



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.

Title V Permit Number	070 -0193-TV
Client/Sequence/Town/Premises Numbers	46/2/070/5
Date Issued	September 13, 2011
Expiration Date	September 13, 2016

Corporation:

Electric Boat Corporation

Premises Location:

75 Eastern Point Road, Groton, Connecticut 06340-1047

Name of Responsible Official and Title:

Joseph A. Walsh, Vice President of Operations

All the following attached pages, 2 through 66, are hereby incorporated by reference into this Title V permit.

/s/ Anne Gobin for
Daniel C. Esty
Commissioner

September 13, 2011
Date

TABLE OF CONTENTS

	PAGE
Section I. Premises Information/Description	
A. Premises Information	6
B. Premises Description.....	6
Section II. Emissions Units Information	
A. Emissions Units Description - Table II.A	7
B. Operating Scenario Identification - Table II.B.....	10
Section III. Applicable Requirements and Compliance Demonstration	
A. Grouped Emissions Unit 1	11
B. Emissions Unit 6	12
C. Emissions Unit 7	14
D. Grouped Emissions Unit 6	14
E. Grouped Emissions Unit 2	15
F. Emissions Unit 14	18
G. Grouped Emissions Unit 4	20
H. Emissions Unit 18	23
I. Grouped Emissions Unit 5	25
J. Emissions Unit 24	27
K. Emissions Unit 25	31
L. Emissions Unit 26	35
M. Emissions Unit 27	39
N. Emissions Unit 28	39
O. Emissions Unit 29	40
P. Emissions Unit 30	40
Q. Emissions Unit 31	41
R. Emissions Unit 32	44
S. Emissions Unit 33	46
T. Emissions Unit 101	47
U. Premises-wide General Requirements- Table III.U.....	49
V. Compliance Assurance Monitoring (CAM) Plan - Table III.V	50
Section IV. Compliance Schedule - Table IV	51
Section V. State Enforceable Terms and Sections	52
Section VI. Permit Shield - Table VI.....	53
Section VII. Title V Requirements	
A. Submittals to the Commissioner & Administrator	54
B. Certifications [RCSA §22a-174-33(b)]	54
C. Signatory Responsibility [RCSA §22a-174-2a(a)].....	54
D. Additional Information [RCSA §22a-174-33(j)(1)(X)].....	55
E. Monitoring Reports [RCSA §22a-174-33(o)(1)].....	55
F. Premises Records [RCSA §22a-174-33(o)(2)].....	55
G. Progress Reports [RCSA §22a-174-33(q)(1)]	56
H. Compliance Certifications [RCSA §22a-174-33(q)(2)]	56
I. Permit Deviation Notifications [RCSA §22a-174-33(p)].....	56
J. Permit Renewal [RCSA §22a-174-33(j)(1)(B)]	56
K. Operate in Compliance [RCSA §22a-174-33(j)(1)(C)].....	57
L. Compliance with Permit [RCSA §22a-174-33(j)(1)(G)].....	57
M. Inspection to Determine Compliance [RCSA §22a-174-33(j)(1)(M)]	57
N. Permit Availability	57

TABLE OF CONTENTS, Continued

PAGE

O. Severability Clause [RCSA §22a-174-33(j)(1)(R)]..... 57
P. Need to Halt or Reduce Activity [RCSA §22a-174-33(j)(1)(T)] 57
Q. Permit Requirements [RCSA §22a-174-33(j)(1)(V)]..... 57
R. Property Rights [RCSA §22a-174-33(j)(1)(W)]..... 58
S. Alternative Operating Scenario Records [RCSA §22a-174-33(o)(3)]..... 58
T. Operational Flexibility and Off-Permit Changes [RCSA §22a-174-33(r)(2)]..... 58
U. Information for Notification [RCSA §22a-174-33(r)(2)(A)]..... 58
V. Transfers [RCSA §22a-174-2a(g)]..... 58
W. Revocation [RCSA §22a-174-2a(h)]..... 59
X. Reopening for Cause [RCSA §22a-174-33(s)]..... 59
Y. Credible Evidence 59
Z. VOC RACT Records..... 59

Section VIII. NESHAP for Shipbuilding and Ship Repair (Surface Coating)

A. Emission Limitations – Table VIII.A..... 60
B. Operating Requirements..... 61
C. Compliance Requirements 61
D. Testing Requirements..... 64
E. Record Keeping Requirements..... 64
F. Reporting Requirements..... 67
G. Other Requirements..... 67

LIST OF ABBREVIATIONS/ACRONYMS

<i>Abbreviation/Acronym</i>	<i>Description</i>
AOS	Alternative Operating Scenario
bhp	Brake Horsepower
°C	Degrees Celsius
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CGS	Connecticut General Statutes
CO	Carbon Monoxide
EU	Emissions Unit
EPA	Environmental Protection Agency
ft ³	Cubic feet
g	Gram
gal	Gallon
GEU	Grouped Emissions Units
h	Hour
HAP	Hazardous Air Pollutant
H ₂ O	Water
in.	Inch(es)
L	Liter
lb	Pound
MMBtu	Million British Thermal Units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSR	New Source Review
NO _x	Nitrogen Oxides
PM	Particulate Matter
PM-2.5	Particulate Matter less than 2.5 microns
PM-10	Particulate Matter less than 10 microns
QA	Quality Assurance
QC	Quality Control
RACT	Reasonably Available Control Technology
RCSA	Regulations of Connecticut State Agencies
SIC	Standard Industrial Classification Code
SO _x	Sulfur Oxides
SOS	Standard Operating Scenario
tpy	Tons per year
VOC	Volatile Organic Compound
VOHAP	Volatile Organic Hazardous Air Pollutant

Title V Permit

All conditions in Sections III, IV, VI, VII and VIII 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: Shipyard facility which constructs, maintains and repairs United States Naval Submarines
Primary SIC: 3731

Facility Mailing Address: 75 Eastern Point Road, Groton, CT 06340-1047
Telephone Number: 860-433-2791

B. PREMISES DESCRIPTION

Electric Boat Corporation (EB) is a major source of regulated air pollutants, located at 75 Eastern Point Road in Groton, Connecticut. EB constructs submarines for the United States Navy and performs maintenance and repairs to submarines that are already a part of the United States Naval Fleet.

Major activities performed during submarine construction include:

- Metal working operations such as welding, brazing and gouging
- Hull preparations such as abrasive blasting and surface coating applications
- Applications to metal parts including surface cleaners, paints, adhesives and special coatings
- Manufacture and testing of ancillary components including woodworking, lead working, pipe fabrication, electrical component fabrication, parts degreasing, and radiological component operations.

Fuel burning equipment used at the facility includes boilers, generators, pumps, compressors, furnaces and dryers. This fuel burning equipment combusts a variety of fuels including propane, gasoline, diesel fuel, No.2 fuel oil and No.4 fuel oil. Cooling towers are used to provide water for process cooling operations and for building air conditioning systems.

Emissions resulting from shipyard activities include volatile organic compounds, HAPs, particulate matter, carbon monoxide, nitrogen oxides and sulfur dioxide.

The facility is subject to the National Emission Standards for Radionuclide Emissions in 40 CFR Part 61 Subpart I. The primary source of radionuclide emissions is the radioactive materials associated with the maintenance and overhaul of nuclear powered ships.

All pollutant emitting equipment at the facility with applicable requirements are included in this Title V permit.

Section II: Emissions Units Information

A. EMISSIONS UNITS DESCRIPTION

It is not intended to incorporate by reference these NSR Permits, Orders, or Registrations into this Title V permit.

TABLE II.A: EMISSIONS UNITS IDENTIFICATION			
Emissions Unit	Emissions Unit Description	Control Unit Description	Permit (P), Order (O), or Registration (R) Number
GEU-1	Emergency engines ≤500 bhp subject to RCSA §22a-174-3b(e) and 40 CFR 63 Subpart ZZZZ		
EU-1	Kohler 180ROZ271 Generator	None	n/a
EU-2	Kohler 50ROZ271 Generator S/N 242612	None	n/a
EU-3	Kohler 50ROZ271 Generator S/N 245560	None	n/a
EU-4	Kohler 100ROZ277 Generator S/N 245436	None	n/a
EU-5	Kohler 100ROZ277 Generator S/N 245798	None	n/a
EU-8	Kohler 50 ROZJ Generator	None	n/a
EU-13	Kohler 250ROZ271 Diesel Generator	None	n/a
EU-6	Kohler 70RZ272 Generator	None	n/a
EU-7	Caterpillar D398A Generator	None	n/a
GEU-2	MagneTek 250 RD Diesel Generators		
EU-9	MagneTek 250 RD Diesel Generator (a)	None	P-070-0257
EU-10	MagneTek 250 RD Diesel Generator (b)	None	P-070-0258
EU-11	MagneTek 250 RD Diesel Generator (c)	None	P-070-0259
EU-12	MagneTek 250 RD Diesel Generator (d)	None	P-070-0260
EU-14	Kohler 250ROZ273 Diesel Generator	None	P-070-0153
GEU-4	Permitted Boilers		
EU-15	Superior Fire Tube Boiler – 350 bhp – North Yard #2	None	P-070-0008
EU-16	B&W Boiler Type FMD 640 – Main Yard #4	None	P-070-0032
EU-17	Superior Fire Tube Boiler 150 – South Yard #1	None	P-070-0055
EU-18	Babcock and Wilcox Boiler – Barge #17	None	P-070-0263
GEU-5	Registered Boilers		
EU-19	Superior Fire Tube Boiler 200 – North Yard #1	None	R-070-0057
EU-20	B&W Boiler Type FMD 40,000	None	R-070-0066
EU-21	B&W Boiler Type FMD 60,000	None	R-070-0067
EU-22	Superior Fire Tube Boiler 350 BPH – Main Yard #1	None	R-070-0068
EU-23	Superior Fire Tube Boiler 250 BPH – South Yard #2	None	R-070-0074
EU-24	Graving Dock #1 Enclosure	Two baghouse filters	P-070-0059
EU-25	Mold In Place Land Level Process	Two baghouse filters per environmental enclosure	P-070-0094
EU-26	Paint Spray Booth - Building #51	Waterwall curtain	P-070-0241
EU-27	Blastec Abrasive Blasting Chamber - Building #212	Baghouse filter	P-070-0255
EU-28	Abrasive Blasting Room – Building #105	Baghouse filter	P-070-0256
EU-29	Wheelabrator-96 - Building #212	Baghouse filter	R-070-0075, R-070-0076
EU-30	Ship Hull Abrasive Grit Blasting	None	R-070-0094
EU-31	Ship Hull Painting	None	R-070-0095
EU-32	Spray Painting – Building #212	Particulate filters	R-070-0227
EU-33	Abrasive Blasting Cabinet – Building #129	Cartridge filters	P-070-0269
GEU-6	Diesel engines subject to 40 CFR 63 Subpart ZZZZ		
EU-35	Kohler 50R0Z Emergency Generator	None	n/a
EU-36	Kohler 30R0Z281 Emergency Generator S/N 192344	None	n/a
EU-37	Cummins 150D6T Generator S/N BC34558	None	n/a

Section II: Emissions Units Information

TABLE IIA: EMISSIONS UNITS IDENTIFICATION, Continued			
Emissions Unit	Emissions Unit Description	Control Unit Description	Permit (P), Order (O), or Registration (R) Number
EU-38	Allis Chalmers KD60 Generator S/N 366A73-4237NI	None	n/a
EU-39	Cummins V8 Fire Pump	None	n/a
EU-40	Detroit 3 Cylinder Fire Pump	None	n/a
EU-41	Kohler 125ROZ Diesel Generator	None	n/a
GEU-10	Parts Washers		
EU-61	Crest Ultrasonics Parts Washer	None	n/a
EU-62	Intercont SJW-3 Parts Washer S/N O2190011	None	n/a
EU-63	Intercont SJW-3 Parts Washer S/N O2188015	None	n/a
EU-64	Parts Washer	None	n/a
EU-65	C2524 Ultrasonic Cleaner	None	n/a
EU-66	Model SJW-3 Cold Cleaning Parts Washer	None	n/a
EU-67	Model TLW-1 Cold Cleaning Parts Washer	None	n/a
EU-101	Abrasive Blast Room – Building #1	Cartridge filters	n/a
All applicable requirements for the following units are listed in the premises-wide general requirements portion of this Title V permit:			
EU-42	10,000 Gallon Underground Gasoline Storage Tank	None	n/a
EU-43	Wheelabrator Blast Chamber S/N A111540	None	n/a
EU-44	Col-Met Lab Powder Coating Booth	None	n/a
GEU-7	Portable Generators		
EU-45	Kohler 60RE0ZJB Emergency Diesel Generator	None	n/a
EU-46	Onan Generator	None	n/a
EU-47	Kohler 250R0Z Emergency Generator S/N861261	None	n/a
EU-48	Kohler 250R0Z Emergency Generator S/N861262	None	n/a
EU-49	Onan 90.0DYC15R11 Emergency Generator S/N 047244081	None	n/a
EU-50	Wisconsin Gasoline Powered Air Compressor S/N 23331	None	n/a
EU-51	Wisconsin Gasoline Powered Air Compressor S/N 28740	None	n/a
EU-100	Caterpillar D333A Diesel Generator S/N 58B3360	None	n/a
GEU-8	Heating Units	None	n/a
EU-52	Columbia 20 bhp Type HRT Boiler	None	n/a
EU-53	Columbia 20 bhp Type HRT Boiler S/N 122540	None	n/a
EU-54	30 bhp Fire Tube Boiler	None	n/a
EU-55	Smith 20 bhp – 19 Series-6 Cast Iron Boiler S/N F96-603	None	n/a
EU-56	Fire Tube Boiler	None	n/a
EU-57	Compressed Air Dryer S/N 125-6000	None	n/a
EU-58	Natural Gas Fired Air Handling Unit	None	n/a
GEU-9	Surface Preparation Equipment		
EU-59	Pangborn 55 EN-2 Blast Chamber S/N 55EN2-581	None	n/a
EU-60	Empire Pro-Finish Abrasive Blasting Cabinet	None	n/a
GEU-11	Cooling Towers		
EU-68	Delta T-75 Cooling Tower	None	n/a
EU-69	Baltimore Air Coil Cooling Tower	None	n/a
EU-70	Baltimore Air Coil Cooling Tower	None	n/a
EU-71	Baltimore Air Coil Cooling Tower	None	n/a
EU-72	Delta T-225I Cooling Tower S/N51435	None	n/a

