



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 | <i>189-0136-TV</i> |
| Client/Sequence/Town/Premises Numbers | <i>655/1/189/27</i> |
| Date Issued | November 17, 2010 |
| Revision Issue Date | September 13, 2013 |
| Expiration Date | November 17, 2015 |

Corporation:

Allnex USA, Inc.

Premises Location:

528 South Cherry Street, Wallingford, CT 06492

Name of Responsible Official and Title:

James Morrell, Site Manager

All the following attached pages, 2 through 39, are hereby incorporated by reference into this Title V permit.

/s/ Anne Gobin for
Daniel C. Esty
Commissioner

September 13, 2013
Date

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LIST OF ACRONYMS

| <i>Acronym</i> | <i>Description</i> |
|-----------------|---|
| ACT | Alternative Control Technique |
| °C | Degrees Celsius |
| CFR | Code of Federal Regulations |
| CGS | Connecticut General Statutes |
| CO | Carbon Monoxide |
| EU | Emissions Unit |
| EPA | Environmental Protection Agency |
| °F | Degrees Fahrenheit |
| gal | Gallon |
| GEU | Grouped Emissions Unit |
| h | Hour |
| HAP | Hazardous Air Pollutant |
| in ² | Square inches |
| lb | Pounds |
| lb/MMBtu | Pounds per Million Btu |
| lb/y | Pounds per Year |
| MACT | Maximum Achievable Control Technology |
| MCPU | Miscellaneous Organic Chemical Manufacturing Process Unit |
| mm Hg | Millimeters of Mercury |
| MON | Miscellaneous Organic NESHAP |
| NO _x | Nitrogen Oxides |
| NSR | New Source Review |
| OHAP | Organic Hazardous Air Pollutant |
| OOS | Out of Service |
| PHA | Process Hazard Analysis |
| PM-10 | Particulate Matter, ≤ 10 microns in size |
| ppm | Parts per Million |
| psi | Pounds per Square Inch |
| psia | Pounds per Square Inch, absolute |
| RACT | Reasonably Available Control Technology |
| RCSA | Regulations of Connecticut State Agencies |
| RMP | Risk Management Plan |
| RTO | Regenerative Thermal Oxidizer |
| scfm | Standard Cubic Feet per Minute |
| SIC | Source Identification Code |
| SO _x | Sulfur Oxides |
| SOS | Standard Operating Scenario |
| tpy | Tons per year |
| U.S.C. | United States Code |
| VOC | Volatile Organic Compound |
| wt % | Percent by Weight |

Title V Operating Permit

All conditions in Sections III through VII of this 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 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 through VII of this Title V permit in accordance with the Clean Air Act, as amended.

Section I: Premises Information and Description

A. PREMISES INFORMATION

Nature of Business: Plastics materials and resins
Primary SIC: 2821

Facility Mailing Address: Allnex USA, Inc.
528 South Cherry Street
Wallingford, Connecticut 06492

Telephone Number: (203) 284-4388

B. PREMISES DESCRIPTION

Allnex USA, Inc. (Allnex) is a research-based chemical company, which develops and manufactures proprietary products and technology. Allnex develops, manufactures and markets specialty chemicals, specialty materials and building block chemicals, serving a broad group of end users, including the mining, coatings, aerospace, and automotive industries. Allnex and its subsidiaries operate sites in North America, South America, Europe and Asia.

Approximately 200 people are employed at the Allnex Wallingford site. The site is located on 238 acres extending from the railroad main line on the east to the Quinnipiac River on the west. It constitutes 25 buildings, two miles of streets and roads and totals 3.2 miles around its perimeter. The primary activities conducted at the site are classified under the Standard Industrial Classification (SIC) code 2821. Liquid amino and waterborne alkyd resins are manufactured at the site.

Also located at the Wallingford site is a separate thermoplastic manufacturing business conducted by Evonik CYRO LLC, a wholly owned subsidiary of Evonik Industries. The Evonik CYRO manufacturing operations are subject to permits issued to Evonik CYRO and therefore are largely not covered under this Title V Permit.

Allnex also operates a wastewater treatment plant that treats effluent from the Allnex and Evonik CYRO manufacturing areas, as well as a boiler house that supplies steam to all parts of the site.

Allnex exceeds the major source threshold for the following pollutants: NO_x, VOC and HAPs.

Allnex is a Title V source located in a serious non-attainment area for ozone as defined in RCSA §22a-174-1.

Section II: Emissions Units Information

A. EMISSIONS UNITS IDENTIFICATION

It is not intended to incorporate by reference these NSR permits, orders or registrations into this Title V permit.

| TABLE II.A: EMISSIONS UNITS IDENTIFICATION | | | |
|---|--|--------------------------|---|
| Emissions Unit | Emissions Unit Description | Control Unit Description | Permit (P), Order (O), or Registration (R) Number |
| EU-R01-2 | NMA Product Tank 104-51 | Scrubber 104-51 | |
| EU-R01-3 | Tank 627-1: Acrylamide | Scrubber 627 | |
| EU-R01-4 | CYMEL 323, 325, AND 327 Wash Tank 105-14 | Scrubber 105 | |
| EU-R01-5 | CYMEL 1161 AND 1168 Wash Tank 105-16 | Scrubber 105 | |
| EU-R01-6 | CYMEL 1130 AND 1133 Wash Tank 105-18 | Scrubber 105 | |
| EU-R01-7 | Recovered Methanol Tank 11 | Scrubber C-100 | |
| EU-R01-8 | CYMEL 303 (4% Salt) Storage Tank 111-001 | | |
| EU-R01-9 | CYMEL 1168 Storage Tank 111-004 | | |
| EU-R01-10 | Recovered Methanol Tank 12 | Scrubber C-100 | |
| EU-R01-11 | Recovered Methanol Tank 20 | Scrubber C-100 | |
| EU-R01-12 | Recovered Methanol Product Tank 203-2 | | |
| EU-R01-13 | Distillate Tank 203-3A (Y37) | | |
| EU-R01-14 | 8% n-Butanol Wash Tank 203-3B | | |
| EU-R01-15 | 80% Iso-Butanol Surge Tank 203-4B | Scrubber 203-4B | |
| EU-R01-16 | T-502 Methyl Formcel Storage | Scrubber 502 | |
| EU-R01-17 | T-503 Formalin Storage | Scrubber 502 | |
| EU-R01-18 | T-507 No. 2 Fuel Oil Tank | | |
| EU-R01-19 | Methanol Raw Material Tank 511 | Scrubber 511 | |
| EU-R01-20 | Methanol/Rec Methanol Raw Material Tank 512 | Scrubber 511 | |
| EU-R01-21 | Waste Alcohol Tank 519 | | |
| EU-R01-22 | Butyl Formcel Storage Tank 533 | Scrubber 533 | |
| EU-R01-23 | CYMEL 1168 Distillate Tank 534 (Y45) | | |
| EU-R01-24 | CYMEL 1133 Distillate (n-BuOH/MeOH) Tank 551 | Scrubber 551 | |
| EU-R01-25 | Tank 553: Formaldehyde Enriched Butanol | Scrubber 551 | |
| EU-R01-26 | CYMEL 1168 Distillate Tank 556 (Y45) | Scrubber 556 | |
| EU-R01-27 | CYMEL 385 Storage Tank 563 | | |
| EU-R01-28 | Tank 565: Empty | | |
| EU-R01-33 | Tank 101-1 - HCl | Scrubber 101-1 | |
| EU-R01-34 | Tank 101-11: Caustic Soda | | |
| EU-R01-35 | Tank 101-12: Nitric Acid | Scrubber 101-12 | |
| EU-R01-36 | Tank 101-15: Empty | | |
| EU-R01-37 | Tank 101-24 Empty | | |
| EU-R01-38 | Tank 101-26: Empty | | |
| EU-R01-39 | Tank 101-37: Empty | | |
| EU-R01-40 | Tank 104-36: Aerotex M-3 | | |
| EU-R01-41 | Tank 104-41: Soda Ash | | |
| EU-R01-42 | Tank 10 - Isopropanol | | |
| EU-R01-43 | Tank 130-001: Ethylene Glycol | | |
| EU-R01-44 | Tank 130-007: Propylene Glycol | | |
| EU-R01-46 | Tank 506: Denatured Alcohol | | |
| EU-R01-47 | Tank 532: Wet Xylene | | |
| EU-R01-48 | Tank 535: Recovered Isobutanol | | |
| EU-R01-49 | Tank 539: Heat Transfer Fluid | | |
| EU-R01-50 | Tank 552: 100% n-Butanol | | |
| EU-R01-51 | Tank 555-12: n-Butanol Wash | Scrubber 555 | |
| EU-R01-52 | Tank 555-4: Methanol Wash | Scrubber 555 | |
| EU-R01-53 | Tank 555-6: Methanol Wash | Scrubber 555 | |
| EU-R01-54 | Tank 555-8: Isobutanol Wash | Scrubber 555 | |
| EU-R01-55 | Tank 555-10: n-Butanol Wash | Scrubber 555 | |
| EU-R01-56 | Tank 557: 100% Isobutanol | | |
| EU-R01-57 | Tank 558: Xylene | | |
| EU-R01-58 | Tank 561: Cymel 1133 Distillate | Scrubber 561 | |
| EU-R01-59 | Tank 562: 80% n-Butanol | Scrubber 562-4 | |
| EU-R01-60 | Tank 564: Formaldehyde Enriched Butanol | Scrubber 562-4 | |

