

# STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF AIR MANAGEMENT

## NEW SOURCE REVIEW PERMIT TO CONSTRUCT AND OPERATE A STATIONARY SOURCE

Issued pursuant to Title 22a of the Connecticut General Statutes (CGS) and Section 22a-174-3a of the Regulations of Connecticut State Agencies (RCSA).

Owner/Operator: Pratt & Whitney, Div. of United Technologies Corp.

Address: 400 Main Street

East Hartford, Connecticut 06108

Equipment Location: 400 Main Street

East Hartford, Connecticut 06108

Equipment Description: HVOF Plasma Spray Booth (AMS)

Town-Permit Numbers: 053-0132

Town-Premises Numbers: 053-0009

Prior Permit Issue Dates: March 8, 2002 (Permit to Construct)

May 9, 2002 (Permit to Operate)

September 22, 2008 (Minor Modification)

Modification Issue Date: October 28, 2010

Expiration Date: None

/s/ Anne Gobin for Amey Marrella Commissioner October 28, 2010

Date

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### PERMIT FOR PROCESS EQUIPMENT

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This permit specifies necessary terms and conditions for the operation of this equipment to comply with state and federal air quality standards. The Permittee shall at all times comply with the terms and conditions stated herein.

### PART I. DESIGN SPECIFICATIONS

### A. General Description

Pratt & Whitney's East Hartford facility includes a High Velocity Oxygen Fuel (HVOF) plasma spray booth which is used for the application of powder coatings. All exhaust from the coating operation is passed through a combined cartridge collector and HEPA filter.

### B. Equipment Design Specifications

- 1. Equipment Description: Progressive Technologies HVOF Plasma Spray Booth
- 2. Maximum Rated Spray Gun Throughput: 15.0 lb/hr
- 3. Minimum Transfer Efficiency: 65%

### C. Control Equipment

- 1. Cartridge collector
- 2. HEPA filter

#### D. Stack Parameters

- 1. Minimum Stack Height (feet): 14
- 2. Maximum Exhaust Flow Rate (acfm): 9,500
- 3. Minimum Distance of Stack to Property Line (feet): 40

### PART II. OPERATIONAL CONDITIONS

### A. Equipment

- 1. Types of Coatings Used: powder coatings
- 2. Maximum Annual Powder Coating Usage: 131,400 pounds

### PART III. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS

### A. Material and Usage Records

- 1. The Permittee shall maintain monthly records of all powder coatings used in this booth, such records shall include:
  - a. Name of coating used;
  - b. Quantity of each coating used (lb); and
  - c. HAP content as applied (lb HAP/lb coating).

FIRM NAME: Pratt & Whitney Div. of United Technologies Corporation EQUIPMENT LOCATION: 400 Main Street, East Hartford, CT 06108 EQUIPMENT DESCRIPTION: HVOF Plasma Spray Booth (AMS)

Town No: 053 Premises No: 0009 Permit No: 0132 Stack No: 127

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### PART III. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS, continued

- 2. The Permittee shall make records of the monthly and consecutive 12 month PM-10/PM-2.5 emissions. The consecutive 12 month emissions shall be determined by adding the current month's emissions to that of the previous 11 months. The Permittee shall make these calculations on a monthly basis.
- 3. The Permittee shall keep all records required by this permit on premises for a period of no less than five (5) years and shall submit such records to the commissioner upon request.

### PART IV. OPERATION AND MAINTENANCE REQUIREMENTS

- A. The Permittee shall comply with any supplied warranties, recommendations and stipulations set by the manufacturer for maintaining and operating the spray booth and filter media.
- B. The Permittee shall ensure that the filter media is properly installed and in good operating condition before the spray booth is operated.

#### PART V. ALLOWABLE EMISSION LIMITS

The Permittee shall not cause or allow this equipment to exceed the emission limits stated herein at any time.

### A. Criteria Pollutants

 $\begin{array}{ccc} & & & \text{tons per 12} \\ \hline \text{Pollutants} & & & \text{consecutive months} \\ \hline \text{PM-10/PM-2.5} & & & \hline \\ \hline \end{array}$ 

Demonstration of compliance with the above emission limits shall be determined by material balances from usage data and Material Safety Data Sheets (MSDS).

The commissioner may require other means (e.g. stack testing) to demonstrate compliance with the above emission limits, as allowed by state or federal statute, law or regulation.

B. Hazardous Air Pollutants: This equipment shall not cause an exceedance of the Maximum Allowable Stack Concentration (MASC) for any hazardous air pollutant (HAP) emitted and listed in RCSA Section 22a-174-29. The Permittee shall be allowed to use the adjustment factor in RCSA §22a-174-29(i). [STATE ONLY REQUIREMENT]

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#### SPECIAL REQUIREMENTS PART VI.

- STATE ONLY REQUIREMENT: The Permittee shall operate this facility at all times in a manner so as not to violate or contribute significantly to the violation of any applicable state noise control regulations, as set forth in RCSA §\$22a-69-1 through 22a-69-7.4.
- STATE ONLY REQUIREMENT: The Permittee shall not cause or permit the emission of any substance or combination of substances which creates or contributes to an odor beyond the property boundary of the premises that constitutes a nuisance, as set forth in RCSA §22a-174-23.

### PART VII. ADDITIONAL TERMS AND CONDITIONS

- This permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the regulated activity in compliance with all applicable requirements of any federal, municipal or other state agency. Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B. Any representative of the DEP may enter the Permittee's site in accordance with constitutional limitations at all reasonable times without prior notice, for the purposes of inspecting, monitoring and enforcing the terms and conditions of this permit and applicable state law.
- C. This permit may be revoked, suspended, modified or transferred in accordance with applicable law.
- This 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 conveys no property rights in real estate or material, nor any exclusive privileges, 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. This permit shall neither create nor affect any rights of persons or municipalities who are not parties to this permit.

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### PART VII. ADDITIONAL TERMS AND CONDITIONS, continued

- E. Any document, including any notice, which is required to be submitted to the commissioner under this permit shall be signed by a duly authorized representative of the Permittee and by the person who is responsible for actually preparing such document, each of whom shall certify in writing as follows: "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."
- Nothing in this 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, 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.
- Within 15 days of the date the Permittee becomes aware of a change in any information submitted to the commissioner under this permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the Permittee shall submit the correct or omitted information to the commissioner.
- The date of submission to the commissioner of any document required by this permit shall be the date such document is received by the commissioner. The date of any notice by the commissioner under this permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three days after it is mailed by the commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" means calendar day. Any document or action which is required by this 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.
- I. Any document required to be submitted to the commissioner under this permit shall, unless otherwise specified in writing by the commissioner, be directed to: Office of Director; Engineering & Enforcement Division; Bureau of Air Management; Department of Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

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