Section II: Emissions Units Information

TABLE II.A: EMISSIONS UNITS IDENTIFICATION, Continued			
Emissions Unit	Emissions Unit Description	Control Unit Description	Permit (P), Order (O), or Registration (R) Number
EU-73	Delta T-150 Cooling Tower	None	n/a
EU-74	Baltimore Air Coil Cooling Tower S/N 83-4607	None	n/a
EU-75	Cooling Tower	None	n/a
EU-76	Delta T-150I Cooling Tower	None	n/a
EU-77	Delta T-150I Cooling Tower	None	n/a
EU-78	Delta T-150I Cooling Tower	None	n/a
EU-79	Protec PCT-350 Cooling Tower	None	n/a
EU-80	Protec PCT-350 Cooling Tower	None	n/a
EU-81	Baltimore Air Coil Cooling Tower	None	n/a
GEU-12	Dip Coating Equipment		
EU-82 thru 84	Manual Dip Coating Process with 3 Drying Ovens	None	n/a
GEU-13	Rubber Molding Equipment		
EU-85 and 86	Rubber Molding Operations with 2 Curing Ovens	None	n/a
GEU-14	Lead Melting Equipment		
EU-87	Melting Shielding Lead – Jampol One Ton Pot	None	n/a
EU-88	Melting Shielding Lead – Jampol Three Ton Pot	None	n/a
GEU-15	Lead Casting Equipment	None	n/a
EU-89 thru 92	Casting Shielding Lead with 4 Casting Molds	None	n/a
GEU-16	Lead Machining		
EU-93 thru 95	Ballast Lead Work with 3 Band Saws	None	n/a
GEU-17	Tile Pouring and Coating Equipment		
EU-96	DMP Processor – MIP Tile Pouring	None	n/a
EU-97	DMP Processor – MIP Tile Pouring	None	n/a
EU-98	IPP Processor – MIP Tile Pouring	None	n/a
EU-99	Devilbiss Paint Arrestor Spray Booth – Manual MIP Kit Manufacturing	None	n/a
GEU-18	Gouging	None	n/a
GEU-19	Plasma Torch Cutting	None	n/a
GEU-20	Adhesives, Fillers and Sealants	None	n/a
GEU-21	Solvents, Lubricants and Other VOCs	None	n/a
GEU-22	Welding	None	n/a
GEU-23	Manual Brazing	None	n/a
GEU-24	Mechanical Cutting, Sanding, Planing, Drilling, Jointing, Grinding	None	n/a
GEU-25	Ship's Exhaust Radionuclides	None	n/a
GEU-26	Tank Vents - Radionuclides	None	n/a
GEU-27	Monitored Temporary Ventilation System - Radionuclides	None	n/a
GEU-28	Building #55 – Radionuclides	None	n/a
GEU-29	Oil and Oily Wastewater Storage Tanks	None	n/a

Section II: Emissions Units Information

B. OPERATING SCENARIO IDENTIFICATION

The Permittee shall be allowed to operate under the following Standard Operating Scenarios (SOS) and Alternative Operating Scenarios (AOS) without notifying the commissioner, provided that such operations are explicitly provided for and described in the Table II.B below. The Permittee shall record contemporaneously, the operating scenario under which each emissions unit is operating in a log to be kept at the subject premises.

TABLE II.B: OPERATING SCENARIO IDENTIFICATION		
Identification of Operating Scenarios	Emissions Unit(s) Associated with the Scenarios	Description of Scenarios
SOS-1	All Emissions Units	All emissions units associated with SOS-1 shall be operated in accordance with applicable registration terms and conditions, and in accordance with best management practices, while dual fuel combustion sources operate combusting liquid fuels.
AOS-1	GEU-4, 5	All emissions units associated with AOS-1 shall be operated in accordance with applicable registration terms and conditions, and in accordance with best management practices, while dual fuel combustion sources operate combusting natural gas.

NOTE: All sources on the premises do not have to operate under the same operating scenario. Sources may operate under SOS1 and AOS1 simultaneously.

Section III: Applicable Requirements and Compliance Demonstration

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

A. GEU-1, Emergency Engines ≤ 500 bhp subject to RCSA §22a-174-3b(e) and 40 CFR 63 Subpart ZZZZ

1. Fuel Sulfur Content

a. *Limitations or Restrictions*

Any nongaseous fuel consumed by the subject emergency engine shall not exceed the sulfur content of motor vehicle diesel fuel where “motor vehicle diesel fuel” is defined as in RCSA §22a-174-42. [RCSA §22a-174-3b(e)(2)(D)]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with fuel sulfur content using any of the following [RCSA §22a-174-3b(h)]:

- i. A fuel certification for a delivery of nongaseous fuel from a bulk petroleum provider;
- ii. A sales receipt for the sale of motor vehicle diesel fuel from a retail location; or
- iii. A copy of a current contract with the fuel supplier supplying the fuel used by the equipment that includes the applicable sulfur content of nongaseous fuel as a condition of each shipment.

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall maintain records of the information necessary for the commissioner to determine compliance with the limitation of fuel sulfur content. [RCSA §22a-174-3b(e)(3)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.A.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

2. Operational Conditions

a. *Limitations or Restrictions*

- i. The Permittee shall not operate any emergency engine for more than 300 hours during any 12 month rolling aggregate. [RCSA §22a-174-3b(e)(2)(C)]
- ii. The Permittee shall comply with the following requirements on or before May 3, 2013 [40 CFR §63.6602 and §63.6640(f)(1)(ii)]:
 - (A) Limit the operation of each engine for maintenance and readiness checks to 100 hours per year. [40 CFR §63.6640(f)(1)(ii)]
 - (B) Change the oil and filter for each engine every 500 hours of operation or annually, whichever comes first. [40 CFR §63.6602]
 - (C) Inspect the air cleaner of each engine every 1000 hours of operation or annually, whichever comes first. [40 CFR §63.6602]
 - (D) Inspect all hoses and belts on each engine every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR §63.6602]

Section III: Applicable Requirements and Compliance Demonstration

- (E) Minimize each engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR §63.6602]

- b. *Monitoring and Testing Requirements*

- i. The Permittee shall monitor the hours of operation of each emergency engine. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall install a non-resettable hour meter on each engine, if one is not already installed, on or before May 3, 2013. [40 CFR §63.6625(f)]
- iii. On and after May 3, 2013, the Permittee shall operate and maintain each engine according to the manufacturer's emission-related operation and maintenance instructions or shall develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §63.6640(a)]

- c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and maintain records of the hours of operation of each engine for each month and each 12 month rolling aggregate. [RCSA §22a-174-3b(e)(4)]
- ii. The Permittee shall make and maintain records of maintenance performed on each engine. [40 CFR §63.6660]

- d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.A.2.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

B. EU-6, Kohler 70RZ272 Generator subject to RCSA §22a-174-3b(e) and 40 CFR 63 Subpart ZZZZ

- 1. Fuel Sulfur Content

- a. *Limitations or Restrictions*

Any nongaseous fuel consumed by the subject emergency engine shall not exceed the sulfur content of motor vehicle diesel fuel where "motor vehicle diesel fuel" is defined as in RCSA §22a-174-42. [RCSA §22a-174-3b(e)(2)(D)]

- b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with fuel sulfur content using any of the following [RCSA §22a-174-3b(h)]:

- i. A fuel certification for a delivery of nongaseous fuel from a bulk petroleum provider;
- ii. A sales receipt for the sale of motor vehicle diesel fuel from a retail location; or
- iii. A copy of a current contract with the fuel supplier supplying the fuel used by the equipment that includes the applicable sulfur content of nongaseous fuel as a condition of each shipment.

Section III: Applicable Requirements and Compliance Demonstration

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall maintain records of the information necessary for the commissioner to determine compliance with the limitation of fuel sulfur content. [RCSA §22a-174-3b(e)(3)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.B.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

2. Operational Conditions

a. *Limitations or Restrictions*

- i. The Permittee shall not operate any emergency engine for more than 300 hours during any 12 month rolling aggregate. [RCSA §22a-174-3b(e)(2)(C)]
- ii. The Permittee shall comply with the following requirements on or before May 3, 2013 [40 CFR §63.6602 and §63.6640(f)(1)(ii)]:
 - (A) Limit the operation of each engine for maintenance and readiness checks to 100 hours per year. [40 CFR §63.6640(f)(1)(ii)]
 - (B) Change the oil and filter for each engine every 500 hours of operation or annually, whichever comes first. [40 CFR §63.6602]
 - (C) Inspect the air cleaner of each engine every 1000 hours of operation or annually, whichever comes first. [40 CFR §63.6602]
 - (D) Inspect all hoses and belts on each engine every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR §63.6602]

b. *Monitoring and Testing Requirements*

- i. The Permittee shall monitor the hours of operation of each emergency engine. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall install a non-resettable hour meter on each engine, if one is not already installed, on or before May 3, 2013. [40 CFR §63.6625(f)]
- iii. The Permittee shall operate and maintain each engine according to the manufacturer's emission-related operation and maintenance instructions or shall develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions on or before May 3, 2013. [40 CFR §63.6640(a)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and maintain records of the hours of operation for each engine for each month and each 12 month rolling aggregate. [RCSA §22a-174-3b(e)(4)]
- ii. The Permittee shall make and maintain records of maintenance performed on each engine. [40 CFR §63.6660]

Section III: Applicable Requirements and Compliance Demonstration

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.B.2.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

C. EU-7, Caterpillar D398A (subject to RCSA §22a-174-3b(e))

1. Fuel Sulfur Content

a. *Limitations or Restrictions*

Any nongaseous fuel consumed by the subject emergency engine shall not exceed the sulfur content of motor vehicle diesel fuel where “motor vehicle diesel fuel” is defined as in RCSA §22a-174-42. [RCSA §22a-174-3b(e)(2)(D)]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with fuel sulfur content using any of the following [RCSA §22a-174-3b(h)]:

- i. A fuel certification for a delivery of nongaseous fuel from a bulk petroleum provider;
- ii. A sales receipt for the sale of motor vehicle diesel fuel from a retail location; or
- iii. A copy of a current contract with the fuel supplier supplying the fuel used by the equipment that includes the applicable sulfur content of nongaseous fuel as a condition of each shipment.

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall maintain records of the information necessary for the commissioner to determine compliance with the limitation of fuel sulfur content. [RCSA §22a-174-3b(e)(3)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.C.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

D. GEU-6, Emergency Diesel Generators subject to 40 CFR 63 Subpart ZZZZ

1. Operational Conditions

a. *Limitations or Restrictions*

- i. The Permittee shall comply with the following requirements on or before May 3, 2013 [40 CFR §63.6602 and §63.6640(f)(1)(ii)]:
 - (A) Limit the operation of each engine for maintenance and readiness checks to 100 hours per year. [40 CFR §63.6640(f)(1)(ii)]
 - (B) Change the oil and filter for each engine every 500 hours of operation or annually, whichever comes first. [40 CFR §63.6602]
 - (C) Inspect the air cleaner of each engine every 1000 hours of operation or annually, whichever comes first. [40 CFR §63.6602]

Section III: Applicable Requirements and Compliance Demonstration

- (D) Inspect all hoses and belts on each engine every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR §63.6602]
- (E) Minimize each engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR §63.6602]

b. *Monitoring and Testing Requirements*

- i. The Permittee shall monitor the hours of operation of each emergency engine. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall install a non-resettable hour meter on each engine, if one is not already installed, on or before May 3, 2013. [40 CFR §63.6625(f)]
- iii. On or before May 3, 2013, the Permittee shall operate and maintain each engine according to the manufacturer's emission-related operation and maintenance instructions or shall develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §63.6640(a)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and maintain records of the hours of operation for each engine for each month and each 12 month rolling aggregate. [RCSA §22a-174-33(j)(1)(K)(ii)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.D.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

E. GEU-2, Four MagneTek 250 RD Diesel Generators

1. Maximum Annual Fuel Usage

a. *Limitations or Restrictions*

4,650 gallons of diesel fuel per engine. [P-070-0257, P-070-0258, P-070-0259, P-070-0260]

b. *Monitoring and Testing Requirements*

The Permittee shall monitor the fuel usage in each engine, using the hours of operation and the maximum hourly fuel firing rate. [RCSA §22a-174-33(j)(1)(K)(ii)]

Section III: Applicable Requirements and Compliance Demonstration

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall keep records of annual operating hours and fuel consumption for each engine. Annual operating hours and fuel consumption shall be based on any consecutive 12 month time period and shall be determined by adding the current month's fuel usage and operating hours to that of the previous 11 months. The Permittee shall make these calculations monthly.
[P-070-0257, P-070-0258, P-070-0259, P-070-0260]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.E.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

2. PM-10, NO_x, VOC and CO Emissions

a. *Limitations or Restrictions per Engine*

- i. PM-10
(A) ≤ 0.08 lb/h
(B) ≤ 0.03 lb/MMBtu
(C) ≤ 0.01 tpy [P-070-0257, P-070-0258, P-070-0259, P-070-0260]
- ii. NO_x
(A) ≤ 4.41 lb/h
(B) ≤ 1.70 lb/MMBtu
(C) ≤ 0.55 tpy [P-070-0257, P-070-0258, P-070-0259, P-070-0260]
- iii. VOC
(A) ≤ 0.33 lb/h
(B) ≤ 0.13 lb/MMBtu
(C) ≤ 0.04 tpy [P-070-0257, P-070-0258, P-070-0259, P-070-0260]
- iv. CO
(A) ≤ 0.67 lb/h
(B) ≤ 0.26 lb/MMBtu
(C) ≤ 0.08 tpy [P-070-0257, P-070-0258, P-070-0259, P-070-0260]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limits by calculating the emission rates using emission factors from the following sources:

- i. Manufacturer's data
ii. The Factor Information Retrieval (FIRE) data system
[P-070-0257, P-070-0258, P-070-0259, P-070-0260]

Section III: Applicable Requirements and Compliance Demonstration

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and maintain records of emissions calculations. [RCSA §22a-174-4(d)(1)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.E.2.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

3. SO_x

a. *Limitations or Restrictions per Engine*

- i. ≤ 0.76 lb/h
ii. ≤ 0.29 lb/MMBtu
iii. ≤ 0.09 tpy
iv. ≤ 0.05% sulfur by weight (dry basis) in diesel fuel [P-070-0257, P-070-0258, P-070-0259, P-070-0260]

b. *Monitoring and Testing Requirements*

- i. The Permittee shall demonstrate compliance with the emission limits by calculating the emission rates using emission factors from the following sources:
(A) Manufacturer's data
(B) The Factor Information Retrieval (FIRE) data system [P-070-0257, P-070-0258, P-070-0259, P-070-0260]
- ii. The Permittee shall monitor fuel sulfur content using a shipping receipt and a certification from the fuel supplier certifying the type of fuel in the shipment and weight percent sulfur in the fuel. [P-070-0257, P-070-0258, P-070-0259, P-070-0260]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and maintain records of emissions calculations for each engine. [RCSA §22a-174-4(d)(1)]
- ii. The Permittee shall keep records of shipping receipts and fuel certifications that include the name of the oil supplier, the sulfur content of the oil and the method used to determine the sulfur content of the oil. [P-070-0257, P-070-0258, P-070-0259, P-070-0260]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.E.3.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

Section III: Applicable Requirements and Compliance Demonstration

F. EU-14, Kohler Diesel Generator, 250ROZ273

1. Maximum Annual Fuel Usage

a. *Limitations or Restrictions*

7,500 gallons of diesel fuel [P-070-0153]

b. *Monitoring and Testing Requirements*

The Permittee shall monitor the fuel usage, using the hours of operation and the maximum hourly fuel firing rate. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

i. The Permittee shall keep records of annual operating hours and fuel consumption. Annual operating hours and fuel consumption shall be based on any consecutive 12 month time period and shall be determined by adding the current month's fuel usage and operating hours to that of the previous 11 months. The Permittee shall make these calculations monthly. [P-070-0153]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.F.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

