstration

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

#### Ahlstrom Nonwovens LLC

#### 11 Canal Bank Road

#### A. EMISSIONS UNIT 103 (EU-103): Paper Manufacturing Machine No. 10 with Two Dryers operating under:

- Permit No. 213-0007
- Subject to RCSA §22a-174-18
- Subject to RCSA §22a-174-20
- Subject to RCSA §22a-174-22e

#### 1. Operational Conditions

##### a. Limitation or Restriction

- i. Paper machine No. 10: Capacity: 11,000 tons/year [P 213-0007]
- ii. Dryer Fuel Type: Natural gas [P 213-0007]
- iii. Maximum Firing Rate and Heat Input – Design Specification [P 213-0007; RCSA §22a-174-33(j)(1)(K)(ii)]
  - (A) Eight foot dryer: 14,563 cf/hr (15 MMBtu/hr)
  - (B) Six foot dryer: 8,738 cf/hr (9 MMBtu/hr)
- iv. Maximum Firing Rate and Heat Input – Operational Limitation [P 213-0007; RCSA §22a-174-33(j)(1)(K)(ii)]
  - (A) Eight foot dryer: 7,020 cf/hr (7.23 MMBtu/hr)
  - (B) Six foot dryer: 3,906 cf/hr (4.02 MMBtu/hr)
- v. Maximum annual fuel usage: 95,711,760 cf per 12 consecutive months for both dryers (based on 8,760 hours of operation per 12 consecutive months). [P 213-0007]

##### b. Monitoring and Testing Requirements

- i. The Permittee shall continuously monitor fuel consumption using a non-resettable totalizing fuel meter. [P 213-0007]

##### 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 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 213-0007]

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

- ii. The Permittee shall keep all records required by this Title V permit for a period of no less than five years and shall submit such records to the commissioner upon request. [P 213-0018]

*d. Reporting Requirements*

- i. 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. PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>x</sub>, NO<sub>x</sub>, VOC, CO and HAP Emissions***a. Limitation or Restriction*

- i. The maximum VOC content per gallon of coating, as applied, excluding water and exempt VOC shall not exceed 2.9 pounds per gallon. [P 213-0007]
- ii. The maximum VOC emissions from coating operation of paper machine No.10 shall not exceed 1,410 pounds per month, 2.6 tons per 12 consecutive months. [P 213-0007]
- iii. Emissions from natural gas combustion in the dryers shall not exceed: [P 213-0007]
  - (A) PM/PM<sub>10</sub>/PM<sub>2.5</sub>: 0.08 lb/hr, 0.35 TPY
  - (B) SO<sub>2</sub>: 0.01 lb/hr, 0.03 TPY
  - (C) NO<sub>x</sub>: 1.10 lb/hr, 180 ppmvd corrected to 12% CO<sub>2</sub>, 4.83 TPY
  - (D) VOC: 0.06 lb/hour, 0.25 TPY
  - (E) CO: 0.92 lb/hr, 4.04 TPY
- iv. The Permittee shall not cause an exceedance of the maximum allowable stack concentration (MASC) for any HAP emitted and listed in RCSA §22a-174-29. STATE ONLY REQUIREMENT [P 213-0007]
- v. The Permittee shall demonstrate compliance with the emission limits by calculating the emission rates using emission factors from the following sources: [P 213-0007]
  - (A) Fuel burning (Natural gas): NO<sub>x</sub>: last approved stack testing.
  - (B) Fuel burning (Natural gas): PM, PM<sub>10</sub>, PM<sub>2.5</sub>, VOC, SO<sub>x</sub>, CO: AP42, 5<sup>th</sup> Edition, Table Nos. 1.4-1 and 1.4-2.
  - (C) Process: VOCs and HAPs: material balance of VOCs and HAPs in coatings/additives used.

*b. Monitoring and Testing Requirements*

- i. The Permittee shall monitor the amount of VOC containing coating/additive used for production in Paper Machine No. 10. [P 213-0007]

*c. Record Keeping Requirements*

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

- i. The Permittee shall make and keep records of all materials used for production in Paper Machine No. 10. The Permittee shall maintain records of the following to determine VOC emissions on a monthly and yearly basis: [P 213-0007]
    - (A) Description of product,
    - (B) Date batch was run,
    - (C) Length of each batch,
    - (D) Feed rates of materials in each run,
    - (E) VOC content by weight (lb VOC/gal) of coating or additives used; and
    - (F) Cumulative record of year-to-date material usage and VOC emissions.
  - ii. The Permittee shall calculate and record monthly and consecutive 12 month PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC and CO emissions from fuel combustion 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 213-0007]
  - iii. The Permittee shall calculate and record the monthly and consecutive 12 month VOC process 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 213-0007]
  - iv. The Permittee shall make and keep records of calculations verifying compliance with RCSA §22a-174-29. [P 213-0007]
  - v. The Permittee shall keep material safety data sheets (MSDS) or technical data sheets (TDS) or safety data sheets (SDS) for each chemical or 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 files in electronic form, access to above paperwork requirement may also be allowed via internet on-demand. [P 213-0007]
  - vi. The Permittee shall keep all records required by this Title V permit for a period of no less than five years and shall submit such records to the commissioner upon request. [P 213-0007]
- d. *Reporting Requirements*
- i. The Permittee shall notify the commissioner in writing of any exceedance or deviation of an emission limitation or operating parameter, and shall identify the cause or the likely cause of such exceedance or deviations, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows: [P 213-0007]
    - (A) For any regulated air pollutant or operating parameter, no later than ten days after such exceedance commenced.

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

(B) For any hazardous air pollutant, no later than 24 hours after such exceedance commenced.

**3. RCSA §22a-174-18 – Control of Particulate Matter and Visible Emissions***a. Limitation or Restriction*

- i. Opacity measured using visual observation shall not exceed the following visible emissions limits: [RCSA §§22a-174-18(b)(1)(A) and (B)]
  - (A) Twenty percent (20%) opacity during any six-minute block average as measured by 40 CFR Part 60, Appendix A, Reference Method 9; or
  - (B) Forty percent (40%) opacity as measured by 40 CFR Part 60, Appendix A, Reference Method 9, reduced to a minute block average.
- ii. The Permittee shall emit no more than 0.10 pounds of particulate matter per MMBtu of heat input. [RCSA §22a-174-18(e)]

*b. Monitoring and Testing Requirements*

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

*c. Record Keeping Requirements*

- i. The Permittee shall maintain records of any opacity observations initiated by the Permittee or at the request of the Commissioner. Such records shall include the dates, times, and places of all visible observations, persons performing the observation, test method used, the operating conditions at the time of the observation, and the results of such observations. Record shall be kept for a minimum of five years after such records were created. [RCSA §22a-174-33(j)(1)(K)]
- ii. The Permittee shall make and keep records of the calculations performed to show compliance with the emission limitation in Section III.A.3.a.ii of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]
- iii. The Permittee shall keep records required by this Title V permit for a minimum of five years after such records were created. [RCSA §22a-174-33(j)(1)(K)]

*d. Reporting Requirements*

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

**4. RCSA §22a-174-20 – Control of Organic Compound Emissions***a. Limitation or Restriction*

- i. The Permittee shall only use coating with an as-applied VOC content less than or equal to 350 grams per liter of coating, excluding the volume of any water and exempt compounds, shall be used for paper, film and foil coating. [RCSA §22a-174-20(q)(4)]

### Section III: Applicable Requirements and Compliance Demonstration

- ii. The Permittee shall use the following work practices: [RCSA §§22a-174-20(q)(6)(A) through (D)]
- (A) New and used VOC-coating or cleaning solvent, including a coating mix on the premises, shall be stored in a nonabsorbent, non-leaking container. Such a container shall be kept closed at all times except when the container is being filled, emptied or is otherwise actively in use.
  - (B) Spills and leaks of VOC-containing coating or cleaning solvent shall be minimized. Any leaked or spilled VOC-containing coating or cleaning solvent shall be absorbed and removed immediately;
  - (C) Absorbent applicators, such as cloth and paper, which are moisture with VOC-containing coating or cleaning solvent, shall be stored in a closed, nonabsorbent, non-leaking container for disposal or recycling; and
  - (D) VOC-containing coating or cleaning solvent shall be conveyed from one location to another in a closed container or pipe.

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

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

#### *c. Record Keeping Requirements*

- i. The Permittee shall maintain records of the information necessary for the commissioner to determine compliance with the applicable requirements of RCSA §22a-174-20. All records shall be: [RCSA §22a-174-20(q)(7)]
  - (A) Made available to the commissioner to inspect and copy upon request;
  - (B) Maintained for five years from the date such record is created; and
  - (C) Maintained in compliance with RCSA §§22a-174-20(aa)(1) through (9).

#### *d. Reporting Requirements*

- i. 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. RCSA §22a-174-22e – Control of Nitrogen Oxides Emissions from Fuel Burning Equipment at Major Sources of Nitrogen Oxide

- **Dryer: 15 MMBtu/hr**
- **Dryer: 9 MMBtu/hr**

#### *a. Limitation or Restriction*

- i. The Permittee shall not allow NO<sub>x</sub> emissions to exceed 180 ppmvd, corrected to 12% carbon dioxide, as determined by NO<sub>x</sub> emission testing. [RCSA §22a-174-22e(d)(8) and (d)(12), P 213-0007]

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

- ii. The Permittee shall calculate the emission unit's non-ozone season emission rate as the sum of the emission unit's NOx emissions during the period from October 1 through April 30, inclusive, divided by the sum of the emission unit's heat input during the period from October 1 through April 30, inclusive. [RCSA §22a-174-22e(d)(19)]
- iii. The Permittee shall calculate the emission unit's ozone season emission rate as the sum of the emission unit's NOx emissions while firing the applicable fuel during the period from May 1 through September 30, inclusive, divided by the sum of the emission unit's heat input while firing the applicable fuel during the period from May 1 through September 30, inclusive. [RCSA §22a-174-22e(d)(20)]

**b. Monitoring and Testing Requirements**

- i. The Permittee shall conduct periodic emission testing in accordance with RCSA §22a-174-22e. [RCSA §22a-174-22e(l)(1)(A)]
- ii. The Permittee shall conduct emission tests within every 63 calendar months following the date the previous emission test was conducted or the date the previous emission test was required to be conducted, whichever is earlier. [RCSA §22a-174-22e(l)(5)]
- iii. Each emission test shall be conducted in accordance with RCSA §22a-174-5 and compliance with the emissions limitations of Section III.A.5.a.i of this Title V permit shall be determined based on the average of three one-hour tests, each performed over a consecutive 60-minute period except as provided in RCSA §§22a-174-22e(l)(6)(A) and (B). [RCSA §22a-174-22e(l)(6)]
- iv. If the Permittee is unable to conduct scheduled emission testing required by RCSA §22a-174-22e due to force majeure, the Permittee shall conduct the required emission testing as soon as practicable after the force majeure event occurs. [RCSA §22a-174-22e(l)(8)]

**c. Record Keeping Requirements**

- i. The Permittee shall retain all records and reports produced for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records and reports shall be retained at the premises where the emissions unit is located, unless the commissioner approves in writing the use of another location in Connecticut. [RCSA §22a-174-22e(j)(1)]
- ii. The Permittee shall make and keep the following records: [RCSA §§22a-174-22e(j)(2)(B), (C), (D), (F) and (G)]
  - (A) The date and work performed for repairs, replacements of parts and other maintenance;
  - (B) Records of the dates and times of all emission testing required, the person performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing;
  - (C) Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22e; and
  - (D) Any other records or reports required by an order or permit issued by the commissioner pursuant to RCSA §22a-174-22e.

**Section III: Applicable Requirements and Compliance Demonstration***d. Reporting Requirements*

- i. The Permittee shall submit a written report of the results of stack testing to the commissioner no more than 60 days after the completion of such emission tests. [RCSA §22a-174-22e(k)(1)]

**B. EMISSIONS UNIT 104 (EU-104): Paper Manufacturing Machine No.11 – Permit Not Required**

- **Subject to RCSA §22a-174-18**
- **Subject to RCSA §22a-174-20**

**1. RCSA §22a-174-18 – Control of Particulate Matter and Visible Emissions***a. Limitation or Restriction*

- i. Opacity measured using visual observation shall not exceed the following visible emissions limits: [RCSA §§22a-174-18(b)(1)(A) and (B)]
  - (A) Twenty percent (20%) opacity during any six-minute block average as measured by 40 CFR Part 60, Appendix A, Reference Method 9; or
  - (B) Forty percent (40%) opacity as measured by 40 CFR Part 60, Appendix A, Reference Method 9, reduced to a minute block average.
- ii. The Permittee shall emit no more than 0.10 pounds of particulate matter per MMBtu of heat input. [RCSA §22a-174-18(e)]

*b. Monitoring and Testing Requirements*

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

*c. Record Keeping Requirements*

- i. The Permittee shall maintain records of any opacity observations initiated by the Permittee or at the request of the commissioner. Such records shall include the dates, times, and places of all visible observation, persons performing the observation, test method used, the operating conditions at the time of the observation, and the results of such observations. Records shall be kept for a minimum of five years after such records were created. [RCSA §22a-174-33(j)(1)(K)]
- ii. The Permittee shall make and keep records of the calculations performed to show compliance with the emission limitation in Section III.B.1.a.ii of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]
- iii. The Permittee shall keep records required by this Title V permit for a minimum of five years after such records were created. [RCSA §22a-174-33(j)(1)(K)]

*d. Reporting Requirements*

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

**Section III: Applicable Requirements and Compliance Demonstration****2. RCSA §22a-174-20(q) – Control of Organic Compound Emissions***a. Limitation or Restriction*

- i. The Permittee shall only use coating with an as-applied VOC content less than or equal to 350 grams per liter of coating, excluding the volume of any water and exempt compounds, for paper, film and foil coating. [RCSA §22a-174-20(q)(4)]
- ii. The Permittee shall use the following work practices: [RCSA §22a-174-20(q)(6)(A) through (D)]
  - (A) New and used VOC-coating or cleaning solvent, including a coating mix on the premises, shall be stored in a nonabsorbent, non-leaking container. Such a container shall be kept closed at all times except when the container is being filled, emptied or is otherwise actively in use.
  - (B) Spills and leaks of VOC-containing coating or cleaning solvent shall be minimized. Any leaked or spilled VOC-containing coating or cleaning solvent shall be absorbed and removed immediately;
  - (C) Absorbent applicator, such as cloth and paper, which are moisture with VOC-coating or cleaning solvent, shall be stored in a closed, nonabsorbent, non-leaking container for disposal or recycling; and
  - (D) VOC-containing coating or cleaning solvent shall be conveyed from one location to another in a closed container or pipe.