Section II: Emissions Units Information

| TABLE II.A: EMISSIONS UNITS IDENTIFICATION | | | |
|---|--|---------------------------------|--|
| Emissions Unit | Emissions Unit Description | Control Unit Description | Permit (P), Order (O), or Registration (R) Number |
| EU-R01-61 | Tank 566: 8% Isobutanol | | |
| EU-R01-62 | Tank 575: Resydrol AY-586 Product | | |
| EU-R01-63 | Tank 576: ZAY Intermediate | Condenser | |
| EU-R01-64 | Tank 577: ZAF Intermediate | Condenser | |
| EU-R01-65 | Tank 579: Tall Oil Fatty Acid | | |
| EU-R01-66 | Tank 590: Soy Oil Fatty Acid | | |
| EU-R01-67 | Tank 591: ZAY Intermediate | Condenser | |
| EU-R01-68 | Tank 592: ZAF Intermediate | Condenser | |
| EU-R01-69 | Tank 120-13: Dry Xylene | | |
| EU-R01-70 | Tank 593 Resydrol AY-6159 Product | | |
| EU-R02-2 | B-37 150 Train Hot Oil Furnace | | |
| EU-R02-4 | B-13B 200 Train Hot Oil Furnace | | |
| EU-R03-1 | B-05/TR1012 Product Drums | | |
| EU-R03-2 | B-05/TR.101 Filter Press 101-13A | | |
| EU-R03-3 | B-05/TR.101 Filter Press 101-13B | | |
| EU-R03-4 | B-05/TR.102 Filter Press 102-06 | | |
| EU-R03-5 | B-05/TR.102 Filter Press 102-11 | | |
| EU-R03-6 | B-05/TR.102 Hot Well 120-30 | Scrubber 101-36 | |
| EU-R03-7 | B-05/TR.101 Hot Well 101-50 | Scrubber 101-36 | |
| EU-R03-9 | B-05/TR.102 Reactor 102-01 | | |
| EU-R03-12 | B-05/TR.101 Decanter 101-04 | 05CN10126A, Condenser | |
| EU-R03-13 | B-05/TR.102 Decanter 102-41 | 05CN12023, Condenser | |
| EU-R03-18 | B-05/TR.102 Receiver 102-27 | 05CN12023, Condenser | |
| EU-R04-1 | B-06/TR.65/68 Luwa Evaporator | | |
| EU-R04-2 | B-06/TR.65/68 Sparkler Filter | | |
| EU-R04-3 | B-06/TR.65/68 Flaker | | |
| EU-R04-4 | B-06/TR.65/68 Filter Press | | |
| EU-R04-5 | B-06/TR.65/68 Granulator | | |
| EU-R04-16 | B-06/TR.65/68 Drumming | | |
| EU-R04-17 | B-06 TRAIN 65/68 Product/Distillate Drumming | | |
| EU-R04-18 | B-06/TR.65/68 Tank Wagon | | |
| EU-R05-1 | B-06 Bag Bailer | | |
| EU-R05-2 | B-06/TR103467 Buggy | | |
| EU-R05-3 | B-06/TR.103 Heinkel Centrifuge 103-60 | MON RTO/Scrubber | |
| EU-R05-4 | B-06/TR.107 Heinkel Centrifuge 107-60 - OOS | MON RTO/Scrubber | |
| EU-R05-5 | B-06/TR.106 Heinkel Centrifuge 106-60 | MON RTO/Scrubber | |
| EU-R05-6 | B-06/TR103 & 104 Drumming | | |
| EU-R05-7 | B-06/TR106 Drumming | | |
| EU-R05-8 | B-06/TR.103 Filter Press (A) | | |
| EU-R05-9 | B-06/TR.103 Filter Press (B) | | |
| EU-R05-10 | B-06/TR.104 Filter Press (C) | | |
| EU-R05-11 | B-06/TR.104 Filter Press (D) | | |
| EU-R05-12 | B-06/TR.106 Filter Press (E) | | |
| EU-R05-13 | B-06/TR.106 Filter Press (F) | | |
| EU-R05-14 | B-06/TR.107 Filter Press (G) | | |
| EU-R05-15 | B-06/TR.107 Filter Press (H) | | |
| EU-R05-18 | B-106/TR106 Reactor 106-01 | MON RTO/Scrubber | |
| EU-R05-19 | B-06/TR.107 Reactor 107-01 - OOS | MON RTO/Scrubber | |
| EU-R05-24 | B-06/TR.106 Blend Tank 106-08 | MON RTO/Scrubber | |
| EU-R05-25 | B-06/TR.106 Blend Tank 106-11 | MON RTO/Scrubber | |
| EU-R05-26 | B-06/TR.107 Blend Tank 107-08 - OOS | MON RTO/Scrubber | |
| EU-R05-27 | B-06/TR.107 Blend Tank 107-11 | MON RTO/Scrubber | |
| EU-R05-28 | B-06/TR.107 Blend Tank 107-24 - OOS | MON RTO/Scrubber | |
| EU-R05-29 | B-06/TR.103 Hydrochloric Acid Weigh Tank | | |
| EU-R05-30 | B-06/TR.103 Nitric Acid Weigh Tank | Scrubber 103-100 | |
| EU-R05-31 | B-06/TR.103/4/6/7 Solvent Transfer Tank | Scrubber 103-41 | |
| EU-R05-32 | B-06/TR.103 33% Caustic Weigh Tank | | |
| EU-R05-33 | B-06/TR.104 Acidified Methanol Tank | | |

