



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	013-0010-TV
Client/ Sequence /Town/Premises Numbers	362/1/013/1
Date Issued	April 18, 2012
Expiration Date	April 18, 2017

Corporation:

The Gilman Brothers Company

Premises Location:

Gilman Road, Gilman, CT 06336

Name of Responsible Official and Title:

Evan Gilman, President

All the following attached pages, 2 through 23, are hereby incorporated by reference into this Title V permit.

 /s/ Macky McCleary
Macky McCleary
Deputy Commissioner

 4/18/12
Date

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Title V Operating Permit

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

LIST OF ABBREVIATIONS/ACRONYMS

<i>Abbreviation/Acronym</i>	<i>Description</i>
CFR	Code of Federal Regulations
CGS	Connecticut General Statutes
DEEP	Department of Energy and Environmental Protection
ESP	Electrostatic Precipitator
EU	Emissions Unit
EPA	Environmental Protection Agency
GEU	Grouped Emissions Units
HAP	Hazardous Air Pollutant
hr	Hour
lb	Pound
MMBTU	Million British Thermal Units
No.	Number
NSR	New Source Review
%	Percent
PM	Particulate Matter
RCSA	Regulations of Connecticut State Agencies
SIC	Standard Industrial Classification Code
SOS	Standard Operating Scenario
TV	Title V Permit
VOC	Volatile Organic Compound

Section I: Premises Information/Description

A. PREMISES INFORMATION

Nature of Business: Manufacture of Foam Board Products
Primary SIC: 3089

Facility Mailing Address: Gilman Road
Gilman, CT 06336

Telephone Number: 860-889-8444

B. PREMISES DESCRIPTION

The Gilman Brothers Company (Gilman Bros.) manufactures foam board products for signage, display, and graphics. They are a major source of Volatile Organic Compounds (VOC) because their potential and actual emissions exceed 50 tons of VOC per year. Their VOC emissions consist almost entirely of isopentane, which is not a Hazardous Air Pollutant (HAP) according to Section 112(b)(1) of the Clean Air Act. They operate the following equipment at their location in Gilman, CT:

Polystyrene Foam Extrusion Line

The polystyrene foam extrusion line is operated under New Source Review (NSR) Permit No. 013-0007. It is comprised of the following equipment:

- Virgin Resin Pellet Silo 1
- Virgin Resin Pellet Silo 2
- Truck Unloading Pneumatic Conveying System
- Foam Extruder E-1
- Extruder/Laminators A & B
- Vacuum Transfer Blowing System
- Edge Trimmers/Sheet Cutters
- Central Scrap Processing Area
- Fluff Conveying System
- Fluff Storage Silo 1
- Fluff Storage Silo 2
- Reclaim Extruder Fluff Day Bin
- Reclaim Extruder R-1
- Reclaim Resin Pellet Silo 1
- Reclaim Pellet Pneumatic Conveying System
- Blowing Agent Storage Tank

The process involves extruding molten polystyrene and isopentane blowing agent through an annular die, drawing the melt over a cooling mandrel, and slitting it to form a sheet. The sheet may be laminated on both sides with a thin sheet of polystyrene. The edges are trimmed and the product is cut to specification before being transported to the finished goods storage area. The edge trimmings and scrap foam board is ground and fed to the fluff silos for storage prior to processing in the reclaim extruder, where the fluff is recycled into resin pellets for later reuse.

Cleaver Brooks Boiler

The Cleaver Brooks Boiler (Model No. CB 100-200) is operated under NSR Permit No. 013-0005. It is fired with a 50%/50% blend of No. 2 and No. 4 fuel oils and provides steam to the facility for space heating. The Cleaver Brooks Boiler (<10MMBTU/hr) is subject to the work practice or management standards of a biennial tune-up in 40 CFR Part 63 Subpart JJJJJ and, therefore, must comply with this standard by March 21, 2012.

