



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	200-0052-TV
Client/ Sequence /Town/Premises Numbers	6689/1/200/52
Date Issued	May 2, 2012
Modification Issue Date	January 6, 2014
Expiration Date	May 2, 2017

Corporation:

Braxton Manufacturing Company, Inc.

Premises Location:

858 Echo Lake Road, Watertown, CT 06795

Name of Responsible Official and Title:

Andy Barnes, Director of Engineering

All the following attached pages, 2 through 22, are hereby incorporated by reference into this Title V permit.

/s/ Anne Gobin for
Macky McCleary
Deputy Commissioner

January 6, 2014
Date

TABLE OF CONTENTS

	PAGE
List of Abbreviations/Acronyms	4
Section I. Premises Information/Description	
A. Premises Information.....	5
B. Premises Description.....	5
Section II. Emissions Units Information	
A. Emissions Units Description - Table II.A.....	6
B. Operating Scenario Identification.....	6
Section III. Applicable Requirements and Compliance Demonstration	
A. Emissions Unit 1.....	7
B. Premises-wide General Requirements	13
Section IV. Compliance Schedule - Table IV	15
Section V. State Enforceable Terms and Conditions	16
Section VI. Title V Requirements	
A. Submittals to the Commissioner & Administrator.....	17
B. Certifications [RCSA §22a-174-33(b)].....	17
C. Signatory Responsibility [RCSA §22a-174-2a(a)]	17
D. Additional Information [RCSA §§22a-174-33(j)(1)(X), -33(h)(2)].....	18
E. Monitoring Reports [RCSA §22a-174-33(o)(1)]	18
F. Premises Records [RCSA §22a-174-33(o)(2)]	18
G. Progress Reports [RCSA §22a-174-33(q)(1)].....	19
H. Compliance Certifications [RCSA §22a-174-33(q)(2)].....	19
I. Permit Deviation Notifications [RCSA §22a-174-33(p)]	19
J. Permit Renewal [RCSA §22a-174-33(j)(1)(B)].....	19
K. Operate in Compliance [RCSA §22a-174-33(j)(1)(C)]	19
L. Compliance with Permit [RCSA §22a-174-33(j)(1)(G)]	20
M. Inspection to Determine Compliance [RCSA §22a-174-33(j)(1)(M)].....	20
N. Permit Availability.....	20
O. Severability Clause [RCSA §22a-174-33(j)(1)(R)]	20
P. Need to Halt or Reduce Activity [RCSA §22a-174-33(j)(1)(T)]	20
Q. Permit Requirements [RCSA §22a-174-33(j)(1)(V)]	20
R. Property Rights [RCSA §22a-174-33(j)(1)(W)]	20
S. Alternative Operating Scenario Records [RCSA §22a-174-33(o)(3)].....	20
T. Operational Flexibility and Off-Permit Changes [RCSA §22a-174-33(r)(2)]	21
U. Information for Notification [RCSA §22a-174-33(r)(2)(A)].....	21
V. Transfers [RCSA §22a-174-2a(g)]	21
W. Revocation [RCSA §22a-174-2a(h)]	21
X. Reopening for Cause [RCSA §22a-174-33(s)]	22
Y. Credible Evidence.....	22

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>
°F	Degree Fahrenheit
acfm	Actual cubic feet per minute
CFR	Code of Federal Regulations
CP/OP	Construction Permit/Operating Permit
DEEP	Department of Energy and Environmental Protection
EU	Emissions Unit
ft ²	Square feet
EPA	Environmental Protection Agency
GEU	Grouped Emissions Units
gph	Gallons per hour
gpm	Gallons per minute
HAP	Hazardous Air Pollutant
hr	Hour
lb	Pound
MACT	Maximum Achievable Control Technology
NSR	New Source Review
PTE	Potential to Emit
RCSA	Regulations of Connecticut State Agencies
SIC	Standard Industrial Classification Code
SIP	State Implementation Plan
SOS	Standard Operating Scenario
tpy	Tons per year
VOC	Volatile Organic Compound

