



Connecticut Department of  
Energy & Environmental Protection  
Bureau of Air Management  
Engineering & Enforcement Division

## General Permit to Limit Potential to Emit Annual Compliance Certification Instructions

*Use these instructions to complete the General Permit to Limit Potential to Emit from Major Stationary Sources of Air Pollution Annual Compliance Certification (DEP-AIR-CC-003). If you have any questions, you may contact the Bureau of Air Management - Compliance Analysis and Coordination Unit (CACU) at (860) 424-3702.*

### Introduction

Under the General Permit to Limit Potential to Emit from Major Stationary Sources of Air Pollution (GPLPE), a permittee is required by Section 5(d)(1) to submit a Compliance Certification, which certifies compliance with the terms and conditions contained in the permit.

These instructions are meant to provide guidance while completing the GPLPE Compliance Certification. **Please note:** The GPLPE Annual Compliance Certification is available to be completed and submitted electronically. Any questions regarding how to utilize the electronic reporting option may be submitted to: DEP.CACU@ct.gov.

**All** registrants with a premises registered under the GPLPE must submit this Annual Compliance Certification.

**Compliance Certification Submittal Deadlines and Address** - The GPLPE Annual Compliance Certifications will be due on or before March 1<sup>st</sup> in each year in which the permittee is registered. The Annual Compliance Certification shall cover the preceding calendar year, commencing on January 1<sup>st</sup> and ending December 31<sup>st</sup>. Only those registrations for which written approval of revocation has been received need not submit the Annual Compliance Certification.

The first Annual Compliance Certification for any premises not previously registered under the GPLPE shall cover the period from the date of

issuance of approval of registration through the end of the calendar year.

For premises previously registered under the GPLPE whose approval of registration was scheduled to expire February 24, 2011, and whom applied for re-registration under the GPLPE issued November 19, 2010 the initial Annual Compliance Certification period shall cover the entire 2011 calendar year (1/1/2011-12/31/2011) regardless of the date when approval of re-registration was received.

### Part I—Facility Information

1. **Premises Name**—Indicate the name of the premises.

**Mailing Address**—Indicate the mailing address, city, state and zip code for the premises.

**Business Phone and Fax number**—Indicate the phone number, extension and fax number of the contact person identified below.

**Contact Person and Title**—Indicate the name and title of the contact person who is responsible for environmental reporting.

**Contact E-mail**—Indicate the e-mail address of the contact person identified above.

2. **Premises Address**—Indicate the site address, city, state and zip code for the premises only if different from the mailing address.
3. **GPLPE Registration Number and Issue Date**—Indicate the GPLPE registration number and effective date of approval found on the Approval of Registration document.
4. **Compliance Certification Period**—Indicate the start date and end date of the period for which compliance is being certified.
5. **Was the facility in compliance with all permit terms and conditions during the compliance certification period?** —Check Yes or No, as applicable, for the premises as a whole. (You will be required to certify compliance with each term or condition of the permit in the body of the certification).

## Part II—Emissions

**Please note:** This is a new section added to the GPLPE Annual Compliance Certification Form and is required to be completed by all registrants regardless of actual emissions levels. This portion of the form is independent of GPLPE Section 5(d)(2) which may also require a registrant to submit an Annual Emission Summary Form in addition to the Annual Compliance Certification.

Permit Condition 5(c)(1)(C) of the general permit requires the maintenance of a log of annual actual emissions of any regulated air pollutant(s) or GHG emitted from the premises. For each pollutant identified, report actual emissions for the preceding calendar year (expressed as tons per year). In the boxes provided hazardous air pollutants (HAPs) report emissions of all HAPs emitted as an aggregate as well as the value for the largest individual HAP emitted from the premises during the calendar year. If any of the emissions reported for any of the pollutants are at or above 80 percent of the emission limitation specified in Section 5(a) of this general permit check the box located at the bottom of the section. When the box for actual

emissions at or above 80 percent of an emission limit is checked this is an indication that the Annual Emissions Summary Form is also required to be completed and submitted to the Department.