Section I: Premises Information/Description

B. PREMISES DESCRIPTION, continued

Zahnradwerk-Kollman Laminators

Gilman Bros. operates 2 Zahnradwerk-Kollman Laminators, which are used to coat foam boards with polymer adhesives by extrusion. These two laminators make up Grouped Emission Unit (GEU) – 01. The emissions from these units do not require Gilman Bros. to obtain NSR permits from the Department. The requirements for the 2 Zahnradwerk-Kollman Laminators are listed in Section III.C. - Premises-Wide Requirements of this Title V Permit.

Propane-Fired Heating Units

Gilman Bros. operates 18 propane-fired heating units, which are used to provide heat to the facility. They have 10 Modine (Model No. HD125AS0121) heaters, which fire at a rate of 0.125 MMBTU/hr; 4 Modine (Model No. PDP250AE0185) heaters, which fire at a rate of 0.200 MMBTU/hr; and 4 Carrier (Model No. 48TJE008-611) Rooftop heaters, which fire at a rate of 0.120 MMBTU/hr. These 18 heaters make up GEU-02. The emissions from these units do not require Gilman Bros. to obtain NSR permits from the Department. The requirements for the 18 propane-fired heating units are listed in Section III.C. - Premises-Wide Requirements of this Title V Permit.

Section II: Emissions Units Information

A. EMISSIONS UNITS IDENTIFICATION:

Emissions units are set forth in Table II.A.1. It is not intended to incorporate by reference these NSR Permits, Orders, or Registrations into this Title V permit.

TABLE II.A: EMISSIONS UNITS DESCRIPTION			
Emissions Unit/ Grouped Emission Unit	Emissions Unit Description	Control Unit Description	Permit, Order, Registration, or Regulation Number
EU-06	Polystyrene Foam Extrusion Line <i>Installed: 1999</i> <i>Throughput: 9,937,000 lb/yr of foam board</i>	None	NSR Permit No. 013-0007
EU-07	Cleaver Brooks 100-200 Boiler (<10 MMBTU/hr) <i>Installed: 1981</i> <i>Throughput: 65,500 gal/hr Blend of 50% #2 and 50% #4 Fuel Oils</i>	None	NSR Permit No. 013-0005
<i>All applicable requirements for the following units are listed in the premises-wide general requirements portion of this permit:</i>			
GEU-01	2 Zahnradwerk-Kollman Laminators <i>Installed: 1999</i> <i>Throughput: 9,198 ton/yr Solid Polymer Adhesive Total</i>	None	None
GEU-02	<ul style="list-style-type: none"> • 10 Modine Model No. HD125AS0121 Propane-Fired Heaters – 0.125 MMBTU/hr • 4 Modine Model No. PDP250AE0185 Propane-Fired Heaters – 0.200 MMBTU/hr • 4 Carrier Model No. 48TJE008-611 Rooftop Propane-Fired Heaters – 0.120 MMBTU/hr <i>Installed: 1995</i> <i>Throughput: 244.89 mgal/yr Propane Total</i>	None None None	None None None

Section II: Emissions Units Information

B. OPERATING SCENARIO IDENTIFICATION

The Permittee shall be allowed to operate under the following Standard Operating Scenario (SOS) without notifying the commissioner, provided that such operations are explicitly provided for and described in the Table II.B below. There are no Alternate Operating Scenarios for the premises.

TABLE II.B: OPERATING SCENARIO IDENTIFICATION		
Identification of Operating Scenarios	Emissions Units Associated with the Scenario	Description of Scenario
SOS	EU-6	Foam board manufacturing from Polystyrene and Isopentane, ESP for fume/PM control, Baghouses for PM control for storage and handling systems
	EU-7	Boiler operates on a blend of 50% No. 2 fuel oil and 50% No. 4 fuel oil
	GEU-01	Laminators coat foam boards by extrusion using solid polymer adhesives.
	GEU-02	Heaters operate using propane as needed.

