



Connecticut Department of  
**ENERGY &  
ENVIRONMENTAL  
PROTECTION**

## 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>	<i>178 - 0125 - TV</i>
<b>Client/Sequence/Town/Premises Numbers</b>	<i>5239/19/178/231</i>
<b>Date Issued</b>	<b>February 24, 2017</b>
<b>Expiration Date</b>	<b>February 24, 2022</b>

**Corporation:**

*Connecticut State Department of Education  
Connecticut Technical High School System  
Stratford School of Aviation Maintenance Technicians*

**Premises Location:**

*200 Great Meadow Road, Stratford, CT 06615*

**Name of Responsible Official and Title:**

*John Woodmansee CIH, CUSA  
Education Consultant - Environmental Health and Safety  
Connecticut Department of Education*

All the following attached pages, 2 through 28, are hereby incorporated by reference into this Title V permit.

/s/ Anne Gobin for  
Robert Klee  
Commissioner

February 24, 2017  
Date

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## LIST OF ABBREVIATIONS/ACRONYMS

<i>Abbreviation/Acronym</i>	<i>Description</i>
°C	Degree Celsius
°F	Degree Fahrenheit
CFR	Code of Federal Regulations
CGS	Connecticut General Statutes
CO	Carbon Monoxide
EU	Emissions Unit
EPA	Environmental Protection Agency
GEU	Grouped Emissions Units
HAP	Hazardous Air Pollutant
hr	Hour
in H <sub>2</sub> O	Inches of Water
lb	Pound
mmHg	Millimeter of Mercury
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSR	New Source Review
PM <sub>10</sub>	Particulate Matter less than 10 microns
RCSA	Regulations of Connecticut State Agencies
SIC	Standard Industrial Classification Code
SO <sub>x</sub>	Sulfur Oxides
TPY	Tons per year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound

## **Title V Permit**

**All conditions in Sections III, IV, VI and VII 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, VI and VII of this Title V permit in accordance with the Clean Air Act, as amended.**

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

### **A. PREMISES INFORMATION**

Nature of Business: Aviation Educational Institution

Primary SIC: 3720

Other SIC: 8249

Facility Mailing Address: 25 Industrial Park Road, Middletown, CT 06457

Telephone Number: (860) 807-2233

### **B. PREMISES DESCRIPTION**

The Stratford School for Aviation Maintenance Technicians (Stratford School) is an educational facility located in Stratford, CT. The Stratford School facility consists of a number of sources that contribute to the potential air emissions from the site. The equipment on site consists of four natural gas fired boilers, five space heaters, two engine test cells, two air compressors, two spray booths, two cleaning booths and two parts washers. In addition, there's a Zyglo inspection unit, a Magnaflux magnetic particle inspection station, a 250-gallon waste oil tank, a welding operation and spray can usage for coating as well as cleaning. Excluding the test cells, all operations at the school take place in a single building.

Stratford School was required to apply for and obtain a Title V permit because the school currently is an aerospace rework operation that is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63 Subpart GG) by virtue of potential emissions which exceed the Title V thresholds. Stratford School submitted an application for registration under the General Permit to Limit Potential to Emit from Major Stationary Sources of Air Pollution (GPLPE) in 2003 in an effort to obtain minor source status. Stratford School was not granted coverage under the GPLPE because they failed to apply for and obtain this minor source status prior to September 1, 1998, the compliance date for all existing affected sources subject to this NESHAP. As such, Stratford School was required to obtain a Title V permit. The applicability of this NESHAP to Stratford School, as well as the compliance requirements, are outlined in this Title V permit.

The two engine test cells at the site are subject to the NESHAP for Engine Test Cells/Stands (40 CFR Part 63 Subpart PTTTT). However, according to 40 CFR §63.9290(b), existing affected sources do not have to meet the requirements of this subpart nor Subpart A of this part. An existing affected source is one that commenced construction or reconstruction on or before May 14, 2002. Since the two test cells at the Stratford School were installed in 1984, these test cells are exempt from the requirements of this subpart.