Section II: Emissions Units Information

| TABLE II.A: EMISSIONS UNITS IDENTIFICATION | | | |
|---|---|---------------------------------|--|
| Emissions Unit | Emissions Unit Description | Control Unit Description | Permit (P), Order (O), or Registration (R) Number |
| EU-R05-34 | B-06/TR.104 IMPA Weigh Tank | | |
| EU-R05-35 | B-06/TR106 Nitric Acid Weigh Tank | Scrubber 104-110 | |
| EU-R05-36 | B-06/TR106 Caustic Head Tank | | |
| EU-R05-37 | B-06/TR107 Nitric Acid Weigh Tank - OOS | | |
| EU-R05-38 | B-06/TR107 Caustic Head Tank - OOS | | |
| EU-R05-43 | B-06/TR.106 Receiver 106-05 | MON RTO/Scrubber | |
| EU-R05-44 | B-06/TR.107 Receiver 107-05 - OOS | MON RTO/Scrubber | |
| EU-R05-45 | B-06/TR.103/104 Hot Well 103-14 | MON RTO/Scrubber | |
| EU-R05-46 | B-06/TR.106/107 Hot Well 106-14 | MON RTO/Scrubber | |
| EU-R05-47 | B-06/TR.103467 Tank Wagon Loading | | |
| EU-R06-1 | B-06/TR.104-34 Reactor (104-34) | Scrubber 104-34 | |
| EU-R06-2 | B-06/TR.104-34 Tank Wagon Loading | | |
| EU-R07-1 | B-05/TR.120 Filter Press - OOS | | |
| EU-R07-2 | B-05/TR.120 Hot Well 102-28 - OOS | | |
| EU-R07-5 | B-05/TR.120 Cutting Kettle 120-07 | 05WSBT, Wet Scrubber | R-189-0156 |
| EU-R07-6 | B-05/TR.120 Drums | | |
| EU-R07-7 | Adipic Acid Hopper - OOS | | |
| EU-R08-1 | B-05/TR.150 Acrylamide Bag Charging | Scrubber 150-36 | |
| EU-R08-2 | B-05/TR.150 Filter Press | | |
| EU-R08-3 | B-05/TR.150 Reactor 150-1A | Scrubber 150-5 | |
| EU-R08-4 | B-05/TR.150 Rolling Storage Tank Wagon Loading | | |
| EU-R08-5 | B-05/TR.150 Blend Tank 150-02 | Scrubber 150-5 | |
| EU-R08-6 | B-05/TR.150 Decanter/Receiver 120-18 | | |
| EU-R08-7 | B-05/TR.150 Receiver/8% Butanol 120-34 | | |
| EU-R08-8 | B-05/TR.150 Hot Well 150-23 | Scrubber 101-36 | |
| EU-R08-9 | B-05/TR.150 Drums | | |
| EU-R08-10 | B-05/TR.150 Tank Wagon Loading | | |
| EU-R08-11 | B-05/TR. 200 Reactor 200 | Scrubber 150-5 | |
| EU-R08-12 | B-05/TR. 200 Decanter 200-2 | | |
| EU-R08-13 | B-05/TR. 200 Receiver 200-3 | | |
| EU-R08-14 | B-05/TR.200 Cutting Kettle 120-04 | Scrubber 150-5 | |
| EU-R08-15 | B-05/TR. 200 Vacuum Pump Receiver 200-6 | | |
| EU-R09-1 | B-06/TR.66 Filter Press - OOS | | |
| EU-R09-2 | B-06/TR.66 Reactor Kettle 66 - OOS | | |
| EU-R09-5 | B-06/TR.66 Drumming - OOS | | |
| EU-R09-6 | B-06/TR.66 Tank Wagon Loading - OOS | | |
| EU-R10-1 | B-06/ Tank 114-01:Hot Water | | |
| EU-R10-2 | B-06/ Tank 114-08 - OOS | | |
| EU-R10-3 | B-06/12.5% Caustic Tank - OOS | | |
| EU-R10-4 | B-06/ Tank 114-20 - OOS | | |
| EU-R10-5 | B-06/Soda Ash Tank 114-23 - OOS | | |
| EU-R10-6 | B-06/15% Sulfuric Acid Tank - OOS | | |
| EU-R10-7 | B-06/Tank 114-29 - OOS | | |
| EU-R11-1 | B-06 MFRS Methanol Column | | |
| EU-R11-2 | B-06 MFRS Formaldehyde Column 110-03 | | |
| EU-R11-3 | B-06 MFRS Methanol Column Receiver (Tank 101-31 East) | | |
| EU-R11-4 | B-06 MFRS Formaldehyde Column Receiver 110-20 | Scrubber 074 | |
| EU-R11-5 | B-06 MFRS Formaldehyde Column Receiver 110-20 | | |
| EU-R12-1 | B-05 MARS Methanol Stripper Column C-1 | 05CPE4, Condenser | |
| EU-R12-2 | B-05 MARS Water Stripper Column C-2 | 05CPE5, Condenser | |
| EU-R12-3 | B-05 MARS Butanol Column C-4 | 05CPE19, Condenser | |
| EU-R12-4 | B-05 MARS Decanter D-1 | | |
| EU-R12-5 | B-05 MARS Decanter D-3 | | |
| EU-R12-6 | B-05 Methanol Reflux Receiver Tank 3 | 05CPE4, Condenser | |
| EU-R12-7 | B-05 MARS Feed Tank 4 (MeOH Column) | | |
| EU-R12-8 | B-05 MARS Feed Tank 5 (Water Stripper Column) | | |
| EU-R12-9 | B-05 MARS Feed Tank 7 (Butanol Column) | | |

Section II: Emissions Units Information

| TABLE II.A: EMISSIONS UNITS IDENTIFICATION | | | |
|---|--|---------------------------------|--|
| Emissions Unit | Emissions Unit Description | Control Unit Description | Permit (P), Order (O), or Registration (R) Number |
| EU-R13-1 | B-06 Vacuum Belt Filter | | |
| EU-R13-2 | B-06 Kettles 61/62 Filter Press | | |
| EU-R13-5 | B-06 Train 61/62 Product Drumming | | |
| EU-R13-6 | B-06/TR.61/62 Tank Wagon Loading | | |
| EU-R15-1 | Equipment Leak Fugitives | | |
| EU-R16-1 | B-06 Resins Cooling Towers | | |
| EU-R16-2 | B-05 Resins Cooling Towers | | |
| EU-R17-2 | Building 6 Parts Cleaner | | |
| EU-S01-1 | Tank 100-76: Diesel | | |
| EU-S01-2 | Tank 120-006: Phosphoric Acid | | |
| EU-S01-3 | Tank 130-004: Empty | | |
| EU-S01-4 | Tank 130-010: Sodium Phosphate | | |
| EU-S01-5 | Tank 16: No. 6 Fuel Oil - OOS | | |
| EU-S01-7 | Tank 1820A: Magnifloc 1820A | | |
| EU-S01-8 | Tank 18: No. 6 Fuel Oil - OOS | | |
| EU-S01-9 | Tank 170-008: Empty | | |
| EU-S01-10 | Tank 559: Gasoline | | |
| EU-S01-11 | Tank 560: Diesel Fuel (for vehicles) | | |
| EU-S01-12 | Tank 581C: Magnifloc 581C | | |
| EU-S01-13 | Tank 605-002: Empty | | |
| EU-S01-14 | Tank: Building 2 Propane | | |
| EU-S02-2 | B-04 Generator Propane Vent | | |
| EU-S02-3 | B-05B Generator Gasoline Vent | | |
| EU-S02-4 | B-06 Generator Gasoline Vent | | |
| EU-S02-6 | B-15 Generator Propane Vent | | |
| EU-S02-9 | WWTP EM Generator Kerosene | | P-189-0075 |
| EU-S02-10 | No. 4 Well Generator Diesel Vent | Catalytic Converter | |
| EU-S02-11 | B-02 Generator Diesel Vent | | |
| EU-S02-12 | B23 Emergency Water Pump - Diesel | | |
| EU-S02-13 | Diesel Air Compressor Engine | | P-189-0189 |
| EU-S03-1 | Boiler #1 | | R-189-0108 |
| EU-S03-2 | Boiler #3 | | R-189-0110 |
| EU-S04-1 | Wastewater Treatment Plant | | |
| EU-S06-1 | Closed Landfill | | |
| EU-S08-1 | Building 2 Parts Cleaner | | |
| EU-S08-2 | Building 15 Parts Cleaner | | |
| EU-S09-1 | Equipment Leak Fugitives | | |
| Grouped Emission Units | | | |
| GEU-01 | EU-S01-1, -5, -7 through -12, Tanks EU-R01-2 through -28, -39, -40, and -42 through -69 Tanks | As above | As above |
| GEU-02 | EU-S02-2 through -4, -6, -10 through -12, Engines | As above | As above |
| GEU-03 | EU-S03-1 and -2, Boilers EU-R02-2 and -4, Resins Combustion Sources | As above | As above |
| GEU-04 | EU-R17-2, EU-S08-1, EU-S08-2, Parts Cleaners | As above | As above |
| GEU-05 | EU-R01-2 through EU-R01-69, EU-R03-1 through EU-R13-6, EU-R15-1 through EU-R16-2, EU-S04-1 | As above | As above |

Section II: Emissions Units Information

B. OPERATING SCENARIO IDENTIFICATION

The Permittee shall be allowed to operate under the following scenarios without notifying the commissioner, provided that such operations are explicitly provided for and described in the table below. The Permittee shall record contemporaneously with the operation of emission units, the operating scenario under which each emissions unit is operating in a log to be kept at the subject premises.

| TABLE II.B: OPERATING SCENARIO IDENTIFICATION | | |
|--|--|---------------------------------|
| Identification of Operating Scenarios | Emissions Unit(s) Associated with the Scenarios | Description of Scenarios |
| SOS-1 | All units included in this standard operating scenario | Resins manufacturing |

Section III: Applicable Requirements and Compliance Demonstration

The following contains terms and conditions for the operation of each identified Emissions Unit regulated by this Title V permit.