Section I: Premises Information/Description

A. PREMISES INFORMATION

Nature of Business: Precision metal drawing
Primary SIC: 3965 Fasteners, Buttons, Needles and Pins
Other SIC: 3469 Metal Stampings
NAICS: 332116

Facility Mailing Address: PO Box 429, Watertown, CT 06795
Telephone Number: 860-274-6781

B. PREMISES DESCRIPTION

Braxton Manufacturing Company, Inc. (Braxton) manufactures precision deep-drawn metal eyelets, deep drawn metal enclosures and housings for communications, aerospace, specialty automotive and electronics industries at its facility located at 858 Echo Lake Road, Watertown, CT 06795.

As part of its manufacturing operation, Braxton uses an Ultra-Kool Cold Trap Plus 30-30-24 open top batch vapor degreaser (EU-1) to clean the manufactured products. The degreaser uses a halogenated solvent, methylene chloride, as the cleaning solvent. This unit is subject to 40 CFR Part 63 Subpart T (MACT) and uses Table 1 Option 6 control combination as the method of compliance with the MACT standard.

Braxton uses a distiller (EU-2) that receives recirculated degreasing solvent and recovers clean methylene chloride, which is returned to the degreaser. The distiller is connected to the degreaser and works in conjunction with the degreaser but is not an affected unit under 40 CFR Part 63 Subpart. The distiller does not have any methylene chloride emissions associated with it.

The cleaned parts from the degreaser are air-dried in a New Holland K-24 Parts Spinner (EU-3) that has a separate stack from the vapor degreaser. The parts spinner is not an affected unit under 40 CFR Part 63 Subpart T and any emissions are considered to be from the batch vapor degreaser.

The premises also includes natural gas fired space heaters, that are grouped as GEU-1 and do not have any Title V applicable requirements.

The company did not obtain a federally enforceable permit limiting the potential-to-emit to below the major source threshold for the vapor degreaser (EU-1) before the compliance deadline under 40 CFR Part 63 Subpart T. The Department is using EPA's March 16, 1995 "Potential to Emit for MACT Standards Guidance on Timing Issues", otherwise known as the "once-in-always-in" policy, to require the facility to operate under the Title V permit program.

Braxton is located in a serious ozone non-attainment area defined in RCSA §22a-174-1(101) and does not exceed the major source threshold for any pollutants.

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-1	Ultra-Kool Cold Trap Plus 30-30-24 batch vapor degreaser; Serial No. 4179 Installation Date: 01/01/05	40 CFR Part 63 Subpart T: Table 1 Option 6	200-0053; Issued 09/14/2010
<i>All applicable requirements for the following units are listed in the premises-wide general requirements portion of this permit:</i>			
EU-2	Solvent distiller	None	None
EU-3	New Holland Parts Spinner, Model No. K-24	None	None
GEU-1	EU-11 through EU-45: Natural Gas fired space heaters	None	None

B. OPERATING SCENARIO IDENTIFICATION

The Permittee shall be allowed to operate under the following Standard Operating Scenarios, provided that such operations are explicitly provided for and described in the Table II.B below.

Emissions Units Associated with the Scenario	Description of Scenario
EU-1	All emissions units associated with EU-1 shall be operated while using methylene chloride for the cleaning of metal parts.
EU-2	EU-2 shall be operated for the purpose of recovering methylene chloride from EU-1.
EU-3	EU-3 shall be operated for the purpose of removing residual solvent (methylene chloride) from the degreased parts.
GEU-1	All emissions units associated with GEU-1 shall be operated while combusting natural gas to provide space heat for the facility.