Section III: Applicable Requirements and Compliance Demonstration

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

A. Emissions Unit 6 (EU-6) – Polystyrene Foam Extrusion Line

Table A.1: Stack Description: Stack No. S5	
Minimum Stack Height (ft above grade)	25 ft
Stack Diameter	0.5 ft
Stack Exit Temperature	60-90°F
Design Exhaust Gas Flow Rate	2,000 acfm
Minimum Distance to Property Line	300 ft

Table A.2: Stack Description: Stack No. S10	
Minimum Stack Height (ft above grade)	6 ft
Stack Diameter	1ft × 2ft rectangle
Stack Exit Temperature	60-90°F
Design Exhaust Gas Flow Rate	1,000 acfm
Minimum Distance to Property Line	83 ft

Table A.3: Stack Description: Stack No. S11	
Minimum Stack Height (ft above grade)	6 ft
Stack Diameter	1ft × 2ft rectangle
Stack Exit Temperature	60-90°F
Design Exhaust Gas Flow Rate	1,000 acfm
Minimum Distance to Property Line	83 ft

1. Isopentane Blowing Agent Usage

a. Limitation or Restriction

Isopentane blowing agent usage shall not exceed a consecutive 12-month average of 78 lb/hr and 6.5% of total foam production. [NSR Permit No. 013-0007, Part II.A.1.]

b. Record Keeping Requirements

- i. The Permittee shall record the monthly and consecutive 12-month isopentane usage and total foam board production in pounds. The consecutive 12 month material usage or production shall be determined by adding the current month's usage or production to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the previous month. [NSR Permit No. 013-0007, Part III.A.1.]
- ii. The Permittee shall calculate and record the monthly and consecutive 12 month isopentane percentage. The isopentane percentage shall be determined by dividing the isopentane usage by total foam board production. The Permittee shall make these calculations within 30 days of the previous month. [NSR Permit No. 013-0007, Part III.A.2.]

c. Reporting Requirements

- i. The Permittee shall keep all records required by this permit for a period of no less than 5 years and shall submit such records to the commissioner upon request. [NSR Permit No. 013-0007, Part III.A.6.]

Section III: Applicable Requirements and Compliance Demonstration

2. Maximum Foam Board Production

a. Limitation or Restriction

The maximum foam board production rate shall not exceed 9,937,000 pounds per consecutive 12-months. [NSR Permit No. 013-0007, Part II.A.2.]

b. Record Keeping Requirements

i. The Permittee shall record the monthly and consecutive 12-month total foam production. The consecutive 12-month material usage or production shall be determined by adding the current month's production to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the previous month. [NSR Permit No. 013-0007, Part III.A.1.]

c. Reporting Requirements

- i. The Permittee shall continue to assess methods to reduce the rate scrap foam board is produced. The Permittee shall submit a report to the commissioner every three years starting from the date of issuance of the modified NSR Permit No. 013-0007. This report shall include an explanation of all measures taken to reduce the scrap foam rate, total foam production, total scrap foam produced and the scrap foam rate for each of the previous three years. [NSR Permit No. 013-0007, Part VI.B.]
- ii. The Permittee shall keep all records required by this permit for a period of no less than 5 years and shall submit such records to the commissioner upon request. [NSR Permit No. 013-0007, Part III.A.6.]

3. Maximum Scrap Foam Board Produced

a. Limitation or Restriction

The maximum scrap foam board produced shall not exceed 1,987,400 pounds per consecutive 12 months and the scrap foam rates shall not exceed a consecutive 12-month average of 20% of the total foam board production for that period. [NSR Permit No. 013-0007, Part II.A.3. and Part II.A.4.]

b. Record Keeping Requirements

- i. The Permittee shall record the monthly and consecutive 12-month total foam production and total scrap foam board produced in pounds. The consecutive 12-month production shall be determined by adding the current month's production to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the previous month. [NSR Permit No. 013-0007, Part III.A.1.]
- ii. The Permittee shall calculate and record the monthly and consecutive 12-month scrap foam rate. The scrap foam rate shall be determined by dividing the total scrap foam board produced by the total foam board production. The Permittee shall make these calculations within 30 days of the previous month. [NSR Permit No. 013-0007, Part III.A.3.]

c. Reporting Requirements

- i. Should the scrap foam rate exceed the consecutive 12-month average of 20% of total foam board production, the Permittee shall submit a performance plan to the commissioner within 45 days of such exceedance. The performance plan shall include an explanation of the cause and remedy of the exceedance and a schedule for meeting the permit limits. [NSR Permit No. 013-0007, Part III.B.1.]