2. PM-10, NO_x, VOC and CO Emissions

a. *Limitations or Restrictions*

i. PM-10

(A) ≤ 0.642 lb/h

(B) ≤ 0.307 lb/MMBtu

(C) ≤ 0.160 tpy

[P-070-0153]

ii. NO_x

(A) ≤ 9.129 lb/h

(B) ≤ 4.368 lb/MMBtu,

(C) ≤ 2.282 tpy

[P-070-0153]

iii. VOC

(A) ≤ 0.869 lb/h

(B) ≤ 0.416 lb/MMBtu

(C) ≤ 0.217 tpy

[P-070-0153]

iv. CO

(A) ≤ 1.967 lb/h

(B) ≤ 0.941 lb/MMBtu

(C) ≤ 0.492 tpy

[P-070-0153]

Section III: Applicable Requirements and Compliance Demonstration

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limits by calculating the emission rates using emission factors from AP-42, fifth edition, January 1995 and FIRE v5.0, August 1995. [P-070-0153]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and maintain records of emissions calculations. [RCSA §22a-174-4(d)(1)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.F.2.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

3. SO_x

a. *Limitations or Restrictions*

- i. ≤ 0.600 lb/h
ii. ≤ 0.287 lb/MMBtu
iii. ≤ 0.150 tpy
iv. ≤ 0.05% sulfur by weight (dry basis) in diesel fuel [P-070-0153]

b. *Monitoring and Testing Requirements*

- i. The Permittee shall demonstrate compliance with the emission limits by calculating the emission rates using emission factors from AP-42, fifth edition, January 1995 and FIRE v5.0, August 1995. [P-070-0153]
ii. The Permittee shall monitor fuel sulfur content using a shipping receipt and a certification from the fuel supplier certifying the type of fuel in the shipment and weight percent sulfur in the fuel. [P-070-0153]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and maintain records of emissions calculations. [RCSA §22a-174-4(d)(1)]
ii. The Permittee shall keep records of shipping receipts and fuel certifications that include the name of the oil supplier, the sulfur content of the oil and the method used to determine the sulfur content of the oil. [P-070-0153]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.F.3.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

Section III: Applicable Requirements and Compliance Demonstration

G. GEU-4, 3 Boilers – North Yard #2 [P-070-0008], Main Yard #4 [P-070-0032] and South Yard #1 [P-070-0055]

1. Maximum Annual Fuel Usage

a. *Limitations or Restrictions*

- i. 117.4 MMft³ of natural gas and 840,960 gallons of No. 2 or No. 4 fuel oil [P-070-0008]
- ii. 408 MMft³ of natural gas and 2,800,000 gallons of No. 2 fuel oil [P-070-0032]
- iii. 55.1 MMft³ of natural gas and 397,700 gallons of No. 2 fuel oil [P-070-0055]

b. *Monitoring and Testing Requirements*

- i. The Permittee shall monitor the fuel usage for each boiler using either fuel purchase receipts, or the annual hours of operation and maximum hourly fuel firing rate, or a fuel meter. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. When more than one fuel supply tank is used to supply any of these boilers or when two or more of the boilers are supplied by one fuel tank, the Permittee shall use fuel metering devices to continuously monitor fuel feed to each boiler. [P-070-0008, P-070-0032, P-070-0055]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created. [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall keep records of annual operating hours and fuel consumption for each boiler. Annual operating hours and fuel consumption shall be based on any consecutive 12 month time period and shall be determined by adding the current month's operating hours and fuel usage to that of the previous 11 months. The Permittee shall make these calculations monthly. [P-070-0008, P-070-0032, P-070-0055]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.G.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

2. Fuel Sulfur Content

a. *Limitations or Restrictions*

- i. ≤ 0.3% sulfur by weight (dry basis) [P-070-0008, P-070-0032, P-070-0055]
- ii. < 1.0% sulfur by weight (dry basis) [P-070-0008]

b. *Monitoring and Testing Requirements*

- i. The Permittee shall monitor fuel sulfur content using a shipping receipt and a certification from the fuel supplier certifying the type of fuel in the shipment and the weight percent of sulfur in the fuel [P-070-0008, 070-0032, 070-0055]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall keep records of shipping receipts and fuel certifications that include the name of the oil supplier, the sulfur content of the oil, and the method used to determine the sulfur content of the oil. [P-070-0008, 070-0032, 070-0055]

Section III: Applicable Requirements and Compliance Demonstration

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.G.2.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

3. PM-10, SO_x, VOC and CO Emissions

a. *Limitations or Restrictions*

i. PM-10

(A) Natural gas:	$\leq 1.58 \text{ lb/h}, \leq 0.1 \text{ lb/MMBtu}, \leq 6.31 \text{ tpy}$	[P-070-0008]
	$\leq 5.55 \text{ lb/h}, \leq 0.1 \text{ lb/MMBtu}, \leq 21.0 \text{ tpy}$	[P-070-0032]
	$\leq 0.68 \text{ lb/h}, \leq 0.1 \text{ lb/MMBtu}, \leq 2.98 \text{ tpy}$	[P-070-0055]
(B) No. 2 fuel oil:	$\leq 1.58 \text{ lb/h}, \leq 0.1 \text{ lb/MMBtu}, \leq 0.84 \text{ tpy}$	[P-070-0008]
	$\leq 5.55 \text{ lb/h}, \leq 0.1 \text{ lb/MMBtu}, \leq 5.58 \text{ tpy}$	[P-070-0032]
	$\leq 0.68 \text{ lb/h}, \leq 0.1 \text{ lb/MMBtu}, \leq 0.04 \text{ tpy}$	[P-070-0055]
(C) No. 4 fuel oil:	$\leq 1.58 \text{ lb/h}, \leq 0.1 \text{ lb/MMBtu}, \leq 6.31 \text{ tpy}$	[P-070-0008]

ii. SO_x

(A) Natural gas:	$\leq 0.01 \text{ lb/h}, \leq 0.04 \text{ tpy}$	[P-070-0008]
	$\leq 0.03 \text{ lb/h}, \leq 0.12 \text{ tpy}$	[P-070-0032]
	$\leq 0.004 \text{ lb/h}, \leq 0.02 \text{ tpy}$	[P-070-0055]
(B) No. 2 fuel oil:	$\leq 4.81 \text{ lb/h}, \leq 17.91 \text{ tpy}$	[P-070-0008]
	$\leq 16.89 \text{ lb/h}, \leq 59.64 \text{ tpy}$	[P-070-0032]
	$\leq 2.07 \text{ lb/h}, \leq 8.47 \text{ tpy}$	[P-070-0055]
(C) No. 4 fuel oil:	$\leq 15.80 \text{ lb/h}, \leq 63.07 \text{ tpy}$	[P-070-0008]

iii. VOC

(A) Natural gas:	$\leq 0.08 \text{ lb/h}, \leq 0.32 \text{ tpy}$	[P-070-0008]
	$\leq 0.30 \text{ lb/h}, \leq 1.12 \text{ tpy}$	[P-070-0032]
	$\leq 0.03 \text{ lb/h}, \leq 0.15 \text{ tpy}$	[P-070-0055]
(B) No. 2 fuel oil:	$\leq 0.02 \text{ lb/h}, \leq 0.08 \text{ tpy}$	[P-070-0008]
	$\leq 0.08 \text{ lb/h}, \leq 0.28 \text{ tpy}$	[P-070-0032]
	$\leq 0.01 \text{ lb/h}, \leq 0.16 \text{ tpy}$	[P-070-0055]
(C) No. 4 fuel oil:	$\leq 0.02 \text{ lb/h}, \leq 0.08 \text{ tpy}$	[P-070-0008]

iv. CO

(A) Natural gas:	$\leq 1.23 \text{ lb/h}, \leq 4.93 \text{ tpy}$	[P-070-0008]
	$\leq 4.53 \text{ lb/h}, \leq 17.14 \text{ tpy}$	[P-070-0032]
	$\leq 0.53 \text{ lb/h}, \leq 2.31 \text{ tpy}$	[P-070-0055]
(B) No. 2 fuel oil:	$\leq 0.56 \text{ lb/h}, \leq 2.10 \text{ tpy}$	[P-070-0008]
	$\leq 1.98 \text{ lb/h}, \leq 7.0 \text{ tpy}$	[P-070-0032]
	$\leq 0.24 \text{ lb/h}, \leq 0.99 \text{ tpy}$	[P-070-0055]
(C) No. 4 fuel oil:	$\leq 0.53 \text{ lb/h}, \leq 2.10 \text{ tpy}$	[P-070-0008]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limits by calculating the emission rates using emission factors from AP-42 (7/98) for natural gas and AP-42 (9/98) for No. 2 and No. 4 fuel oils. [P-070-0008, P-070-0032, P-070-0055]

Section III: Applicable Requirements and Compliance Demonstration

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and maintain records of emissions calculations and emission factors used. [RCSA §22a-174-4(d)(1)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.G.3.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

4. NO_x Emissions

a. *Limitations or Restrictions*

i. Natural gas firing

- | | | |
|-----|---|--------------------------------------|
| (A) | ≤ 3.16 lb/h, ≤ 0.20 lb/MMBtu, ≤ 12.62 tpy | [P-070-0008, RCSA §22a-174-22(e)(1)] |
| (B) | ≤ 11.1 lb/h, ≤ 0.20 lb/MMBtu, ≤ 42.0 tpy | [P-070-0032, RCSA §22a-174-22(e)(1)] |
| (C) | ≤ 1.36 lb/h, ≤ 0.20 lb/MMBtu, ≤ 5.97 tpy | [P-070-0055, RCSA §22a-174-22(e)(1)] |

ii. No. 2 fuel oil firing

- | | | |
|-----|--|--------------------------------------|
| (A) | ≤ 3.95 lb/h, ≤ 0.20 lb/MMBtu, ≤ 8.41 tpy | [P-070-0008, RCSA §22a-174-22(e)(1)] |
| (B) | ≤ 13.88 lb/h, ≤ 0.20 lb/MMBtu, ≤ 11.16 tpy | [P-070-0032, RCSA §22a-174-22(e)(1)] |
| (C) | ≤ 1.70 lb/h, ≤ 0.20 lb/MMBtu, ≤ 8.47 tpy | [P-070-0055, RCSA §22a-174-22(e)(1)] |

iii. No. 4 fuel oil firing

- | | | |
|-----|---|--------------------------------------|
| (A) | ≤ 3.95 lb/h, ≤ 0.25 lb/MMBtu, ≤ 15.77 tpy | [P-070-0008, RCSA §22a-174-22(e)(1)] |
|-----|---|--------------------------------------|

b. *Monitoring and Testing Requirements*

- i. The Permittee shall conduct an emission test at least once every five years to demonstrate compliance with the emission limitation. [RCSA §22a-174-22(k)(1)]
- ii. The Permittee shall demonstrate compliance with the emission limitation using sampling and analytical procedures approved under 40 CFR Part 60, Appendix A, or under procedures in RCSA §22a-174-5(d). [RCSA §22a-174-22(k)(2)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and maintain records of monthly and rolling 12 month total fuel use and operating hours for each boiler. [P-070-0008, P-070-0032, P-070-0055, RCSA §22a-174-22(l)(1)(C)]
- ii. The Permittee shall make and maintain records of the dates, times and places of all emissions testing, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing for each boiler. [RCSA §22a-174-22(l)(1)(H)]

Section III: Applicable Requirements and Compliance Demonstration

d. *Reporting Requirements*

- i. The Permittee shall provide the records specified in Section III.G.4.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]
- ii. Within 30 days of the completion of emission tests, the Permittee shall submit a report of such testing to the Commissioner. [RCSA §22a-174-22(1)(2)]
- iii. On or before April 15 of each year, the Permittee shall submit a report on NOx emissions for each boiler to the commissioner. [RCSA §22a-174-22(1)(6)]

H. EU-18, Babcock & Wilcox Boiler, Barge #17

1. Maximum Annual Fuel Usage

a. *Limitations or Restrictions*

320,880 gallons of No. 2 fuel oil [P-070-0263]

b. *Monitoring and Testing Requirements*

- i. The Permittee shall monitor the fuel usage using either fuel purchase receipts, or the annual hours of operation and maximum hourly fuel firing rate, or a fuel meter. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. When more than one fuel supply tank is used to supply this source or when multiple sources are supplied by one fuel tank, the Permittee shall use a fuel metering device to continuously monitor fuel feed to this permitted source. [P-070-0263]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall keep records of annual operating hours and fuel consumption. Annual operating hours and fuel consumption shall be based on any consecutive 12 month time period and shall be determined by adding the current month's operating hours and fuel usage to that of the previous 11 months. The Permittee shall make these calculations monthly. [P-070-0263]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.H.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

2. Fuel Sulfur Content

a. *Limitations or Restrictions*

≤ 0.05% sulfur by weight (dry basis) [P-070-0263]

b. *Monitoring and Testing Requirements*

- i. The Permittee shall monitor fuel sulfur content using a shipping receipt and a certification from the fuel supplier certifying the type of fuel in the shipment and the weight percent of sulfur in the fuel. [P-070-0263]

Section III: Applicable Requirements and Compliance Demonstration

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall keep records of shipping receipts and fuel certifications that include the name of the oil supplier, the sulfur content of the oil, and the method used to determine the sulfur content of the oil. [P-070-0263]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.H.2.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

3. PM-10, SO_x, VOC and CO Emissions

a. *Limitations or Restrictions*

- i. PM-10
≤ 0.96 lb/h, ≤ 0.16 tpy [P-070-0263]
- ii. SO_x
≤ 7.05 lb/h, ≤ 1.18 tpy [P-070-0263]
- iii. VOC
≤ 0.19 lb/h, ≤ 0.03 tpy [P-070-0263]
- iv. CO
≤ 4.78 lb/h, ≤ 0.80 tpy [P-070-0263]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limits by calculating the emission rates using emission factors from AP-42, Section 1.3 Fuel Oil Combustion, Fifth Edition, September 1998. [P-070-0263]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and maintain records of emissions calculations and emission factors used. [RCSA §22a-174-4(d)(1)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.H.3.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

Section III: Applicable Requirements and Compliance Demonstration

4. NO_x Emissions

a. *Limitations or Restrictions*

≤ 22.92 lb/h, ≤ 0.20 lb/MMBtu, ≤ 3.85 tpy [P-070-0263, RCSA §22a-174-22(e)(1)]

b. *Monitoring and Testing Requirements*

- i. The Permittee shall conduct an emission test at least once every five years to demonstrate compliance with the emission limitation. [RCSA §22a-174-22(k)(1)]
- ii. The Permittee shall demonstrate compliance with the emission limitation using sampling and analytical procedures approved under 40 CFR Part 60, Appendix A, or under procedures in RCSA §22a-174-5(d). [RCSA §22a-174-22(k)(2)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and maintain records of monthly and rolling 12 month total fuel use and operating hours. [P-070-0263, RCSA §22a-174-22(l)(1)(C)]
- ii. Records of the dates, times and places of all emissions testing, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing. [RCSA §22a-174-22(l)(1)(H)]

d. *Reporting Requirements*

- i. The Permittee shall provide the records specified in Section III.H.4.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]
- ii. Within 30 days of the completion of emission tests, the Permittee shall submit a report of such testing to the commissioner. [RCSA §22a-174-22(l)(2)]
- iii. On or before April 15 of each year, the Permittee shall submit a report on NO_x emissions to the commissioner. [RCSA §22a-174-22(l)(6)]