The four gas fired boilers at the facility were manufactured by HydroTherm, Inc. and are hot water heating systems with vessel capacities of seven gallons each that do not produce steam and have a heat input capacity of 300,000 BTUs each. As such, these units meet the definition of hot water heaters as specified under 40 CFR §63.7575 and therefore, in accordance with 40 CFR §63.7491(d), are exempt from the NESHAP for Major Sources: Industrial, Commercial, Institutional Boilers and Process Heaters, 40 CFR Part 63 Subpart DDDDD. Furthermore, these units meet the definition of hot water heaters as specified under 40 CFR §63.11237 and therefore, in accordance with 40 CFR §63.11195(f), are exempt from the NESHAP for Area Sources: Industrial, Commercial, and Institutional Boilers, 40 CFR Part 63 Subpart JJJJJ.

## 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 or Regulations into this Title V permit.

<b>TABLE II.A: EMISSIONS UNITS DESCRIPTION</b>				
<b>Emissions Unit</b>	<b>Grouped Emissions Unit</b>	<b>Emissions Unit Description</b>	<b>Control Unit Description</b>	<b>Permit or Regulation Number</b>
EU-1	GEU-1	Test Cell No. 1 Constructed 1984		Permit No. 178-0122
EU-2	GEU-1	Test Cell No. 2 Constructed 1984		Permit No. 178-0123
EU-3	GEU-2	Spray Booth Constructed 1987	Filters, Code No. 18	RCSA §22a-174-3c(b)(10)
EU-4	GEU-2	Spray Booth Constructed 1987	Filters, Code No. 18	RCSA §22a-174-3c(b)(10)
EU-5		Cleaning Operations		40 CFR Part 63 Subpart GG

### B. OPERATING SCENARIO IDENTIFICATION

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

There are no Alternate Operating Scenarios for the premises.

<b>TABLE II.B: OPERATING SCENARIO IDENTIFICATION</b>	
<b>Emissions Units Associated with the Scenario</b>	<b>Description of Scenario</b>
GEU-1	The Permittee operates the engine test cells using three engines; one gasoline fired and the other two are jet fuel A fired.
GEU-2	The Permittee uses the spray booths to coat both metal and non-metal parts and the booths are operated in accordance with the requirements of RCSA §22a-174-3c.
EU-5	The Permittee operates a cleaning operation in accordance with 40 CFR §63.744.

### Section III: Applicable Requirements and Compliance Demonstration

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

#### A. GROUPED EMISSIONS UNIT 1 (GEU-1) - ENGINE TEST CELLS

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

###### a. Limitation or Restriction

- i. On any day from May 1 to September 30, inclusive, of any year: the NO<sub>x</sub> emissions shall not exceed 137 pounds from the premises. [Permit Nos. 178-0122 & 178-0123]
- ii. NO<sub>x</sub> emissions from each test cell shall not exceed 2.843 lb/hr or 0.0656 TPY. [Permit Nos. 178-0122 & 178-0123]

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

Record keeping specified in Section III.A.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 make and maintain records sufficient to demonstrate compliance with the emission limits in Section III.A.1.a.ii of this Title V permit, for each test cell, using emission factors from the following sources: [Permit Nos. 178-0122 & 178-0123]
  - (A) EPA's AIRS (3/90), SCC 2-04-001-01 Aircraft Engine Testing of a Turbojet Engine
  - (B) EPA's FIRE 6.23 (reference to AP-42, 9/85), SCC 2-04-004-01 Engine Testing of Reciprocating Internal Combustion Engine firing gasoline fuel

###### d. Reporting Requirements

The Permittee shall be required to submit reports of monitoring data such as air pollutants, fuels, and operational information on forms furnished or prescribed by the commissioner. Such forms shall be signed or verified in writing by a ranking corporate officer or managing official with offices located in the state. The signature shall constitute personal affirmation that such officer has exercised due diligence in verifying the accuracy of the record or report and that, to the best of his knowledge and belief, the record or report is true, complete, and complies fully with applicable state requirements. [Permit Nos. 178-0122 & 178-0123]

##### 2. TSP and PM<sub>10</sub>

###### a. Limitation or Restriction

TSP or PM<sub>10</sub> emissions from each test cell shall not exceed 0.702 lb/hr or 0.015 TPY. [Permit Nos. 178-0122 & 178-0123]