4. VOC

a. Limitation or Restriction

- i. The annual VOC emissions shall not exceed 89.9 tons per 12-consecutive months. [NSR Permit No. 013-0007, Part V.A.]

Section III: Applicable Requirements and Compliance Demonstration

- ii. The hourly VOC emissions shall not exceed 20.52 lb/hr. [NSR Permit No. 013-0007, Part V.A.]

b. Monitoring Requirements

- i. The Permittee shall continuously cover all open drums and vessels when not in use that contain solvents, cleaners, coatings, or cleaning rags so as to minimize the amounts of VOCs emitted into the atmosphere. [NSR Permit No. 013-0007, Part VI. C.]

c. Record Keeping Requirements

- i. The Permittee shall record the monthly and consecutive 12-month VOC emissions. The consecutive 12-month VOC emissions shall be determined by adding the current month's VOC emissions to that of the previous 11 months. Such records shall include a sample calculation for each of the three stages of the process (extrusion, reclaim, & warehouse). The Permittee shall make these calculations within 30 days of the previous month. [NSR Permit No. 013-0007, Part III.A.4.]
- ii. The Permittee shall keep a sample calculation showing compliance with the hourly emission limitation based on material balance of the blowing agent. [NSR Permit No. 013-0007, Part V.A.2.]

d. Reporting Requirements

- i. The Permittee shall continue to access methods to reduce VOCs emitted by this equipment. The Permittee shall submit a report to the commissioner every three years starting from the date of issuance of modified NSR Permit No. 013-0007. This report shall include the controls reviewed, the non-VOC blowing agents researched, an evaluation of the commercial and technical viability with respect to this equipment, and the annualized cost per ton of emission reductions. The Permittee may be required to modify NSR Permit No. 013-0007 to incorporate the findings of the report into the operations of the Polystyrene Foam Extrusion Line. [NSR Permit No. 013-0007, Part VI. A. and CGS §22a-6(a)(6)]
- ii. The Permittee shall keep all records required by this permit for a period of no less than 5 years and shall submit such records to the commissioner upon request. [NSR Permit No. 013-0007, Part III.A.6.]

5. PM

a. Limitation or Restriction

- i. The annual PM emissions shall not exceed 1.1 tons per consecutive 12-months. [NSR Permit No. 013-0007, Part A.]
- ii. The hourly PM emissions shall not exceed 0.24 lb/hr. [NSR Permit No. 013-0007, Part A.]

b. Record Keeping Requirements

- i. The Permittee shall record the monthly and consecutive 12-month PM emissions. The consecutive 12-month PM emissions shall be determined by adding the current month's PM emissions to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the previous month. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall keep a sample calculation showing compliance with the hourly emission limitation based on mass balance of the fluff silos and laminating coextruders. [NSR Permit No. 013-0007, Part V.A.1.]

c. Reporting Requirements

- i. The Permittee shall keep all records required by this permit for a period of no less than 5 years and shall submit such records to the commissioner upon request. [NSR Permit No. 013-0007, Part III.A.6.]

Section III: Applicable Requirements and Compliance Demonstration

B. Emission Unit 7 (EU-7) Cleaver Brooks Model CB 100-200 Boiler

Minimum Stack Height (ft above grade)	28 ft
Stack Exit Temperature	300°F
Minimum Exhaust Gas Flow Rate	1,700 acfm
Minimum Distance to Property Line	375 ft

1. Fuel Type

a. Limitation or Restriction

- i. The Permittee shall use a blend of 50% No. 2 Fuel Oil and 50% No. 4 Fuel oil, as blended by the fuel dealer. [NSR Permit No. 013-0005, Part I.1.]
- ii. The Permittee shall use a fuel with a sulfur content of 0.6% or less by weight, dry basis. [NSR Permit No. 013-0005, Part I.3.]