*b. Monitoring and Testing Requirements*

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

*c. Record Keeping Requirements*

- i. The Permittee shall maintain records of the information necessary for the commissioner to determine compliance with the limitation in Section III.B.2.a.i of this Title V permit. All records shall be: [RCSA §22a-174-20(q)(7), RCSA §22a-174-33(j)(1)(K)(i)]
  - (A) Made available to the commissioner to inspect and copy upon request;
  - (B) Maintained for five years from the date such record is created; and
  - (C) Maintained in compliance with RCSA §§22a-174-20(aa)(1) through (9)

*d. Reporting Requirements*

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

**Section III: Applicable Requirements and Compliance Demonstration****C. EMISSIONS UNIT 105 (EU-105): Paper Manufacturing Machine No. 12 with two Dryers, and one Spooner oven operating under:**

- **Permit No. 213-0018**
- **Subject to RCSA §22a-174-18**
- **Subject to RCSA §22a-174-20**
- **Subject to RCSA §22a-174-22e**

**1. Operational Conditions***a. Limitation or Restriction*

- i. Paper Machine No. 12 - Capacity: 7,200 tons/year [P 213-0018]
- ii. Fuel Type: Natural gas [P 213-0018]
- iii. Maximum Firing Rate and Heat Input – Design Specification [P 213-0018]
  - (A) Spooner Oven: 6,796 cf/hr (7 MMBtu/hr)
  - (B) First Dryer: 14,738 cf/hr (15.18 MMBtu/hr)
  - (C) Second Dryer: 5,825 cf/hr (6 MMBtu/hr)
- iv. Maximum Firing Rate and Heat Input – Operational Conditions [P 213-0018]
  - (A) Spooner Oven: 5,196 cf/hr (5.35 MMBtu/hr)
  - (B) First Dryer: 9,920 cf/hr (10.22 MMBtu/hr)
  - (C) Second Dryer: 2,594 cf/hr (2.67 MMBtu/hr)
- v. Maximum annual fuel usage: 155,139,600 per 12 consecutive months for both dryers (based on 8,760 hours of operation per 12 consecutive months). [P 213-0018]

*b. Monitoring and Testing Requirements*

- i. The Permittee shall continuously monitor fuel consumption using a non-resettable totalizing fuel meter. [P 213-0018]

*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 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 213-0018]
- ii. The Permittee shall keep all records required by this Title V permit for a period of no less than five years and shall submit such records to the commissioner upon request. [P 213-0018]

**Section III: Applicable Requirements and Compliance Demonstration***d. Reporting Requirements*

- i. 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. PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>x</sub>, NO<sub>x</sub>, VOC, CO and HAPs Emissions***a. Limitation or Restriction*

- i. The maximum VOC content per gallon of coating, as applied, excluding water and exempt VOC shall not exceed 2.9 pounds per gallon. [P 213-0018]
- ii. The maximum VOC emissions from coating operation of paper machine No.12 shall not exceed 3,650 pounds per month, 5.5 tons per 12 consecutive months. [P 213-0018]
- iii. Emissions from natural gas combustion in the dryers shall not exceed: [P 213-0018]
  - (A) PM/PM<sub>10</sub>/PM<sub>2.5</sub>: 0.13 lb/hr, 0.56 TPY
  - (B) SO<sub>2</sub>: 0.01 lb/hr, 0.05 TPY
  - (C) NO<sub>x</sub>: 1.79 lb/hr, 180 ppmvd corrected to 12% CO<sub>2</sub>, 7.83 TPY
  - (D) VOC:0.09 lb/hr, 0.40 TPY
  - (E) CO: 1.50 lb/hr, 6.55 TPY
- iv. The Permittee shall not cause an exceedance of the maximum allowable stack concentration (MASC) for any HAP emitted and listed in RCSA §22a-174-29. STATE ONLY REQUIREMENT. [P 213-0018]
- v. The Permittee shall demonstrate compliance with emission limits by calculating the emission rates using emission factors from the following sources: [P 213-0018]
  - (A) Fuel burning (Natural gas): NO<sub>x</sub>: last approved stack testing.
  - (B) Fuel Burning (Natural gas): PM, PM<sub>10</sub>, PM<sub>2.5</sub>, VOC, SO<sub>2</sub>, CO: AP42, 5<sup>th</sup> Edition, Tables 1.4-1 and 1.4-2.
  - (C) Process: VOCs and HAPs: material balance of VOCs and HAPs in coatings/additives used.

*b. Monitoring and Testing Requirements*

- i. The Permittee shall monitor the amount of VOC containing coating/additive used for production in paper machine No. 12. [P 213-0018]

*c. Record Keeping Requirements*

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

- i. The Permittee shall make and keep records of all materials used for production in paper machine No. 12. The Permittee shall maintain records of the following to determine VOC emissions on a monthly and yearly basis: [P 213-0018]
    - (A) Description of product,
    - (B) Date batch was run,
    - (C) Length of each batch,
    - (D) Feed rates of material in each run,
    - (E) VOC content by weight (lb VOC/gal) of coating or additives used; and
    - (F) Cumulative record of year-to-date material usage and VOC emissions.
  - ii. The Permittee shall calculate and record monthly and consecutive 12 month PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC and CO emissions from fuel combustion 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 213-0018]
  - iii. The Permittee shall calculate and record monthly and consecutive 12 month VOC process 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 213-0018]
  - iv. The Permittee shall make and keep records of calculations verifying compliance with RCSA §22a-174-29. [P 213-0018]
  - v. The Permittee shall keep material safety data sheets (MSDS) or technical data sheets (TDS) or Safety Data Sheets (SDS) for each chemical or solvent used. Such information shall include the quantity and type of 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 requirements may also be allowed via internet on-demand. [P 213-0018]
  - vi. The Permittee shall keep all records required by this Title V permit for a period of no less than five years and shall submit such records to the commissioner upon request. [P 213-0018]
- d. *Reporting Requirements*
- i. The Permittee shall notify the commissioner in writing of any exceedance or deviation of an emission limitation or operating parameter, and shall identify the cause or the likely cause of such exceedance or deviations, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows: [P 213-0018]
    - (A) For any regulated air pollutant or operating parameter, no later than ten days after such exceedance commenced.

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

(B) For any hazardous air pollutant, no later than 24 hours after such exceedance commenced.

**3. RCSA §22a-174-18 – Control of Particulate Matter and Visible Emissions***a. Limitation or Restriction*

- i. Opacity measured using visual observation shall not exceed the following visible emissions limits: [RCSA §22a-174-18(b)(1)(A) and (B)]
  - (A) Twenty percent (20%) opacity during any six-minute block average as measured by 40 CFR Part 60, Appendix A, Reference Method 9; or
  - (B) Forty percent (40%) opacity as measured by 40 CFR Part 60, Appendix A, Reference Method 9, reduced to a minute block average.
- ii. The Permittee shall emit no more than 0.10 pounds of particulate matter per MMBtu of heat input. [RCSA §22a-174-18(e)]

*b. Monitoring and Testing Requirements*

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

*c. Record Keeping*

- i. The Permittee shall maintain records of any opacity observations initiated by the Permittee or at the request of the commissioner. Such records shall include the dates, times, and places of all visible observations, persons performing the observation, test method used, the operating conditions at the time of the observation, and the results of such observations. Records shall be kept for a minimum of five years after such records were created. [RCSA §22a-174-33(j)(1)(K)]
- ii. The Permittee shall make and keep records of the calculations performed to show compliance with the emission limitation in Section III.C.3.a.ii of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]
- iii. The Permittee shall keep records required by this Title V permit for a minimum of five years after such records were created. [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 date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

**4. RCSA §22a-174-20(q) – Control of Organic Compound Emissions***a. Limitation or Restriction*

- i. The Permittee shall use coating with an as-applied VOC content less than or equal to 350 grams per liter of coating, excluding the volume of any water and exempt compounds, for paper, film and foil coating. [RCSA §22a-174-20(q)(4)]

### Section III: Applicable Requirements and Compliance Demonstration

- ii. The Permittee shall use the following work practices: [RCSA §§22a-174-20(q)(6)(A) through (D)]
  - (A) New and used VOC-coating or cleaning solvent, including a coating mix on the premises, shall be stored in a nonabsorbent, non-leaking container. Such a container shall be kept closed at all times except when the container is being filled, emptied or s otherwise actively in use.
  - (B) Spills and leaks of VOC-containing coating or cleaning solvent shall be minimized. Any leaked or spilled VOC-containing coating or cleaning solvent shall be absorbed and removed immediately;
  - (C) Absorbent applicators, such as cloth and paper, which are moisture with VOC-containing coating or cleaning solvent, shall be stored in a closed, nonabsorbent, non-leaking container for disposal or recycling; and
  - (D) VOC-containing coating or cleaning solvent shall be conveyed from one location to another in a closed container or pipe.

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

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

#### *c. Record Keeping Requirements*

- i. The Permittee shall maintain records of the information necessary for the commissioner to determine compliance with the limitation in Section III.C.4.a.i of this Title V permit. All records shall be: [RCSA §22a-174-20(q)(7), RCSA §22a-174-33(j)(1)(K)(i)]
  - (A) Made available to the commissioner to inspect and copy upon request;
  - (B) Maintained for five years from the date such record is created; and
  - (C) Maintained in compliance with RCSA §22a-174-20(aa) though (9).

#### *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. RCSA §22a-174-22e – Control of Nitrogen Oxides Emissions from Fuel Burning Equipment at Major Sources of Nitrogen Oxide

**Dryer: 15.18 MMBtu/hr**

**Dryer: 6 MMBtu/hr**

#### *a. Limitation or Restriction*

- i. The Permittee shall not allow NO<sub>x</sub> emissions to exceed 180 ppmvd, corrected to 12% carbon dioxide, as determined by NO<sub>x</sub> emission testing. [RCSA §§22a-174-22e(d)(8) and (d)(12), P 213-0018]

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

- ii. The Permittee shall calculate the emission unit's non-ozone season emission rate as the sum of the emission unit's NO<sub>x</sub> emissions during the period from October 1 through April 30, inclusive. [RCSA §22a-174-22e(d)(19)]
- iii. The Permittee shall calculate the emission unit's ozone season emission rate as the sum of the emission unit's NO<sub>x</sub> emissions while firing the applicable fuel during the period from May 1 through September 30, inclusive, divided by the sum of the emission unit's heat input while firing the applicable fuel during the period from May 1 through September 30, inclusive. [RCSA §22a-174-22e(d)(20)]

**b. Monitoring and Testing Requirements**

- i. The Permittee shall conduct periodic emission testing in accordance with RCSA §22a-174-22e. [RCSA §22a-174-22e(l)(1)(A)]
- ii. The Permittee shall conduct emission tests within every 63 calendar months following the date the previous emission test was conducted or the date the previous emission test was required to be conducted, whichever is earlier. [RCSA §22a-174-22e(l)(5), P 213-0018]
- iii. Each emission test shall be conducted in accordance with RCSA §22a-174-5 and compliance with the emissions limitations of Section III.C.5.a.i of this Title V permit shall be determined based on the average of three one-hour tests, each performed over a consecutive 60-minute period except as provided in RCSA §§22a-174-22e(l)(6)(A) and (B). [RCSA §22a-174-22e(l)(6)]

**c. Record Keeping Requirements**

- i. The Permittee shall retain all records and reports produced for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records and reports shall be retained at the premises where the emissions unit is located, unless the commissioner approves in writing the use of another location in Connecticut. [RCSA §22a-174-22e(j)(1)]
- ii. The Permittee shall make and keep the following records: [RCSA §§22a-174-22e(j)(2)(B), (C), (D), (F) and (G)]
  - (A) The date and work performed for repairs, replacements of parts and other maintenance;
  - (B) Records of the dates and times of all emission testing required, the person performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing;
  - (C) Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22e; and
  - (D) Any other records or reports required by an order or permit issued by the commissioner pursuant to RCSA §22a-174-22e.

**d. Reporting Requirements**

The Permittee shall submit a written report of the results of stack testing to the commissioner no more than 60 days after the completion of such emission tests. [RCSA §22a-174-22e(k)(1)]

**Section III: Applicable Requirements and Compliance Demonstration****D. EMISSIONS UNIT 116 (EU-116): Paper Manufacturing Machine No. 4 (R&D) with a 1.0 MMBtu/hr natural gas fired dryer operating under:**

- Subject to RCSA §22a-174-18
- Subject to RCSA §22a-174-20(q)

**1. RCSA §22a-174-18 – Control of Particulate Matter and Visible Emissions***a. Limitation or Restriction*

- i. Opacity using visual observation shall not exceed the following visible emissions limits: [RCSA §22a-174-18(b)(1)(A) and (B)]
  - (A) Twenty percent (20%) opacity during any six-minute block average as measured by 40 CFR Part 60, Appendix A, Reference Method 9; or
  - (B) Forty percent (40%) opacity as measured by 40 CFR Part 60, Appendix A, Reference Method 9, reduced to a minute block average.
- ii. The Permittee shall emit no more than 0.10 pounds of particulate matter per MMBtu of heat input. [RCSA §22a-174-18(e)]

*b. Testing and Monitoring Requirements*

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

*c. Record Keeping Requirements*

- i. The Permittee shall maintain records of any opacity observations initiated by the Permittee or at the request of the commissioner. Such records shall include the dates, times, and places of all visible observations, persons performing the observation, test method used, the operating conditions at the time of the observation, and the results of such observations. Records shall be kept for a minimum of five years after such records were created. [RCSA §22a-174-33(j)(1)(K)]
- ii. The Permittee shall make and keep records of the calculations performed to show compliance with the emission limitation in Section III.D.1.a.ii of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]
- iii. The Permittee shall keep records required by this Title V permit for a minimum of five years after such records were created. [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 date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

**2. RCSA §22a-174-20(q) – Control of Volatile Organic Compounds***a. Limitation or Restriction*

### Section III: Applicable Requirements and Compliance Demonstration

- i. The Permittee shall use coating with an as-applied VOC content less than or equal to 350 grams per liter of coating, excluding the volume of any water and exempt compounds, for paper, film and foil coating. [RCSA §22a-174-20(q)(4)]
- ii. The Permittee shall use the following work practices: [RCSA §§22a-174-20(q)(6)(A) through (D)]
  - (A) New and used VOC-coating or cleaning solvent, including a coating mix on the premises, shall be stored in a nonabsorbent, non-leaking container. Such a container shall be kept closed at all times except when the container is being filled, emptied or s otherwise actively in use;
  - (B) Spills and leaks of VOC-containing coating or cleaning solvent shall be minimized. Any leaked or spiled VOC-containing coating or cleaning solvent shall be absorbed and removed immediately;
  - (C) Absorbent applicators, such as cloth and paper, which are moisture with VOC-containing coating or cleaning solvent, shall be stored in a closed, nonabsorbent, non-leaking container for disposal or recycling; and
  - (D) VOC-containing coating or cleaning solvent shall be conveyed from one location to another in a closed container or pipe.