Section III: Applicable Requirements and Compliance Demonstration

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

A. Emissions Unit 1 (EU-1) Ultra-Kool Cold Trap Plus 30-30-24 Batch Vapor Degreaser (NSR Permit Number 200-0053)

1. Design Specifications

a. Limitation or Restriction [NSR Permit]

i. The unit shall be designed with:

A. Solvent /Air Interface Area (ft²): 12.5

B. Hourly Solvent Consumption (lb/hr): 5.0

C. This emissions unit shall have:

1. An idling and down time mode cover that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of crack, holes, and other defects. [40 CFR §63.463(a)(1)(i)]

2. A freeboard ratio of 1.0 or greater. [NSR Permit]

3. An automated parts handling system capable of moving parts or parts baskets a speed of 11 feet per minute or less from the initial loading of parts through removal of cleaned parts. [40 CFR §63.463(a)(3)]

4. A safety switch to shut off sump heat if the sump liquid solvent level drops to the sump heater coils. [40 CFR §63.463(a)(4)]

5. A vapor level control thermostat to shut off the sump heat if the vapor level rises above the height of the primary condenser. [40 CFR §63.463(a)(5)]

6. A primary condenser. [40 CFR §63.463(a)(6)]

7. Freeboard Refrigerated Chiller[40 CFR §63.463(b)(1)(i); Table 1]

8. Maximum Temperature at Center of Air Blanket (°F): 31

D. Stack Parameters: The work area is ventilated by general building exhaust

1. Minimum Exhaust Gas Flow Rate (acfm): 1000

2. Normal Stack Exit Temperature: Ambient

3. Minimum Distance from exhaust vent to Property line (ft): 106

Section III: Applicable Requirements and Compliance Demonstration

b. Monitoring Requirements [NSR Permit]

- i. The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode on weekly basis. [40 CFR §63.463(e)(2)(i)]40 CFR §63.466(a)(1)]
- ii. The Permittee shall monitor any exceedances of the freeboard refrigeration control device. An exceedance occurs when the air blanket temperature is greater than thirty-one (31) degrees Fahrenheit and has not been corrected within 15 days of detection. [RSCA 22a-174-33(j)(l)(K)(ii)]
- iii. The Permittee shall conduct a monthly visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes and other defects. [40 CFR §63.463(a)(1)(i); 40 CFR §63.466(b)(1)]
- iv. The Permittee shall determine the hoist speed monthly by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in feet divided by the time in minutes. If after the first year of operation, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly. If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated. [40 CFR §63.466(c)(1), (c)(2), and (c)(3)]
- v. The Permittee shall determine that the safety switch for the sump heat is working correctly on a monthly basis. [RSCA 22a-174-33(j)(l)(K)(ii)]
- vi. The Permittee shall determine that the vapor level control thermostat is working correctly on a monthly basis. [RSCA 22a-174-33(j)(l)(K)(ii)]
- vii. The Permittee may use alternate monitoring procedures approved by the Administrator in lieu of the above monitoring procedures provided that they are not inconsistent with any other term or condition of NSR Permit No. 200-0053. Any request to use alternate monitoring procedures shall be submitted in accordance with 40 CFR §63.8(f). [40 CFR §63.466(g)]

c. Record Keeping Requirements

The Permittee shall make and keep records of the following:

- i. The solvent/air interface area. [RSCA 22a-174-33(j)(l)(K)(ii)]
- ii. The temperature of the air blanket temperature measurements on a weekly basis. Records shall include the date of the measurement, the temperature and the name of the operator. [NSR Permit; 40 CFR §63.467(b)(2)]
- iii. The inspection of the cover operation on a monthly basis. Records shall include the date of the inspection, the results and the name of the operator. [NSR Permit; 40 CFR §63.467(b)(1)]
- iv. The measured hoist speed on a monthly basis or quarterly basis, as applicable. Records shall include the date of the measurement, the hoist speed and the name of the operator. [NSR Permit; 40 CFR §63.467(b)(1); 40 CFR §63.466(c)]
- v. That the safety switch and vapor level control thermostat are operating correctly. [RSCA 22a-174-33(j)(l)(K)(ii)]

Section III: Applicable Requirements and Compliance Demonstration

- vi. Any exceedance of the air blanket temperature limitation or cover operation. Records shall include any adjustments or repairs made to the solvent cleaning system or control device to reestablish required levels. The parameter must be immediately remeasured upon adjustment or repair and demonstrated to be within required limits. [40 CFR §63.463(e)(3)(ii)]
- vii. All corrections and adjustments made to demonstrate that monitored parameters have returned to accepted levels. [40 CFR §63.467(b)(2)]
- viii. Any alternate monitoring which has been approved by the Administrator.