b. Record Keeping Requirements

- i. Each fuel oil shipment shall include a shipping receipt from the fuel supplier and a certification from the fuel supplier certifying the type of fuel in the shipment and the weight percent of sulfur in the fuel. The shipping receipt and/or certification shall include the name of the oil supplier, the sulfur content of the oil and method used to determine the content of the oil. The Permittee shall maintain records of each shipping receipt and certification. [NSR Permit No. 013-0005, Part IV.3.]

c. Reporting Requirements

- i. The Permittee shall maintain all records required by this section on the premises at all times and shall make them available at the request of the commissioner for a period of 5 years. [RCSA §22a-174-33(o)(2)]

2. Fuel Usage

a. Limitation or Restriction

- i. The Permittee shall not exceed a fuel consumption rate of 65,500 gallons per consecutive 12-month period. [NSR Permit No. 013-0005, Part I.2.]

b. Monitoring Requirements

- i. The Permittee shall use a non-resettable totalizing fuel metering device to continuously monitor fuel feed to the Cleaver Brooks CB 100-200 boiler. [NSR Permit No. 013-0005, Part IV.2.]

c. Record Keeping Requirements

- i. The Permittee shall make and keep monthly records of the totalizing fuel meter readings. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. Annual fuel consumption by the Cleaver Brooks CB 100-200 boiler shall be based on any consecutive 12-month period and shall be determined by adding the current month's fuel usage to that of the previous 11 months. The Permittee shall make these calculations monthly. [NSR Permit No. 013-0005, Part IV.1.]

d. Reporting Requirements

- i. The Permittee shall maintain all records required by this section on the premises at all times and shall make them available at the request of the commissioner for a period of 5 years. [RCSA §22a-174-33(o)(2)]

Section III: Applicable Requirements and Compliance Demonstration

3. Criteria Pollutant Emissions

a. Limitation or Restriction

The Permittee shall not exceed the following emission limits:

- i. PM-10 – 0.031 lb/MMBTU, 0.142 TPY
- ii. SO_x – 0.656 lb/MMBTU, 2.999 TPY
- iii. NO_x – 0.143 lb/MMBTU, 0.655 TPY
- iv. VOC – 0.002 lb/MMBTU, 0.011 TPY
- v. CO – 0.036 lb/MMBTU, 0.164 TPY
- vi. Pb – 1.11E-04 lb/MMBTU, 5.07E-04 TPY

b. Record Keeping Requirements

- i. The Permittee shall make and keep a sample calculation for each pollutant to demonstrate compliance with the lb/MMBTU emission limitations specified in Part B.3.A. of this Title V permit. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall make and keep records of monthly and annual emissions. The Permittee shall make these calculations using fuel usage and emission factors obtained from AP-42, 5th edition. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. Reporting Requirements

- i. The Permittee shall maintain all records required by this section on the premises at all times and shall make them available at the request of the commissioner for a period of 5 years. [RCSA §22a-174-33(o)(2)]

4. MASC Compliance

a. Limitation or Restriction

The Permittee shall not exceed the following emission limits:

- i. Lead – 54420.63 µg/m³
- ii. Sulfuric Acid – 36,284.21 µg/m³
- iii. Formaldehyde – 21,770.53 µg/m³
- iv. Nickel – 9,071.05 µg/m³
- v. Arsenic – 90.71 µg/m³
- vi. Beryllium – 18.14 µg/m³
- vii. Cadmium – 725.68 µg/m³
- viii. Chromium – 18,142.11 µg/m³
- ix. Copper – 36,284.21 µg/m³
- x. Mercury – 1,814.21 µg/m³

b. Record Keeping Requirements

- i. The Permittee shall make and keep a sample calculation for each pollutant to demonstrate compliance with the MASC emission limitations specified in Part B.4.a. of this Title V Permit. [RCSA §22a-174-33(j)(1)(K)(ii)]