A. GEU-01, ORGANIC LIQUID STORAGE TANKS

40 CFR 60 Subpart Kb Requirements

1. VOC emissions for EU-R01-19, 20, 24, 58

a. *Limitations or Restrictions*

- i. \leq 500 ppm above background [40 CFR 60 Subpart Kb]
- ii. \geq 95% control efficiency [40 CFR 60 Subpart Kb]

b. *Monitoring and Testing Requirements*

- i. The Permittee shall maintain a closed vent system designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by a reading of less than 500 ppm above background and visual inspections, as determined in 40 CFR 60 Subpart VV, §60.485(b). [40 CFR §60.112b(a)(3)(i)]
- ii. The control device shall be designed and operated to reduce inlet VOC emissions by 95% or greater. [40 CFR §60.112b(a)(3)(ii)]
- iii. The Permittee shall operate the closed vent system and control device and monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to the Administrator in accordance with 40 CFR 60.113b(c)(1). [40 CFR §60.113b(c)(2)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. A copy of the operating plan. [40 CFR §60.115b(c)(1)]
- ii. The measured values of parameters in Section III.A.1.b.iii of this Title V permit. [40 CFR §60.115b(c)(2)]
- iii. The Permittee shall keep readily accessible records showing the dimension of each tank and an analysis showing the capacity of each tank for the life of each tank. [40 CFR §60.116b(b)]

d. *Reporting Requirements*

- i. Provide the records specified in Section III.A.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

RCSA §22a-174-20(a) Requirements

2. The Permittee shall comply with the requirements of RCSA §22a-174-20(a).

- a. The Permittee shall not place, store or hold in any stationary tank, reservoir or other container of more than 40,000 gallons (150,000 liters) capacity any volatile organic compound with a vapor pressure of 1.5 psia or greater under actual storage conditions unless the tank, reservoir or other container is a pressure tank capable of maintaining working pressures sufficient at all time to prevent vapor or gas loss to the atmosphere or is designed, and equipped, with one of the vapor loss control devices listed below. If the control devices specified are used to comply with the requirements of RCSA §22a-174-20(a)(2), then the requirements of RCSA §22a-174-20(a)(8) must be met. [RCSA §22a-174-20(a)(2)]

Section III: Applicable Requirements and Compliance Demonstration

- i. A fixed roof and a floating roof, consisting of a pontoon type, double deck type roof or internal floating cover, which will rest on the surface of the liquid contents and be equipped with a closure seal or seals to close the space between the roof edge and tank wall. This control equipment is not permitted if the volatile organic compound has a vapor pressure of 11.0 psia (568 mm Hg), or greater under actual storage conditions. All tank gauging or sampling devices must be gas-tight except when tank gauging or sampling is taking place. [RCSA §22a-174-20(a)(2)(A)]
 - ii. A vapor recovery system which collects all volatile organic compound vapors and gases discharged from the tank and a vapor return or disposal system which is designed to process such vapors so as to reduce their emission to the atmosphere by at least 95% by weight. [RCSA §22a-174-20(a)(2)(B)]
 - iii. Other equipment or means with an efficiency equal to that required under RCSA §22a-174-20(a)(2)(B) for purposes of air pollution control as may be approved by the commissioner by permit or order. [RCSA §22a-174-20(a)(2)(C)]
 - iv. On or after June 1, 1985 a floating roof, consisting of a pontoon type, double deck type roof or external floating roof cover, which will rest on the surface of the liquid contents and be equipped with primary and secondary closure seals to close the space between the roof edge and the tank wall. This control equipment is not permitted if the volatile organic compound has a vapor pressure of 11.0 psia (568 mm Hg) or greater under actual storage conditions. All tank gauging or sampling devices must be gas-tight except when tank gauging or sampling is taking place. The owner or operator of any tank subject to this provision shall ensure that: [RCSA §22a-174-20(a)(2)(D)]
 - A. Any seal is intact and uniformly in place around the circumference of the floating roof and the tank wall.
 - B. The total area of gaps, determined in accordance with the requirements of RCSA §22a-174-20(a)(9), exceeding 0.125 inches in width between the secondary closure seal and the tank wall does not exceed 1.0 in² per foot of tank diameter.
 - C. A secondary closure seal gap measurement as specified above is made annually.
 - D. A visual inspection of the secondary closure seal is conducted semiannually.
 - E. Any emergency roof drain is provided with a slotted fabric cover, which covers at least 90% of the open area.
- b. The Permittee shall not place, store or hold in any stationary storage vessel of more than 250 gallon (950 liter) capacity any volatile organic compound with a vapor pressure of 1.5 psi or greater under actual storage conditions unless such vessel is equipped with a permanent submerged fill pipe with a discharge point 18 inches or less from the bottom of the storage vessel or is a pressure tank as described in RCSA §22a-174-20(a)(2). [RCSA §22a-174-20(a)(3)]
 - c. The provisions of RCSA §22a-174-20(a)(3) shall not apply to loading of volatile organic compounds into any storage vessel having a capacity of less than 1,000 gallons which was installed prior to June 1, 1972, nor to any underground storage vessel installed prior to June 1, 1972, where the fill pipe between the fill connection and the storage vessel is an offset fill pipe. [RCSA §22a-174-20(a)(4)]
 - d. If the Permittee uses the control devices specified in RCSA §22a-174-20(a)(2)(A) or (D), the Permittee shall ensure that such tank meets the requirements below: [RCSA §22a-174-20(a)(8)]
 - i. There are no visible holes, tears or other openings in the seal or any seal fabric or materials
 - ii. All openings except stub drains are equipped with covers, lids or seals such that:
 - A. The cover, lid or seal is in the closed position at all times except in actual use.
 - B. Automatic bleeder vents are closed at all times except when the roof is being floated off or being landed on the roof leg supports.
 - C. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.
 - iii. Routine inspections are conducted through roof hatches once per month.
 - iv. A complete inspection of cover and seal is conducted whenever the tank is emptied for non-operational reasons but in any event at least once per year.