I. GEU-5, Five Registered Boilers

1. Fuel Sulfur Content

a. *Limitations or Restrictions*

- i. Distillate fuel oil: ≤ 0.3% sulfur by weight (dry basis) [CGS §16a-21a]
- ii. Residual fuel oil: ≤ 1.0% sulfur by weight (dry basis) [RCSA §22a-174-19(a)(2)(i)]

b. *Monitoring and Testing Requirements*

The Permittee shall monitor fuel sulfur content using a shipping receipt and a certification from the fuel supplier certifying the type of fuel in the shipment and the weight percent of sulfur in the fuel. [RCSA §22a-174-33(j)(1)(K)(ii)]

Section III: Applicable Requirements and Compliance Demonstration

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall keep records of shipping receipts and fuel certifications that include the name of the oil supplier, the sulfur content of the oil, and the method used to determine the sulfur content of the oil. [RCSA §22a-174-4(d)(1)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.I.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

2. PM-10 Emissions

a. *Limitations or Restrictions*

- i. Natural gas: ≤ 0.1 lb/MMBtu [RCSA §22a-174-18(e)(2)(C)]
ii. Distillate fuel oil: ≤ 0.12 lb/MMBtu [RCSA §22a-174-18(e)(2)(B)]
iii. Residual fuel oil: ≤ 0.14 lb/MMBtu [RCSA §22a-174-18(e)(2)(A)]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limits by calculating the emission rates using emission factors from AP-42, Fifth Edition, January 1995. [RCSA §22a-174-33(j)(K)(ii)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and maintain records of emissions calculations and emission factors used. [RCSA §22a-174-4(d)(1)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.I.2.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

3. NO_x Emissions

a. *Limitations or Restrictions*

- i. Natural gas and distillate fuel oil: ≤ 0.20 lb/MMBtu
ii. Residual fuel oil: ≤ 0.25 lb/MMBtu [RCSA §22a-174-22(e)(1)]

b. *Monitoring and Testing Requirements*

- i. The Permittee shall conduct an emission test at least once every five years to demonstrate compliance with the emission limitation. [RCSA §22a-174-22(k)(1)]

Section III: Applicable Requirements and Compliance Demonstration

- ii. The Permittee shall demonstrate compliance with the emission limitation using sampling and analytical procedures approved under 40 CFR Part 60, Appendix A, or under procedures in RCSA §22a-174-5(d). [RCSA §22a-174-22(k)(2)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and maintain records of monthly and rolling 12 month total fuel use and operating hours for each boiler. [P-070-0263, RCSA §22a-174-22(l)(1)(C)]
- ii. Records of the dates, times and places of all emissions testing, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing for each boiler. [RCSA §22a-174-22(l)(1)(H)]

d. *Reporting Requirements*

- i. The Permittee shall provide the records specified in Section III.I.3.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]
- ii. Within 30 days of the completion of emission tests, the Permittee shall submit a report of such testing to the Commissioner. [RCSA §22a-174-22(l)(2)]
- iii. On or before April 15 of each year, the Permittee shall submit a report on NO_x emissions to the commissioner. [RCSA §22a-174-22(l)(6)]

J. EU-24, Enclosed Graving Dock #1 – Surface Treatment Enclosure

1. PM-10 Emissions

a. *Limitations or Restrictions*

≤ 8.2 lb/h, ≤ 0.13 tpy [P-070-0059]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limit using an emission factor of 40 lb particulate/2000 lb blast media and a control efficiency of 99%. [P-070-0059]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and keep records demonstrating that the hourly emission limit is not exceeded, including the method used to arrive at the calculated values. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall maintain monthly records of grit blast media usage. [RCSA §22a-174-33(j)(1)(K)(ii)]
- iii. The Permittee shall calculate annual emissions each month by adding the current month's emissions to that of the previous 11 months. [RCSA §22a-174-33(j)(1)(K)(ii)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.J.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

Section III: Applicable Requirements and Compliance Demonstration

2. VOC Emissions (P-070-0059)

a. *Limitations or Restrictions*

- i. ≤ 400 lb/h, ≤ 12.0 tpy [P-070-0059]
- ii. In accordance with RCSA §22a-174-20(s)(10), coatings applied premises-wide to any miscellaneous metal parts or products exceeding 55 gallons per 12 month period cannot exceed:
 - (A) 4.3 lb/gal of a clear coating [RCSA §22a-174-20(s)(3)(A)]
 - (B) 3.5 lb/gal of air dried or forced warm air dried at temperatures up to 90 °C [RCSA §22a-174-20(s)(3)(B)]
 - (C) 3.5 lb/gal of any extreme performance coating [RCSA §22a-174-20(s)(3)(C)]
 - (D) 3.0 lb/gal of any other coatings, adhesives, fillers or sealants [RCSA §22a-174-20(s)(3)(D)]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limits through records of coating usage and emissions calculations. [P-070-0059, RCSA §22a-174-33(j)(1)(K)(ii)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall maintain daily records of all coatings and diluents used, including:
 - description of coating including name and density in lb/gal
 - % VOC by weight
 - water and exempt VOC content by weight
 - non-volatile content by volume and by weight
 - amount of each coating used in gallons
 - total amount of diluent used for each coating in pounds and in gallons. [RCSA §22a-174-20(aa)]
- ii. The Permittee shall make and keep records demonstrating that the hourly emission limit is not exceeded, including the method used to arrive at the calculated values. [RCSA §22a-174-33(j)(1)(K)(ii)]
- iii. The Permittee shall calculate annual emissions each month by adding the current month's emissions to that of the previous 11 months. [RCSA §22a-174-33(j)(1)(K)(ii)]
- iv. The Permittee shall maintain records in accordance with Section VII.Z of this Title V permit. [RCSA §22a-174-32(g)(1)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.J.2.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

3. VOC Emissions (40 CFR §63.780)

a. *Limitations or Restrictions*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

Section III: Applicable Requirements and Compliance Demonstration

b. *Monitoring and Testing Requirements*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

c. *Record Keeping Requirements*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

d. *Reporting Requirements*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

4. VOC Emissions (RCSA §22a-174-20(ii))

a. *Limitations or Restrictions*

The Permittee shall comply with the industrial solvent cleaning requirements of RCSA §22a-174-20(ii) for any solvent cleaning or surface preparation that is not performed to meet a standard or specification issued or approved by the US Department of Defense. [RCSA §22a-174-20(ii)(3)(A)(vii)]

b. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall maintain records of US Department of Defense standards or specifications to qualify for exemption from industrial solvent cleaning requirements specified by RCSA §22a-174-20(ii). [RCSA §22a-174-20(ii)(3)(A)(vii)]

c. *Reporting Requirements*

Provide the records specified in Section III.J.4.b of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

5. Spray Gun Cleaning

a. *Limitations or Restrictions*

i. The Permittee shall clean spray gun equipment in accordance with one of the following procedures:

- (A) Use an enclosed gun cleaner,
- (B) Place cleaning solvent in the pressure pot and force the solvent through the gun with the atomizing cap in place, without the use of atomizing air. Used cleaning solvent shall be directed into a vat drum or other waste container that is closed when not in use,
- (C) Disassemble the spray gun and cleaning components and associated hoses and pumps by hand in a vat, which shall remain closed at all times when not in use. Components and associated hoses and pumps may be soaked in a vat with a capacity of not greater than 20 liters. Such a soaking vat shall remain closed during the soaking period, except when inserting or removing items,
- (D) Force cleaning solvent through the spray gun and direct the atomized solvent spray into a waste container that is fitted with a device to capture the resulting emissions,
- (E) Install, operate and maintain air pollution control equipment that reduces uncontrolled VOC emissions to the atmosphere from any spray application equipment cleaning by an overall control efficiency of at least 85%. [RCSA §22a-172-20(jj)(4)]

Section III: Applicable Requirements and Compliance Demonstration

b. *Monitoring and Testing Requirements*

The Permittee shall use the following work practices:

- i. New and used cleaning solvent, including those mixed 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. [RCSA §22a-174-20(jj)(5)(A)]
- ii. Spills and leaks of cleaning solvent shall be minimized. Any leaked or spilled solvent shall be absorbed and removed immediately. [RCSA §22a-174-20(jj)(5)(B)]
- iii. Absorbent applicators, such as cloth and paper that are moistened with cleaning solvent shall be stored in a closed, non-absorbent, non-leaking container for disposal or recycling. [RCSA §22a-174-20(jj)(5)(C)]
- iv. Cleaning solvent shall be conveyed from one location to another in a closed container or pipe. [RCSA §22a-174-20(jj)(5)(D)]
- v. Air pollution control equipment shall be operated and maintained in accordance with the manufacturer's recommendations. [RCSA §22a-174-20(jj)(5)(E)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

The Permittee shall maintain the daily records of all cleaning solvents as follows:

- i. Name and description of each cleaning solvent. [RCSA §22a-174-20(jj)(6)(B)(i)]
- ii. VOC content of each solvent, as applied, and the associated calculations. [RCSA §22a-174-20(jj)(6)(B)(ii)]
- iii. VOC content of each solvent, as supplied. [RCSA §22a-174-20(jj)(6)(B)(iii)]
- iv. The amount of each cleaning solvent. [RCSA §22a-174-20(jj)(6)(B)(iv)]
- v. A Material Safety Data Sheet for each cleaning solvent. [RCSA §22a-174-20(jj)(6)(B)(v)]
- vi. A description of the type of cleaning equipment and process. [RCSA §22a-174-20(jj)(6)(B)(vi)]
- vii. Documentation of control device efficiency and capture efficiency, if applicable using an applicable EPA reference method or alternate method as approved by the commissioner. [RCSA §22a-174-20(jj)(6)(B)(vii)]
- viii. Date and type of maintenance performed on air pollution control equipment, if applicable. [RCSA §22a-174-20(jj)(6)(B)(viii)]
- ix. Records described above shall be made available to the commissioner to inspect and copy upon request and shall be maintained for five years from the date such records are created. [RCSA §22a-174-20(jj)(6)(A)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.J.5.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

6. Adhesives

a. *Limitations or Restrictions*

The requirements of RCSA §22a-174-44 shall not apply to adhesives, cleanup solvents and surface preparation solvents used in the assembly, repair and manufacture of submarines, when the use of a non-complying adhesive or solvent is necessary to meet military performance specifications, provided that records of the use of such noncompliant adhesives or solvents are maintained as specified in Section III.J.6.c of this Title V permit. [RCSA §22a-174-44(c)(1)(H)]

Section III: Applicable Requirements and Compliance Demonstration

b. *Monitoring and Testing Requirements*

The Permittee shall keep the records specified in Section III.J.6.c of this Title V permit. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

The Permittee shall maintain records of the information necessary and sufficient for the commissioner to determine compliance with the applicable requirements of RCSA §22a-174-44. Such information may include:

- i. A list of each adhesive, sealant adhesive primer, sealant primer, cleanup solvent and surface preparation solvent in use and in storage [RCSA §22a-174-44(f)(1)(A)];
- ii. Identification of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent by product name and description [RCSA §22a-174-44(f)(1)(B)];
- iii. The VOC content of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent product as supplied [RCSA §22a-174-44(f)(1)(C)];
- iv. The mix ratio of any catalysts, reducers or other components used [RCSA §22a-174-44(f)(1)(D)];
- v. The final VOC content or vapor pressure of each adhesive sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent as applied [RCSA §22a-174-44(f)(1)(E)]; or
- vi. The monthly volume of each adhesive sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used [RCSA §22a-174-44(f)(1)(F)].

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.J.6.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

K. EU-25, Mold In Place Land Level Facility – Special Hull Treatment Process

1. PM-10 Emissions

a. *Limitations or Restrictions*

≤ 44.4 lb/h, ≤ 0.25 tpy [P-070-0094]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limit using an emission factor of 40 lb particulate/2000 lb blast media and a control efficiency of 99%. [P-070-0094]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and keep records demonstrating that the hourly emission limit is not exceeded, including the method used to arrive at the calculated values. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall maintain monthly records of grit blast media usage. [RCSA §22a-174-33(j)(1)(K)(ii)]

Section III: Applicable Requirements and Compliance Demonstration

iii. The Permittee shall calculate annual emissions each month by adding the current month's emissions to that of the previous 11 months. [RCSA §22a-174-33(j)(1)(K)(ii)]

d. *Reporting Requirements*

i. The Permittee shall provide the records specified in Section III.K.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

2. VOC Emissions (P-070-0094)

a. *Limitations or Restrictions*

i. $\leq 115 \text{ lb/h, } \leq 9.0 \text{ tpy}$ [P-070-0094]

ii. In accordance with RCSA §22a-174-20(s)(10), coatings applied premises-wide to any miscellaneous metal parts or products exceeding 55 gallons per 12 month period cannot exceed:

- (A) 4.3 lb/gal of a clear coating [RCSA §22a-174-20(s)(3)(A)]
- (B) 3.5 lb/gal of air dried or forced warm air dried at temperatures up to 90 °C [RCSA §22a-174-20(s)(3)(B)]
- (C) 3.5 lb/gal of any extreme performance coating [RCSA §22a-174-20(s)(3)(C)]
- (D) 3.0 lb/gal of any other coatings, adhesives, fillers or sealants [RCSA §22a-174-20(s)(3)(D)]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limits through records of coating usage and emissions calculations. [P-070-0094, RCSA §22a-174-33(j)(1)(K)(ii)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall maintain daily records of all coatings and diluents used, including:
 - description of coating including name and density in lb/gal
 - % VOC by weight
 - water and exempt VOC content by weight
 - non-volatile content by volume and by weight
 - amount of each coating used in gallons
 - total amount of diluent used for each coating in pounds and in gallons. [RCSA §22a-174-20(aa)]
- ii. The Permittee shall make and keep records demonstrating that the hourly emission limit is not exceeded, including the method used to arrive at the calculated values. [RCSA §22a-174-33(j)(1)(K)(ii)]
- iii. The Permittee shall calculate annual emissions each month by adding the current month's emissions to that of the previous 11 months. [RCSA §22a-174-33(j)(1)(K)(ii)]
- iv. The Permittee shall maintain records in accordance with Section VII.Z of this Title V permit. [RCSA §22a-174-32(g)(1)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.K.2.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