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

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

#### *c. Record Keeping Requirements*

- i. The Permittee shall maintain records of the information necessary for the commissioner to determine compliance with the limitation in Section III.D.2.a.i of this Title V permit. All records shall be: [RCSA §22a-174-20(q)(7)]
  - (A) Made available to the commissioner to inspect and copy upon request;
  - (B) Maintained for five years from the date such record is created; and
  - (C) Maintained in compliance with RCSA §22a-174-20(aa) though (9).

#### *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)]

### **E. EMISSIONS UNIT 118 (EU-118): Paper Manufacturing Machine No. 15 with a Dryer operating under:**

- **Subject to RCSA §22a-174-18**
- **Subject to RCSA §22a-174-20(q)**
- **Subject to RCSA §22a-174-22e**

### Section III: Applicable Requirements and Compliance Demonstration

#### 1. RCSA §22a-174-18 – Control of Particulate Matter and Visible Emissions

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

- i. Opacity using visual observation shall not exceed the following visible emissions limits: [RCSA §§22a-174-18(b)(1)(A) and (B)]
  - (A) Twenty percent (20%) opacity during any six-minute block average as measured by 40 CFR Part 60, Appendix A, Reference Method 9; or
  - (B) Forty percent (40%) opacity as measured by 40 CFR Part 60, Appendix A, Reference Method 9, reduced to a minute block average.
- ii. The Permittee shall emit no more than 0.10 pounds of particulate matter per MMBtu of heat input. [RCSA §22a-174-18(e)]

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

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

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

- i. The Permittee shall maintain records of any opacity observations initiated by the Permittee or at the request of the Commissioner. Such records shall include the dates, times, and places of all visible observations, persons performing the observation, test method used, the operating conditions at the time of the observation, and the results of such observations. Record shall be kept for a minimum of five years after such records were created. [RCSA §22a-174-33(j)(1)(K)]
- ii. The Permittee shall make and keep records of the calculations performed to show compliance with the emission limitation in Section III.E.1.a.ii of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]
- iii. The Permittee shall keep records required by this Title V permit for a minimum of five years after such records were created. [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 date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

#### 2. RCSA §22a-174-20 – Control of Organic Compound Emissions

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

- i. The Permittee shall only use coating with an as-applied VOC content less than or equal to 350 grams per liter of coating, excluding the volume of any water and exempt compounds, for paper, film and foil coating. [RCSA §22a-174-20(q)(4)]
- ii. The Permittee shall use the following work practices: [RCSA §§22a-174-20(q)(6)(A) through (D)]

### Section III: Applicable Requirements and Compliance Demonstration

- (A) New and used VOC-coating or cleaning solvent, including a coating mix on the premises, shall be stored in a nonabsorbent, non-leaking container. Such a container shall be kept closed at all times except when the container is being filled, emptied or is otherwise actively in use;
- (B) Spills and leaks of VOC-containing coating or cleaning solvent shall be minimized. Any leaked or spilled VOC-containing coating or cleaning solvent shall be absorbed and removed immediately;
- (C) Absorbent applicators, such as cloth and paper, which are moisture with VOC-containing coating or cleaning solvent, shall be stored in a closed, nonabsorbent, non-leaking container for disposal or recycling; and
- (D) VOC-containing coating or cleaning solvent shall be conveyed from one location to another in a closed container or pipe.

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

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

#### *c. Record Keeping Requirements*

- i. The Permittee shall maintain records of the information necessary for the commissioner to determine compliance with the limitation in Section III.E.2.a.i of this Title V permit: [RCSA §22a-174-20(q)(7); RCSA §22a-174-33(j)(1)(K)(i)]

(A) Made available to the commissioner to inspect and copy upon request

(B) Maintained for five years from the date such record is created; and

(C) Maintained in compliance with RCSA §§22a-174-20(aa)(1) through (9).

#### *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. RCSA §22a-174-22e – Control of Nitrogen Oxides Emissions from Fuel Burning Equipment at Major Sources of Nitrogen Oxide

- **Dryer: 16 MMBtu/hr**

#### *a. Limitation or Restriction*

- i. The Permittee shall not allow NO<sub>x</sub> emissions to exceed 180 ppmvd, corrected to 12% carbon dioxide, as determined by NO<sub>x</sub> emission testing. [RCSA §22a-174-22e(d)(8) and (d)(12)]

### Section III: Applicable Requirements and Compliance Demonstration

- ii. The Permittee shall calculate the emission unit's non-ozone season emission rate as the sum of the emission unit's NO<sub>x</sub> emissions during the period from October 1 through April 30, inclusive, divided by the sum of the emission unit's heat input during the period from October 1 through April 30, inclusive. [RCSA §22a-174-22e(d)(19)]
- iii. The Permittee shall calculate the emission unit's ozone season emission rate as the sum of the emission unit's NO<sub>x</sub> emissions while firing the applicable fuel during the period from May 1 through September 30, inclusive, divided by the sum of the emission unit's heat input while firing the applicable fuel during the period from May 1 through September 30, inclusive. [RCSA §22a-174-22e(d)(20)]

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

- i. The Permittee shall conduct periodic emission testing in accordance with RCSA §22a-174-22e. [RCSA §22a-174-22e(l)(1)(A)]
- ii. The Permittee shall conduct emission tests within every 63 calendar months following the date the previous emission test was conducted or the date the previous emission test was required to be conducted, whichever is earlier. [RCSA §22a-174-22e(l)(5)]
- iii. Each emission test shall be conducted in accordance with RCSA §22a-174-5 and compliance with the emissions limitations of Section III.E.3.a.i of this Title V permit shall be determined based on the average of three one-hour tests, each performed over a consecutive 60-minute period except as provided in RCSA §§22a-174-22e(l)(6)(A) and (B). [RCSA §22a-174-22e(l)(6)]
- iv. If the Permittee is unable to conduct scheduled emission testing required by RCSA §22a-174-22e due to force majeure, the Permittee shall conduct the required emission testing as soon as practicable after the force majeure event occurs. [RCSA §22a-174-22e(l)(8)]

#### *c. Record Keeping Requirements*

- i. The Permittee shall retain all records and reports produced for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records and reports shall be retained at the premises where the emissions unit is located, unless the commissioner approves in writing the use of another location in Connecticut. [RCSA §22a-174-22e(j)(1)]
- ii. The Permittee shall make and keep the following records: [RCSA §§22a-174-22e(j)(2)(B), (C), (D), (F) and (G)]

(A) The date and work performed for repairs, replacements of parts and other maintenance;

(B) Records of the dates and times of all emission testing required, the person performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing;

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

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

**Section III: Applicable Requirements and Compliance Demonstration***d. Reporting Requirements*

The Permittee shall submit a written report of the results of stack testing to the commissioner no more than 60 days after the completion of such emission tests. [RCSA §22a-174-22e(k)(1)]

**F. EMISSIONS UNIT 120 (EU-120): Cold Cleaner Degreaser operating under:**

- **Subject to RCSA §22a-174-20(l) – work practice standards and record keeping**
- **Solvent utilized has a vapor pressure less than 1.0 mmHg at 20 °C**

**1. RCSA §22a-174-20 – Control of Organic Compound Emissions***a. Limitation or Restriction*

- i. The Permittee of a cold cleaning unit with an internal volume greater than one (1) liter and using solvents containing greater than five percent (5%) VOCs by weight shall meet the requirements of RCSA §22a-174-20(l) as follows: [RCSA §§22a-174-20(1)(3)(A) through (L)]
  - (A) Equip the cleaning device with a cover that is easily operated with one hand.
  - (B) Equip the cleaning device with an internal rack or equipment for draining cleaned parts so parts are enclosed under the cover while draining. Such drainage rack or equipment may be external for applications where an internal type cannot fit into the cleaning system.
  - (C) Collect and store waste solvent in closed containers. Closed containers used for storing waste solvent may contain a device that allows pressure relief but does not allow liquid solvent to drain from the container.
  - (D) Close the cover if parts are not being handled in the cleaner for two (2) minutes or more, or if the device is not in use.
  - (E) Drain the cleaned parts for at least 15 seconds or until dripping ceases, whichever is longer.
  - (F) If a degreasing solvent spray is used:
    - (i) Supply a degreasing solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray),
    - (ii) Maintain a solvent spray pressure that does not exceed ten (10) pounds per square inch as measured at the pump outlet, and
    - (iii) Perform spraying within the confines of the cold cleaning unit.
  - (G) Minimize the drafts across the top of each cold cleaning unit such that whenever the cover is open the unit is not exposed to drafts greater than 40 meters per minute, as measured between one and two meters upwind, at the same elevation as the tank lip.
  - (H) Do not operate the unit upon occurrence of any visible solvent leak until such leak is repaired. Any leaked solvent or solvent spilled during transfer shall be cleaned immediately, and the wipe rags or other sorbent material used to clean the spilled or leaked solvent shall be immediately stored in covered containers for disposal or recycling.

### Section III: Applicable Requirements and Compliance Demonstration

- (I) Provide a permanent, conspicuous label on or posted near each unit summarizing the applicable operating requirements.
- (J) Use only solvent that has a vapor pressure less than or equal to 1.0 mmHg at 20 degrees Celsius.
- (K) Shall not clean sponges, fabric, wood, leather, paper and other absorbent material in a cold cleaning machine.

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

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

#### *c. Record Keeping Requirements*

- i. The Permittee shall maintain records of the information necessary for the commissioner to determine compliance with the limitations of Section III.F.1.a of this Title V permit for a minimum of five (5) years after such records is made: [RCSA §22a-174-20(1)(3)(J)(i) through (iv), RCSA §22a-174-33(j)(1)(K)(i)]
  - (A) The type of solvent used, including a description of the solvent and the solvent name,
  - (B) The vapor pressure of the solvent in mmHg measured at 20 degrees Celsius (68 degrees Fahrenheit),
  - (C) The percent VOC content by weight, and
  - (D) The amount of solvent added to each unit on a monthly basis.

#### *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 date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

### **G. GROUPED EMISSIONS UNIT 2 (GEU-2: EU-372 and EU-373): Spunbond Extruder Machine No. 14 and Spunbond Extruder and Laminator Machine No. 18 operating under:**

- **Subject to RCSA §22a-174-18**

#### **1. RCSA §22a-174-18 – Control of Particulate Matter and Visible Emissions**

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

- i. Opacity using visual observation shall not exceed the following visible emissions limits: [RCSA §§22a-174-18(b)(1)(A) and (B)]
  - (A) Twenty percent (20%) opacity during any six-minute block average as measured by 40 CFR Part 60, Appendix A, Reference Method 9; or

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

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

- ii. The Permittee shall emit no more than 0.10 pounds of particulate matter per MMBtu of heat input. [RCSA §22a-174-18(e)]

*b. Monitoring and Testing Requirements*

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

*c. Record Keeping Requirements*

- i. The Permittee shall maintain records of any opacity observations initiated by the Permittee or at the request of the Commissioner. Such records shall include the dates, times, and places of all visible observations, persons performing the observation, test method used, the operating conditions at the time of the observation, and the results of such observations. Record shall be kept for a minimum of five years after such records were created. [RCSA §22a-174-33(j)(1)(K)]
- ii. The Permittee shall make and keep records of the calculations performed to show compliance with the emission limitation in Section III.G.1.a.ii of this Title V permit. [RCSA §22a-174-33(j)(1)(K)]
- iii. The Permittee shall keep records required by this Title V permit for a minimum of five years after such records were created. [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 date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

**H. EMISSIONS UNIT 374 (EU-374): Gaston Systems CFS Foam Applicator operating under:**

- **Permit No. 213-0113**

**1. Operational Conditions and VOC Allowable Emissions**

*a. Limitations or Restrictions*

- i. Maximum Application Rate: 47.6 gal/hr [P 213-0113]
- ii. Maximum VOC Content of Coating as Applied: 2.9 lb/gal [P 213-0113]
- iii. Allowable Clean Up Solvent: Water [P 213-0113]
- iv. The Permittee shall comply with any stipulations and recommendations set by the manufacturer for operating and maintaining the Gaston Systems Foam Coater. The Permittee shall also ensure that all coatings used are handled in accordance with the safety specifications outlined in the Material Safety Data Sheets. [P 213-0113]

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

- v. The Permittee shall not cause or allow this equipment to exceed the emission limits stated herein at any time. [P 213-0113]
  - (A) VOC: 14.0 TPY
- vi. Demonstration of compliance with the above emission limits shall be met by calculating the emission rates using a material balance of the VOCs in coatings used. [P 213-0113]
- vii. The commissioner may require other means (e.g. stack testing) to demonstrate compliance with the emission limitations in Section III.H.1.a.v of this Title V permit, as allowed by state or federal statute, law or regulation. [P 213-0113]
- viii. The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations. [P 213-0113]

**b. Monitoring and Testing Requirements**

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

**c. Record Keeping Requirements**

- i. Material usage records: The Permittee shall maintain daily records of all coatings and diluents used. The records shall include: [P 213-0113]
  - (A) Date;
  - (B) Description of coating, including name and density (lb/gal);
  - (C) Volatile Organic Compound content of coating as applied by weight (lb VOC/gal);
  - (D) Water and exempt VOC content of coating as applied by weight (lb/gal);
  - (E) Non-volatile content of coating as applied by volume and weight (lb/gal);
  - (F) Hours of operation (hr);
  - (G) Quantity of coating used (gal); and
  - (H) Quantity of diluent used for each coating (lb, gallons)
- ii. Such daily records shall clearly display, at a minimum, compliance with all materials usage and emissions limitations set forth in this permit. [P 213-0113]
- iii. The source shall keep a twelve (12) month record of VOC emissions. The twelve (12) month record of VOC emissions shall be determined by adding the current month's record to that of the previous eleven months. These calculations shall be made on a monthly basis. [P 213-0113]
- iv. The Permittee shall maintain accurate records of the quantity and type of material (cleaners, solvents or coatings) used, spilled, recycled or manifested as waste material so as to determine the amount of VOCs emitted to the atmosphere. [P 213-0113]

### Section III: Applicable Requirements and Compliance Demonstration

- v. The Permittee shall keep records and reports of any changes and demonstration of compliance with permit limits in accordance with RCSA §22a-174-4a(h). Material safety data sheets or technical data sheets must include the quantity and type of each hazardous air pollutant contained in the coating or solvent. [P 213-0113]
- vi. The emissions from any new compound, for production or trial runs, shall be counted towards any applicable emission limit in this Title V permit. [P 213-0113]
- vii. Usage records of this unit and material safety data sheets for each coating and solvent used shall be maintained on site for a period not less than five (5) years and submitted to the commissioner upon request. [P 213-0113]

#### 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. Hazardous Air Pollutants (HAPs) Emissions [STATE ONLY REQUIREMENT]

#### a. Limitation or Restrictions

- i. This equipment shall not cause an exceedance of the Maximum Allowable Stack Concentration (MASC) for Hazardous Air Pollutants (HAP) emitted and listed in RCSA §22a-174-29.