Section III: Applicable Requirements and Compliance Demonstration

e. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, if the Permittee uses the control devices specified in RCSA §22a-174-20(a)(2)(A) or (D), make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. Records of the average monthly storage temperature, true vapor pressure, monthly throughput and type of volatile organic compounds stored are maintained. [RCSA §22a-174-20(a)(8)(E) and RCSA §22a-174-33]
- ii. Records of the results of inspections conducted under RCSA §22a-174-20(a)(8)(C) and (D) are maintained. [RCSA §22a-174-20(a)(8)(F) and RCSA §22a-174-33]

f. *Reporting Requirements*

- i. Provide the records specified in Section III.A.2.e of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

B. GEU-02, ENGINES W/O PERMITS

1. NO_x RACT Requirements

If the Permittee operates the emergency engine for routine, scheduled testing or maintenance on any day for which the commissioner has forecast that ozone levels will be “moderate to unhealthy,” “unhealthy,” or “very unhealthy,” then RCSA §22a-174-22 subsections (d) through (k) shall apply to the engine, unless exempted by the commissioner.

a. *Monitoring Requirements*

- i. The Permittee shall monitor daily emergency engine operating hours, identifying the operating hours of emergency and non-emergency use. [RCSA §22a-174-22(l)(1)(A)]

b. *Record Keeping Requirements*

- i. The Permittee shall keep daily records of operating hours, identifying the operating hours of emergency and non-emergency use. [RCSA §22a-174-22(l)(1)(A)]
- ii. The Permittee shall keep records of all tune-ups, repairs, replacement of parts and other maintenance. [RCSA §22a-174-22(l)(1)(D)]

c. *Reporting Requirements*

- i. The Permittee shall provide the records specified in Section III.B.1.b of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]
- ii. On or before April 15 of each year, the Permittee shall submit a report on NO_x emissions on a form provided by the commissioner. [RCSA §22a-174-22(l)(6)]

2. Fuel Sulfur Content

a. *Limitations or Restrictions for Each Unit*

- i. ≤ 0.3 wt %, No. 2 oil [CGS §16a-21a and RCSA §22a-174-19(a)(2)(i)]

Section III: Applicable Requirements and Compliance Demonstration

b. *Monitoring and Testing Requirements*

- i. Fuel merchant certification from the fuel supplier certifying the type of fuel in the shipment and the wt % of sulfur in the fuel for each fuel shipment. [RCSA §22a-174-19(a)(5)]
- ii. Shipping receipt from the fuel supplier. The shipping receipt and/or certification shall include the name of the oil supplier, the sulfur content of the oil and the method used to determine the sulfur content of the oil. [RCSA §22a-174-19(a)(5)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. Fuel merchant certification of the sulfur content for each fuel shipment. [RCSA §22a-174-19(a)(5)]

d. *Reporting Requirements*

- i. Provide the records specified in Section III.B.2.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

3. 40 CFR 63 Subpart ZZZZ Requirements (EU-S02-10 and -11 only)

a. *Work Practice Standards*

- i. By May 3, 2013, the Permittee shall comply with the applicable emissions limitations contained in Table 2c of 40 CFR 63 Subpart ZZZZ. [40 CFR §§63.6595(a)(1) and 63.6602]

b. *Record Keeping Requirements*

- i. By May 3, 2013, the Permittee shall keep records of the required maintenance conducted. [40 CFR §63.6655(e)]
- ii. By May 3, 2013, the Permittee shall keep records of the hours of operation of the engine that is recorded through a non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [40 CFR §63.6655(f)]

C. EU-S02-9, KOHLER EMERGENCY GENERATOR, MODEL # 9163-7416

1. PM-10, SO_x, NO_x, VOC and CO emissions, annual fuel usage and annual hours of operation

a. *Limitations and Restrictions*

- | | | | |
|------|--|------------------------------|--------------|
| i. | PM-10 – Emission factor: 1.2 lb/h | Annual emissions: ≤ 0.36 tpy | [P-189-0075] |
| ii. | SO _x – Emission factor: 1.41 lb/h | Annual emissions: ≤ 0.42 tpy | [P-189-0075] |
| iii. | NO _x – Emission factor: 49.5 lb/h | Annual emissions: ≤ 14.9 tpy | [P-189-0075] |
| iv. | VOC – Emission factor: 3.38 lb/h | Annual emissions: ≤ 1.0 tpy | [P-189-0075] |
| v. | CO – Emission factor: 10.9 lb/h | Annual emissions: ≤ 3.2 tpy | [P-189-0075] |
| vi. | Annual fuel usage: ≤ 63,000 gal | | [P-189-0075] |
| vii. | Annual hours of operation: ≤ 600 h | | [P-189-0075] |

Section III: Applicable Requirements and Compliance Demonstration

b. *Monitoring and Testing Requirements*

- i. Verify emissions using monthly fuel monitoring, hours of operation, emission factors and engineering calculations. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. Annual emissions shall be verified by adding the current month's emissions to the previous 11 months' emissions. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. Records of monthly and annual fuel usage and emissions shall be kept. [RCSA §22a-174-33(o)(2)]
- ii. Records of hours of operation shall be kept. [RCSA §22a-174-33(o)(2)]

d. *Reporting Requirements*

- i. On a monthly basis, review data recorded and calculated for that month and report to the commissioner within two working days any exceedences of an emission limit. [Section VII.I of this Title V permit]
- ii. Provide written monitoring reports to the commissioner by the 30th day following the end of each semi-annual period. [Section VII.E of this Title V permit]
- iii. Provide the records specified in Section III.C.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

2. Fuel Sulfur Content

a. *Limitations or Restrictions*

- i. ≤ 0.1 wt % [P-189-0075]

b. *Monitoring and Testing Requirements*

- i. Fuel merchant certification from the fuel supplier certifying the type of fuel in the shipment and the wt % of sulfur in the fuel for each fuel shipment. [RCSA §22a-174-19(a)(5)]
- ii. Shipping receipt from the fuel supplier. The shipping receipt and/or certification shall include the name of the oil supplier, the sulfur content of the oil and the method used to determine the sulfur content of the oil. [RCSA §22a-174-19(a)(5)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. Fuel merchant certification of the sulfur content for each fuel shipment. [RCSA §22a-174-19(a)(5)]

d. *Reporting Requirements*

- i. Provide the records specified in Section III.C.2.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

Section III: Applicable Requirements and Compliance Demonstration

3. NO_x RACT Requirements

If the Permittee operates the emergency engine for routine, scheduled testing or maintenance on any day for which the commissioner has forecast that ozone levels will be “moderate to unhealthy,” “unhealthy,” or “very unhealthy,” then RCSA §22a-174-22 subsections (d) through (k) shall apply to the engine, unless exempted by the commissioner.

a. *Monitoring Requirements*

- i. The Permittee shall monitor daily emergency engine operating hours, identifying the operating hours of emergency and non-emergency use. [RCSA §22a-174-22(l)(1)(A)]

b. *Record Keeping Requirements*

- i. The Permittee shall keep daily records of operating hours, identifying the operating hours of emergency and non-emergency use. [RCSA §22a-174-22(l)(1)(A)]
- ii. The Permittee shall keep records of all tune-ups, repairs, replacement of parts and other maintenance. [RCSA §22a-174-22(l)(1)(D)]

c. *Reporting Requirements*

- i. The Permittee shall provide the records specified in Section III.C.3.b of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]
- ii. On or before April 15 of each year, the Permittee shall submit a report on NO_x emissions on a form provided by the commissioner. [RCSA §22a-174-22(l)(6)]

D. EU-S02-13, CATERPILLAR MODEL 3406C DIESEL COMPRESSOR

1. PM-10, SO_x, NO_x, VOC and CO emissions, annual fuel usage and annual hours of operation

a. *Limitations or Restrictions*

- i. PM-10 – Emission factor: 0.6 lb/h Annual emissions: ≤ 0.04 tpy [P-189-0189]
- ii. SO_x – Emission factor: 0.87 lb/h Annual emissions: ≤ 0.63 tpy [P-189-0189]
- iii. NO_x – Emission factor: 5.6 lb/h Annual emissions: ≤ 4.03 tpy [P-189-0189]
- iv. VOC – Emission factor: 0.06 lb/h Annual emissions: ≤ 0.04 tpy [P-189-0189]
- v. CO – Emission factor: 0.43 lb/h Annual emissions: ≤ 0.43 tpy [P-189-0189]
- vi. Annual fuel usage: ≤ 30,960 gal [P-189-0189]
- vii. Annual hours of operation: ≤ 1440 h [P-189-0189]

b. *Monitoring and Testing Requirements*

- i. Verify emissions using monthly fuel monitoring, hours of operation, emission factors and engineering calculations. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. Annual emissions shall be verified by adding the current month’s emissions to the previous 11 months’ emissions. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

Section III: Applicable Requirements and Compliance Demonstration

- b. *Record Keeping Requirements*
 - i. The Permittee shall keep daily records of operating hours, identifying the operating hours of emergency and non-emergency use. [RCSA §22a-174-22(l)(1)(A)]
 - ii. The Permittee shall keep records of all tune-ups, repairs, replacement of parts and other maintenance. [RCSA §22a-174-22(l)(1)(D)]
- c. *Reporting Requirements*
 - i. The Permittee shall provide the records specified in Section III.D.3.b of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]
 - ii. On or before April 15 of each year, the Permittee shall submit a report on NO_x emissions on a form provided by the commissioner. [RCSA §22a-174-22(l)(6)]

