STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Air Management
Compliance Analysis & Coordination Unit
79 Elm Street
Hartford, Connecticut 06106-5127

Title V Semi-Annual Monitoring Report Instructions

Introduction

A permittee with a premises permitted under the State of Connecticut's Title V Regulations is required by § 22a-174-33(o) of the Regulations of Connecticut State Agencies (RCSA) to submit written monitoring reports to the commissioner of Environmental Protection. Unless a more frequent schedule is specified in the Title V permit, such monitoring reports are required to be submitted on or before January 30th (covering July 1 – December 31 of the previous calendar year) and July 30th (covering January 1 – June 30th of the year in which the report is submitted). The monitoring report should be based on monitoring conducted in accordance with the Title V permit.

Report Submittal
When complete, please submit the report with an original signature to the following address:

Compliance Analysis and Coordination Unit
Bureau of Air Management
CTDEP
79 Elm Street
Hartford, CT 06106-5127

What is Monitoring?
Under the Title V program, monitoring includes many different types of procedures or systems related to determining compliance with the Title V permit. According to RCSA § 22a-174-1(68), monitoring means "any action or procedure that is used to determine actual emissions from a stationary source or compliance with the requirements of any permit, order, statute or regulation."

Therefore, monitoring may include, but is not limited to, instrumental or non-instrumental methods, including periodic inspections, visual observations, work practice checks, and record keeping related to documenting that an action has been taken or that a permit requirement has been met. Some examples of monitoring include continuous emissions monitoring, periodic readings of parameters related to operating conditions, stack tests using EPA reference test methods, vendor or laboratory analytical testing, and manual inspections that include making records of process conditions or work practices.

Part 1—Facility Information

Corporation Name—Indicate the name found on the first page of the Title V permit under Corporation.

Facility Name—Indicate the name of the facility only if different from the corporation name.

Corporation Address—Indicate the mailing address of the corporation.

Premises Address—Indicate the site address of the facility.

Corporate Contact Person—Indicate the name of the corporate contact person who is responsible for environmental reporting.

Contact Phone/FAX/email—Indicate the phone number, FAX number, and email address of the contact person identified above.

Title V Permit Number—Indicate the Title V permit number found at the top of the first page of the Title V permit.

Reporting Period Dates—Indicate the start date and end date of the six month period for which data is being reported.

Deviations During This Reporting Period?— Answer yes or no. Details will be provided in the body of the report.

Definition of Deviation: RCSA § 22a-174-33(a)(4) contains a definition of "deviation" which incorporates 40 CFR 71.6 (a)(3)(iii)(C) by reference. This section states the following: *A deviation is any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring or record keeping established in the Title V permit. Included in the meaning of Deviation are any of the following:*

1) *A situation where emissions exceed an emission limitation or standard;*
2) *A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met;*
3) *A situation in which observations or data collected demonstrates non-compliance with an emission limitation or standard or any work practice or operating condition required by the permit; or*
4) *A situation in which an exceedance or an excursion, as defined in 40 CFR 64, occurs.*

Monitoring system failures are also considered deviations from the Title V operating permit.

Monitoring System Failures During This Reporting Period?—Answer yes or no. Details will be provided in the body of the report.

Part 2—Certification

Refer to RCSA § 22a-174-2a(a), (Signatory Responsibilities) for guidance on who may sign the Certification.

Part 3—Monitoring System Failure Details

As stated above, monitoring system failures are considered a deviation of the Title V operating permit. Connecticut requires that these failures be listed separately to facilitate review of this information. Monitoring system failures should <u>not</u> be listed in Part 4.

A failure of a monitoring system would be a failure of any of the monitoring systems described in the Title V permit. See the above description of a monitoring system under <u>What is Monitoring?</u> for further detail. Note that a monitoring system may include record keeping and/ or reporting procedures.

Emission Unit(s)—Indicate the source's emission unit (e.g. EMU-3) or grouped emission unit (e.g. GEMU-2) number.

Permit Condition Number—Indicate the combination of numbers and letters which describes the permit condition, e.g. III.A.7.a.

Monitoring System Failure Period Start Date, Time--Enter the date (*mm/dd/yyyy)* and time (*hh:mm; 24 hr clock)* the failure started.

Monitoring System Failure Period End Date, Time--Enter the date (*mm/dd/yyyy)* and time (*hh:mm;* 24 hr clock*)* the failure ended.

Description and Cause of Monitoring Failure--Provide a brief description and cause of the monitoring failure. For example, if for demonstration of compliance, a source is required to record a pressure reading once each hour and a company operating one-shift-only missed a complete day's worth of readings, the description might read "one 8-hour period of readings missed."

Corrective Actions Taken to Remedy Monitoring System Failure--Provide a brief description of the corrective actions taken to remedy the monitoring system failure.

Measures Taken to Prevent Future Monitoring System Failures—Provide a brief description of the measures taken to prevent future failures. For example, quality assurance procedures might be modified, routine checks might be implemented, spare parts could be kept on hand to reduce downtime, etc.

Part 4—Other Deviations

Note the definition of deviation described above and be sure to include all deviations, not just those recorded by instrumental monitoring systems (e.g., CEMs). Again, monitoring system failures should only be listed in Part 3.

As stated above, all deviations must be included, regardless of whether they were previously reported under RCSA § 22a-174-33(p) prompt notification requirements (e.g., the 10 day notification).

Emission Unit(s)—Indicate the source's emission unit (e.g. EMU-3) or grouped emission unit (e.g. GEMU-2) number.

Permit Condition Number—Indicate the combination of numbers and letters which describes the permit condition, e.g. III.A.7.a.

Deviation Period Start Date, Time--Enter the date (*mm/dd/yyyy)* and time (*hh:mm; 24 hr clock)* the deviation started.

Deviation Period End Date, Time--Enter the date (*mm/dd/yyyy)* and time (*hh:mm;* 24 hr clock*)* the deviation ended.

Description, Cause or likely cause of Deviation--Provide a brief description and cause or likely cause of the deviation. For example, an oxidizer might not have been operating properly due to a break in the line providing auxiliary fuel.

Measured Value of Deviation —Indicate quantitatively the degree to which the limit was exceeded. For example, if a hazardous air pollutant (HAP) maximum allowable stack concentration (MASC) limit is 34.4 ug/m^3 over an 8-hour period and the emission unit exceeded the limit at 50 ug/m^3 for 10 hours, the measured value would be 50 ug/m^3.

Description and Date(s) of Actions Taken to Correct Deviation--Provide a brief description and date(s) of actions taken to correct the deviation. For example, the emission unit that was the source of the deviation might have been immediately shut down and had its control equipment repaired before the unit was restarted.

Description and Date(s) of Measures Taken to Prevent Future Deviations —Provide a brief description and date(s) of the measures taken to prevent future deviations. For example, if no operation and maintenance plan exists for the control equipment, a plan could be developed and followed. Additionally, spare parts could be kept on hand to reduce downtime if a problem occurs.