Section III: Applicable Requirements and Compliance Demonstration

c. Reporting Requirements

- i. The Permittee shall maintain all records required by this section on the premises at all times and shall make them available at the request of the commissioner for a period of 5 years. [RCSA §22a-174-33(o)(2)]

Section III: Applicable Requirements and Compliance Demonstration

C. PREMISES-WIDE GENERAL REQUIREMENTS

Premises-Wide General Requirements

1. **Annual Emission Statements** : The Permittee shall submit annual emission statements requested by the commissioner as set forth in RCSA §22a-174-4(d)(1).
2. **Emergency Episode Procedures**: The Permittee shall comply with the procedures for emergency episodes as set forth in RCSA §22a-174-6.
3. **Reporting of Malfunctioning Control Equipment**: The Permittee shall comply with the reporting requirements of malfunctioning control equipment as set forth in RCSA §22a-174-7.
4. **Prohibition of Air Pollution**: The Permittee shall comply with the requirement to prevent air pollution as set forth in RCSA §22a-174-9.
5. **Public Availability of Information**: The public availability of information shall apply, as set forth in RCSA §22a-174-10.
6. **Prohibition Against Concealment/ Circumvention**: The Permittee shall comply with the prohibition against concealment or circumvention as set forth in RCSA §22a-174-11.
7. **Violations and Enforcement**: The Permittee shall not violate or cause the violation of any applicable regulation as set forth in RCSA §22a-174-12.
8. **Variances**: The Permittee may apply to the commissioner for a variance from one or more of the provisions of these regulations as set forth in RCSA §22a-174-13.
9. **No Defense to Nuisance Claim**: The Permittee shall comply with the regulations as set forth in RCSA §22a-174-14.
10. **Severability**: The Permittee shall comply with the severability requirements as set forth in RCSA §22a-174-15.
11. **Responsibility to Comply**: The Permittee shall be responsible to comply with the applicable regulations as set forth in RCSA §22a-174-16.
12. **Particulate Emissions**: The Permittee shall comply with the standards for control of particulate matter and visible emissions as set forth in RCSA §22a-174-18. (Section 18 approved by EPA on 9-23-1982, current Regulation submitted to EPA on 12-1-2004.)
13. **Sulfur Compound Emissions**: The Permittee shall comply with the requirements for control of sulfur compound emissions as set forth in RCSA §22a-174-19.
14. **Organic Compound Emissions**: The Permittee shall comply with the requirements for control of organic compound emissions as set forth in RCSA §22a-174-20.
15. **Nitrogen Oxide Emissions**: The Permittee shall comply with the requirements for control of nitrogen oxide emissions as set forth in RCSA §22a-174-22.
16. **Ambient Air Quality**: The Permittee shall not cause or contribute to a violation of an ambient air quality standard as set forth in RCSA §22a-174-24(b).
17. **Emission Fees**: The Permittee shall pay an emission fee as set forth in RCSA §22a-174-26(d).

Section IV: Compliance Schedule

TABLE IV: COMPLIANCE SCHEDULE				
Emissions units	Applicable regulations	Steps required for achieving compliance (Milestones)	Date by which each step is to be completed	Dates for monitoring, record keeping, and reporting
		No steps are required for achieving compliance at this time.		

Section V: State Enforceable Terms and Conditions

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

State Enforceable Terms and Conditions

- A.** This Title V permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the emissions units in compliance with all applicable requirements of any other Bureau of the Department of Energy and Environmental Protection or any federal, local or other state agency. Nothing in this Title V permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B.** Nothing in this Title V permit shall affect the commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, investigate air pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the Permittee by the commissioner.
- C.** 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: Title V Requirements

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

Title V Requirements

A. SUBMITTALS TO THE COMMISSIONER & ADMINISTRATOR

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

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

Any submittal to the Administrator of the Environmental Protection Agency shall be in a computer-readable format and addressed to: 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

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

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

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

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

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

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

1. Each deviation caused by upset or control equipment deficiencies; and
2. Each deviation of a permit requirement that has been monitored by the monitoring systems required under this 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;

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

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

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

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

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

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

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

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

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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.

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

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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.

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

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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.