#### b. Monitoring and Testing Requirements

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

#### c. Record Keeping Requirements

- i. The Permittee shall keep records of all raw materials and amount used, MSDS's or technical data sheets and calculations demonstrating MASC compliance for HAPs emitted. [RCSA §22a-174-33(j)(1)(K)]
- ii. The Permittee shall keep records required by this Title V permit for a minimum of five years after such records were created. [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)]

**Ahlstrom Power Windsor Locks LLC**

**26 Canal bank Road**

### I. EMISSIONS UNIT 1 (EU-1): General Electric Turbine operating under:

- Permit No. 213-0029
- Subject to RCSA §22a-174-22e

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

- **Subject to 40 CFR Part 60 Subpart GG**

**1. Operational Conditions***a. Limitation or Restriction*

- i. Fuel Types: Natural Gas and No. 2 Fuel Oil [P 213-0029]
- ii. Maximum No. 2 Fuel Oil Sulfur Content (% by weight, dry basis): 0.05 [P 213-0029]
- iii. Maximum Natural Gas Firing Rate: [P 213-0029]
  - (A) Natural Gas: 539,029.1 ft<sup>3</sup>/hr
  - (B) No. 2 Fuel Oil: 3,755.3 gal/hr
- iv. Maximum Gross Heat Input: [P 213-0029]
  - (A) Natural Gas: 555.2 MMBtu/hr @ 0 °F
  - (B) No. 2 Fuel Oil: 529.5 MMBtu/hr @ 0 °F
- v. Minimum Exhaust Gas Flow Rate at Maximum Operation: [P 213-0029]
  - (A) Gas Turbine: 430,965 acfm
  - (B) Gas Turbine with the Equivalent of one Nebraska Boiler (EU-2 or EU-3): 480,801 acfm
- vi. The Permittee shall operate the equivalent of only one of two Nebraska boilers (EU-2 or EU-3) at full load simultaneously with the stationary gas turbine (EU-1). [P 213-0029]
- vii. The Permittee shall be allowed to burn a combination of No. 2 fuel oil and natural gas for the purpose of maintenance for a period not to exceed one hour per week. During these periods, the gas turbine will be subject to the No. 2 fuel oil allowable emissions in Section III.I.3.a.ii.(C) and (D) of this Title V permit. [P 213-0029]

*b. Monitoring and Testing Requirements*

- i. The Permittee shall use individual fuel metering devices or billing meters to continuously monitor fuel feed to the turbine. [P 213-0029]

*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's 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 213-0029]

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

- ii. The Permittee shall keep records of the natural gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel specifying the maximum total sulfur content for the natural gas. [P 213-0029]
- iii. The Permittee shall keep records of the fuel certification for each delivery of fuel oil from a bulk petroleum provider or a copy of the current contract with the fuel supplier supplying the fuel used by the equipment that includes the applicable sulfur content of the fuel as a condition of each shipment. The shipping receipt or contract shall include the date of the delivery, the name of the fuel supplier, type of fuel delivered, and the percentage of sulfur in such fuel, by weight, dry basis, and the method used to determine the sulfur content of such fuel. [P 213-0029, RCSA §22a-174-19a(i)(1)(A)]
- iv. The Permittee shall keep records of all exceedances of any operating parameter. Such records shall include: [P 213-0029]
  - (1) The date and time of the exceedance;
  - (2) A detailed description of the exceedance; and
  - (3) The duration of the exceedance.
- v. The Permittee shall keep all records required by this Title V permit for a period of no less than five years and shall submit such records to the commissioner upon request. [P 213-0029]

**d. Reporting Requirements**

- i. The Permittee shall notify the commissioner in writing of any exceedance of an operating parameter and shall identify the cause or likely cause of such exceedance, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures, no later than ten days after such exceedance commenced. [P 213-0029]
- ii. The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier. [RCSA §22a-174-33(j)(1)(X)]

**2. Continuous Emission Monitoring (CEM) Requirements and Associated Emission Limits****a. Limitation or restriction**

- i. The Permittee shall comply with the CEM requirements as set forth in RCSA §22a-174-4a, RCSA §22a-174-22e, 40 CFR Part 60 Subpart GG and 40 CFR Parts 72-78, if applicable. [P 213-0029, RCSA §22a-174-33(j)(1)(K)]
- ii. CEM shall be required for the following pollutant/operational parameters and enforced on the following basis: [P 213-0029]
  - (A) Opacity: The Permittee shall not exceed 10% during any six minute block average or 40% instantaneous opacity.
  - (B) NO<sub>x</sub> (Burning No. 2 Fuel Oil): The Permittee shall not exceed the emission limits in Section III.I.3a.ii.(C) of this Title V permit during any 1 hour block averaging time.

### Section III: Applicable Requirements and Compliance Demonstration

(C) NO<sub>x</sub> (Burning Natural Gas): The Permittee shall not exceed the emission limits in Section III.I.3.a.ii.(A) of this Title V permit during any 1 hour block averaging time.

(D) O<sub>2</sub>: There are no limits for O<sub>2</sub> but there are monitoring requirements.

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

- i. Opacity: The Permittee shall monitor opacity using CEM data based on a six minute block average time. [P 213-0029]
- ii. O<sub>2</sub>: The Permittee shall monitor O<sub>2</sub> using CEM data based on a 1 hour block average time. [P 213-0029]
- iii. NO<sub>x</sub> (No. 2 Fuel Oil and Natural Gas): The Permittee shall monitor NO<sub>x</sub> using CEM data based on a 1 hour block average time. [P 213-0029]

#### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of all required monitoring data and supporting information. [RCSA §22a-174-33(o)(2)]
- ii. The Permittee shall keep records required by this permit for a period of no less than five years and shall submit such records to the commissioner upon request. [P 213-0029]

#### *d. Reporting Requirements*

- i. The Permittee shall notify the commissioner in writing of any malfunction of the stationary gas turbine, the air pollution control equipment or the continuous monitoring system. The Permittee shall submit such notification within 10 days of the malfunction. The notification shall include the following: [P 213-0029]
  - (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.
- ii. The Permittee shall notify the commissioner in writing of any exceedance of an operating parameter, no later than ten days after such exceedance commenced, and shall identify the cause or likely cause of such exceedance, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures. [P 213-0029]

### 3. PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, CO, GHG, and HAPs

#### *a. Limitation or Restriction*

- i. Definitions [P 213-0029]
  - (A) “Event” shall be defined as the time that it takes the combustion turbine to startup or shutdown.
  - (B) “Startup” shall be defined as that period of time from the initiation of combustion turbine firing until the unit reaches steady state operation.

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

- (C) “Shutdown” shall be defined as that period of time from the initiation of the shutdown process of the combustion turbine until the point at which the combustion process stopped.
  - (D) “Malfunction” means any sudden and unavoidable failure of air pollution control equipment or of a process to operate in a normal or usual manner.
  - (E) “Nebraska Boiler” means one or both boilers operating in accordance with Permit Nos. 213-0031 and 213-0032.
- ii. The Permittee shall not cause or allow this equipment to exceed the emission limits stated herein at any time, unless otherwise noted. [P 213-0029]

**(A) Natural Gas – Criteria Pollutants**

- (1) PM (Filterable + Condensable): 10.38 lb/hr, 0.019 lb/MMBtu, 38.86 tons per 12 consecutive months
- (2) PM<sub>10</sub> (Filterable + Condensable): 4.97 lb/hr, 8.96E-3 lb/MMBtu, 18.62 tons per 12 consecutive months
- (3) PM<sub>2.5</sub> (Filterable + Condensable): 3.66 lb/hr, 6.60E-3 lb/MMBtu, 13.71 tons per 12 consecutive months
- (4) SO<sub>2</sub>: 0.32 lb/hr, 1.21 tons per 12 consecutive months
- (5) NO<sub>x</sub>: 82.28 lb/hr, 42 ppmvd@15% O<sub>2</sub> (This limit shall not apply during periods of startup or shutdown), 309.8 tons per 12 consecutive months
- (6) VOC: 14.36 lb/hr, 0.026 lb/MMBtu (This limit shall not apply during periods of startup or shutdown), 54.06 tons per 12 consecutive months
- (7) CO: 61.85 lb/hr, 232.87 tons per 12 consecutive months
- (8) GHG: 261,241 tons per 12 consecutive months

**(B) Natural Gas – Non-Criteria Pollutant**

- (1) H<sub>2</sub>SO<sub>4</sub>: 0.10 lb/hr, 0.29 tons per 12 consecutive months

**(C) No. 2 Fuel Oil – Criteria Pollutants**

- (1) PM (Filterable + Condensable): 23.43 lb/hr, 0.042 lb/MMBtu, 87.69 tons per 12 consecutive months
- (2) PM<sub>10</sub> (Filterable + Condensable): 20.99 lb/hr, 0.038 lb/MMBtu, 78.54 tons per 12 consecutive months
- (3) PM<sub>2.5</sub> (Filterable + Condensable): 6.38 lb/hr, 0.012 lb/MMBtu, 23.90 tons per 12 consecutive months
- (4) SO<sub>2</sub>: 26.48 lb/hr, 98.90 tons per 12 consecutive months

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

- (5) NO<sub>x</sub>: 130.25 lb/hr, 62 ppmvd@15% O<sub>2</sub> (This limit shall not apply during periods of startup and shutdown), 486.6 tons per 12 consecutive months
  - (6) VOC: 13.77 lb/hr, 0.026 lb/MMBtu (This limit shall not apply during periods of startup and shutdown), 51.43 tons per 12 consecutive months
  - (7) CO: 57.71 lb/hr, 215.60 tons per 12 consecutive months
  - (8) Pb: 0.007 lb/hr, 0.03 tons per 12 consecutive months
  - (9) GHG: 347,295 tons per 12 consecutive months
- (D) No. 2 Fuel Oil – Non-Criteria Pollutant
- (1) H<sub>2</sub>SO<sub>4</sub>: 3.15 lb/hr, 11.78 tons per 12 consecutive months
- iii. Annual Emission Limits – Combustion Turbine and the Equivalent of One Nebraska Boiler at Maximum Rated Capacity [P 213-0029]
- (A) Criteria Pollutants
- (1) PM (Filterable + Condensable): 105.03 tons per 12 consecutive months
  - (2) PM<sub>10</sub> (Filterable + Condensable): 91.20 tons per 12 consecutive months
  - (3) PM<sub>2.5</sub> (Filterable + Condensable): 32.14 tons per 12 consecutive months
  - (4) SO<sub>2</sub>: 136.15 tons per 12 consecutive months
  - (5) NO<sub>x</sub>: 635.6 tons per 12 consecutive months
  - (6) VOC: 58.44 tons per 12 consecutive months
  - (7) CO: 296.6 tons per 12 consecutive months
  - (8) Pb: 0.032 tons per 12 consecutive months
  - (9) GHG: 458,862 tons per 12 consecutive months
- (B) Non-Criteria Pollutants
- (1) H<sub>2</sub>SO<sub>4</sub>: 12.6 tons per 12 consecutive months
- (C) Emissions during startup and shutdown shall be counted towards the annual emission limits.
- iv. This equipment shall not cause an exceedance of the maximum allowable stack concentration (MASC) for any hazardous air pollutant emitted and listed in RCSA §22a-174-29. [STATE ONLY REQUIREMENT]

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

- v. The Permittee shall maintain and operate a continuous monitoring system (CMS) for all operating parameters and air pollution control parameters necessary to determine compliance with the limits in Section III.I.2.a.ii.(A) and (C) of this Title V permit. [P 213-0029]
- vi. The Permittee shall shutdown the turbine in accordance with the following: [P 213-0029]
  - (A) NO<sub>x</sub>: Shutdown limit – 24 consecutive 1 hour block average > permit limit
- vii. The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations. [P 213-0029]
- viii. The Permittee shall operate and maintain this equipment, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction. [P 213-0029]
- ix. A period of startup or shutdown shall not exceed 180 minutes per event. [P 213-0029]
- x. The Permittee shall properly operate the control equipment at all times that this equipment is in operation and emitting air pollutants. [P 213-0029]

**b. Monitoring and Testing Requirements**

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

**c. Record Keeping Requirements**

- i. The Permittee shall calculate and record the monthly and consecutive 12 month PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, CO and H<sub>2</sub>SO<sub>4</sub> emissions in units of tons for natural gas and No. 2 fuel oil separately. 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 213-0029]
- ii. The Permittee shall calculate and records the monthly and consecutive 12 month PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, CO and H<sub>2</sub>SO<sub>4</sub> emissions in units of tons for permit Nos. 213-0029, 213-0031 and 213-0032 combined. The monthly and consecutive 12 month emissions shall be calculated to demonstrate compliance with the annual emission limitation in Section III.I.2.a.iii of this Title V permit. The combined consecutive 12 month emissions shall be determined by adding (for each pollutant) the current month's combined 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 213-0029]
- iii. The Permittee shall keep records of all exceedances of any operating parameter. Such records shall include: [P 213-0029]
  - (A) The date and time of the exceedance;
  - (B) A detailed description of the exceedance, and
  - (C) The duration of the exceedance.