Section III: Applicable Requirements and Compliance Demonstration

3. VOC Emissions (40 CFR §63.780)

a. *Limitations or Restrictions*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

b. *Monitoring and Testing Requirements*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

c. *Record Keeping Requirements*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

d. *Reporting Requirements*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

4. VOC Emissions (RCSA §22a-174-20(ii))

a. *Limitations or Restrictions*

The Permittee shall comply with the industrial solvent cleaning requirements of RCSA §22a-174-20(ii) for any solvent cleaning or surface preparation that is not performed to meet a standard or specification issued or approved by the US Department of Defense. [RCSA §22a-174-20(ii)(3)(A)(vii)]

b. *Record Keeping Requirements*

The Permittee shall maintain records of US Department of Defense standards or specifications to qualify for exemption from industrial solvent cleaning requirements specified by RCSA §22a-174-20(ii). [RCSA §22a-174-20(ii)(3)(A)(vii)]

c. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.K.4.b of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

5. Spray Gun Cleaning

a. *Limitations or Restrictions*

i. The Permittee shall clean spray gun equipment in accordance with one of the following procedures:

- (A) Use an enclosed gun cleaner,
- (B) Place cleaning solvent in the pressure pot and force the solvent through the gun with the atomizing cap in place, without the use of atomizing air. Used cleaning solvent shall be directed into a vat drum or other waste container that is closed when not in use,
- (C) Disassemble the spray gun and cleaning components and associated hoses and pumps by hand in a vat, which shall remain closed at all times when not in use. Components and associated hoses and pumps may be soaked in a vat with a capacity of not greater than 20 liters. Such a soaking vat shall remain closed during the soaking period, except when inserting or removing items,

Section III: Applicable Requirements and Compliance Demonstration

- (D) Force cleaning solvent through the spray gun and direct the atomized solvent spray into a waste container that is fitted with a device to capture the resulting emissions,
- (E) Install, operate and maintain air pollution control equipment that reduces uncontrolled VOC emissions to the atmosphere from any spray application equipment cleaning by an overall control efficiency of at least 85%. [RCSA §22a-172-20(jj)(4)]

b. *Monitoring and Testing Requirements*

The Permittee shall use the following work practices:

- i. New and used cleaning solvent, including those mixed 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. [RCSA §22a-174-20(jj)(5)(A)]
- ii. Spills and leaks of cleaning solvent shall be minimized. Any leaked or spilled solvent shall be absorbed and removed immediately. [RCSA §22a-174-20(jj)(5)(B)]
- iii. Absorbent applicators, such as cloth and paper that are moistened with cleaning solvent shall be stored in a closed, non-absorbent, non-leaking container for disposal or recycling. [RCSA §22a-174-20(jj)(5)(C)]
- iv. Cleaning solvent shall be conveyed from one location to another in a closed container or pipe. [RCSA §22a-174-20(jj)(5)(D)]
- v. Air pollution control equipment shall be operated and maintained in accordance with the manufacturer's recommendations. [RCSA §22a-174-20(jj)(5)(E)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

The Permittee shall maintain the daily records of all cleaning solvents as follows:

- i. Name and description of each cleaning solvent. [RCSA §22a-174-20(jj)(6)(B)(i)]
- ii. VOC content of each solvent, as applied, and the associated calculations. [RCSA §22a-174-20(jj)(6)(B)(ii)]
- iii. VOC content of each solvent, as supplied. [RCSA §22a-174-20(jj)(6)(B)(iii)];
- iv. The amount of each cleaning solvent. [RCSA §22a-174-20(jj)(6)(B)(iv)]
- v. A Material Safety Data Sheet for each cleaning solvent. [RCSA §22a-174-20(jj)(6)(B)(v)]
- vi. A description of the type of cleaning equipment and process. [RCSA §22a-174-20(jj)(6)(B)(vi)]
- vii. Documentation of control device efficiency and capture efficiency, if applicable using an applicable EPA reference method or alternate method as approved by the commissioner. [RCSA §22a-174-20(jj)(6)(B)(vii)]
- viii. Date and type of maintenance performed on air pollution control equipment, if applicable. [RCSA §22a-174-20(jj)(6)(B)(viii)]
- ix. Records described above shall be made available to the commissioner to inspect and copy upon request and shall be maintained for five years from the date such records are created. [RCSA §22a-174-20(jj)(6)(A)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.K.5.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

Section III: Applicable Requirements and Compliance Demonstration

6. Adhesives

a. *Limitations or Restrictions*

The requirements of RCSA §22a-174-44 shall not apply to adhesives, cleanup solvents and surface preparation solvents used in the assembly, repair and manufacture of submarines, when the use of a non-complying adhesive or solvent is necessary to meet military performance specifications, provided that records of the use of such noncompliant adhesives or solvents are maintained as specified in Section III.K.6.c of this Title V permit. [RCSA §22a-174-44(c)(1)(H)]

b. *Monitoring and Testing Requirements*

The Permittee shall keep the records specified in Section III.K.6.c of this Title V permit. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

The Permittee shall maintain records of the information necessary and sufficient for the commissioner to determine compliance with the applicable requirements of RCSA §22a-174-44. Such information may include:

- i. A list of each adhesive, sealant adhesive primer, sealant primer, cleanup solvent and surface preparation solvent in use and in storage [RCSA §22a-174-44(f)(1)(A)];
- ii. Identification of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent by product name and description [RCSA §22a-174-44(f)(1)(B)];
- iii. The VOC content of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent product as supplied [RCSA §22a-174-44(f)(1)(C)];
- iv. The mix ratio of any catalysts, reducers or other components used [RCSA §22a-174-44(f)(1)(D)];
- v. The final VOC content or vapor pressure of each adhesive sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent as applied [RCSA §22a-174-44(f)(1)(E)]; or
- vi. The monthly volume of each adhesive sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used [RCSA §22a-174-44(f)(1)(F)].

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.K.6.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

L. EU-26, Building 51 – Spray Booth Operations

1. PM-10 Emissions

a. *Limitations or Restrictions*

≤ 0.04 tpy [P-070-0241]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limit using a conventional spray gun transfer efficiency of 65% and a waterwall control efficiency of 98.5%. [P-070-0241]

Section III: Applicable Requirements and Compliance Demonstration

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall make and keep records demonstrating that the hourly emission limit is not exceeded, including the method used to arrive at the calculated values. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall maintain monthly records of all coating usage. [RCSA §22a-174-33(j)(1)(K)(ii)]
- iii. The Permittee shall calculate annual emissions each month by adding the current month's emissions to that of the previous 11 months. [RCSA §22a-174-33(j)(1)(K)(ii)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.L.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

2. VOC Emissions (P-070-0241)

a. *Limitations or Restrictions*

- i. ≤ 0.85 tpy [P-070-0241]
- ii. In accordance with RCSA §22a-174-20(s)(10), coatings applied premises-wide to any miscellaneous metal parts or products exceeding 55 gallons per 12 month period cannot exceed:
 - (A) 4.3 lb/gal of a clear coating [RCSA §22a-174-20(s)(3)(A)]
 - (B) 3.5 lb/gal of air dried or forced warm air dried at temperatures up to 90 °C [RCSA §22a-174-20(s)(3)(B)]
 - (C) 3.5 lb/gal of any extreme performance coating [RCSA §22a-174-20(s)(3)(C)]
 - (D) 3.0 lb/gal of any other coatings, adhesives, fillers or sealants [RCSA §22a-174-20(s)(3)(D)]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limits through records of coating usage and emissions calculations. [P-070-0241, RCSA §22a-174-33(j)(1)(K)(ii)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall maintain daily records of all coatings and diluents used, including:
 - description of coating including name and density in lb/gal
 - % VOC by weight
 - water and exempt VOC content by weight
 - non-volatile content by volume and by weight
 - amount of each coating used in gallons
 - total amount of diluent used for each coating in pounds and in gallons. [RCSA §22a-174-20(aa)]
- ii. The Permittee shall calculate annual emissions each month by adding the current month's emissions to that of the previous 11 months. [RCSA §22a-174-33(j)(1)(K)(ii)]
- iii. Maintain records in accordance with Section VII.Z of this Title V permit. [RCSA §22a-174-32(g)(1)]

Section III: Applicable Requirements and Compliance Demonstration

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.L.2.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

3. VOC Emissions (40 CFR §63.780)

a. *Limitations or Restrictions*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

b. *Monitoring and Testing Requirements*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

c. *Record Keeping Requirements*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

d. *Reporting Requirements*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

4. VOC Emissions (RCSA §22a-174-20(ii))

a. *Limitations or Restrictions*

The Permittee shall comply with the industrial solvent cleaning requirements of RCSA §22a-174-20(ii) for any solvent cleaning or surface preparation that is not performed to meet a standard or specification issued or approved by the US Department of Defense. [RCSA §22a-174-20(ii)(3)(A)(vii)]

b. *Record Keeping Requirements*

The Permittee shall maintain records of US Department of Defense standards or specifications to qualify for exemption from industrial solvent cleaning requirements specified by RCSA §22a-174-20(ii). [RCSA §22a-174-20(ii)(3)(A)(vii)]

c. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.L.4.b of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

5. Spray Gun Cleaning

a. *Limitations or Restrictions*

i. The Permittee shall clean spray gun equipment in accordance with one of the following procedures:

(A) Use an enclosed gun cleaner,

Section III: Applicable Requirements and Compliance Demonstration

- (B) Place cleaning solvent in the pressure pot and force the solvent through the gun with the atomizing cap in place, without the use of atomizing air. Used cleaning solvent shall be directed into a vat drum or other waste container that is closed when not in use,
- (C) Disassemble the spray gun and cleaning components and associated hoses and pumps by hand in a vat, which shall remain closed at all times when not in use. Components and associated hoses and pumps may be soaked in a vat with a capacity of not greater than 20 liters. Such a soaking vat shall remain closed during the soaking period, except when inserting or removing items,
- (D) Force cleaning solvent through the spray gun and direct the atomized solvent spray into a waste container that is fitted with a device to capture the resulting emissions,
- (E) Install, operate and maintain air pollution control equipment that reduces uncontrolled VOC emissions to the atmosphere from any spray application equipment cleaning by an overall control efficiency of at least 85%. [RCSA §22a-172-20(jj)(4)]

b. *Monitoring and Testing Requirements*

The Permittee shall use the following work practices:

- i. New and used cleaning solvent, including those mixed 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. [RCSA §22a-174-20(jj)(5)(A)]
- ii. Spills and leaks of cleaning solvent shall be minimized. Any leaked or spilled solvent shall be absorbed and removed immediately. [RCSA §22a-174-20(jj)(5)(B)]
- iii. Absorbent applicators, such as cloth and paper that are moistened with cleaning solvent shall be stored in a closed, non-absorbent, non-leaking container for disposal or recycling. [RCSA §22a-174-20(jj)(5)(C)]
- iv. Cleaning solvent shall be conveyed from one location to another in a closed container or pipe. [RCSA §22a-174-20(jj)(5)(D)]
- v. Air pollution control equipment shall be operated and maintained in accordance with the manufacturer's recommendations. [RCSA §22a-174-20(jj)(5)(E)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]

The Permittee shall maintain the daily records of all cleaning solvents as follows:

- i. Name and description of each cleaning solvent. [RCSA §22a-174-20(jj)(6)(B)(i)]
- ii. VOC content of each solvent, as applied, and the associated calculations. [RCSA §22a-174-20(jj)(6)(B)(ii)]
- iii. VOC content of each solvent, as supplied. [RCSA §22a-174-20(jj)(6)(B)(iii)]
- iv. The amount of each cleaning solvent. [RCSA §22a-174-20(jj)(6)(B)(iv)]
- v. A Material Safety Data Sheet for each cleaning solvent. [RCSA §22a-174-20(jj)(6)(B)(v)]
- vi. A description of the type of cleaning equipment and process. [RCSA §22a-174-20(jj)(6)(B)(vi)]
- vii. Documentation of control device efficiency and capture efficiency, if applicable using an applicable EPA reference method or alternate method as approved by the commissioner. [RCSA §22a-174-20(jj)(6)(B)(vii)]
- viii. Date and type of maintenance performed on air pollution control equipment, if applicable. [RCSA §22a-174-20(jj)(6)(B)(viii)]
- ix. Records described above shall be made available to the commissioner to inspect and copy upon request and shall be maintained for five years from the date such records are created. [RCSA §22a-174-20(jj)(6)(A)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.L.5.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

Section III: Applicable Requirements and Compliance Demonstration

M. EU-27, Blastec Abrasive Blasting Chamber – Building 212

1. PM-10 Emissions

a. *Limitations or Restrictions*

$\leq 1.1 \text{ lb/h}, \leq 4.7 \text{ tpy}$ [P-070-0255]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limits by making and keeping monthly records of the quantity of abrasive used. [P-070-0255]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall record the date and details of all repairs and maintenance to the baghouse and exhaust system, maintaining a particulate removal efficiency of 99%. [P-070-0255]
- ii. The Permittee shall record the pressure drop as in. H_2O across the filter at least once per operational day of abrasive blasting. [P-070-0255]
- iii. The quantity of abrasive used shall be based on any consecutive 12 month timer period and shall be determined for each abrasive used by adding each month's abrasive used to that of the previous 11 months. The Permittee shall make this calculation monthly. [P-070-0255]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.M.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

N. EU-28, Abrasive Blasting Room – Building 105

1. PM-10 Emissions

a. *Limitations or Restrictions*

$\leq 0.23 \text{ lb/h}, \leq 1.03 \text{ tpy}$ [P-070-0256]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limits by making and keeping monthly records of the quantity of abrasive used. [P-070-0256]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall record the date and details of all repairs and maintenance to the baghouse and exhaust system, maintaining a particulate removal efficiency of 99%. [P-070-0256]

Section III: Applicable Requirements and Compliance Demonstration

- ii. The Permittee shall record the pressure drop as in. H₂O across the filter at least once per operational day of abrasive blasting. [P-070-0256]
- iii. The quantity of abrasive used shall be based on any consecutive 12 month timer period and shall be determined for each abrasive used by adding each month's abrasive used to that of the previous 11 months. The Permittee shall make this calculation monthly. [P-070-0256]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.N.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

O. EU-29, Wheelabrator-96 and Baghouse – Building 212

1. PM-10 Emissions

a. *Limitations or Restrictions*

Maintain minimum particulate removal efficiency of 99%
of particulate entering the pollution control equipment [R-070-0075, R-070-0076]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limit using a baghouse with a minimum control efficiency of 99%. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall record the date and details of all repairs and maintenance to the baghouse and exhaust systems, maintaining a particulate removal efficiency of 99%. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall record the pressure drop as in. H₂O across the filter at least once per operational shift of abrasive blasting. [RCSA §22a-174-33(j)(1)(K)(ii)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.O.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

P. EU-30, Ship Hull Abrasive Grit Blasting – Graving Dock #2

1. PM-10 Emissions

a. *Limitations or Restrictions*

≤ 34.2 lb/h [RCSA §22a-174-18(f)(2)]

Section III: Applicable Requirements and Compliance Demonstration

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limits by making and keeping monthly records of the quantity of blast grit used.

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall calculate annual emissions each month by adding the current month's emissions to that of the previous 11 months. [RCSA §22a-174-33(j)(1)(K)(ii)].