d. Reporting Requirements

- i. The Permittee shall submit a report of all exceedances and all corrections and adjustments made to avoid exceedance as specified in 40 CFR §63.468(h). [40 CFR §63.463(e)(4)]
- ii. The Permittee shall submit an exceedance report to the Administrator semiannually except when, the Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency is approved. Exceedance reports shall be postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance reports shall include the following: [40 CFR §63.468(h); RSCA §22a-174-33(j)(l)(K)(ii)]
 - A. Information on the actions taken to comply with 40 CFR §63.463(e). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - B. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
 - C. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
- iii. At which time the Permittee is required to submit an exceedance report on a quarterly (or more frequent) basis, the Permittee may reduce the frequency of reporting to semiannually pursuant to 40 CFR §63.463(i).
- iv. The Permittee shall submit all required reports in accordance with Section VI.E of this permit.

2. Operation and Maintenance Requirements

a. Limitation or Restriction [NSR Permit; 40 CFR §63.463(d)]

The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications, written recommendations or using alternative maintenance practices that have been demonstrated to the Administrator's satisfaction to achieve the same or better results as those recommended by the manufacturer for the following work practices:

Section III: Applicable Requirements and Compliance Demonstration

- i. The cover(s) of the solvent cleaning machine shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.
 - ii. The parts basket(s) or the parts being cleaned in an open-top batch vapor cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts basket(s) or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
 - iii. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).
 - iv. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holds shall be tipped or rotated before being removed, if practical.
 - v. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.
 - vi. During startup of the vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
 - vii. During shutdown of the vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
 - viii. When the solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
 - ix. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
 - x. Sponges, fabric, wood, and paper products shall not be cleaned in the solvent cleaning machine.
 - xi. Ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place. [40 CFR §63.463(e)(2)(iv)(A)]
 - xii. The Permittee shall properly operate the control equipment at all times that this equipment is in operation and emitting air pollutants.
 - xiii. All equipment operators shall be trained in the proper operation and maintenance of both the degreaser and the control devices. Each operator shall be able to complete and pass the applicable sections of the test of solvent cleaning procedures in 40 CFR Part 63 Subpart T, Appendix A if requested during an inspection by the Administrator.
- b. Record Keeping Requirements*
- i. The Permittee shall make and keep records of the degreaser operator training.

Section III: Applicable Requirements and Compliance Demonstration

- ii. The Permittee shall keep records of the manufacturer's specifications, written recommendations and/or work practice operating procedures for the lifetime of the machine. [40 CFR §63.467(a)(1); RSCA §22a-174-33(j)(1)(K)(ii)]
- iii. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993 or after November 29, 1993 for the lifetime of the machine., may be substituted. [40 CFR §63.467(a)(2)]

c. Reporting Requirements

- i. The Permittee shall submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include the following:[40 CFR §63.468(f)(1) & (f)(2)]
 - A. A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR §63.463(d)(10)."
 - B. An estimate of solvent consumption for each solvent cleaning machine during the reporting period.
- ii. The Permittee shall submit all required reports in accordance with Section VI.E of this permit.

3. HAP: Methylene Chloride

a. Limitation or Restriction

- i. Allowable Solvent: Methylene Chloride
- ii. Maximum Solvent Emitted: Shall not exceed 1,780 lb/month and 9.5 tons/12 consecutive months. [NSR Permit]
 - **Solvent Consumption** means the amount of halogenated hazardous air pollutant solvent added to the solvent cleaning machine.
 - **Solvent Removed** means the amount of solvent removed from the solvent cleaning machine less contaminants during the measurement period
 - **Solvent Emitted** means halogenated hazardous air pollutant solvent consumed (i.e. halogenated hazardous air pollutant solvent added to the machine) minus the liquid hazardous air pollutant solvent removed from the machine and the halogenated hazardous air pollutant solvent removed from the machine in the solid waste.
- iii. The Permittee shall ensure that the total facility wide emissions of methylene chloride are equal to or less than 60,000 kilograms on a 12-month rolling basis. [40 CFR §63.471(b)(2), Table 1]

b. Monitoring Requirements

The Permittee shall monitor and keep a log of the monthly solvent consumption, solvents removed, and solvents emitted. [40 CFR §63.471(b)(1); RSCA 22a-174-33(j)(1)(K)(ii)]