4. 40 CFR 63 Subpart ZZZZ Requirements

- a. *Work Practice Standards*
 - i. By May 3, 2013, the Permittee shall comply with the applicable emissions limitations contained in Table 2c of Subpart ZZZZ or 40 CFR 63. [40 CFR §§63.6595(a)(1) and 63.6602]
- b. *Record Keeping Requirements*
 - i. By May 3, 2013, the Permittee shall keep records of the required maintenance conducted. [40 CFR §63.6655(e)]
 - ii. By May 3, 2013, the Permittee shall keep records of the hours of operation of the engine that is recorded through a non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [40 CFR §63.6655(f)]

E. GEU-03, BOILERS #1, #3, AND 150 AND 200 TRAIN HOT OIL FURNACES

1. NO_x Emissions

- a. *Limitations and Restrictions for each unit*
 - i. Natural gas firing: 0.20 lb/MMBtu [RCSA §22a-174-22]
 - ii. Propane firing (boilers only): 0.20 lb/MMBtu [RCSA §22a-174-22]
- b. *Monitoring and Testing Requirements*
 - i. Verify emissions using the most recent NO_x RACT performance test data, monthly fuel monitoring, heat content of fuel and engineering calculations. [RCSA §22a-174-22 and RCSA §22a-174-33(j)(1)(K)(ii)]
 - ii. The Permittee shall conduct emissions tests at least once every five years. Such tests shall be conducted no later than five years from the date of the last test for the subject unit or no later than five years from the date the last test for the subject unit should have been conducted, whichever is earlier. Compliance with the emission limitations shall be determined based on the average of three one-hour tests, each performed over a consecutive 60-minute period and performed in accordance with RCSA §22a-174-5. [RCSA §22a-174-22(k)(1)]
 - iii. Demonstrate compliance with emission limitations of this section using sampling and analytical procedures approved under 40 CFR Part 60, Appendix A, or under procedures in RCSA

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§22a-174-5(d). Sampling shall be conducted when the source is at normal operating temperature and, unless allowed otherwise by the commissioner in a permit or order, is operating at or above 90% of maximum rated capacity for a fuel-burning source or at or above 90% of design capacity for a waste combustor. Notwithstanding such requirement, any source which has operated in excess of 100% of its maximum rated capacity at any time since January 1, 1990 shall be tested when the source is operating at or above 90% of its highest operating rate since January 1, 1990. [RCSA §22a-174-22(k)(2)]

- iv. Annual emissions shall be verified by adding the current month's emissions to the previous 11 months' emissions. [RCSA §22a-174-33(j)(1)(K)(ii)]

c. *Record Keeping Requirements*

In accordance with Section VII.F of this permit, make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. Records of monthly and annual fuel usage shall be kept. [RCSA §22a-174-33(o)(2)]
- ii. Records of all tune-ups, repairs, replacement of parts and other maintenance. [RCSA §22a-174-22(l)(1)(D)]
- iii. Copies of all documents submitted to the commissioner pursuant to this section. [RCSA §22a-174-22(l)(1)(E)]
- iv. Procedures for calculating NO_x emission rates. [RCSA §22a-174-22(l)(1)(G)]
- v. Records of the dates and times of all emission testing required by this section, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing. [RCSA §22a-174-22(l)(1)(H)]

d. *Reporting Requirements*

- i. Provide the records specified in Section III.E.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]
- ii. Within 30 days of the completion of emission tests, submit a written report of the results of such testing to the commissioner. [RCSA §22a-174-22(l)(2)]
- iii. On or before April 15 of each year, submit a report on NO_x emissions from the source on forms provided by the commissioner. [RCSA §22a-174-22(l)(6)]

F. **GEU-04, PARTS CLEANERS**

1. VOC Emissions

a. *Monitoring Requirements*

VOC emission calculations shall be done once every six months using Material Safety Data Sheets for the solvent used in the cold cleaning unit. [RCSA §22a-174-33(j)(1)(K)(ii)]

b. *Work Practice Standards* - [RCSA §22a-174-20(l)(3)]:

- i. Equip the cleaning device with a cover that is easily operated with one hand.
- ii. Equip the cleaning device with an internal rack or equipment for draining cleaned parts so that parts are enclosed under the cover while draining. Such drainage rack or equipment may be external for applications where an internal type cannot fit into the cleaning system.
- iii. Collect and store waste solvent in closed containers. Closed containers used for storing waste solvent may contain a device that allows pressure relief but does not allow liquid solvent to drain from the container.

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- iv. Close the cover if parts are not being handled in the cleaner for two minutes or more, or if the device is not in use.
- v. Drain the cleaned parts for at least 15 seconds or until dripping ceases, whichever is longer.
- vi. If used, supply a degreasing solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure which does not exceed ten psi measured at the pump outlet and perform such spraying within the confines of the cold cleaning unit.
- vii. Minimize the drafts across the top of the cold cleaning unit such that whenever the cover is open the unit is not exposed to drafts greater than 40 meters per minute, as measured between one and two meters upwind, and at the same elevation as the tank lip.
- viii. Do not operate the unit upon the occurrence of any visible solvent leak until such leak is repaired. Any leaked solvent or solvent spilled during transfer shall be cleaned immediately, and the wipe rags or other sorbent material used to clean the spilled or leaked solvent shall be immediately stored in covered containers for disposal or recycling.
- ix. Provide a permanent, conspicuous label on or posted near the unit clearly summarizing the applicable operating requirements.
- x. On or after May 1, 2008, use only solvent that has a vapor pressure less than or equal to 1.0 mm Hg at 20°C.
- xi. Sponges, fabric, wood, leather, paper and other absorbent material shall not be cleaned in a cold cleaning machine.

c. *Record Keeping Requirements*

In accordance with Section VII.F of this Title V permit, the Permittee shall make and maintain the following records for a minimum of five years, commencing on the date such records were created [RCSA §22a-174-33(o)(2)]:

- i. Maintain records of the following information for a minimum of five years after such record is made [RCSA §22a-174-20(1)(3)(J)]:
 1. The type of solvent used, including a description of the solvent and the solvent name,
 2. The vapor pressure of the solvent in mm Hg measured at 20°C (68°F),
 3. The percent VOC content by weight, and
 4. The amount of solvent added to each unit on a monthly basis.
- ii. Name and address of any person and his or her company to whom waste degreasing solvent is transferred, and the amount of waste degreasing solvent transferred.
- iii. Records showing compliance with Section III.F.1.b.vii of this Title V permit.

d. *Reporting Requirements*

- i. The Permittee shall provide written monitoring reports to the commissioner by the 30th day following the end of each semi-annual period in accordance with Section VII.F of this Title V permit.
- ii. The Permittee shall provide the records specified in Section III.F.1.c of this Title V permit to the commissioner within 30 days of receipt of a written request from the commissioner or such sooner time as the commissioner may require. [RCSA §22a-174-4(d)(1)]

G. GEU-05, MON MACT AFFECTED EQUIPMENT

1. In accordance with 40 CFR 63 Subpart FFFF, Miscellaneous Organic Chemical Manufacturing, for the subject emission units the Permittee shall meet the requirements of 40 CFR 63 Subpart FFFF, including monitoring, reporting and record keeping, by the dates given in 40 CFR 63 Subpart FFFF.
2. General Requirements [40 CFR §63.2450]
 - a. The Permittee must be in compliance with the emission limits and work practice standards in 40 CFR 63

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Subpart FFFF, Tables 1 through 7 at all times, except during periods of startup, shutdown, and malfunction, and must meet the requirements specified in 40 CFR §§63.2455 through 63.2490 (or the alternative means of compliance in 40 CFR §§63.2495, 63.2500, or 63.2505), except as specified in paragraphs (b) through (s) of 40 CFR §63.2450. The Permittee must meet the notification, reporting and recordkeeping requirements specified in 40 CFR §§63.2515, 63.2520 and 63.2525.