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

### Section III: Applicable Requirements and Compliance Demonstration

Record keeping specified in Section III.A.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 make and maintain records sufficient to demonstrate compliance with the emission limits in Section III.A.2.a of this Title V permit, for each test cell, using emission factors from the following sources: [Permit Nos. 178-0122 & 178-0123]

(A) EPA's AIRS (3/90), SCC 2-04-001-01 Aircraft Engine Testing of a Turbojet Engine

(B) EPA's FIRE 6.23 (reference to AP-42, 9/85), SCC 2-04-004-01 Engine Testing of Reciprocating Internal Combustion Engine firing gasoline fuel

*d. Reporting Requirements*

The Permittee shall be required to submit reports of monitoring data such as air pollutants, fuels, and operational information on forms furnished or prescribed by the commissioner. Such forms shall be signed or verified in writing by a ranking corporate officer or managing official with offices located in the state. The signature shall constitute personal affirmation that such officer has exercised due diligence in verifying the accuracy of the record or report and that, to the best of his knowledge and belief, the record or report is true, complete, and complies fully with applicable state requirements. [Permit Nos. 178-0122 & 178-0123]

### 3. CO

*a. Limitation or Restriction*

CO emissions from each test cell shall not exceed 84.31 lb/hr or 2.0 TPY. [Permit Nos. 178-0122 & 178-0123]

*b. Monitoring and Testing Requirements*

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 make and maintain records sufficient to demonstrate compliance with the emission limits in Section III.A.3.a of this Title V permit, for each test cell, using emission factors from the following sources: [Permit Nos. 178-0122 & 178-0123]

(A) EPA's AIRS (3/90), SCC 2-04-001-01 Aircraft Engine Testing of a Turbojet Engine

(B) EPA's FIRE 6.23 (reference to AP-42, 9/85), SCC 2-04-004-01 Engine Testing of Reciprocating Internal Combustion Engine firing gasoline fuel

*d. Reporting Requirements*

The Permittee shall be required to submit reports of monitoring data such as air pollutants, fuels, and operational information on forms furnished or prescribed by the commissioner. Such forms shall be



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signed or verified in writing by a ranking corporate officer or managing official with offices located in the state. The signature shall constitute personal affirmation that such officer has exercised due diligence in verifying the accuracy of the record or report and that, to the best of his knowledge and belief, the record or report is true, complete, and complies fully with applicable state requirements.  
[Permit Nos. 178-0122 & 178-0123]

#### 4. SO<sub>x</sub>

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

Emissions of SO<sub>x</sub> from each test cell shall not exceed 3.475 lb/hr or 0.0442 TPY.  
[Permit Nos. 178-0122 & 178-0123]

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

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*

The Permittee shall make and maintain records sufficient to demonstrate compliance with the emission limits in Section III.A.4.a of this Title V permit, for each test cell using an emission factor derived from the percent sulfur content in the fuel. [Permit Nos. 178-0122 & 178-0123]

##### *d. Reporting Requirements*

The Permittee shall be required to submit reports of monitoring data such as air pollutants, fuels, and operational information on forms furnished or prescribed by the commissioner. Such forms shall be signed or verified in writing by a ranking corporate officer or managing official with offices located in the state. The signature shall constitute personal affirmation that such officer has exercised due diligence in verifying the accuracy of the record or report and that, to the best of his knowledge and belief, the record or report is true, complete, and complies fully with applicable state requirements.  
[Permit Nos. 178-0122 & 178-0123]

#### 5. Opacity

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

i. The opacity shall not exceed 20% during any six-minute block average (15 second intervals - minimum of three sets in a 60 minute period.) [RCSA §22a-174-18(b)(1)(A)]

ii. The opacity shall not exceed 40% during any one-minute block average.  
[RCSA §22a-174-18(b)(1)(B)]

##### *b. Monitoring Requirements*

Record keeping specified in Section III.5.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)(ii)]

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

i. The Permittee shall document any exceedance of the opacity limits in Section III.A.5.a of this Title V

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

permit. [RCSA §22a-174-33(j)(1)(K)(ii)]