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.P.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

Q. EU-31, Ship Hull Painting – Graving Dock #2 and Land Level Facility

1. VOC Emissions [R-070-0095]

a. *Limitations or Restrictions*

- i. In accordance with RCSA §22a-174-20(s)(10), coatings applied premises-wide to any miscellaneous metal parts or products exceeding 55 gallons per 12 month period cannot exceed:

- | | |
|--|-----------------------------|
| (A) 4.3 lb/gal of a clear coating | [RCSA §22a-174-20(s)(3)(A)] |
| (B) 3.5 lb/gal of air dried or forced warm air dried at temperatures up to 90 °C | [RCSA §22a-174-20(s)(3)(B)] |
| (C) 3.5 lb/gal of any extreme performance coating | [RCSA §22a-174-20(s)(3)(C)] |
| (D) 3.0 lb/gal of any other coatings, adhesives, fillers or sealants | [RCSA §22a-174-20(s)(3)(D)] |

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limits through records of coating usage and emissions calculations. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall maintain daily records of all coatings and diluents used, including:
 - description of coating including name and density in lb/gal
 - % VOC by weight
 - water and exempt VOC content by weight
 - non-volatile content by volume and by weight
 - amount of each coating used in gallons
 - total amount of diluent used for each coating in pounds and in gallons. [RCSA §22a-174-20(aa)]
- ii. The Permittee shall calculate annual emissions each month by adding the current month's emissions to that of the previous 11 months. [RCSA §22a-174-33(j)(1)(K)(ii)]

Section III: Applicable Requirements and Compliance Demonstration

iii. Maintain records in accordance with Section VII.Z of this Title V permit. [RCSA §22a-174-32(g)(1)]

d. *Reporting Requirements*

Provide the records specified in Section III.Q.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

2. VOC emissions (40 CFR §63.780)

a. *Limitations or Restrictions*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

b. *Monitoring and Testing Requirements*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

c. *Record Keeping Requirements*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

d. *Reporting Requirements*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

3. VOC Emissions (RCSA §22a-174-20(ii))

a. *Limitations or Restrictions*

The Permittee shall comply with the industrial solvent cleaning requirements of RCSA §22a-174-20(ii) for any solvent cleaning or surface preparation that is not performed to meet a standard or specification issued or approved by the US Department of Defense. [RCSA §22a-174-20(ii)(3)(A)(vii)]

b. *Record Keeping Requirements*

The Permittee shall maintain records of US Department of Defense standards or specifications to qualify for exemption from industrial solvent cleaning requirements specified by RCSA §22a-174-20(ii). [RCSA §22a-174-20(ii)(3)(A)(vii)]

c. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.Q.3.b of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

Section III: Applicable Requirements and Compliance Demonstration

4. Spray Gun Cleaning

a. *Limitations or Restrictions*

- i. The Permittee shall clean spray gun equipment in accordance with one of the following procedures:
 - (A) Use an enclosed gun cleaner,
 - (B) Place cleaning solvent in the pressure pot and force the solvent through the gun with the atomizing cap in place, without the use of atomizing air. Used cleaning solvent shall be directed into a vat drum or other waste container that is closed when not in use,
 - (C) Disassemble the spray gun and cleaning components and associated hoses and pumps by hand in a vat, which shall remain closed at all times when not in use. Components and associated hoses and pumps may be soaked in a vat with a capacity of not greater than 20 liters. Such a soaking vat shall remain closed during the soaking period, except when inserting or removing items,
 - (D) Force cleaning solvent through the spray gun and direct the atomized solvent spray into a waste container that is fitted with a device to capture the resulting emissions,
 - (E) Install, operate and maintain air pollution control equipment that reduces uncontrolled VOC emissions to the atmosphere from any spray application equipment cleaning by an overall control efficiency of at least 85%. [RCSA §22a-172-20(jj)(4)]

b. *Monitoring and Testing Requirements*

The Permittee shall use the following work practices:

- i. New and used cleaning solvent, including those mixed 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. [RCSA §22a-174-20(jj)(5)(A)]
- ii. Spills and leaks of cleaning solvent shall be minimized. Any leaked or spilled solvent shall be absorbed and removed immediately. [RCSA §22a-174-20(jj)(5)(B)]
- iii. Absorbent applicators, such as cloth and paper that are moistened with cleaning solvent shall be stored in a closed, non-absorbent, non-leaking container for disposal or recycling. [RCSA §22a-174-20(jj)(5)(C)]
- iv. Cleaning solvent shall be conveyed from one location to another in a closed container or pipe. [RCSA §22a-174-20(jj)(5)(D)]
- v. Air pollution control equipment shall be operated and maintained in accordance with the manufacturer's recommendations. [RCSA §22a-174-20(jj)(5)(E)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created. [RCSA §22a-174-33(o)(2)]

The Permittee shall maintain the daily records of all cleaning solvents as follows:

- i. Name and description of each cleaning solvent. [RCSA §22a-174-20(jj)(6)(B)(i)]
- ii. VOC content of each solvent, as applied, and the associated calculations. [RCSA §22a-174-20(jj)(6)(B)(ii)]
- iii. VOC content of each solvent, as supplied. [RCSA §22a-174-20(jj)(6)(B)(iii)];
- iv. The amount of each cleaning solvent. [RCSA §22a-174-20(jj)(6)(B)(iv)]
- v. A Material Safety Data Sheet for each cleaning solvent. [RCSA §22a-174-20(jj)(6)(B)(v)]
- vi. A description of the type of cleaning equipment and process. [RCSA §22a-174-20(jj)(6)(B)(vi)]
- vii. Documentation of control device efficiency and capture efficiency, if applicable using an applicable EPA reference method or alternate method as approved by the commissioner. [RCSA §22a-174-20(jj)(6)(B)(vii)]
- viii. Date and type of maintenance performed on air pollution control equipment, if applicable. [RCSA §22a-174-20(jj)(6)(B)(viii)]

Section III: Applicable Requirements and Compliance Demonstration

- ix. Records described above shall be made available to the commissioner to inspect and copy upon request and shall be maintained for five years from the date such records are created. [RCSA §22a-174-20(jj)(6)(A)]

- d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.Q.4.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

R. EU-32, Spray Painting, Building #212

- 1. VOC Emissions [R-070-0227]

- a. *Limitations or Restrictions*

- i. In accordance with RCSA §22a-174-20(s)(10), coatings applied premises-wide to any miscellaneous metal parts or products exceeding 55 gallons per 12 month period cannot exceed:

- (A) 4.3 lb/gal of a clear coating [RCSA §22a-174-20(s)(3)(A)]
- (B) 3.5 lb/gal of air dried or forced warm air dried at temperatures up to 90 °C [RCSA §22a-174-20(s)(3)(B)]
- (C) 3.5 lb/gal of any extreme performance coating [RCSA §22a-174-20(s)(3)(C)]
- (D) 3.0 lb/gal of any other coatings, adhesives, fillers or sealants [RCSA §22a-174-20(s)(3)(D)]

- b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limits through records of coating usage and emissions calculations. [RCSA §22a-174-33(j)(1)(K)(ii)]

- c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall maintain daily records of all coatings and diluents used, including:
 - description of coating including name and density in lb/gal
 - % VOC by weight
 - water and exempt VOC content by weight
 - non-volatile content by volume and by weight
 - amount of each coating used in gallons
 - total amount of diluent used for each coating in pounds and in gallons. [RCSA §22a-174-20(aa)]
- ii. The Permittee shall calculate annual emissions each month by adding the current month's emissions to that of the previous 11 months. [RCSA §22a-174-33(j)(1)(K)(ii)]
- iii. Maintain records in accordance with Section VII.Z of this Title V permit. [RCSA §22a-174-32(g)(1)]

- d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.R.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

Section III: Applicable Requirements and Compliance Demonstration

2. VOC Emissions (40 CFR §63.780)

a. *Limitations or Restrictions*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

b. *Monitoring and Testing Requirements*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

c. *Record Keeping Requirements*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

d. *Reporting Requirements*

The Permittee shall comply with Section VIII: NESHAP for Shipbuilding and Ship Repair (Surface Coating) of this Title V permit.

3. VOC Emissions (RCSA §22a-174-20(ii))

a. *Limitations or Restrictions*

The Permittee shall comply with the industrial solvent cleaning requirements of RCSA §22a-174-20(ii) for any solvent cleaning or surface preparation that is not performed to meet a standard or specification issued or approved by the US Department of Defense. [RCSA §22a-174-20(ii)(3)(A)(vii)]

b. *Record Keeping Requirements*

The Permittee shall maintain records of US Department of Defense standards or specifications to qualify for exemption from industrial solvent cleaning requirements specified by RCSA §22a-174-20(ii). [RCSA §22a-174-20(ii)(3)(A)(vii)]

c. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.R.3.b of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

4. Spray Gun Cleaning

a. *Limitations or Restrictions*

i. The Permittee shall clean spray gun equipment in accordance with one of the following procedures:

- (A) Use an enclosed gun cleaner,
- (B) Place cleaning solvent in the pressure pot and force the solvent through the gun with the atomizing cap in place, without the use of atomizing air. Used cleaning solvent shall be directed into a vat drum or other waste container that is closed when not in use,
- (C) Disassemble the spray gun and cleaning components and associated hoses and pumps by hand in a vat, which shall remain closed at all times when not in use. Components and associated hoses and pumps may be soaked in a vat with a capacity of not greater than 20 liters. Such a soaking vat shall remain closed during the soaking period, except when inserting or removing items,

Section III: Applicable Requirements and Compliance Demonstration

- (D) Force cleaning solvent through the spray gun and direct the atomized solvent spray into a waste container that is fitted with a device to capture the resulting emissions,
- (E) Install, operate and maintain air pollution control equipment that reduces uncontrolled VOC emissions to the atmosphere from any spray application equipment cleaning by an overall control efficiency of at least 85%. [RCSA §22a-172-20(jj)(4)]

b. *Monitoring and Testing Requirements*

The Permittee shall use the following work practices:

- i. New and used cleaning solvent, including those mixed 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. [RCSA §22a-174-20(jj)(5)(A)]
- ii. Spills and leaks of cleaning solvent shall be minimized. Any leaked or spilled solvent shall be absorbed and removed immediately. [RCSA §22a-174-20(jj)(5)(B)]
- iii. Absorbent applicators, such as cloth and paper that are moistened with cleaning solvent shall be stored in a closed, non-absorbent, non-leaking container for disposal or recycling. [RCSA §22a-174-20(jj)(5)(C)]
- iv. Cleaning solvent shall be conveyed from one location to another in a closed container or pipe. [RCSA §22a-174-20(jj)(5)(D)]
- v. Air pollution control equipment shall be operated and maintained in accordance with the manufacturer's recommendations. [RCSA §22a-174-20(jj)(5)(E)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]

The Permittee shall maintain the daily records of all cleaning solvents as follows:

- i. Name and description of each cleaning solvent. [RCSA §22a-174-20(jj)(6)(B)(i)]
- ii. VOC content of each solvent, as applied, and the associated calculations. [RCSA §22a-174-20(jj)(6)(B)(ii)]
- iii. VOC content of each solvent, as supplied. [RCSA §22a-174-20(jj)(6)(B)(iii)]
- iv. The amount of each cleaning solvent. [RCSA §22a-174-20(jj)(6)(B)(iv)]
- v. A Material Safety Data Sheet for each cleaning solvent. [RCSA §22a-174-20(jj)(6)(B)(v)]
- vi. A description of the type of cleaning equipment and process. [RCSA §22a-174-20(jj)(6)(B)(vi)]
- vii. Documentation of control device efficiency and capture efficiency, if applicable using an applicable EPA reference method or alternate method as approved by the commissioner. [RCSA §22a-174-20(jj)(6)(B)(vii)]
- viii. Date and type of maintenance performed on air pollution control equipment, if applicable. [RCSA §22a-174-20(jj)(6)(B)(viii)]
- ix. Records described above shall be made available to the commissioner to inspect and copy upon request and shall be maintained for five years from the date such records are created. [RCSA §22a-174-20(jj)(6)(A)]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.R.4.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

Section III: Applicable Requirements and Compliance Demonstration

S. EU-33, Abrasive Blasting Cabinet – Building 129

1. PM, PM-10/2.5 Emissions

a. *Limitations or Restrictions*

- i. Maximum abrasive media usage rate of 540,200 tpy
- ii. ≤ 0.0002 lb/h PM, PM-10 and PM-2.5
- iii. ≤ 0.00015 tpy PM, PM-10 and PM-2.5 [P-070-0269]

b. *Monitoring and Testing Requirements*

The Permittee shall demonstrate compliance with the emission limits by making and keeping monthly records of the quantity of grit blast media used. [P-070-0269]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, make and maintain the following records for a minimum of five years, commencing on the date such records were created. [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall record monthly and annual grit blast usage. The annual usage shall be determined by adding the current month's usage to the previous 11 month's usage. [P-070-0269]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.S.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

T. EU-101, Abrasive Blast Room – Building 1

1. PM-10/2.5 Emissions

a. *Limitations or Restrictions*

- i. Maximum abrasive media usage rate of 5,880 tpy
- ii. ≤ 0.00008 lb/h PM-10, ≤ 0.00001 lb/h PM-2.5
- iii. ≤ 0.00033 tpy PM-10, ≤ 0.00003 tpy PM-2.5 [P-070-0280]

b. *Monitoring and Testing Requirements*

- i. The Permittee shall monitor the pressure drop across the control device and insure it is within the manufacturer's recommended limits. [P-070-0280]
- ii. The Permittee shall demonstrate compliance with the emission limits by making and keeping monthly records of the quantity of grit blast media used. [P-070-0280]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. The Permittee shall record monthly and annual grit blast usage. The annual usage shall be determined by adding the current month's usage to the previous 11 month's usage. [P-070-0280]

Section III: Applicable Requirements and Compliance Demonstration

- ii. The Permittee shall record the date and details of all repairs and maintenance to the abrasive blast system and control equipment. [P-070-0280]

d. *Reporting Requirements*

The Permittee shall provide the records specified in Section III.T.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