## Part III—Status of Compliance with Permit Terms and Conditions

RCSA § 22a-174-33(q) requires that certification be made with respect to each permit term or condition in the subject permit. The permittee is required to indicate continuous compliance "CC" or intermittent compliance "IC" with each permit term or condition. Indicate a compliance status by checking the box next to the appropriate response.

**Permit Term or Condition**—This column is filled out for your convenience. Each permit term or condition for the GPLPE Annual Compliance Certification is identified with the condition number where applicable.

A status of compliance with each of these conditions shall be indicated by marking the appropriate response in the column on the right. The determination of the compliance status is an evaluation of whether or not the source was, during the covered period, in compliance with those permit terms and conditions.

**Method(s)/ Means Used to Determine Compliance**— Demonstration of compliance with the terms and conditions of this general permit is achieved through the creation and maintenance of records. For the purposes of this certification the compliance status shall be determined by conducting a review of those records.

**Compliance Status**—Indicate "CC" if the source has been in continuous compliance with the permit term or condition during the certification period. Indicate "IC" if the source was not in continuous compliance with the permit term or condition during the certification period. Indicate a compliance status by checking the box next to the appropriate response.

### **Continuous vs. Intermittent Compliance -**

On June 27, 2003, EPA promulgated a final rulemaking (68 FR 38518) that contains revisions to the compliance certification requirements contained in 40 CFR 70 and 71. Since Connecticut's Title V implementing regulation (section 22a-174-33) incorporates 40 CFR 70.6 by reference, effective June 27, 2003 Connecticut's requirements for compliance certification changed as well.

EPA stated that they believe "that the determination of the compliance status made by the responsible official, for the purpose of the compliance certification, is simply an evaluation of whether or not the source is, at the time of the certification, and was, during the covered period, in compliance with those permit terms and conditions that establish practically enforceable obligations on the part of the source. Absent evidence to the contrary, the responsible official for a source that is in compliance according to the monitoring results in the permit may certify "continuous" compliance, provided that the responsible official did not fail to monitor, or report, or collect the minimum data required by the permit".

Any failure to meet the permit terms or conditions during a period when the permit required compliance would mean that compliance was not continuous, and the responsible official must certify that compliance for the permit term or condition (that is the basis of the certification) was intermittent. A responsible official is always free to include any written explanation and other material information that helps clarify the responsible official's conclusion regarding the compliance status.

**Note:** When complete, submit the original signed document to the following address:

COMPLIANCE ANALYSIS COORDINATION UNIT  
BUREAU OF AIR MANAGEMENT  
DEPARTMENT OF ENERGY & ENVIRONMENTAL  
PROTECTION  
79 ELM STREET  
HARTFORD, CONNECTICUT 06106-5127

### **Not Applicable**

Not Applicable "NA" shall only be accepted as a response to the compliance status of permit conditions where it has been provided as an option. The following are the permit conditions for which "NA" has been provided as an option:

5(a)(3) "NA" may be applied to this permit condition given that the facility is not a wood furniture manufacturing operation or an aerospace manufacturing and rework operation subject to RCSA Section 22a-174-32

5(c)(1)(D) If the facility is not subject to Section 22a-174-32 of the Regulations of Connecticut State Agencies "NA" may be applied to this permit condition

5(d)(2) (A)-(B) if the facility was below 80% of each emissions limitations as reported in the registration for approval under this general permit and the log of actual annual emissions demonstrates emissions have been maintained at or below 80% for all pollutants since receiving approval of registration under the current general permit the facility is not required to submit an Annual Emissions Summary Form and may apply "NA" to these permit conditions.

5(d)(3) (A) and (B) If there were no exceedances of an emission limitation during the certification period the permittee therefore had no incidents to report. "NA" is acceptable because the reporting requirements were not triggered.

"NA" will not be accepted as a response for any other permit conditions.

## **Part II—Certification**

An authorized representative, in accordance with Section 22a-174-2a(a) of the Regulations of Connecticut State Agencies (RCSA), of the premises for which this report is being submitted must sign this section