Section III: Applicable Requirements and Compliance Demonstration

c. Record Keeping Requirements

- i. The Permittee shall record the monthly and consecutive 12 month solvent consumption, solvents removed and solvents emitted. The consecutive 12 month solvent consumption, solvents removed and solvents emitted shall be determined by adding each month's solvent consumption, solvents removed and solvents emitted to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of the previous month. These records shall also consist of the following: [NSR Permit; 40 CFR §63.467(b)(3)]
 - A. The dates and amounts of solvent that are added to the solvent cleaning machine. [40 CFR §63.471(e)(1)]
 - B. The solvent composition of wastes removed from the solvent cleaning machine using the following: [40 CFR §63.471(e)(2)]
 1. The Permittee shall record, on the first operating day of the month, determine the total amount of halogenated solvent removed from the solvent cleaning machine in solid waste by using EPA reference Method 25d or engineering calculations included in the compliance report. [40 CFR §63.471(c)(3)]
 - C. The Permittee shall also maintain calculation sheets showing how monthly emission and 12-month rolling total emissions were determined. [40 CFR §63.471(e)(3)]
- ii. The Permittee shall make and keep records of the potential to emit from all solvent cleaning operations using Equation 6, 40 CFR §63.465(e).
- iii. The Permittee shall record, on the first operating day of every month demonstrate compliance with the applicable facility-wide emission limit on a 12-month rolling total emission limit using the following procedures: [40 CFR §63.471(c)]
 - A. That the solvent cleaning machine contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soiled materials. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions. [40 CFR §63.471(c)(1)]
 - B. Using the records of all solvent additions and deletions for the previous month, determine solvent emissions from the cleaning machine using Equation 10, 40 CFR §63.471(c)(2).
 - C. After 12 months of emission data are available, determine the cleaning unit 12-month rolling total emission for the 12-month period ending with the most recent month using Equation 11, 40 CFR §63.471(c)(4).
 - D. After 12 months of emission data are available, determine the facility 12-month rolling total emission for the 12-month period ending with the most recent month using Equation 12, 40 CFR §63.471(c)(5).
- iv. The Permittee shall make and keep records of the halogenated HAP solvent content for each solvent used for the lifetime of the machine. [40 CFR §63.467(a)(5)]

Section III: Applicable Requirements and Compliance Demonstration

d. Reporting Requirements

- i. The Permittee shall submit a solvent emission report every year. This solvent emission report shall contain the following:
 - A. The average monthly solvent emission estimates calculated each month in kilograms per month. [40 CFR §63.471(h)(1)]
 - B. The 12-month rolling total solvent emission estimates calculated each month. [40 CFR §63.471(h)(2)]
 - C. This report can be combined with the annual report required in Section III.A.3.C.i of this permit. [40 CFR §63.471(h)(3)]
- ii. The Permittee shall submit all required reports in accordance with Section VI.E of this permit.

B. 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.

Section III: Applicable Requirements and Compliance Demonstration

- 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 these sections.

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
2. The delegation of authority to the duly authorized representative has been given in writing by an officer of

Section VI: Title V Requirements

Title V Requirements

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;
3. The name of the individual who performed the sampling or the measurement and the name of such individual's employer;

Section VI: Title V Requirements

Title V Requirements

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).

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

Section VI: Title V Requirements

Title V Requirements

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 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

Section VI: Title V Requirements

Title V Requirements

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 determined that the commissioner failed to act in a timely manner on a permit renewal application.

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

Section VI: Title V Requirements

Title V Requirements

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

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

Y. CREDIBLE EVIDENCE

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