- ii. The Permittee shall make and keep records on premises of the result of any opacity tests or readings done to demonstrate compliance with the limits in Section III.A.5.a of this Title V permit. [RCSA §22a-174-33(j)(1)(K)(ii)]

#### *d. Reporting Requirements*

The Permittee shall be required to submit reports of monitoring data such as air pollutants, fuels, and operational information on forms furnished or prescribed by the commissioner. Such forms shall be signed or verified in writing by a ranking corporate officer or managing official with offices located in the state. The signature shall constitute personal affirmation that such officer has exercised due diligence in verifying the accuracy of the record or report and that, to the best of his knowledge and belief, the record or report is true, complete, and complies fully with applicable state requirements. [Permit Nos. 178-0122 & 178-0123]

### **6. Hours of Operation**

#### *a. Limitation or Restriction*

No engine used in the test cells shall be continuously operated for more than four hours in any eight hour period. [Permit Nos. 178-0122 & 178-0123]

#### *b. Monitoring Requirements*

The Permittee shall monitor the hours of operation of each test cell, using log entries made by the operator of the units. [Permit Nos. 178-0122 & 178-0123]

#### *c. Record Keeping Requirements*

The Permittee shall make and keep records of the times of operation of each test cell during each day. Records shall include the name of the unit's operator, the engine being tested and the date and the times of startup and shutdown of each unit or the hours run each day. [RCSA §22a-174-33(j)(1)(K)(ii)]

#### *d. Reporting Requirements*

The Permittee shall be required to submit reports of monitoring data such as air pollutants, fuels, and operational information on forms furnished or prescribed by the commissioner. Such forms shall be signed or verified in writing by a ranking corporate officer or managing official with offices located in the state. The signature shall constitute personal affirmation that such officer has exercised due diligence in verifying the accuracy of the record or report and that, to the best of his knowledge and belief, the record or report is true, complete, and complies fully with applicable state requirements. [Permit Nos. 178-0122 & 178-0123]

### **7. Fuel Type**

#### *a. Limitation or Restriction*

- i. The Permittee shall use Jet Fuel A when testing the Westinghouse J34-WE-36A Test Engine and Pratt & Whitney PT6a-Turboprop Test Engine. [Permit Nos. 178-0122 & 178-0123]

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- ii. The Permittee shall use Aviation Gas when testing the Reciprocating Internal Combustion Prop Test Engine. [Permit Nos. 178-0122 & 178-0123]

- b. *Monitoring and Testing Requirements*

Record keeping specified in Section III.A.7.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

- c. *Record Keeping Requirements*

The Permittee shall maintain records of the type of fuel used in each engine listed in Section III.A.7.a of this Title V permit, whenever said engine is operated. [Permit Nos. 178-0122 & 178-0123]

- d. *Reporting Requirements*

The Permittee shall be required to submit reports of monitoring data such as air pollutants, fuels, and operational information on forms furnished or prescribed by the commissioner. Such forms shall be signed or verified in writing by a ranking corporate officer or managing official with offices located in the state. The signature shall constitute personal affirmation that such officer has exercised due diligence in verifying the accuracy of the record or report and that, to the best of his knowledge and belief, the record or report is true, complete, and complies fully with applicable state requirements. [Permit Nos. 178-0122 & 178-0123]

## **8. Fuel Usage**

- a. *Limitation or Restriction*

For each test cell, fuel usage shall not exceed 1,000 gallons per engine, over any consecutive 12 month period. [Permit Nos. 178-0122 & 178-0123]

- b. *Monitoring Requirements*

The Permittee shall use a non-resettable totalizing fuel metering device to continuously monitor fuel feed to each test cell. [Permit Nos. 178-0122 & 178-0123]

- c. *Record Keeping Requirements*

The Permittee shall maintain records of annual fuel usage. These records shall include the engine being tested and the amount of fuel fed to the test cell. Annual fuel consumption shall be based on any consecutive 12 month time period and shall be determined by adding (for each fuel) the current month's fuel usage to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of the previous month. [Permit Nos. 178-0122 & 178-0123]

- d. *Reporting Requirements*

The Permittee shall be required to submit reports of monitoring data such as air pollutants, fuels, and operational information on forms furnished or prescribed by the commissioner. Such forms shall be signed or verified in writing by a ranking corporate officer or managing official with offices located in the state. The signature shall constitute personal affirmation that such officer has exercised due diligence in verifying the accuracy of the record or report and that, to the best of his knowledge and belief, the record or report is true, complete, and complies fully with applicable state requirements.