Section III: Applicable Requirements and Compliance Demonstration

U. PREMISES-WIDE GENERAL REQUIREMENTS

TABLE III.U: PREMISES-WIDE GENERAL REQUIREMENTS		
Pollutants or Process Parameters	Applicable Regulatory References/Citations	Compliance Demonstration Requirements
Annual Emission Statements	RCSA §22a-174-4	1. The Permittee shall submit annual emission statements requested by the commissioner as set forth in RCSA §22a-174-4(d)(1).
Emission Testing	RCSA §22a-174-5	2. The Permittee shall comply with the procedures for sampling, emission testing, sample analysis, and reporting as set forth in RCSA §22a-174-5.
Emergency Episode Procedures	RCSA §22a-174-6	3. The Permittee shall comply with the procedures for emergency episodes as set forth in RCSA §22a-174-6.
Reporting of Malfunctioning Control Equipment	RCSA §22a-174-7	4. The Permittee shall comply with the reporting requirements of malfunctioning control equipment as set forth in RCSA §22a-174-7.
Prohibition of Air Pollution	RCSA §22a-174-9	5. The Permittee shall comply with the requirement to prevent air pollution as set forth in RCSA §22a-174-9.
Public Availability of Information	RCSA §22a-174-10	6. The public availability of information shall apply, as set forth in RCSA §22a-174-10.
Prohibition Against Concealment/Circumvention	RCSA §22a-174-11	7. The Permittee shall comply with the prohibition against concealment or circumvention as set forth in RCSA §22a-174-11.
Violations and Enforcement	RCSA §22a-174-12	8. The Permittee shall not violate or cause the violation of any applicable regulation as set forth in RCSA §22a-174-12.
Variances	RCSA §22a-174-13	9. 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.
No Defense to Nuisance Claim	RCSA §22a-174-14	10. The Permittee shall comply with the regulations as set forth in RCSA §22a-174-14.
Severability	RCSA §22a-174-15	11. The Permittee shall comply with the severability requirements as set forth in RCSA §22a-174-15.
Responsibility to Comply	RCSA §22a-174-16	12. The Permittee shall be responsible to comply with the applicable regulations as set forth in RCSA §22a-174-16.
Particulate Emissions	RCSA §22a-174-18	13. 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.)
Sulfur Compound Emissions	RCSA §22a-174-19	14. The Permittee shall comply with the requirements for control of sulfur compound emissions as set forth in RCSA §22a-174-19.
Organic Compound Emissions	RCSA §22a-174-20	15. The Permittee shall comply with the requirements for control of organic compound emissions as set forth in RCSA §22a-174-20.
Carbon Monoxide Emissions	RCSA §22a-174-21	16. The Permittee shall comply with the requirements for control of carbon monoxide emissions as set forth in RCSA §22a-174-21.
Nitrogen Oxide Emissions	RCSA §22a-174-22	17. The Permittee shall comply with the requirements for control of nitrogen oxide emissions as set forth in RCSA §22a-174-22.
Emission Fees	RCSA §22a-174-26	18. The Permittee shall pay an emission fee as set forth in RCSA §22a-174-26(d).
VOC RACT	RCSA §22a-174-32	19. The Permittee shall comply with the standards for Reasonably Available Control Technology (RACT) for volatile organic compounds as set forth in RCSA §22a-174-32.
Asbestos NESHAP	40 CFR 61 Subpart M	20. The Permittee shall make notifications for applicable demolition or renovation activities.
Shipbuilding and Ship Repair (Surface Coating) NESHAP	40 CFR 63 Subpart II	21. The Permittee shall comply with the National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair (Surface Coating) as specified in 40 CFR 63, Subpart II.
Protection of Stratospheric Ozone	40 CFR 82 Subpart F	22. The Permittee shall comply with the standards for recycling and emissions reduction of products using ozone depleting substances pursuant to 40 CFR Part 82 Subpart F.

Section III: Applicable Requirements and Compliance Demonstration

V. COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

EU-24, 25, 27-29: Abrasive blasting EUs with baghouse control units

TABLE III.V: COMPLIANCE ASSURANCE MONITORING (CAM) PLAN	
Control Devices	Baghouses
Pollutant	PM
Indicator	Pressure drop across filter bags
Justification	A pressure drop across the filters bags less than the indicator value could signal filter bag failure
Measurement Approach	Measure the pressure drop across the filters bags using a differential pressure gauge
Indicator Range:	
EU-24	< 3 in. of H ₂ O or > 6 in. of H ₂ O
EU-25	< 3 in. of H ₂ O
EU-27	< 3 in. of H ₂ O
EU-28	< 3 in. of H ₂ O
EU-29	< 3 in. of H ₂ O
Corrective Action	When there is an excursion, the Permittee shall: <ol style="list-style-type: none"> 1. Make a record of the event, 2. Inspect the control device, 3. Take corrective action, and 4. Take preventative action, as appropriate.
Data Representativeness	Pressure taps are located at the baghouse inlet and outlet. Differential pressure gauges accurate to $\pm 2\%$ of full scale
Monitoring Frequency	Once per operational day of blasting
Averaging Periods	n/a
QA/QC Practices	The baghouses and filters will be maintained in accordance with the manufacturer's specifications and written recommendations.
Record Keeping	The Permittee shall maintain for a period of five years records of inspections and corrective actions taken in response to excursions.
Reporting	The Permittee shall, as part of the semi-annual monitoring report and /or annual compliance certification, submit a report semiannually on the number, duration, cause of any excursion and the corrective action taken.

Section IV: Compliance Schedule

THERE IS NO COMPLIANCE SCHEDULE REQUIRED AT THIS TIME

TABLE IV: COMPLIANCE SCHEDULE				
Emissions Unit	Applicable Regulations	Steps Required for Achieving Compliance (Milestones)	Date by which Each Step is to be Completed	Dates for Monitoring, Record Keeping, and Reporting
EU-24 EU-25 EU-27 EU-28 EU-29	40 CFR 64.6(d)	The Permittee shall implement the baghouse pressure drop monitoring program described in Section III.U of this Title V permit.	No later the 180 days from the date of issuance of this Title V permit.	Submittal of progress reports by March 1 and September 1 as specified by Section VII.G of this Title V permit.

Section V: State Enforceable Terms and Sections

Only the Commissioner of the Department of Environmental Protection has the authority to enforce the terms, conditions and limitations contained in this section.

- 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 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.** 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.
- D.** 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.
- 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.
- F.** Open Burning: The Permittee is prohibited from conducting open burning, except as may be allowed by CGS §22a-174(f).
- G.** Fuel Sulfur Content: The Permittee shall not use No. 2 heating oil that exceeds three-tenths of one percent sulfur by weight as set forth in CGS §16a-21a.

Section VI: Permit Shield

NO PERMIT SHIELDS HAVE BEEN GRANTED

In accordance with RCSA §22a-174-33(k), a Permittee complying with the conditions of this Title V permit shall be deemed in compliance with any applicable requirements identified in Table VI below as of the date of issuance. Also, in accordance with RCSA §22a-174-33(k), a Permittee complying with the conditions of this Title V permit shall be deemed exempt from any non-applicable requirements identified below as of the date of issuance.

This Title V permit shall not alter or affect the following:

- A. The provisions of section 303 of the Clean Air Act, including the authority of the Administrator under the Act;
- B. The liability of an owner or operator of a Title V source for any violation of applicable requirements prior to or at the effective date of a Title V permit;
- C. The applicable requirements of the acid rain program under 40 CFR Part 72; and
- D. The ability of the Administrator or commissioner to obtain information from the owner or operator of a Title V source.

TABLE VI: PERMIT SHIELD				
Regulated Pollutants	Emissions Unit	Applicable Requirement or Non-Applicable Requirement Descriptions	Applicable Regulatory References	*Applicability
n/a				

***For Applicability, use AR to indicate Applicable Requirement and NR for Non-Applicable Requirement**

Section VII: Title V Requirements

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

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 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: Director, Air Compliance Program; Attn: Air Compliance Clerk; Office of Environmental Stewardship; EPA-New England, Region 1; 5 Post Office Square, Suite 100; Boston, Massachusetts 02109-3912.

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

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

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

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

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

1. The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding 25 million dollars in second quarter 1980 dollars; or
2. The delegation of authority to the duly authorized representative has been given in writing by an officer of the corporation in accordance with corporate procedures and the following:
 - a. 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,
 - b. 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

Section VII: Title V Requirements

- c. 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)]

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, within 15 days of the date the Permittee becomes aware of a change in any information submitted to the commissioner under this Title V permit or of any change in any information contained in the application, or that any such information was inaccurate or misleading or that any relevant information was omitted, the Permittee shall submit the changed, corrected, or omitted information to the commissioner.

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 permit, which has occurred since the date of the last monitoring report; and
3. Each deviation caused by a failure of the monitoring system to provide reliable data.

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

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

1. The type of monitoring or records used to obtain such data, including record keeping;
2. The date, place, and time of sampling or measurement;
3. The name of the individual who performed the sampling or the measurement and the name of such individual's employer;
4. The date(s) on which analyses of such samples or measurements were performed;
5. The name and address of the entity that performed the analyses;
6. The analytical techniques or methods used for such analyses;

Section VII: Title V Requirements

7. The results of such analyses;
8. The operating conditions at the subject source at the time of such sampling or measurement; and
9. All calibration and maintenance records relating to the instrumentation used in such sampling or measurements, all original strip-chart recordings or computer printouts generated by continuous monitoring instrumentation, and copies of all reports required by the subject permit.

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

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

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

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

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

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

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

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

Notwithstanding Subsection D of Section VII 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).

Section VII: Title V Requirements

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 22a-174-33(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 (B) unless imposition of such limits is required by an applicable requirement.

M. INSPECTION TO DETERMINE COMPLIANCE [RCSA §22a-174-33(j)(1)(M)]

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

N. PERMIT AVAILABILITY

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

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

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

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

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

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

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

Section VII: Title V Requirements

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

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

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

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

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

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

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

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

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

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

V. TRANSFERS [RCSA §22a-174-2a(g)]

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

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

Section VII: Title V Requirements

W. REVOCATION [RCSA §22a-174-2a(h)]

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

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

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

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

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

Y. CREDIBLE EVIDENCE

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

Z. VOC RACT RECORDS [RCSA § 22a-174-32(g)(1)]

The Permittee shall maintain for at least five years, and make available for the commissioner's inspection upon demand, the following:

1. purchase records for all materials which are used or stored at the premises which contain VOCs;
2. for any VOC emissions resulting from coating operations, records of the name of each coating, the coating density expressed in pounds per gallon or pounds per unit, the percent VOC content by weight of each coating, the percent solids content by weight, the water and exempt VOC content of each coating by weight, the amount of each coating used in gallons, the total amount of diluent used for each coating in pounds and in gallons, and the coating viscosity in pounds VOC per pounds solid or in kilograms VOC per kilogram solids; and
3. the results of any VOC emissions testing performed pursuant to subsection 22a-174-32(f).

Section VIII: NESHAP FOR SHIPBUILDING AND SHIP REPAIR (surface coating)

A. Emission Limitations

1. The Permittee shall not cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit given in Table VIII.A of this Title V permit, as determined by the procedures in Sections VIII.C.5-7 of this Title V permit. For the compliance procedures described in Sections VIII.C.5 or VIII.C.6 of this Title V permit, VOC shall be used as a surrogate for VOHAP and the EPA Reference Method 24 shall be used as the definitive measure for determining compliance. For the compliance procedure described in Section VIII.C.7 of this Title V permit, an alternative test method capable of measuring independent VOHAP shall be used to determine compliance. The method must be submitted to and approved by the Administrator. [40 CFR §63.783(a)]

Table VIII.A: Limits			
Coating Category^f	VOHAP limits^{abc}		
	grams/liter coating (minus water and exempt compounds)	grams/liter solid^d	
		t ≥ 4.5°C	t < 4.5°C^e
General use	340	571	728
Air flask	340	571	728
Antenna	530	1,439	--
Antifoulant	400	765	971
Heat resistant	420	841	1,069
High-gloss	420	841	1,069
High-temperature	500	1,237	1,597
Inorganic zinc high-build	340	571	728
Military exterior	340	571	728
Mist	610	2,235	--
Navigational aids	550	1,597	--
Nonskid	340	571	728
Nuclear	420	841	1,069
Organic zinc	360	630	802
Pretreatment wash primer	780	11,095	--
Repair and maint. of thermoplastics	550	1,597	--
Rubber camouflage	340	571	728
Sealant for thermal spray aluminum	610	2,235	--
Special marking	490	1,178	--
Specialty interior	340	571	728
Tack coat	610	2,235	--
Undersea weapons systems	340	571	728
Weld-through precon. Primer	650	2,885	--

^a - The limits are expressed in two sets of equivalent units. Either set of limits may be used for the compliance procedure described in Section VIII.C.5 of this Title V permit but only the limits expressed in units of g/L solids (nonvolatiles) shall be used for the compliance procedures described in Sections VIII.C.6 and VIII.C.7 of this Title V permit.

Section VIII: NESHAP FOR SHIPBUILDING AND SHIP REPAIR (surface coating)

^b - VOC (including exempt compounds listed as HAP) shall be used as a surrogate for VOHAP for those compliance procedures described in Section VIII.C.5-7 of this Title V permit.

^c - To convert from g/L to lb/gal, multiply by (3.785 L/gal)(1/453.6 lb/g) or 1/120. For compliance purposes, metric units define the standards.

^d - VOHAP limits expressed in units of mass of VOHAP per volume of solids were derived from the VOHAP limits expressed in units of mass of VOHAP per volume of coating assuming the coatings contain no water or exempt compounds and that the volumes of all components within a coating are additive.

^e These limits apply during cold-weather time periods, as defined in 40 CFR §63.782. Cold-weather allowances are not given to coatings in categories that permit over a 40 percent VOHAP content by volume. Such coatings are subject to the same limits regardless of weather conditions.

^f As defined in 40 CFR §63.782

B. Operating Requirements

1. The Permittee of the affected source shall ensure that: [40 CFR §63.783(b)]
 - a. All handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills. [40 CFR §63.783(b)(1)]
 - b. All containers, tanks, vats, drums, and piping systems are free of cracks, holes, and other defects and remain closed unless materials are being added to or removed from them. [40 CFR §63.783(b)(2)]

C. Compliance Requirements

1. For each batch of coating that is received, the Permittee shall: [40 CFR §63.785(a)]
 - a. Determine the coating category and the applicable VOHAP limit as specified in Section VIII.A.1 of this Title V permit. [40 CFR §63.785(a)(1)]
 - b. Certify the as-supplied VOC content of the batch of coating. The Permittee may use a certification supplied by the manufacturer for the batch, although the Permittee retains liability should subsequent testing reveal a violation. If the Permittee performs the certification testing, only one of the containers in which the batch of coating was received is required to be tested. [40 CFR §63.785(a)(2)]
2. In lieu of testing each batch of coating, as applied, the Permittee may determine compliance with the VOHAP limits using any combination of the procedures described in Section VIII.C.5-7 of this Title V permit. The procedure used for each coating shall be determined and documented prior to application. [40 CFR §63.785(b)(1)]
3. The results of any compliance demonstration conducted by the Permittee, Office of Air Resources or the USEPA using Method 24 shall take precedence over the results using the procedures in Section VIII.C.5-7 of this Title V permit. [40 CFR §63.785(b)(2)]
4. The results of any compliance demonstration conducted by the Permittee, the Office of Air Resources or the USEPA using an approved test method to determine VOHAP content shall take precedence over the results using the procedures in Section VIII.C.7 of this Title V permit. [40 CFR §63.785(b)(3)]
5. Coatings to which thinning solvent will not be added.
 - a. For coatings to which thinning solvent (or any other material) will not be added under any circumstance or to which only water is added, the Permittee of an affected source shall comply as follows:

Section VIII: NESHAP FOR SHIPBUILDING AND SHIP REPAIR (surface coating)

[40 CFR §63.785(c)(1)]

- i. Certify the as-applied VOC content of each batch of coating. [40 CFR §63.785(c)(1)(i)]
- ii. Notify the persons responsible for applying the coating that no thinning solvent may be added to the coating by affixing a label to each container of coating in the batch or through another means described in the facility’s current NESHAP Implementation Plan. [40 CFR §63.785(c)(1)(ii)]
- iii. If the certified as-applied VOC content of each batch of coating used during a calendar month is less than or equal to the applicable VOHAP limit in Section VIII.A.1 (either in terms of g/L of coating or g/L of solids) of this Title V permit, then compliance is demonstrated for that calendar month, unless a violation is revealed using Method 24. [40 CFR §63.785(c)(1)(iii)]

6. Coatings to which thinning solvent will be added—coating—by coating compliance.

- a. For a coating to which thinning solvent is routinely or sometimes added, the Permittee shall comply as follows: [40 CFR §63.785(c)(2)]
 - i. Prior to the first application of each batch, designate a single thinner for the coating and calculate the maximum allowable thinning ratio (or ratios, if the Permittee complies with the cold-weather limits in addition to the other limits specified in Section VIII.A.1 of this Title V permit) for each batch as follows: [40 CFR §63.785(c)(2)(i)]

$$R = \frac{(V_s)(\text{VOHAP limit}) - m_{\text{VOC}}}{D_{\text{th}}} \quad \text{Eqn. 1}$$

where:

R=Maximum allowable thinning ratio for a given batch (L thinner/L coating as supplied);

V_s=Volume fraction of solids in the batch as supplied (L solids/L coating as supplied);

VOHAP limit=Maximum allowable as-applied VOHAP content of the coating (g VOHAP/L solids);

m_{VOC}=VOC content of the batch as supplied [g VOC (including cure volatiles and exempt compounds on the HAP list)/L coating (including water and exempt compounds) as supplied];

D_{th}=Density of the thinner (g/L).