### Section III: Applicable Requirements and Compliance Demonstration

- iv. The Permittee shall keep records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the stationary gas turbine; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. Such records shall contain the following information: [P 213-0029]
  - (A) Type of event (startup, shutdown, or malfunction);
  - (B) Equipment affected;
  - (C) Date of event;
  - (D) Duration of event (minutes);
  - (E) Fuel being used during event; and
  - (F) Total NO<sub>x</sub>, VOC and CO emissions emitted (lb) during the event. VOC and CO emissions during an event, shall be accounted by calculating emissions using the lb/hr allowable emissions in Section III.I.3.ii.(A) and (C) of this Title V permit.
- v. The Permittee shall keep all records required by this Title V permit for a period of no less than five years and submit such records to the commissioner upon request. [P 213-0029]

#### *d. Reporting Requirements*

- i. The Permittee shall notify the commissioner in writing of any exceedance of an emissions limitation, and shall identify the cause or likely cause of such exceedance, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows: [P 213-0029]
  - (A) For any hazardous air pollutant, no later than 24 hours after such exceedance commenced; and
  - (B) For any other regulated air pollutant, no later than ten days after such exceedance commenced.
- ii. The Permittee shall submit the above notification to the Supervisor of the compliance Analysis & Coordination Unit, Enforcement Section, Bureau of Air Management; Department of Energy and Environmental Protection; 79 Elm Street, 5<sup>th</sup> Floor; Hartford, Connecticut 06106-5127. [P 213-0029]

## 4. Opacity

### *a. Limitation or Restriction*

This equipment shall not exceed 10% opacity for any 6 minute block average or 40% instantaneous opacity. [P 213-0029]

### *b. Monitoring and Testing Requirements*

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

### *c. Record Keeping Requirements*

### Section III: Applicable Requirements and Compliance Demonstration

- i. The Permittee shall maintain records of any opacity observations initiated by the Permittee or at the request of the Commissioner. Such records shall include the dates, times, and places of all visible observations, persons performing the observation, test method used, the operating conditions at the time of the observation, and the results of such observations. Records shall be kept for a minimum of five years after such records were created. [RCSA §22a-174-33(j)(1)(K)]
- ii. The Permittee shall keep records of the opacity. Such records shall include: [P 213-0029, RCSA 22a-174-33(j)(1)(K)(ii)]
  - (A) The date and time of the exceedance;
  - (B) A detailed description of the exceedance; and
  - (C) The duration of the exceedance.
- iii. 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. [P 213-0029]

#### d. Reporting Requirements

- i. The Permittee shall submit a report of exceedance to the commissioner with 30 days of the end of the previous month. Such report shall include the following: [P 213-0029]
  - (A) Copies of the exceedance records for the month, as recorded in Section III.I.4.c.ii of this Title V permit.
  - (B) An explanation of the likely causes of the exceedances, and
  - (C) An explanation of remedial actions taken to correct the exceedance.

### 5. RCSA §22a-174-22e – Control of Nitrogen Oxides Emissions from Fuel Burning Equipment at Major Sources of Nitrogen Oxides

#### a. Limitation or Restriction

- i. The Permittee shall not cause or allow this emission unit to exceed the applicable emission limitations specified in Section III.I.5 of this Title V permit unless the Permittee undertakes one of the following actions: [RCSA §22a-174-22e(d)(1)(A) through (C)]
  - (A) Implements an alternative compliance mechanism as provided in RCSA §22a-174-22e(g);
  - (B) Operates under a case-by-case RACT determination as provided in RCSA §22a-174-22e(h); or
  - (C) Ceases operation as provide in RCSA §22a-174-22e(f).
- ii. The Permittee shall comply with the following emission limitations, based on a daily block average for an emission unit with a NOx CEM system: [RCSA §22a-174-22e(d)(5)(C)]

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

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

- (A) Gas-fired: 25 ppmvd
- (B) Oil-fired: 42 ppmvd
- iii. The Permittee shall comply with the following non-ozone season emissions limitation. The averaging period for the non-ozone season limit is October 1 through April 30: [RCSA §22a-174-22e(d)(5)(D)]
  - (A) Gas or oil-fired: 0.15 lb/MMBtu (7 month average)
- iv. The Permittee of an emission unit capable of firing two or more fuels for which a standard is designated in RCSA §22a-174-22e(d) shall not cause or allow emissions of NOx from such emission unit in excess of the emission limitation in RCSA §22a-174-22e(d) for the particular equipment and fuel used. [RCSA §22a-174-22e(d)(10)(B)]
- v. The Permittee of an emission unit that has a CEM system for NOx is subject to the following averaging times for emissions limitations: [RCSA §22a-174-22e(d)(11)(A) through (C)]
  - (A) For a non-ozone season emissions limitation, the period from October 1 to April 30, inclusive, including all periods of operation, except as provided in RCSA §22a-174-22e(m);
  - (B) For an ozone season emissions limitation, the period from May 1 to September 30, inclusive, including all periods of operation, except as provided in RCSA §22a-174-22e(m)(3);
  - (C) For any other emissions limitation, a daily block average, including all periods of operation, except as provided in RCSA §22a-174-22e(m)(3).
- vi. Emission limitations quantified in units of ppmvd shall be corrected to fifteen percent (15%) oxygen. [RCSA §22a-174-22e(d)(16)]
- vii. The Permittee shall calculate the emission unit's non-ozone season emission rate as the sum of the emission unit's NOx emission during the period from October 1 through April 30, inclusive, divided by the sum of the emission unit's heat input during the period from October 1 through April 30, inclusive. [RCSA §22a-174-22e(d)(19)]
- viii. The Permittee shall calculate an emission unit's ozone season emission rate as the sum of the emission unit's NOx emissions while firing the applicable fuel during the period from May 1 through September 30, inclusive. [RCSA §22a-174-22e(d)(20)]

*b. Monitoring and Testing Requirements*

- i. The Permittee shall collect quality assured CEM data for all emission unit operating conditions. Data collection shall include periods of startup or shutdown, monitoring system malfunctions, out-of-control periods, while conducting maintenance or repairs, and periods of required monitoring system quality assurance or quality control activities, such as calibration checks and required zero and span adjustments. [RCSA §22a-174-22e(m)(2)]
- ii. Emissions data used to determine compliance with the applicable emissions limitations in Section III.I.5.a of this Title V permit shall not include data collected during the following periods: [RCSA §22a-174-22e(m)(3)(A) through (D)]
  - (A) When the monitoring system is out-of-control as specified in the facility-specific monitoring plan;

### Section III: Applicable Requirements and Compliance Demonstration

- (B) While conducting required monitoring system quality assurance or quality control activities, including calibration checks and required zero and span adjustments;
  - (C) While conducting maintenance or repairs of the monitoring system to prevent or correct a malfunction; or
  - (D) When the emission unit is not operating.
- iii. Compliance with the seasonal limits of Section III.I.5.a of this Title V permit shall be determined using emissions and operating data for the entire five-month period for an ozone season emissions limitation or for the entire seven-month period for a non-ozone season emissions limitation. [RCSA §22a-174-22e(5)]

#### *c. Record Keeping Requirements*

- i. The Permittee shall retain all records and reports produced pursuant to RCSA Section 22a-174-22e for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records and reports shall be retained at the premises where the emission unit is located, unless the commissioner approves in writing the use of another location in Connecticut. [RCSA §22a-174-22e(j)(1)]
- ii. The Permittee shall make and keep the following records: [RCSA §22a-174-22e(j)(2)(B),(C), (D)(i) through (iv), (F) and (G)]

- (A) The date and work performed for repairs, replacement of parts and another maintenance;
- (B) Records of the dates and times of all emission testing required by RCSA §22a-174-22e, the persons performing the measurements, the testing methods used, the operating conditions at the time of the testing, and the results of such testing;
- (C) Records of all performance evaluations, calibration checks and adjustments on such monitor;
- (D) A record of maintenance performed;
- (E) All data necessary to complete the quarterly reports required under §22a-174-22e;
- (F) Charts, electronically stored data, and printed records produced by the CEM system as needed to demonstrate compliance with the requirements of RCSA §22a-174-22e;
- (G) Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22e; and
- (H) Any other records or reports required by an order or permit issued by the commissioner pursuant to RCSA §22a-174-22e.

#### *d. Reporting Requirements*

- i. Not more than 60 days after the completion of a certification test conducted under the requirements of RCSA §22a-174-22e(m), the Permittee of such emission unit shall submit a written report of the results of such testing to the commissioner. [RCSA §22a-174-22e(k)(2)]

### Section III: Applicable Requirements and Compliance Demonstration

- ii. The Permittee shall submit to the commissioner, on forms provided by the commissioner, written quarterly reports of excess emissions and CEM system malfunctions. Such reports shall be submitted to the commissioner on or before January 30, April 30, July 30 and October 30 of each year and shall include: [RCSA §22a-174-22e(k)(3)(A) through (G)]
  - (A) All daily block average data, in a format acceptable to the commissioner, for the three calendar month period ending the month before the due date of the report;
  - (B) The date and time of commencement and completion of each period of excess emissions;
  - (C) The magnitude and suspected cause of the excess emissions;
  - (D) Actions taken to correct the excess emissions;
  - (E) The date and time when each malfunction of the CEM system commenced and ended;
  - (F) Actions taken to correct each malfunction; and
  - (G) If no excess emissions or CEM system malfunctions occur during a quarter, the Permittee shall indicate that no excess emissions or malfunctions occurred during the quarter.
- iii. Upon written notice, the commissioner may require any Permittee to provide all hourly CEM data, in a format acceptable to the commissioner, for the three calendar month period identified in such written notice. [RCSA §22a-174-22e(k)(4)]
- iv. The Permittee shall notify the commissioner in writing at least 30 days prior to conducting any performance or quality assurance testing of any CEM for NO<sub>x</sub>. Any such testing shall be conducted in accordance with testing protocol approved by the commissioner. Any CEM for NO<sub>x</sub> shall be installed, calibrated and operated in accordance with the performance and quality assurance specifications contained in RCSA §22a-174-4a and 40 CFR Part 60, Subpart A, Appendix B and appendix F, or, for affected units, 40 CFR Part 75. [RCSA §22a-174-22e(m)(4)]

#### 6. 40 CFR Part 60 Subpart GG – Standard of Performance for Stationary Gas Turbines

Note: Pursuant to 40 CFR §60.13(i), EPA approved the use of continuous emission monitors (CEMs) for both NO<sub>x</sub> and SO<sub>2</sub> as an alternative to respectively, monitoring of the water-to-fuel ratio required under 40 CFR §60.334(a) to estimate nitrogen oxide (NO<sub>x</sub>) emissions and monitoring of the nitrogen and sulfur content of the fuel under 40 CFR §60.334(b). [Approval Letter – EPA to Mr. Fairbanks – May 3, 1996] However, CEMs for SO<sub>2</sub> are not installed.

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

- i. The Permittee subject to the provisions of 40 CFR Part 60 Subpart GG, shall not cause the discharge into the atmosphere any gases which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen on a dry basis. [40 CFR §60.333(a)]
- ii. The Permittee shall not burn any fuel which contains total sulfur in excess of 0.8 percent by weight (8,000 ppmw). [40 CFR §60.333(b)]
- iii. The Permittee shall comply with the applicable NO<sub>x</sub> emission limitation of 40 CFR §60.332. [40 CFR §60.334(b), §60.332(a), EPA Approved Alternative Letter May 3, 1996]

**Section III: Applicable Requirements and Compliance Demonstration***b. Monitoring and Testing Requirements*

- i. The Permittee subject to the provisions of 40 CFR Part 60 Subpart GG: [40 CFR §§60.334(h)(1), (2) and (3)]
  - (A) Shall monitor the total sulfur content of the fuel being fired in the turbine. The sulfur content of the fuel must be determined using total sulfur methods described in 40 CFR §60.335(b)(10). Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than 0.4 weight percent (4000 ppmw), ASTM D4084-82, 94, D5504-01, D6228-98, or Gas Processors Association Standard 2377-86 (all which are incorporated by reference-see §60.17), which measure the major sulfur compounds may be used; and
  - (B) Shall monitor the nitrogen content of the fuel combusted in the turbine, if the owner or operator claims an allowance for fuel bound nitrogen (i.e. if an F-value greater than zero is being or will be used by the Permittee to calculate STD in 40 CFR §60.332). The nitrogen content of the fuel shall be determined using methods described in 40 CFR §60.335(b)(9) or an approved alternative.
  - (C) Notwithstanding the provision of Section III.I.6.b.i.(A) of this Title V permit, the Permittee may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in 40 CFR §60.331(u), regardless of whether an existing custom schedule approved by the administrator for 40 CFR Part 60 Subpart GG requires such monitoring. The Permittee shall use one of the following sources of information to make the required demonstration: [40 CFR §60.334(h)(3)(i), (ii)]
    - (1) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or
    - (2) Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount of fuel sampling data specified in Section 2.3.1.4 or 2.3.2.4 of Appendix D to part 75 of this chapter is required.
- ii. The Permittee shall install, calibrate, operate and maintain a NO<sub>x</sub> CEMS capable of calculating NO<sub>x</sub> emission concentrations corrected to 15% O<sub>2</sub> at ISO standard conditions. [40 CFR §60.334(b), Approved Alternative Letter May 3, 1996]
- iii. Monitor data availability shall be no less than 90% on a quarterly basis, in accordance with CTDEEP specifications. Periods of unavailability which are the results of daily calibrations and other QA activities shall be included as downtime. [Approved Alternative Letter May 3, 1996]
- iv. NO<sub>x</sub> CEMs shall compute 1-hour averages from four or more data points equally spaced over each 1-hour period. Hourly averages must contain valid data points for at least 75% of the hour. [Approved Alternative Letter May 3, 1996]

*c. Record Keeping Requirements*

- i. The Permittee shall make and keep records as specified in 40 CFR §60.7. [Approved Alternative Letter May 3, 1996]

### Section III: Applicable Requirements and Compliance Demonstration

- ii. The Permittee shall maintain records to show compliance with the requirements of 40 CFR Part 60 Subpart GG. Records shall be kept for a minimum of five years after such records were created. [RCSA §22a-174-33(j)(1)(K)]

#### d. Reporting Requirements

- i. For the affected unit that elects to continuously monitor parameters or emissions, or to periodically determine the fuel content or fuel nitrogen content under 40 CFR Part 60 Subpart GG, the Permittee shall submit reports of excess emissions and monitor downtime, in accordance with §60.7(c). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown and malfunction. For the purpose of reports required under §60.7(c), periods of excess emissions and monitor downtime that shall be reported as defined in 40 CFR §60.334(j). [40 CFR §60.334(j), Approved Alternative Letter May 3, 1996]

#### 7. Clean Air Interstate Rule (CAIR)

The stationary gas turbine (EU-1) is a CAIR NO<sub>x</sub> Ozone season unit and therefore is subject to RCSA §22a-174-22c. The unit shall comply with all applicable requirements stated in RCSA §22a-174-22c and the standard requirements of the CAIR permit application.