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[Permit Nos. 178-0122 & 178-0123]

#### 9. Fuel Sulfur Content

*a. Limitation or Restriction*

Maximum sulfur content of fuel consumed shall not exceed 0.3% for Jet Fuel A or 0.05% for Aviation Gas. [Permit Nos. 178-0122 & 178-0123]

*b. Monitoring and Testing Requirements*

Record keeping specified in Section III.A.9.c of this Title V permit shall be sufficient to meet other Monitoring and Testing Requirements pursuant to RCSA §22a-174-33. [RCSA §22a-174-33(j)(1)(K)(ii)]

*c. Record Keeping Requirements*

The Permittee shall maintain records of the fuel certification for each delivery of fuel 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, the percentage of sulfur in such fuel, by weight, dry basis, and the method used to determine the sulfur content of such fuel. [Permit Nos. 178-0122 & 178-0123]

*d. Reporting Requirements*

The Permittee shall be required to submit reports of monitoring data such as air pollutants, fuels, and operational information on forms furnished or prescribed by the commissioner. Such forms shall be signed or verified in writing by a ranking corporate officer or managing official with offices located in the state. The signature shall constitute personal affirmation that such officer has exercised due diligence in verifying the accuracy of the record or report and that, to the best of his knowledge and belief, the record or report is true, complete, and complies fully with applicable state requirements. [Permit Nos. 178-0122 & 178-0123]

#### B. GROUPED EMISSIONS UNIT 2 (GEU-2) - SPRAY BOOTHS

##### 1. Non-Compliant Coating Usage

*a. Limitation or Restriction*

The Permittee shall not use in excess of 55 gallons of any non-compliant coatings at the premises during any 12 consecutive months. [RCSA §22a-174-20(s)(7)(H)]

*b. Monitoring Requirements*

The Permittee shall monitor the amount of noncompliant coatings, and the VOC content of each, on a daily, monthly and consecutive 12 month basis. [RCSA §22a-174-33(j)(1)(K)(ii)]

*c. Record Keeping Requirements*

The Permittee shall make and keep records of the amount of noncompliant coatings used in the surface coating operation and the VOC content of each. The material safety data sheets of each solvent or

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coating shall also form a part of these records. The Permittee shall total the solvent and coating usage monthly. The consecutive 12 month usage shall be calculated each calendar month by adding the current month's usage to that of the previous 11 months. [RCSA §22a-174-33(j)(1)(K)(ii)]

#### d. Reporting Requirements

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

## 2. VOC

#### a. Limitation or Restriction

- i. The Permittee shall limit the purchase of VOC containing coatings, including diluents and clean-up solvents but excluding water, to 1,500 gallons or less in any calendar year. [RCSA §22a-174-3c(b)(10)]
- ii. The Permittee shall comply with all applicable VOC/Organic HAP content limits in 40 CFR Part 63 Subpart GG.
- iii. The Permittee shall use only coatings that have an as applied VOC content no greater than the applicable levels in RCSA §22a-174-20, Table 20(s)-1, 20(s)-2, 20(s)-3, 20(s)-4, 20(s)-5, 20(s)-6a or 20(s)-6b in accordance RCSA §22a-174-20(s)(3)(A), or
- iv. The Permittee shall use a combination of low-VOC coatings and add-on air pollution control equipment to achieve a VOC emission rate no greater than the applicable level in RCSA §22a-174-20, Table 20(s)-7, 20(s)-8, 20(s)-9, or 20(s)-10. [RCSA §22a-174-20(s)(3)(B)], or
- v. The Permittee shall achieve a level of control that is equivalent to RCSA §22a-174-20(s)(3)(A), or (B) as requested from and approved by the commissioner, in accordance with RCSA §22a-174-20(cc). [RCSA §22a-174-20(s)(3)(D)]