If V_s is not supplied directly by the coating manufacturer, the Permittee shall determine V_s as follows:

$$V_s = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \quad \text{Eqn. 2}$$

where:

Section VIII: NESHAP FOR SHIPBUILDING AND SHIP REPAIR (surface coating)

$m_{\text{volatiles}}$ =Total volatiles in the batch, including VOC, water, and exempt compounds (g/L coating); and

D_{avg} =Average density of volatiles in the batch (g/L)

The procedures specified in Section VIII.D.4 of this Title V permit may be used to determine the values of variables defined in this paragraph. In addition, the Permittee may choose to construct nomographs, based on Equation 1, similar or identical to the one provided in Appendix B of 40 CFR 63, Subpart II as a means of easily estimating the maximum allowable thinning ratio.

- ii. Prior to the first application of each batch, notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch of the coating by affixing a label to each container of coating or through another means described in the facility's current NESHAP Implementation Plan. [40 CFR §63.785(c)(2)(ii)]
- iii. By the 15th day of each calendar month, determine the volume of each batch of the coating used, as supplied, during the previous month. [40 CFR §63.785(c)(2)(iii)]
- iv. By the 15th day of each calendar month, determine the total allowable volume of thinner for the coating used during the previous month as follows: [40 CFR §63.785(c)(2)(iv)]

$$V_{th} = \sum_{i=1}^n (R \times V_b)_i + \sum_{i=1}^n (R_{cold} \times V_{b - cold})_i \quad \text{Eqn. 3}$$

where:

V_{th} =Total allowable volume of thinner for the previous month (L thinner);

R =Maximum allowable thinning ratio for a given batch (L thinner/L coating as supplied);

V_b =Volume of each batch, as supplied and before being thinned, used during non-cold-weather days of the previous month (L coating as supplied);

R_{cold} =Maximum allowable thinning ratio for each batch used during cold-weather days (L thinner/L coating as supplied);

V_{b-cold} =Volume of each batch, as supplied and before being thinned, used during cold-weather days of the previous month (L coating as supplied);

i =Each batch of coating; and

n =Total number of batches of the coating.

- v. By the 15th day of each calendar month, determine the volume of thinner actually used with the coating during the previous month. [40 CFR §63.785(c)(2)(v)]
- vi. If the volume of thinner actually used with the coating [Section VIII.C.6.(a)(v) of this Title V permit] is less than or equal to the total allowable volume of thinner for the coating [Section VIII.C.6.(a)(iv) of this Title V permit], then compliance is demonstrated for the coating for the previous month, unless a violation is revealed using Method 24. [40 CFR §63.785(c)(2)(vi)]

Section VIII: NESHAP FOR SHIPBUILDING AND SHIP REPAIR (surface coating)

7. Demonstration of compliance through an alternative (i.e., other than Method 24 of Appendix A to 40 CFR part 60) test method.

The Permittee shall comply as follows:

- a. Certify the as-supplied VOHAP content (g VOHAP/L solids) of each batch of coating. [40 CFR §63.785(c)(4)(i)]
 - b. If no thinning solvent will be added to the coating, the Permittee shall follow the procedure described in Section VIII.C.5, except that VOHAP content shall be used in lieu of VOC content. [40 CFR §63.785(c)(4)(ii)]
 - c. If thinning solvent will be added to the coating, Permittee shall follow the procedure described in Section VIII.C.6 of this Title V permit, except that in Equation 1 the term “Mvoc” shall be replaced by the term “MVOHAP” defined as the VOHAP content of the coating as supplied (g VOHAP/L coating) and the term “Dth” shall be replaced by the term “Dth(VOHAP)” defined as the average density of the VOHAP thinner(s) (g/L). [40 CFR §63.785(c)(4)(iii)]
8. A violation revealed through any approved test method shall result in a 1-day violation for enforcement purposes. A violation revealed through the recordkeeping procedures described in Sections VIII.C.5-7 of this Title V permit shall result in a 30-day violation for enforcement purposes, unless the Permittee provides sufficient data to demonstrate the specific days during which noncompliant coatings were applied. [40 CFR §63.785(d)]

D. Testing Requirements

1. For the compliance procedures described in Sections VIII.C.5-7 of this Title V permit, Method 24 of 40 CFR part 60, appendix A, is the definitive method for determining the VOC content of coatings, as supplied or as applied. When a coating or thinner contains exempt compounds that are volatile HAP or VOHAP, the Permittee shall ensure, when determining the VOC content of a coating, that the mass of these exempt compounds is included. [40 CFR §63.786(a)]
2. For the compliance procedure described in Section VIII.C.7 of this Title V permit, the USEPA must approve the test method for determining VOHAP content of coatings and thinners. The criteria for approval of the test method are specified in 40 CFR §63.786(b). [40 CFR §63.786(b)]
3. A coating manufacturer or the Permittee may use batch formulation data as a test method in lieu of Method 24 to certify the as-supplied VOC content of a coating if the manufacturer or the Permittee has determined that batch formulation data have a consistent and quantitatively known relationship to Method 24 results. This determination shall consider the role of cure volatiles, which may cause emissions to exceed an amount based solely upon coating formulation data. Notwithstanding such determination, in the event of conflicting results, Method 24 shall take precedence. [40 CFR §63.786(c)]
4. The Permittee shall use or ensure that the manufacturer uses the form and procedures mentioned in 40 CFR 63 Subpart II appendix A to determine values for the thinner and coating parameters used in Equations 1 and 2 of this Title V permit. The Permittee shall ensure that the coating/thinner manufacturer (or supplier) provides information on the VOC and VOHAP contents of the coatings/thinners and the procedure(s) used to determine these values. [40 CFR §63.786(d)]

E. Recordkeeping Requirements

1. The Permittee shall compile records on a monthly basis and maintain those records for a minimum of five years. At a minimum, these records shall include: [40 CFR §63.788(b)(2)]

Section VIII: NESHAP FOR SHIPBUILDING AND SHIP REPAIR (surface coating)

- a. A copy of the affected source's approved implementation plan; [40 CFR §63.788(b)(2)(ii)]
 - b. The volume of each low-usage-exempt coating applied; [40 CFR §63.788(b)(2)(iii)]
 - c. Identification of the coatings used, their appropriate coating categories, and the applicable VOHAP limit; [40 CFR §63.788(b)(2)(iv)]
 - d. Certification of the as-supplied VOC content of each batch of coating; [40 CFR §63.788(b)(2)(v)]
 - e. A determination of whether containers meet the standards as described in Section VIII.B.1.b of this Title V permit; and [40 CFR §63.788(b)(2)(vi)]
 - f. The results of any Method 24 of appendix A to 40 CFR part 60 or approved VOHAP measurement test conducted on individual containers of coating, as applied. [40 CFR §63.788(b)(2)(vii)]
2. The records required by Section VIII.E.1 of this Title V permit shall include additional information, as determined by the compliance procedure(s) described in Sections VIII.C.5-7 of this Title V permit, that the Permittee followed. [40 CFR §63.788(b)(3)]
- a. Coatings to which thinning solvent will not be added.

The records maintained by the Permittee demonstrating compliance using the procedure specified in Section VIII.C.5 of this Title V permit shall contain the following information: [40 CFR §63.788(b)(3)(i)]
 - i. Certification of the as-applied VOC content of each batch of coating; and [40 CFR §63.788(b)(3)(i)(A)]
 - ii. The volume of each coating applied. [40 CFR §63.788(b)(3)(i)(B)]
 - b. Coatings to which thinning solvent will be added--coating-by-coating compliance.

The records maintained by the Permittee demonstrating compliance using the procedure specified in Section VIII.C.6 of this Title V permit shall contain the following information: [40 CFR §63.788(b)(3)(ii)]
 - i. The density and mass fraction of water and exempt compounds of each thinner and the volume fraction of solids (nonvolatiles) in each batch, including any calculations; [40 CFR §63.788(b)(3)(ii)(A)]
 - ii. The maximum allowable thinning ratio (or ratios, if the affected source complies with the cold-weather limits in addition to the other limits specified in Section VIII.A.1 of this Title V permit) for each batch of coating, including calculations; [40 CFR §63.788(b)(3)(ii)(B)]
 - iii. If the Permittee chooses to comply with the cold-weather limits, the dates and times during which the ambient temperature at the affected source was below 4.5°C (40°F) at the time the coating was applied and the volume used of each batch of the coating, as supplied, during these dates; [40 CFR §63.788(b)(3)(ii)(C)]
 - iv. The volume used of each batch of the coating, as supplied; [40 CFR §63.788(b)(3)(ii)(D)]
 - v. The total allowable volume of thinner for each coating, including calculations; and [40 CFR §63.788(b)(3)(ii)(E)]
 - vi. The actual volume of thinner used for each coating. [40 CFR §63.788(b)(3)(ii)(F)]

Section VIII: NESHAP FOR SHIPBUILDING AND SHIP REPAIR (surface coating)

- c. Demonstration of compliance through an alternative (i.e., non-Method 24 in Appendix A to 40 CFR part 60) test method.

The records maintained by the Permittee demonstrating compliance using the procedure described in Section VIII.C.7 of this Title V permit, shall contain the following information:

- i. Identification of the Administrator-approved VOHAP test method or certification procedure; [40 CFR §63.788(b)(3)(iv)(A)]
 - ii. For coatings to which the Permittee does not add thinning solvents, the source shall record the certification of the as-supplied and as-applied VOHAP content of each batch and the volume of each coating applied; [40 CFR 63,788(b)(3)(iv)(B)]
 - iii. For coatings to which the Permittee adds thinning solvents on a coating-by-coating basis, the source shall record all of the information required to be recorded by Section VIII.E.2.b of this Title V permit. [40 CFR §63.788(b)(3)(iv)(C)]
3. If the Permittee detects a violation of the emission limitations specified in Section VIII.A.1 of this Title V permit, the Permittee shall for the remainder of the reporting period during which the violation(s) occurred, include the following information in his or her records: [40 CFR §63.788(b)(4)]
- a. A summary of the number and duration of deviations during the reporting period, classified by reason, including known causes for which a Federally-approved or promulgated exemption from an emission limitation or standard may apply. [40 CFR §63.788(b)(4)(i)]
 - b. Identification of the data availability achieved during the reporting period, including a summary of the number and total duration of incidents that the monitoring protocol failed to perform in accordance with the design of the protocol or produced data that did not meet minimum data accuracy and precision requirements, classified by reason. [40 CFR §63.788(b)(4)(ii)]
 - c. Identification of the compliance status as of the last day of the reporting period and whether compliance was continuous or intermittent during the reporting period. [40 CFR §63.788(b)(4)(iii)]
 - d. If, pursuant to Section VIII.E.3.c of this Title V permit, the Permittee identifies any deviation as resulting from a known cause for which no Federally-approved or promulgated exemption from an emission limitation or standard applies, the monitoring report shall also include all records that the source is required to maintain that pertain to the periods during which such deviation occurred and: [40 CFR §63.788(b)(4)(iv)]
 - i. The magnitude of each deviation; [40 CFR §63.788(b)(4)(iv)(A)]
 - ii. The reason for each deviation; [40 CFR §63.788(b)(4)(iv)(B)]
 - iii. A description of the corrective action taken for each deviation, including action taken to minimize each deviation and action taken to prevent recurrence; and [40 CFR §63.788(b)(4)(iv)(C)]
 - iv. All quality assurance activities performed on any element of the monitoring protocol. [40 CFR §63.788(b)(4)(iv)(D)]

Section VIII: NESHAP FOR SHIPBUILDING AND SHIP REPAIR (surface coating)

F. Reporting Requirements

1. Before the 60th day following completion of each 6-month period after December 16, 1997, the Permittee shall submit a report to the Office of Air Resources and the USEPA for each of the previous 6 months. The report shall include all of the information that must be retained pursuant to Sections VIII.E.1-2 of this Title V permit, except for that information specified in Sections VIII.E.1.a, VIII.E.1.d, VIII.E.2.a.1 and VIII.E.2.b.1 of this Title V permit. If a violation at the facility is detected, the Permittee shall also report the information specified in Section VIII.E.3 of this Title V permit for the reporting period during which the violation(s) occurred. To the extent possible, the report shall be organized according to the compliance procedure(s) followed each month by the Permittee. [40 CFR §63.788(c)]
2. The Permittee may apply to the USEPA for permission to use an alternative means (such as an add-on control system) of limiting emissions from coating operations by following the provisions of 40 CFR §63.783(c). [40 CFR §63.783(c)]

G. Other Requirements

1. The provisions of this section do not apply to coatings used in volumes less than 200 liters (52.8 gallons) per year, provided the total volume of coating exempt under this condition does not exceed 1,000 liters per year (264 gallons per year) at this facility. Coatings exempt under this condition shall be clearly labeled as “low-usage exempt” and the volume of such coating applied shall be maintained in the Permittee’s records. [40 CFR §63.781(b)]
2. The provisions of this section do not apply to coatings applied with hand-held, non refillable, aerosol containers or to unsaturated polyester resin (i.e. fiberglass lay-up) coatings. Coatings applied to suitably prepared fiberglass surfaces for protective or decorative purposes are subject to this section. [40 CFR §63.781(c)]
3. Comply with all applicable provisions in 40 CFR §63.1-15, Subpart A, “General Provisions” as indicated in Table 1 of 40 CFR §63.780.