#### J. GROUPED EMISSIONS UNIT 1 (GEU-1: EU-2 AND EU-3): Two Nebraska Modified Type A Boilers Operating under:

- Permit Nos. 213-0031 and 213-0032
- Subject to RCSA §22a-174-22e
- Subject to 40 CFR Part 60 Subpart Db
- Subject to 40 CFR Part 63 Subpart JJJJJ

#### 1. Operational Conditions

##### a. Limitation or Restriction

- i. Fuel Types: Natural gas and No. 2 fuel oil [P 213-0031 and P 213-0032]
- ii. Maximum No. 2 fuel oil sulfur content (% by weight, dry basis): 0.0015 [P 213-0031 and P 213-0032]
- iii. Maximum Natural Gas Firing Rate (each Nebraska boiler): [P 213-0031 and P 213-0032]
  - (A) Natural gas: 172,427 ft<sup>3</sup>/hr (see Section III.J.1.a.iv of this Title V permit)
  - (B) No. 2 fuel oil: 1,206 gal/hr
- iv. The Permittee shall limit the maximum allowable fuel firing rate of natural gas to 162,081 ft<sup>3</sup>/hr. [P 213-0031 and P 213-0032]
- v. Gross Heat Input (each Nebraska boiler): [P 213-0031 and P 213-0032]
  - (A) Natural gas: 177.6 MMBtu/hr
  - (B) No. 2 fuel oil: 170.1 MMBtu/hr

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

- vi. Minimum Exhaust Gas Flow Rate at Maximum Operation (each Nebraska boiler): 49,836 acfm [P 213-0031 and P 213-0032]
- vii. If one or both boilers are operating simultaneously with the stationary gas turbine (EU-1), the combined maximum firing rate of the boilers operating when burning No. 2 fuel oil is limited to 1,206 gal/hr. [P 213-0031 and P 213-0032]
- viii. The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations. [P 213-0031 and P 213-0032]

**b. Monitoring and Testing Requirements**

The Permittee shall use individual fuel metering devices or billing meters to continuously monitor fuel feed to each Nebraska boiler. [P 213-0031 and P 213-0032]

**c. Record Keeping Requirements**

- i. The Permittee shall keep records of monthly and consecutive 12 month fuel consumption for each Nebraska boiler. 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 213-0031 and P 213-0032]
- ii. The Permittee shall keep records of the fuel certification for each delivery of fuel oil from a bulk petroleum provider or a copy of the current contract with the fuel supplier supplying the fuel used by the equipment that includes the applicable sulfur content of the fuel as a condition of each shipment. The shipping receipt or contract shall include the date of delivery, the name of the fuel supplier, type of fuel delivered, and the percentage of sulfur in such fuel, by weight, dry basis, and the method used to determine the sulfur content of such fuel. [P 213-0031 and P 213-0032]
- iii. The Permittee shall keep records of the natural gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel specifying the maximum total sulfur content for the natural gas. [P 213-0031 and P 213-0032]
- iv. 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. [P 213-0031 and P 213-0032]

**d. Reporting Requirements**

- i. The Permittee shall notify the commissioner in writing of any exceedance of an operating parameter, and shall identify the cause or likely cause of such exceedance, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures for any other regulated air pollutant or operating parameter, no later than ten days after such exceedance commenced. [P 213-0031 and P 213-0032]
- ii. The Permittee shall notify the commissioner in writing of any malfunction of the stationary gas turbine (EU-1), the air pollution control equipment or the continuous monitoring system. The Permittee shall submit such notification within ten days of the malfunction. The notification shall include the following: [P 213-0031 and P 213-0032]

### Section III: Applicable Requirements and Compliance Demonstration

- (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.
- iii. The Permittee shall submit the above notification to the Supervisor of the Compliance Analysis & Coordination Unit, Enforcement Section, Bureau of Air Management; Department of Energy and Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.  
[P 213-0031 and P 213-0032]

#### 2. PM, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, VOC, CO, Pb, GHG, Sulfuric Acid and Hazardous Air Pollutants (HAPs)

##### a. Limitation or Restriction

- i. Definitions [P 213-0031 and P 213-0032]
  - (A) Nebraska boiler means one or both boilers operating in accordance with Permit Nos. 213-0031 and 213-0032.
  - (B) Combustion turbine means General Electric gas turbine operating in accordance with Permit No. 213-0029.
- ii. The Permittee shall shut down the boiler in accordance with the following: [P 213-0031 and P 213-0032]
  - (A) NO<sub>x</sub>: Shutdown: 24 consecutive 1 hour block averages > permit limit
- iii. The NO<sub>x</sub> allowable emission limits contained in Section III.J.2.a.iv.(A) and (C) of this Title V permit do not apply during tuning events. A boiler tuning event shall not exceed three consecutive hours or six total hours per day. A tuning event that results in exceedance of the allotted time and/or NO<sub>x</sub> emission limits in Section III.J.2.a.v.(A) and (C) of this Title V permit shall be reported in accordance with Section III.J.2.d of this Title V permit.
- iv. Emissions during boiler tuning events shall be counted towards the annual emission limitation in Section III.J.2.a.v.(D) of this Title V permit. [P 213-0031 and P 213-0032]
- v. The Permittee shall not cause or allow this equipment to exceed the emission limits stated herein at any time. [P 213-0031 and P 213-0032]
  - (A) Natural Gas: Criteria Pollutants
    - (1) PM (Filterable + Condensable): 1.86 lb/hr, 0.010 lb/MMBtu, 8.16 tons per 12 consecutive months
    - (2) PM<sub>10</sub> (Filterable + Condensable): 1.32 lb/hr, 7.45E-03 lb/MMBtu, 5.80 tons per 12 consecutive months
    - (3) PM<sub>2.5</sub> (Filterable + Condensable): 1.32 lb/hr, 7.45E-03 lb/MMBtu, 5.80 tons per 12 consecutive months
    - (4) SO<sub>2</sub>: 0.10 lb/hr, 0.44 tons per 12 consecutive months

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

(5) NO<sub>x</sub>: 19.54 lb/hr, 29 ppmvd, 85.59 tons per 12 Consecutive months

(6) VOC: 1.00 lb/hr, 4.38 tons per 12 consecutive months

(7) CO: 14.56 lb/hr, 63.77 tons per 12 consecutive months

(8) GHG: 83,567 tons per 12 consecutive months

(B) Natural Gas: Non-Criteria Pollutants

(1) H<sub>2</sub>SO<sub>4</sub>: 0.005 lb/hr, 0.02 tons per 12 consecutive months

(C) No. 2 Fuel Oil – Criteria Pollutants

(1) PM: 3.96 lb/hr, 0.023 lb/MMBtu, 17.35 tons per 12 consecutive months

(2) PM<sub>10</sub>: 2.89 lb/hr, 0.017 lb/MMBtu, 12.66 tons per 12 consecutive months

(3) PM<sub>2.5</sub>: 1.88 lb/hr, 0.011 lb/MMBtu, 8.25 tons per 12 consecutive months

(4) SO<sub>2</sub>: 8.51 lb/hr, 37.25 tons per 12 consecutive months

(5) NO<sub>x</sub>: 34.02 lb/hr, 52 ppmvd, 149.01 tons per 12 consecutive months

(6) VOC: 0.82 lb/hr, 3.59 tons per 12 consecutive months

(7) CO: 13.95 lb/hr, 61.10 tons per 12 consecutive months

(8) Pb: 0.0015 lb/hr, 0.007 tons per 12 consecutive months

(9) GHG: 111,567 tons per 12 consecutive months

(D) No. 2 Fuel Oil – Non-Criteria Pollutants

(1) H<sub>2</sub>SO<sub>4</sub>: 0.188 lb/hr, 0.82 tons per 12 consecutive months

(E) Annual Emission Limits – Combustion Turbine and the Equivalent of One Nebraska Boiler (both burning No. 2 Fuel Oil) at Maximum Rated Capacity – Criteria Pollutants

(1) PM (Filterable + Condensable): 105.03 tons per 12 consecutive months

(2) PM<sub>10</sub> (Filterable + Condensable): 91.20 tons per 12 consecutive months

(3) PM<sub>2.5</sub> (Filterable + Condensable): 32.14 tons per 12 consecutive months

(4) SO<sub>2</sub>: 136.15 tons per 12 consecutive months

(5) NO<sub>x</sub>: 635.6 tons per 12 consecutive months

(6) VOC: 58.44 tons per 12 consecutive months

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

- (7) CO: 296.6 tons per 12 consecutive months
- (8) Pb: 0.032 tons per 12 consecutive months
- (9) GHG: 458,862 tons per 12 consecutive months
- (F) Annual Emission Limits – Combustion Turbine and the Equivalent of One Nebraska Boiler (both burning No. 2 Fuel Oil) at Maximum Rated Capacity – Non-Criteria Pollutants
  - (1) H<sub>2</sub>SO<sub>4</sub>: 12.6 tons per 12 consecutive months
- (G) This equipment shall not cause an exceedance of the maximum allowable stack concentration (MASC) for hazardous air pollutant (HAP) emitted and listed in RCSA §22a-174-29. [STATE ONLY REQUIREMENT]
- vi. Demonstration of compliance with the above emission limits shall be met by calculating the emission rates using the most recent approved stack test results for that pollutant (except for pollutants that have CEM), or if unavailable, emission factors from the following sources: [P 213-0031 and P 213-0032]
  - (A) NO<sub>x</sub>: Continuous Emissions Monitoring System (CEM)
  - (B) SO<sub>2</sub>: Mass balance
  - (C) PM/PM<sub>10</sub>/PM<sub>2.5</sub>, VOC and Lead: Compilation of Air Pollution Factors, AP42, Fifth Edition, Table 1.3 and 1.4
  - (D) H<sub>2</sub>SO<sub>4</sub>: Mass balance
- b. *Monitoring and Testing Requirements*

Record keeping specified in Section III.J.2.c of this Title V permit shall be sufficient to meet Monitoring and Testing Requirements. [RCSA §22a-174-33(j)(1)(K)(ii)]
- c. *Record Keeping Requirements*
  - i. The Permittee shall calculate and record the monthly and consecutive 12 month PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, CO and H<sub>2</sub>SO<sub>4</sub> emissions in units of tons for natural gas and No. 2 fuel oil separately. The consecutive 12 month emission shall be determined by adding (from 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 213-0031 and P 213-0032]
  - ii. The Permittee shall calculate and record the monthly and consecutive 12 month PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, CO and H<sub>2</sub>SO<sub>4</sub> emissions in units of tons for Permit Nos. 213-0029, 213-0031 and 213-0032 combined. The monthly and consecutive 12 month emissions shall be calculated to demonstrate compliance with the annual emission limitation in Section III.J.2.a.v.(E) of this Title V permit. The combined consecutive 12 month emissions shall be determined by adding (for each pollutant) the current month's combined 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 213-0031 and P 213-0032]

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

- iii. 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. [P 213-0031 and P 213-0032]

*d. Reporting Requirements*

- i. The Permittee shall notify the commissioner in writing of any exceedance of an emissions limitation, and shall identify the cause or likely cause of such exceedance, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows:  
[P 213-0031 and P 213-0032]

(A) For any hazardous air pollutant, no later than 24 hours after such exceedance commenced; and

(B) For any other regulated air pollutant, no later than ten days after such exceedance commenced.

- ii. The Permittee shall submit the above notification to the Supervisor of the Compliance Analysis & Coordination Unit, Enforcement Section, Bureau of Air Management; Department of Energy and Environmental Protection; 79 Elm Street, 5<sup>th</sup> Floor; Hartford, Connecticut 06106-5127. [P 213-0031 and P 213-0032]

**3. Opacity***a. Limitation or Restriction*

- i. This equipment shall not exceed 10% opacity for any 6 minute block average or 40% instantaneous opacity. [P 213-0031 and P 213-0032]
- ii. The Permittee shall shut down the boiler in accordance with the following (each Nebraska boiler): [P 213-0031 and P 213-0032]

(A) Shutdown Limit: Five consecutive six minute block average > 40%

*b. Monitoring and Testing Requirements*

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

*c. Record Keeping Requirements*

- i. The Permittee shall maintain records of any opacity observations initiated by the Permittee or at the request of the Commissioner. Such records shall include the dates, times, and places of all visible observations, persons performing the observation, test method used, the operating conditions at the time of the observation, and the results of such observations. Records shall be kept for a minimum of five years after such records were created. [RCSA §22a-174-33(j)(1)(K)]
- ii. The Permittee shall keep all records required by this Title V permit for a period of no less than five years and shall submit such records to the commissioner upon request. [P 213-0031 and P 213-0032]

*d. Reporting Requirements*

### Section III: Applicable Requirements and Compliance Demonstration

- i. The Permittee shall notify the commissioner in writing of any exceedance and shall identify the cause or likely cause of such exceedance, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures no later than ten days after such exceedance commenced. [P 213-0031 and P 213-0032]
- ii. The Permittee shall submit the above notification to the Supervisor of the Compliance Analysis & Coordination Unit, Enforcement Section, Bureau of Air Management; Department of Energy and Environmental Protection; 79 Elm Street, 5<sup>th</sup> Floor; Hartford, Connecticut 06106-5127. [P 213-0031 and P 213-0032]

#### 4. 40 CFR Part 63 Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers Area Sources

- **Classification: gas – fired boiler**

*Gas-fired boiler* includes any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or for periodic testing, maintenance, or operator training on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours during any calendar year. [40 CFR §63.11237]

- EU-2 and EU-3 are exempt from the requirements of 40 CFR Part 63 Subpart JJJJJJ pursuant to 40 CFR §63.11196(e) because they are classified as “gas-fired boiler.”