#### b. Monitoring Requirements

- i. The Permittee shall monitor the quantity of VOC coatings purchased on a monthly and consecutive 12 month basis. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall monitor the solvents and coatings used and the VOC content of each, on a daily, monthly and consecutive twelve-month basis. [RCSA §22a-174-33(j)(1)(K)(ii)]

#### c. Record Keeping Requirements

- i. The Permittee shall maintain purchase records to demonstrate compliance with coating and solvent limitations set forth in RCSA §22a-174-3c(b)(10). Such records shall be maintained for five years from the date created and made available to the commissioner to inspect and copy upon request. [RCSA §22a-174-3c(c)]
- ii. The Permittee shall make and keep records of the solvents and coatings used in the surface coating operation, the name and description of each coating and cleaning solvent, VOC content of each coating and diluent, as applied, VOC content of each coating or cleaning solvent, as supplied, the

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

amount of each coating and cleaning solvent purchased or used, the Material Safety Data Sheet, Environmental Data Sheet, Certified Product Data Sheet, or an equivalent data sheet for each coating and cleaning solvent, documentation of control device efficiency and capture efficiency, date and type of maintenance performed on air pollution control equipment. All records made pursuant of this subdivision shall be made available to the commissioner to inspect and copy upon request, and maintained for five years from the date such record is created. [RCSA §22a-174-20(s)(8)]

iii. The Permittee shall record the total solvent and coating usage monthly. The consecutive 12 month usage shall be calculated each calendar month by adding the current month's usage to that of the previous 11 months. [RCSA §22a-174-33(j)(1)(K)(ii)]

#### *d. Reporting Requirements*

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

### **C. EMISSIONS UNIT 5 (EU-5) – CLEANING OPERATIONS**

#### **1. Housekeeping Measures**

- a. The Permittee shall place solvent-laden cloth, paper, or other absorbent applicators in bags or other closed containers upon completing their use. Keep containers closed at all times, except when depositing or removing materials (cotton tipped swabs used for very small cleaning operations are exempt from this requirement). [40 CFR §63.744(a)(1)]
- b. The Permittee shall store fresh and spent solvents in closed containers (except semi-aqueous cleaners). [40 CFR §63.744(a)(2)]
- c. The Permittee shall handle and transfer solvents to, or from cleaning operations, and to waste handling areas in a manner that minimizes spills. [40 CFR §63.744(a)(3)]

#### **2. Hand Wiping Operations**

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

- i. The Permittee shall meet one of the composition requirements as outlined in 40 CFR §63.744, Table 1 [40 CFR §63.744(b)(1)]; or
- ii. The Permittee shall use a cleaning solvent with a composite vapor pressure of 45 mmHg (24.1 in H<sub>2</sub>O) or less at 20 °C (68 °F). [40 CFR §63.744(b)(2)]

##### *b. Monitoring Requirements*

The Permittee shall monitor what method is used to comply with the hand-wipe cleaning requirements outlined in Section III.C.2.a of this Title V permit. [RCSA §22a-174-33(j)(1)(K)(ii)]

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

- i. The Permittee shall maintain the following records for each cleaning solvent used:  
[40 CFR §63.752(b)(1)]

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

- (A) name of the product used;
  - (B) vapor pressure; and
  - (C) documentation showing the organic HAP constituents.
- ii. The Permittee shall make and maintain records identifying the chosen method of compliance for each hand-wipe cleaning operation. [RCSA §22a-174-33(j)(1)(K)(ii)]
- iii. The Permittee shall maintain the following records for each cleaning solvent used in hand-wipe cleaning operations that complies with the composition requirements specified in 40 CFR §63.744(b)(1),:  
[40 CFR §63.752(b)(2)]
- (A) name of each cleaning solvent used;
  - (B) all data and calculations that demonstrate that the cleaning solvent complies with one of the stated composition requirements; and
  - (C) annual records of the volume of each solvent used, as determined from facility purchase records or usage records.
- iv. The Permittee shall maintain the following records for each cleaning solvent used in hand-wipe cleaning operations that complies with the vapor pressure requirement in 40 CFR §63.744(b)(2),:  
[40 CFR §63.752(b)(3)]
- (A) name of each cleaning solvent used;
  - (B) composite vapor pressure of each cleaning solvent used;
  - (C) all vapor pressure test results, if appropriate, data, and calculations used to determine the composite vapor pressure of each cleaning solvent; and
  - (D) amount in gallons of each cleaning solvent used each month at each operation.
- v. The Permittee shall record the following if a cleaning solvent used in any of the exempt hand-wipe cleaning operations specified in 40 CFR §63.744(e) doesn't conform to the composition or vapor pressure requirements: [40 CFR §63.752(b)(4)]
- (A) the identity and amount (in gallons) of each cleaning solvent used each month at each operation; and
  - (B) a list of the exempt operations in which these solvents are being used.