- b. The Permittee must determine if an emission stream is a halogenated vent stream, as defined in 40 CFR §63.2550, by calculating the mass emission rate of halogen atoms in accordance with 40 CFR §63.115(d)(2)(v).
 - c. Except when complying with 40 CFR §63.2485, if the Permittee reduces organic HAP emissions by venting emissions through a closed-vent system to any combination of control devices (except a flare) or recovery devices, the Permittee must meet the requirements of 40 CFR §63.982(c) and the requirements referenced therein.
3. OHAP Emissions from Continuous Process Vents [40 CFR §63.2455]
- a. *Limitations and Restrictions for each unit*
 - i. Reduce Group 1 Continuous Process Vent Emissions by $\geq 98\%$. [40 CFR 63 Subpart FFFF, Table 1]
 - b. The Permittee must meet each emission limit in 40 CFR 63 Subpart FFFF, Table 1 that applies to the Permittee, and the Permittee must meet each applicable requirement specified in paragraphs (b) and (c) of 40 CFR §63.2455.
4. OHAP Emissions from Batch Process Vents [40 CFR §63.2460]
- a. *Limitations and Restrictions each unit*
 - i. Reduce Group 1 Batch Process Vent Emissions by $\geq 98\%$. [40 CFR 63 Subpart FFFF, Table 2]
 - b. The Permittee must meet each emission limit in 40 CFR 63 Subpart FFFF, Table 2 that applies to the Permittee, and the Permittee must meet each applicable requirement specified in paragraphs (b) and (c) of 40 CFR §63.2460.
5. OHAP Emissions from Storage Tanks [40 CFR §63.2470]
- a. *Limitations and Restrictions for each unit*
 - i. Reduce Group 1 Storage Tank Vent Emissions by $\geq 95\%$. [40 CFR 63 Subpart FFFF, Table 4]
 - b. The Permittee must meet each emission limit in 40 CFR 63 Subpart FFFF, Table 4 that applies to the Permittee's storage tanks, and the Permittee must meet each applicable requirement specified in paragraphs (b) through (e) of 40 CFR §63.2470.
6. OHAP Emissions from Transfer Racks [40 CFR §63.2475]
- a. *Limitations and Restrictions for each unit*
 - i. Reduce Group 1 Transfer Rack Emissions by $\geq 95\%$. [40 CFR 63 Subpart FFFF, Table 5]
 - b. The Permittee must meet each emission limit or work practice standard in 40 CFR 63 Subpart FFFF, Table 5 that applies to the Permittee's transfer racks, and the Permittee must meet each applicable requirement specified in paragraphs (b) and (c) of 40 CFR §63.2475.

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7. OHAP Emissions from Equipment Leaks [40 CFR §63.2480]
 - a. *Limitations and Restrictions*
 - i. Employ leak detection and repair work standard per 40 CFR 63 Subpart UU, except as qualified by 40 CFR 63 Subpart FFFF. [40 CFR 63 Subpart FFFF, Table 6]
 - b. The Permittee must meet each requirement in 40 CFR 63 Subpart FFFF, Table 6 that applies to the Permittee's equipment leaks, except as specified in paragraphs (b) through (d) of 40 CFR §63.2480.
8. OHAP Emissions from Wastewater Streams [40 CFR §63.2485]
 - a. *Limitations and Restrictions*
 - i. Control Group 1 wastewater stream per 40 CFR 63 Subpart G, except as qualified by 40 CFR 63 Subpart FFFF. [40 CFR 63 Subpart FFFF, Table 7]
 - b. The Permittee must meet each requirement in 40 CFR 63 Subpart FFFF, Table 7 that applies to the Permittee's wastewater streams and liquid streams in open systems within an MCPU, except as specified in paragraphs (b) through (o) of 40 CFR §63.2485.
9. OHAP Emissions from Heat Exchange Systems [40 CFR §63.2490]
 - a. *Limitations and Restrictions*
 - i. Employ heat exchange system requirements per 40 CFR 63 Subpart F, except as qualified by 40 CFR 63 Subpart FFFF. [40 CFR 63 Subpart FFFF, Table 10]
 - b. The Permittee must comply with each requirement in 40 CFR 63 Subpart FFFF, Table 10 that applies to the Permittee's heat exchange systems, except as specified in paragraphs (b) and (c) of 40 CFR §63.2490.
10. Notifications [40 CFR §63.2515]
 - a. The Permittee must submit all of the notifications in 40 CFR §§63.6(h)(4) and (5), 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply to the Permittee by the dates specified.
 - b. If the Permittee is required to conduct a performance test, the Permittee must submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required in 40 CFR §63.7(b)(1). For any performance test required as part of the initial compliance procedures for batch process vents in 40 CFR 63 Subpart FFFF, Table 2, the Permittee must also submit the test plan required by 40 CFR §63.7(c) and the emission profile with the notification of the performance test.
11. Reports [40 CFR §63.2520]
 - a. The Permittee must submit a compliance report containing the information in 40 CFR §63.2520(e) on a semiannual basis. Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Each compliance report must be postmarked or delivered no later than August 31 or February 28, whichever date is the first date following the end of the semiannual reporting period.
12. Records [40 CFR §63.2525]
 - a. The Permittee must keep the records specified in paragraphs (a) through (k) of 40 CFR §63.2525.

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13. Compliance Options [40 CFR §63.2535]

- a. In accordance with 40 CFR §63.2535(c), the Permittee is in compliance with 40 CFR 63 Subpart FFFF for those storage tanks with a fixed roof, closed-vent system, and control device in compliance with the provisions of 40 CFR 60, Subpart Kb, except that the Permittee must comply with the monitoring, record keeping, and reporting requirements in 40 CFR 63 Subpart FFFF. This applies to EU-R01-19, 20, 24, and 58.
- b. In accordance with 40 CFR §63.2535(c), if the Permittee has a storage tank assigned to an MCPU that is subject to control under 40 CFR 60 Subpart Kb, the Permittee may elect to comply only with the requirements for Group 1 storage tanks in 40 CFR 63 Subpart FFFF. This applies to EU-R01-7, 10, 11, 63, 64, 67, and 68.

H. PREMISES-WIDE GENERAL REQUIREMENTS

| Table III.H: PREMISE-WIDE GENERAL REQUIREMENTS | | |
|--|----------------------------------|---|
| Pollutants or Process Parameters | Pollutants or Process Parameters | Pollutants or Process Parameters |
| Annual Emission Statements | RCSA §22a-174-4 | 1. The Permittee shall submit annual emission statements requested by the commissioner as set forth in RCSA §22a-174-4(d)(1). |
| Emission Testing | RCSA §22a-174-5 | 2. The Permittee shall comply with the procedures for sampling, emission testing, sample analysis, and reporting as set forth in RCSA §22a-174-5. |
| Emergency Episode Procedures | RCSA §22a-174-6 | 3. The Permittee shall comply with the procedures for emergency episodes as set forth in RCSA §22a-174-6. |
| Reporting of Malfunctioning Control Equipment | RCSA §22a-174-7 | 4. The Permittee shall comply with the reporting requirements of malfunctioning control equipment as set forth in RCSA §22a-174-7. |
| Prohibition of Air Pollution | RCSA §22a-174-9 | 5. The Permittee shall comply with the requirement to prevent air pollution as set forth in RCSA §22a-174-9. |
| Public Availability of Information | RCSA §22a-174-10 | 6. The public availability of information shall apply, as set forth in RCSA §22a-174-10. |
| Prohibition Against Concealment/Circumvention | RCSA §22a-174-11 | 7. The Permittee shall comply with the prohibition against concealment or circumvention as set forth in RCSA §22a-174-11. |
| Violations and Enforcement | RCSA §22a-174-12 | 8. The Permittee shall not violate or cause the violation of any applicable regulation as set forth in RCSA §22a-174-12. |
| Variances | RCSA §22a-174-13 | 9. 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. |
| No Defense to Nuisance Claim | RCSA §22a-174-14 | 10. The Permittee shall comply with the regulations as set forth in RCSA §22a-174-14. |
| Severability | RCSA §22a-174-15 | 11. The Permittee shall comply with the severability requirements as set forth in RCSA §22a-174-15. |
| Responsibility to Comply | RCSA §22a-174-16 | 12. The Permittee shall be responsible to comply with the applicable regulations as set forth in RCSA §22a-174-16. |