The Permittee will evaluate the applicability of 40 CFR Part 63 Subpart JJJJJJ if EU-2 and EU-3 are operated outside of the gas-fired boiler classification.

#### 5. RCSA §22a-174-22e - Control of Nitrogen Oxides Emissions from Fuel Burning Equipment at Major Sources of Nitrogen Oxide

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

- i. The Permittee shall not cause or allow an emission unit to exceed the following emission limitations, based on a daily block average for an emission unit with a NO<sub>x</sub> CEM system: [RCSA §22a-174-22e(d)(3)(C)]

(A) Natural gas: 0.10 lb/MMBtu

(B) No. 2 Fuel oil: 0.15 lb/MMBtu

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

- i. The Permittee shall calibrate, maintain, operate and certify the CEM system to demonstrate compliance with RCSA §22a-174-22e. [RCSA §22a-174-22e(m)(1)]
- ii. The Permittee shall collect qualified data for all emission unit operating conditions. Data collection shall include periods of startup or shutdown, monitoring system malfunctions, out-of-control periods, while conducting maintenance or repairs, and periods of required monitoring system quality assurance or quality control activities, such as calibration checks and required zero and span adjustments. [RCSA §22a-174-22e(m)(2)]

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

- iii. Emissions data used to determine compliance with applicable emissions limitations in Section III.J.5 of this Title V permit shall not include data collected during the following periods:

[RCSA §§22a-174-22e(m)(3)(A) through (D)]

- (A) When the monitoring system is out-of-control as specified in the facility-specific monitoring plan;
  - (B) While conducting required monitoring system quality assurance or quality control activities, including calibration checks and required zero and span adjustments;
  - (C) While conducting maintenance or repairs of the monitoring system to prevent or correct a malfunction; or
  - (D) When the emission unit is not operating.
- iv. The Permittee shall notify the commissioner in writing at least 30 days prior to conducting performance or quality assurance testing of any CEM for NO<sub>x</sub>. Any such testing shall be conducted in accordance with a testing protocol approved by the commissioner. Any CEM for NO<sub>x</sub> shall be installed, calibrated and operated in accordance with the performance and quality assurance specifications contained in RCSA §22a-174-4 and 40 CFR Part 60, Subpart A, Appendix B and Appendix F. [RCSA §22a-174-22e(m)(4)]

*c. Record Keeping Requirements*

- i. The Permittee of an emission unit subject to RCSA §22a-174-22e shall make and keep the following records: [RCSA §22a-174-22e(j)(2)(B), (D), (E), (F), (G)]
- (A) The date and work performed for repairs, replacement of parts and other maintenance;
  - (B) CEM requirements:
    - (1) Records of all performance evaluations, calibration checks and adjustments on such monitor,
    - (2) A record of maintenance performed,
    - (3) All data necessary to complete quarterly reports required under RCSA §22a-174-22e(k)(3), and
    - (4) Charts, electronically stored data, and printed records produced by such CEM system as needed to demonstrate compliance.
  - (C) For each tune-up, for each emission unit, conducted pursuant to RCSA §22a-174-22e(i):
    - (1) The date on which the emission unit is tuned-up; the name, title and affiliation of the person performing the tune-up, and a description of work performed, and
    - (2) The procedures used to inspect and perform adjustments.
  - (D) Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22e;
- ii. The Permittee shall retain all records and reports produced pursuant to RCSA §22a-174-22e for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records shall be retained at the premises where the emission unit is located, unless the commissioner approves in writing the use of another location in Connecticut. [RCSA §22a-174-22e(j)(1)]

### Section III: Applicable Requirements and Compliance Demonstration

#### d. Reporting Requirements

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

#### K. EMISSION UNIT 7(EU-7): Solar Gas Turbine Model Titan 130 operating under:

- Permit No. 213-0116
- Subject to 40 CFR Part 60 Subpart KKKK

#### 1. Operational Conditions

##### a. Limitation or Restriction

- i. Fuel Type: Natural gas [P 213-0116]
- ii. Fuel Sulfur Content: shall not exceed 20 gr/100 scf [40 CFR §60.4365(a)]
- iii. Maximum Fuel Consumption over any Consecutive 12 Month Period: 1,516 MMcf/yr [P 213-0116]
- iv. Maximum Natural Gas Firing Rate (at 100% full load, 60% relative humidity, 0° F and 29.88 inches Hg ambient pressure): 0.173 MMscf/hr [P 213-0116]
- v. Minimum Exhaust Gas Flow rate at 100% load: 101,397 acfm [P 213-0116]

##### b. Monitoring and Testing Requirements

- i. The Permittee shall comply with the CEM requirements as set forth in RCSA §22a-174-4a. CEM shall be required for the following pollutant/operational parameters and enforced on the following basis: [P 213-0116]
  - (A) Operational Parameter: Fuel Consumption
    - (1) Averaging Time: Continuous
    - (2) Emission Limit: Manufacturer's recommendation
    - (3) Units: scf
- ii. The Permittee shall use an individual non-resettable totalizing fuel metering device or billing meter to continuously monitor fuel feed to the turbine. [P 213-0116]
- iii. The Permittee shall comply with the monitoring requirements of 40 CFR Part 60 Subpart KKKK by contractually limiting the maximum sulfur content of natural gas. [40 CFR §60.4365(a)]

##### c. Record Keeping Requirements

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

- 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 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 213-0116]
- ii. The Permittee shall keep records of all exceedances of any operating parameter. Such records shall include: [P 213-0116]
  - (A) The date and time of the exceedance;
  - (B) A detailed description of the exceedance; and
  - (C) The duration of the exceedance.
- iii. The Permittee shall keep records, when turbines are changed for routine maintenance, to include the following: [P 213-0116]
  - (A) The date the turbine was changed,
  - (B) The reason for the change,
  - (C) Documentation that the replacement turbine is the same make and model number, and
  - (D) Documentation that the replacement turbine does not result in an increase in emissions, the emission of any new pollutants, or increases in electrical output of the turbine.
- iv. 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. [P 213-0116]

**d. Reporting Requirements**

- i. The Permittee shall notify the commissioner in writing of any exceedance of an operating parameter, and shall identify the cause or likely cause of such exceedance, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows: [P 213-0116]
  - (A) For any operating parameter, no later than ten days after such exceedance commenced.
- ii. The Permittee shall notify the commissioner in writing of any malfunction of the stationary gas turbine (EU-7), the air pollution control equipment or the continuous monitoring system. The Permittee shall submit such notification within ten days of the malfunction. The notification shall include the following: [P 213-0116]
  - (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.

**2. PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, CO, GHG, Ammonia and HAPs****a. Limitation or Restriction**

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

- i. The Permittee shall not cause or allow this equipment to exceed the emission limits stated herein at any time. [P 213-0116]
  - (A) Criteria Pollutants – Short Term Emission Limits: These short term emission limits do not apply during periods of startup and shutdown, unless otherwise noted.
    - (1) PM<sub>10</sub>/PM<sub>2.5</sub>: 2.66 lb/hr
    - (2) SO<sub>2</sub>: 1.59 lb/hr
    - (3) NO<sub>x</sub>: 3.22 lb/hr, 5.0 ppmvd@15% O<sub>2</sub>
    - (4) VOC: 2.39 lb/hr
    - (5) CO: 2.37 lb/hr, 6.0 ppmvd@15% O<sub>2</sub>
  - (B) Non-Criteria Pollutants
    - (1) Ammonia: 5.0 ppmvd@15% O<sub>2</sub>
  - (C) Startup and Shutdown Emission Limits
    - (1) NO<sub>x</sub> startup limit: 13.8 lb/event
    - (2) NO<sub>x</sub> shutdown limit: 6.0 lb/event
    - (3) CO startup limit: 740 lb/event
    - (4) CO shutdown limit: 405 lb/event
  - (D) Annual Emission Limits
    - (1) PM<sub>10</sub>/PM<sub>2.5</sub>: 11.9 Tons per 12 Consecutive Months
    - (2) SO<sub>2</sub>: 7.0 Tons per 12 Consecutive Months
    - (3) NO<sub>x</sub>: 14.2 Tons per 12 Consecutive Months
    - (4) VOC: 10.9 Tons per 12 Consecutive Months
    - (5) CO: 17.3 Tons per 12 Consecutive Months
    - (6) GHG: 91,323 Tons per 12 Consecutive Months
- ii. 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. [P 213-0116] [STATE ONLY REQUIREMENT]
- iii. The Permittee shall minimize emissions during periods of startup and shutdown by the following work practices and time constraints: [P 213-0116]

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

- (A) Start the ammonia injection as soon as minimum catalyst temperature is reached;
  - (B) The oxidation catalyst shall not be bypassed during startup or shutdown;
  - (C) The duration of startup shall not exceed 60 minutes for a hot start;
  - (D) The duration of startup shall not exceed 120 minutes for a warm start;
  - (E) The duration of startup shall not exceed 180 minutes for a cold start;
  - (F) A hot start shall be defined as startup when the turbine has been down for less than 8 hours;
  - (G) A warm start shall be defined as startup when the turbine has been down for more than 8 hours;
  - (H) A cold start shall be defined as startup when the turbine has been down for more than 48 hours;
  - (I) The duration of shutdown shall not exceed 30 minutes; and
  - (J) Emissions during these periods shall be counted towards the annual emission limits stated herein.
- iv. Demonstration of compliance with the above emission limits shall be met by calculating the emission rates using emission factors from the following sources: [P 213-0116]
- (A) NO<sub>x</sub>, CO, VOC and Ammonia: Stack test data
  - (B) SO<sub>2</sub>, HAPs: Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Section 3.1, April 2000 (turbine)
  - (C) PM<sub>10</sub>/PM<sub>2.5</sub>, NO<sub>x</sub> (startup/shutdown), CO (startup/shutdown): Manufacturer's Data
- v. 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 regulations. [P 213-0116]
- vi. The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specification and written recommendations. The Permittee shall operate and maintain this stationary combustion turbine, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction. [P 213-0116]
- b. Monitoring and Testing Requirements*
- i. The Permittee shall comply with the CEM requirements as set forth in RCSA §22a-174-4a. CEM shall be required for the following pollutant/operational parameters and enforced on the following basis: [P 213-0116]
- (A) Operational Parameter: SCR Temperature
    - (1) Averaging Time: 4 hours rolling
    - (2) Emission Limit: Manufacturer's recommendation

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

- (3) Unit: °F
- (B) Operational Parameter: SCR Pressure Drop
  - (1) Averaging Time: 4 hours rolling
  - (2) Emission Limit: Manufacturer's recommendation
  - (3) Unit: Inches H<sub>2</sub>O
- ii. The Permittee shall continuously monitor and continuously records the SCR ammonia injection rate (lb/hr), operating temperature (°F) and pressure drop (inches of water) across the catalyst bed. The Permittee shall maintain these parameters within the ranges recommended by the manufacturer to achieve compliance with the emission limits in this Title V permit. [P 213-0116]
- iii. The Permittee shall continuously monitor and continuously record the oxidation catalyst inlet temperature (°F). The Permittee shall maintain this parameter within the range recommended by the manufacturer to achieve compliance with the emission limits in this Title V permit. [P 213-0116]
- iv. The Permittee shall perform inspections of the SCR and oxidation catalysts as recommended by the manufacturer. [P 213-0116]
- v. The Permittee shall conduct recurrent stack testing for NO<sub>x</sub>, CO, VOC and Ammonia within five years from the date of the previous stack test to demonstrate compliance with their respective limits. [P 213-0116]

*c. Record Keeping Requirements*

- i. The Permittee shall calculate and record monthly and consecutive 12 month PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</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 213-0116]
- ii. The Permittee shall keep records of all exceedances of an operating parameter. Such records shall include: [P 213-0116]
  - (A) The date and time of the exceedance;
  - (B) A detailed description of the exceedance; and
  - (C) The duration of the exceedance
- iii. The Permittee shall keep records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the stationary gas turbine and any malfunction of the air pollution control equipment. Such records shall contain the following information: [P 213-0116]
  - (A) Type of event (startup, shutdown, or malfunction);
  - (B) Equipment affected;

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

- (C) Date of event;
  - (D) Duration of event (minutes);
  - (E) Fuel being used during event; and
  - (F) Total NOx and CO emissions emitted (lb) during the event.
- iv. The Permittee shall keep records of each delivery of anhydrous ammonia. The records shall include: [P 213-0116]
- (A) The date of delivery;
  - (B) The name of the supplier; and
  - (C) The quantity of ammonia delivered.
- v. The Permittee shall keep records of the inspection and maintenance of the SCR and oxidation catalysts. The records shall include the name of the inspector, the date, the results or actions and the date the catalyst is replaced. [P 213-0116]
- vi. The Permittee shall make and keep records of the actual stack concentration (ASC) and MASC calculations for each Nebraska boiler to show compliance with RCSA §22a-174-29. STATE ONLY REQUIREMENT [RCSA §22a-174-33(j)(1)(K)]
- vii. The Permittee shall keep records of stack testing reports submitted to the Department. [RCSA §22a-174-33(j)(1)(K)]
- viii. The Permittee shall keep records required by this permit for a period of no less than five years and shall submit such records to the commissioner upon request. [P 213-0116]
- d. Reporting Requirements*
- i. The Permittee shall notify the commissioner in writing of any exceedance of an operating parameter, and shall identify the cause or the likely cause of such exceedance, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows: [P 213-0116]
    - (A) For any hazardous air pollutant, no later than 24 hours after such exceedance commenced; and
    - (B) For any other regulated air pollutant or operating parameter, no later than ten days after such exceedance commenced.
  - ii. The Permittee shall notify the commissioner in writing of any malfunction of the gas stationary turbine, the air pollution control equipment or the continuous monitoring system. The Permittee shall submit such notification within ten days of the malfunction. The notification shall include the following: [P 213-0116]
    - (A) A description of the malfunction and a description of the circumstances surrounding the cause or the likely cause of such malfunction; and

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

(B) A description of all corrective actions and preventative measures taken and/or planned with respect to such malfunction and the dates of such actions and measures.