#### *d. Reporting Requirements*

- i. The Permittee shall submit semiannual reports every six months from the date of notification of compliance status, which includes: [40 CFR §63.753(b)]
- (A) any instance where a non-compliant cleaning solvent is used for a non-exempt hand-wipe cleaning operation;

### Section III: Applicable Requirements and Compliance Demonstration

- (B) a list of any new cleaning solvents used for hand-wipe cleaning in the previous six months and their composite vapor pressure or notification that they comply with the composition requirements specified in 40 CFR §63.744(b)(1);
- (C) if the operation has been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance; and
- (D) the statement shall be signed by the authorized official as required in RCSA §22a-174-2a(a).

#### 3. Spray Gun Cleaning

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

- i. The Permittee shall disassemble the spray gun, soak and/or clean the components by hand in a vat. [40 CFR §63.744(c)(3)]
- ii. The Permittee shall clean the spray gun in a vat that is closed except when in use. During the soaking period, the vat shall remain closed except when inserting and removing components. [40 CFR §63.744(c)(3)]

##### *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 Requirements*

- i. The Permittee shall keep the following records for each cleaning solvent used: [40 CFR §63.752(b)(1)]
  - (A) name of the product used;
  - (B) vapor pressure; and
  - (C) documentation showing the organic HAP constituents.
- ii. The Permittee shall make and maintain records of the solvents used in the cleaning operation and the VOC content of each. The material safety data sheets of each solvent shall also form a part of these records. The Permittee shall total the solvent usage monthly. The consecutive 12 month usage shall be calculated each calendar month by adding the current month's usage to that of the previous 11 months. [RCSA §22a-174-33(j)(1)(K)(ii)]

##### *d. Reporting Requirements*

- i. The Permittee shall submit semiannual reports every six months from the date of notification of compliance status, which includes: [40 CFR §63.753(b)]
  - (A) any instance where a noncompliant spray gun cleaning method is used;
  - (B) any instance where a leaking spray gun cleaner remains un-repaired and in use for more than 15



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days.

- (C) if the operation has been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance;
- (D) the statement shall be signed by the authorized official as required in RCSA §22a-174-2a(a).

#### D. PREMISES-WIDE GENERAL REQUIREMENTS

1. **Annual Emission Statements:** The Permittee shall submit annual emission statements requested by the commissioner as set forth in RCSA §22a-174-4(d)(1).
2. **Emission Testing:** The Permittee shall comply with the procedures for sampling, emission testing, sample analysis, and reporting as set forth in RCSA §22a-174-5.
3. **Emergency Episode Procedures:** The Permittee shall comply with the procedures for emergency episodes as set forth in RCSA §22a-174-6.
4. **Reporting of Malfunctioning Control Equipment:** The Permittee shall comply with the reporting requirements of malfunctioning control equipment as set forth in RCSA §22a-174-7.
5. **Prohibition of Air Pollution:** The Permittee shall comply with the requirement to prevent air pollution as set forth in RCSA §22a-174-9.
6. **Public Availability of Information:** The public availability of information shall apply, as set forth in RCSA §22a-174-10.
7. **Prohibition Against Concealment/Circumvention:** The Permittee shall comply with the prohibition against concealment or circumvention as set forth in RCSA §22a-174-11.
8. **Violations and Enforcement:** The Permittee shall not violate or cause the violation of any applicable regulation as set forth in RCSA §22a-174-12.
9. **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. (Section 18 approved by EPA on 9-23-1982, current Regulation submitted to EPA on 12-1-2004.)
14. **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.