**3. Opacity***a. Limitation or Restriction*

- i. Opacity shall be no greater than 10% over any six minute block average. [P 213-0116]

*b. Monitoring and Testing Requirements*

- i. If required by the commissioner, the Permittee shall measure opacity using 40 CFR Part 60, Appendix A, Reference Method 9. [P 213-0116]

*c. Record Keeping Requirements*

- i. If testing was required by the commissioner, the Permittee shall maintain records of the opacity test required in Section III.K.3.a of this Title V permit. Such records shall include the dates, times, and places of all visible observations, persons performing the observations, test methods used, the operating conditions at the time of the observation, and the results of such observations. [RCSA §22a-174-33(j)(1)(K)]

*d. Reporting Requirements*

- i. 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. RCSA §22a-174-22e – Control of Nitrogen Oxides Emissions from Fuel Burning Equipment at Major Sources of Nitrogen Oxide**

Pursuant to RCSA §22a-174-22e(a)(1)(A), EU-7 is not considered an “affected unit” because the nameplate capacity of the unit is less than 15 MW.

*a. Limitation or Restriction*

- i. The Permittee shall not cause or allow an emission unit to exceed the following emission limitations, based on a daily block average for an emission unit with CEM system: [RCSA §22a-174-22e(d)(5)(C)]

(A) Natural gas: 25 ppmvd

(B) No. 2 fuel oil: 42 ppmvd

- ii. Emissions limitations quantified in units of ppmvd shall be corrected to 15% oxygen. [RCSA §22a-174-22e(d)(16)]

*b. Monitoring and Testing Requirements*

- i. The Permittee shall conduct periodic emissions testing in accordance with 40 CFR Part 60 Subpart KKKK to demonstrate compliance. [RCSA §22a-174-22e(1)(1)(B)]

*c. Record Keeping Requirements*

### Section III: Applicable Requirements and Compliance Demonstration

- i. The Permittee of an emission unit subject to RCSA §22a-174-22e shall make and keep the following records: [RCSA §§22a-174-22e(j)(2)(B), (F) and (G)]
  - (A) Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22e;
  - (B) The date and work performed for repairs, replacement of parts and other maintenance;
  - (C) Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22e.
- ii. The Permittee retain all records and reports produced pursuant to RCSA §22a-174-22e for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records shall be retained at the premises where the emission unit is located, unless the commissioner approves in writing the use of another location in Connecticut. [RCSA §22a-174-22e(j)(1)]

#### *d. Reporting Requirements*

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

#### **L. Premises Wide Caps for VOC and HAPs for Premises Located at 11 Canal Bank Road and 26 Canal Bank Road, Windsor Locks, CT 06069**

- **Permit No. 213-0113 – Collateral Condition**

#### **1. Emissions Limitation and Operational Conditions**

##### *a. Limitation or Restrictions*

- i. Premises: In accordance with the determination issued by the Department on October 18, 2024, Ahlstrom Nonwoven LLC located at 11 Canal Bank Road and Ahlstrom Power Windsor Locks LLC located at 26 Canal Bank Road are considered a single stationary source. The limitations and restrictions, and record keeping requirements in Section III.L of this Title V permit apply to this stationary source.
- ii. The Permittee shall not cause or allow the emissions of VOC from the premises during any consecutive 12 month period to be equal to or exceed 40 tons. [P 213-0113]
- iii. The Permittee shall not cause or allow emissions of HAPs from the premises during any consecutive 12 month period to be equal to or exceed the following: [P 213-0113]
  - (A) For any single HAP: 8 tons
  - (B) For any combination of HAPs: 20 tons
- iv. Emission Units Operating Under New Source Review permits: Any emission unit operating under a New Source Review permit shall comply with the requirements of the most recent issued permit for that emission unit. [P 213-0113]

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

- v. Emission Units Operating Under RCSA §22a-174-3b: Any emission units operating under RCSA §22a-174-3b shall comply with the requirements prescribed in this Regulation that are applicable to the emission unit. [P 213-0113]
- vi. The Permittee shall calculate actual emissions using data from the following sources. The source used shall be selected in the following order, based on availability: [P 213-0113]
  - (A) CEM,
  - (B) Data supplied by the manufacturer of the emission unit,
  - (C) Material balance,
  - (D) Compilation of Air Pollutant Emission Factors (AP-42),
  - (E) AIRS Facility Subsystem Emissions, or
  - (F) The Emission Inventory Improvement Program (EIIP).
- b. *Monitoring Requirements*
  - i. The Permittee shall monitor emission sources of VOC and HAPs by use of record keeping in accordance with Section III.L.1.c of this Title V permit. [P 213-0113]
  - ii. The Permittee shall monitor fuel consumption or hours of operation from fuel burning equipment as follows: [P 213-0113]
    - (A) Fuel consumption through a dedicated non-resettable fuel flow meter or a common billing meter.
    - (B) Hours of operation through a dedicated non-resettable hour meter.
- c. *Record Keeping Requirements*
  - i. The Permittee shall make and keep records of VOC and HAPs actual emissions from each unit. Such records shall include the following: [P 213-0113]
    - (A) A description of the emission unit,
    - (B) Maximum rated capacity, if applicable,
    - (C) Installation and removal date of emissions unit (or estimation if unknown),
    - (D) A log for each month for each emission unit that shall include, as applicable:
      - (1) Identification of the fuel(s), solvents, coatings, raw materials, or other such materials used,
      - (2) The total amount of fuels, solvents, coatings, raw materials, or other such materials used,
      - (3) Hours of operation during each month, as necessary, to calculate emissions,
      - (4) Emission factor used for emission calculations and source of such emission factor,

### Section III: Applicable Requirements and Compliance Demonstration

- (5) All purchase orders, invoices, Material Safety Data Sheets, test results or other documents necessary to verify information and calculations in the monthly log, and
- (6) Calculations of actual emissions.
- ii. The Permittee shall make and keep records of the monthly and consecutive 12 month VOC and HAPs actual emissions for the premises. The consecutive 12 month VOC and HAPs emissions shall be determined by adding the current month's VOC and HAPs emissions to that of the previous 11 months. [P 213-0113]
- iii. The Permittee shall keep all records required by this Title V permit for a period of no less than five years and submit such records to the commissioner upon request. [P 213-0113]

#### d. Reporting Requirements

- i. The Permittee shall notify the commissioner in writing of any exceedance of a VOC or HAP emission limitation. The Permittee shall identify the cause or the likely cause of such exceedance, all corrective actions and preventative measures taken with respect thereto, and the dates of such actions and measures as follows: [P 213-0113]
  - (A) For any hazardous air pollutant, no later than 24 hours after such exceedance commenced; and
  - (B) For VOC or any operating parameter, no later than ten days after such exceedance commenced.

### M. 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.

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

9. **Variations:** 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 Dioxide Emissions:** The Permittee shall comply with the requirements for Control of Sulfur Dioxide Emissions from Power Plants and other large stationary sources of air pollution as set forth in RCSA §22a-174-19a.
16. **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.
17. **Organic Compound Emissions:** The Permittee shall comply with the requirements for control of organic compound emissions as set forth in RCSA §22a-174-20.
18. **Nitrogen Oxide Emissions:** The Permittee shall comply with the requirements for control of nitrogen oxide emissions as set forth in RCSA §22a-174-22e.
19. **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).
20. **Open Burning:** The Permittee is prohibited from conducting open burning, except as may be allowed by CGS §22a-174(f).
21. **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.
22. **Emission Fees:** The Permittee shall pay an emission fee as set forth in RCSA §22a-174-26(d).

**Section IV: Compliance Schedule**

<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**

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.** 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 V: State Enforceable Terms and Conditions**

- F.** The Permittee shall comply with the requirements for Control of Carbon Dioxide Emissions as set forth in RCSA §22a-174-31.
- G.** The Permittee shall comply with the requirements for Architectural and Industrial Maintenance Coatings as set forth in RCSA §22a-174-41.
- H.** The Permittee shall comply with the requirements for Adhesives and Sealants as set forth in RCSA §22a-174-44.

## Section VI: Title V Requirements

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

### SECTION VI: TITLE V REQUIREMENTS

#### A. SUBMITTALS TO THE COMMISSIONER & ADMINISTRATOR

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

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

Any submittal to the Administrator of the Environmental Protection Agency shall be submitted per the procedure required by the applicable requirement or otherwise in a computer-readable format and addressed to: Director, Enforcement and Compliance Assurance Division, U.S. EPA Region I, 5 Post Office Square, Suite 100 (Mailcode: 04-02), Boston, Massachusetts 02109-3912, Attn: Air Compliance Clerk.

#### B. CERTIFICATIONS [RCSA §22a-174-33(b)]

In accordance with RCSA §22a-174-33(b), any report or other document required by this Title V permit and any other information submitted to the commissioner or Administrator shall be signed by an individual described in RCSA §22a-174-2a(a), or by a duly authorized representative of such individual. Any individual signing any document pursuant to RCSA §22a-174-33(b) shall examine and be familiar with the information submitted in the document and all attachments thereto, and shall make inquiry of those individuals responsible for obtaining the information to determine that the information is true, accurate, and complete, and shall also sign the following certification as provided in RCSA §22a-174-2a(a)(4):

“I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under Section 22a-175 of the Connecticut General Statutes, under Section 53a-157b of the Connecticut General Statutes, and in accordance with any applicable statute.”

#### C. SIGNATORY RESPONSIBILITY [RCSA §22a-174-2a(a)]

For purposes of signing any Title V-related application, document, report or certification required by RCSA §22a-174-33, any corporation's duly authorized representative may be either a named individual or any individual occupying a named position. Such named individual or individual occupying a named position is a duly authorized representative if such individual is responsible for the overall operation of one or more manufacturing, production or operating facilities subject to RCSA §22a-174-33 and either:

**Section VI: Title V Requirements**

1. The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding 25 million dollars in second quarter 1980 dollars; or
2. The delegation of authority to the duly authorized representative has been given in writing by an officer of the corporation in accordance with corporate procedures and the following:
  - i. Such written authorization specifically authorizes a named individual, or a named position, having responsibility for the overall operation of the Title V premises or activity,
  - ii. Such written authorization is submitted to the commissioner and has been approved by the commissioner in advance of such delegation. Such approval does not constitute approval of corporate procedures, and
  - iii. If a duly authorized representative is a named individual in an authorization submitted under subclause ii. of this subparagraph and a different individual is assigned or has assumed the responsibilities of the duly authorized representative, or, if a duly authorized representative is a named position in an authorization submitted under subclause ii. of this subparagraph and a different named position is assigned or has assumed the duties of the duly authorized representative, a new written authorization shall be submitted to the commissioner prior to or together with the submission of any application, document, report or certification signed by such representative.

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

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

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

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

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

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

**Section VI: Title V Requirements****F. PREMISES RECORDS [RCSA §22a-174-33(o)(2)]**

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

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

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

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

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

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

**Section VI: Title V Requirements****H. COMPLIANCE CERTIFICATIONS [RCSA §22a-174-33(q)(2)]**

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

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

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

Notwithstanding Section VI.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.

**Section VI: Title V Requirements****M. INSPECTION TO DETERMINE COMPLIANCE [RCSA §22a-174-33(j)(1)(M)]**

The commissioner may, for the purpose of determining compliance with this Title V permit and other applicable requirements, enter the premises at reasonable times to inspect any facilities, equipment, practices, or operations regulated or required under such permit; to sample or otherwise monitor substances or parameters; and to review and copy relevant records lawfully required to be maintained at such premises in accordance with this Title V permit. It shall be grounds for permit revocation should entry, inspection, sampling, or monitoring be denied or effectively denied, or if access to and the copying of relevant records is denied or effectively denied.

**N. PERMIT AVAILABILITY**

The Permittee shall have available at the facility at all times a copy of this Title V permit.

**O. SEVERABILITY CLAUSE [RCSA §22a-174-33(j)(1)(R)]**

The provisions of this Title V permit are severable. If any provision of this Title V permit or the application of any provision of this Title V permit to any circumstance is held invalid, the remainder of this Title V permit and the application of such provision to other circumstances shall not be affected.

**P. NEED TO HALT OR REDUCE ACTIVITY [RCSA §22a-174-33(j)(1)(T)]**

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Title V permit.

**Q. PERMIT REQUIREMENTS [RCSA §22a-174-33(j)(1)(V)]**

The filing of an application or of a notification of planned changes or anticipated noncompliance does not stay the Permittee's obligation to comply with this Title V permit.

**R. PROPERTY RIGHTS [RCSA §22a-174-33(j)(1)(W)]**

This Title V permit does not convey any property rights or any exclusive privileges. This Title V permit is subject to, and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby, including CGS §4-181a(b) and RCSA §22a-3a-5(b). This Title V permit shall neither create nor affect any rights of persons who are not parties to this Title V permit.

**S. ALTERNATIVE OPERATING SCENARIO RECORDS [RCSA §22a-174-33(o)(3)]**

The Permittee shall, contemporaneously with making a change authorized by this Title V permit from one alternative operating scenario to another, maintain a record at the premises indicating when changes are made from one operating scenario to another and shall maintain a record of the current alternative operating scenario.

**T. OPERATIONAL FLEXIBILITY AND OFF-PERMIT CHANGES [RCSA §22a-174-33(r)(2)]**

The Permittee may engage in any action allowed by the Administrator in accordance with 40 CFR §§70.4(b)(12)(i) to (iii)(B), inclusive, and 40 CFR §§70.4(b)(14)(i) to (iv), inclusive, without a Title V non-minor permit modification, minor permit modification or revision and without requesting a Title V non-minor permit modification, minor permit modification or revision provided such action does not:

**Section VI: Title V Requirements**

1. Constitute a modification under 40 CFR Part 60, 61 or 63;
2. Exceed emissions allowable under the subject permit;
3. Constitute an action which would subject the Permittee to any standard or other requirement pursuant to 40 CFR Parts 72 to 78, inclusive; or
4. Constitute a non-minor permit modification pursuant to RCSA §22a-174-2a(d)(4).

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

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

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

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

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

The proposed transferor and transferee of a permit shall submit to the commissioner a request for a permit transfer on a form provided by the commissioner. A request for a permit transfer shall be accompanied by any fees required by any applicable provision of the general statutes or regulations adopted thereunder. The commissioner may also require the proposed transferee to submit with any such request, the information identified in CGS §22a-60.

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

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

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

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

**Section VI: Title V Requirements**

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

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

**Y. CREDIBLE EVIDENCE**

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

### **Print for Compliance Certification or Enforcement**

Click the button below to generate the appropriate checklist. Be aware that this macro does not work unless you have access to the DEEP D-Drive.

This macro takes anywhere from 2-5 minutes to run. Your computer will look like it is locked up but it is working. Unfortunately the new DEEP virtual computer system makes this process even slower. Please be patient.

Print Enforcement Checklist

Print Compliance Certification