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

- 15. Organic Compound Emissions:** The Permittee shall comply with the requirements for control of organic compound emissions as set forth in RCSA §22a-174-20.
- 16. Nitrogen Oxide Emissions:** The Permittee shall comply with the requirements for control of nitrogen oxide emissions as set forth in RCSA §22a-174-22.
- 17. 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).
- 18. Emission Fees:** The Permittee shall pay an emission fee as set forth in RCSA §22a-174-26(d).
- 19. Handling and Storage of Waste :** Except as provided in 40 CFR §63.741(e), the owner or operator of each facility subject to this subpart that produces a waste that contains HAP shall conduct the handling and transfer of the waste to or from containers, tanks, vats, vessels and piping systems in such a manner that minimizes spills. [40 CFR §63.748]

**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.** Noise: The Permittee shall operate in compliance with the regulations for the control of noise as set forth in RCSA §§22a-69-1 through 22a-69-7.4, inclusive.
- F.** Hazardous Air Pollutants (HAPs): The Permittee shall operate in compliance with the regulations for the control of HAPs as set forth in RCSA §22a-174-29.

## **Section V: State Enforceable Terms and Conditions**

- G.** Open Burning: The Permittee is prohibited from conducting open burning, except as may be allowed by CGS §22a-174(f).
- H.** Fuel Sulfur Content
1. For the period beginning July 1, 2014 and ending June 30, 2018, the Permittee shall not use No. 2 heating oil that exceeds five hundred parts per million of sulfur by weight as set forth in CGS §16a-21a(a)(2)(A); and
  2. On or after July 1, 2018, 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).

## **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: Office of the Director; Engineering & Enforcement Division; Bureau of Air Management; Department of Energy and Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

Any submittal to the Administrator of the Environmental Protection Agency shall be in a computer-readable format and addressed to: U.S. EPA New England, 5 Post Office Square, Suite 100 (OES04-2), Boston, Massachusetts 02109, Attn: Air 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 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.D of this Title V permit, the Permittee shall notify the commissioner in writing, on forms prescribed by the commissioner, of any deviation from an emissions limitation, and shall identify the cause or likely cause of such deviation, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows:

1. For any hazardous air pollutant, no later than 24 hours after such deviation commenced; and
2. For any other regulated air pollutant, no later than ten days after such deviation commenced.

### J. PERMIT RENEWAL [RCSA §22a-174-33(j)(1)(B)]

All of the terms and conditions of this Title V permit shall remain in effect until the renewal permit is issued or denied provided that a timely renewal application is filed in accordance with RCSA §§22a-174-33(g), -33(h), and -33(i).

### K. OPERATE IN COMPLIANCE [RCSA §22a-174-33(j)(1)(C)]

The Permittee shall operate the source in compliance with the terms of all applicable regulations, the terms of this Title V permit, and any other applicable provisions of law. In addition, any noncompliance constitutes a violation of the Clean Air Act and Chapter 446c of the Connecticut General Statutes and is grounds for federal and/or state enforcement action, permit termination, revocation and reissuance, or modification, and denial of a permit renewal application.

### L. COMPLIANCE WITH PERMIT [RCSA §22a-174-33(j)(1)(G)]

This Title V permit shall not be deemed to:

1. Preclude the creation or use of emission reduction credits or allowances or the trading thereof in accordance with RCSA §§22a-174-33(j)(1)(I) and -33(j)(1)(P), provided that the commissioner's prior written approval of the creation, use, or trading is obtained;
2. Authorize emissions of an air pollutant so as to exceed levels prohibited pursuant to 40 CFR Part 72;
3. Authorize the use of allowances pursuant to 40 CFR Parts 72 through 78, inclusive, as a defense to noncompliance with any other applicable requirement; or
4. Impose limits on emissions from items or activities specified in RCSA §§22a-174-33(g)(3)(A) and -33(g)(3)(B) unless imposition of such limits is required by an applicable requirement.

## 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.

## **Section VI: Title V Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

## **Section VI: Title V Requirements**

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

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

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

### **Y. CREDIBLE EVIDENCE**

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