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| Table III.H: PREMISE-WIDE GENERAL REQUIREMENTS | | |
|--|----------------------------------|--|
| Pollutants or Process Parameters | Pollutants or Process Parameters | Pollutants or Process Parameters |
| Particulate Emissions | RCSA §22a-174-18 | 13. The Permittee shall comply with the standards for control of particulate matter and visible emissions as set forth in RCSA §22a-174-18. (§ 18 approved by US EPA on 9-23-1982, current Regulation submitted to US EPA on 12-1-2004.) |
| Sulfur Compound Emissions | RCSA §22a-174-19 | 14. The Permittee shall comply with the requirements for control of sulfur compound emissions as set forth in RCSA §22a-174-19. |
| Organic Compound Emissions | RCSA §22a-174-20 | 15. The Permittee shall comply with the requirements for control of organic compound emissions as set forth in RCSA §22a-174-20. |
| Carbon Monoxide Emissions | RCSA §22a-174-21 | 16. The Permittee shall comply with the requirements for control of carbon monoxide emissions as set forth in RCSA §22a-174-21. |
| Nitrogen Oxide Emissions | RCSA §22a-174-22 | 17. The Permittee shall comply with the requirements for control of nitrogen oxide emissions as set forth in RCSA §22a-174-22. |
| Emission Fees | RCSA §22a-174-26 | 18. The Permittee shall pay an emission fee as set forth in RCSA §22a-174-26(d). |
| Protection of Stratospheric Ozone | 40 CFR Part 82 | 19. The Permittee shall comply with the standards for recycling and emissions reduction of products using ozone depleting substances pursuant to 40 CFR Part 82 Subpart F. |

I. 112(r) ACCIDENTAL RELEASE REQUIREMENTS

This premises is subject to the accidental release prevention regulations in 40 CFR Part 68. The Permittee shall comply with the requirements of 40 CFR Part 68, including but not limited to the following:

1. Develop and implement a management system. [40 CFR §68.15]
 - a. Assign a qualified person or position that has the overall responsibility for the development, implementation and integration of the risk management program elements.
 - b. When responsibility for implementing individual requirements of 40 CFR Part 68 is assigned to persons other than the person identified under Section III.I.1.a of this Title V permit, the names or positions of these people shall be documented and the lines of authority defined through an organization chart or similar document.

2. Conduct a hazard assessment. [40 CFR §§68.20 through 68.42]
 - a. Analyze and report in the Risk Management Plan (RMP) [40 CFR §68.25]:
 - i. One worst-case release scenario that is estimated to create the greatest distance in any direction to an endpoint provided in Appendix A to 40 CFR Part 68 resulting from an accidental release of regulated toxic substances from covered processes under worst-case conditions defined in 40 CFR §68.22;
 - ii. One worst-case release scenario that is estimated to create the greatest distance in any direction to an endpoint defined in 40 CFR §68.22(a) resulting from an accidental release of regulated flammable substances from covered processes under worst-case conditions defined in 40 CFR §68.22;
 - iii. Additional worst-case release scenarios for a hazard class if a worst-case release from another

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covered process affects public receptors different from those potentially affected by the worst-case release scenario developed under paragraphs (i) or (ii) above.

- b. Identify and analyze at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one alternative release scenario to represent all flammable substances held in covered processes. [40 CFR §68.28]
 - c. Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 40 CFR §68.22(a). [40 CFR §68.30]
 - d. List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 40 CFR §68.22(a). [40 CFR §68.33]
 - e. Review and update the offsite consequence analyses at least once every five years. If changes in processes, quantities stored or handled, or any other aspect of the premises might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more, complete a revised analysis within six months of the change and submit a RMP as provided in 40 CFR §68.190. [40 CFR §68.36]
 - f. Maintain the following records on the offsite consequence analyses [40 CFR §68.39]:
 - i. For worst-case scenarios, a description of the vessel or pipeline and substance selected as worst case, assumptions and parameters used, and the rationale for selection; assumptions shall include use of any administrative controls and any passive mitigation that were assumed to limit the quantity that could be released. Documentation shall include the anticipated effect of the controls and mitigation on the release quantity and rate.
 - ii. For alternative release scenarios, a description of the scenarios identified, assumptions and parameters used, and the rationale for the selection of specific scenarios; assumptions shall include use of any administrative controls and any mitigation that were assumed to limit the quantity that could be released. Documentation shall include the effect of the controls and mitigation on the release quantity and rate.
 - iii. Documentation of estimated quantity released, release rate, and duration of release.
 - iv. Methodology used to determine distance to endpoints.
 - v. Data used to estimate population and environmental receptors potentially affected.
 - g. Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries or significant property damage on site or known offsite deaths, injuries, evacuations, sheltering in place, property damage or environmental damage. [40 CFR §68.42]
3. Implement the prevention requirements of 40 CFR §§68.65 through 68.87.
- a. At least every five years after the completion of the initial process hazard analysis, the process hazard analysis shall be updated and revalidated to assure that the process hazard analysis is consistent with the current process. [40 CFR §68.67(f)]
 - b. The process hazard analysis shall be performed by a team with expertise in engineering and process operations, and the team shall include at least one employee who has experience and knowledge specific to the process being evaluated. Also, one member of the team must be knowledgeable in the specific process hazard analysis methodology being used. Updated and revalidated process hazard analyses completed to comply with 29 CFR §1910.119(e) are acceptable to meet the requirements of this paragraph. [40 CFR §68.67(d)]
 - c. Promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be

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completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions. [40 CFR §68.67(e)]

- d. Retain process hazards analyses and updates or revalidations for each process covered by this section, as well as the documented resolution of recommendations described in Section III.I.3.b above for the life of the process. [40 CFR §68.67(g)]
- e. Develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information. [40 CFR §68.69(a)]
- f. Operating procedures shall be readily accessible to employees who work in or maintain a process. [40 CFR §68.69(b)]
- g. The operating procedures shall be reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources. Certify annually that these operating procedures are current and accurate. [40 CFR §68.69(c)]
- h. Develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tagout; confined space entry; opening process equipment or piping; and control over entrance into a stationary source by maintenance, contractor, laboratory, or other support personnel. These safe work practices shall apply to employees and contractor employees. [40 CFR §68.69(d)]
- i. Each employee before being involved in operating a newly assigned process, shall be trained in an overview of the process and in the operating procedures as specified in 40 CFR §68.69. The training shall include emphasis on the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks. [40 CFR §68.71(a)]
- j. Refresher training shall be provided at least every three years, and more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process. [40 CFR §68.71(b)]
- k. Prepare a record which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training. [40 CFR §68.71(c)]
- l. Establish and implement written procedures to maintain the on-going integrity of process equipment. [40 CFR §68.73(b)]
- m. Train each employee involved in maintaining the on-going integrity of process equipment in an overview of that process and its hazards and in the procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner. [40 CFR §68.73(c)]
- n. Perform mechanical integrity inspections and tests of process equipment. Document each inspection and test that has been performed on process equipment. The documentation shall identify the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test. [40 CFR §68.73(d)]
- o. Correct deficiencies in equipment that are outside acceptable limits (defined by the process safety information in 40 CFR §68.65) before further use or in a safe and timely manner when necessary means are taken to assure safe operation. [40 CFR §68.73(e)]
- p. In the construction of new plants and equipment, follow the quality assurance procedures listed at 40

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CFR §68.73(f). [40 CFR §68.73(f)]

- q. Establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, and procedures; and, changes to stationary sources that affect a covered process. [40 CFR §68.75]
 - r. Perform a pre-startup safety review for new stationary sources and for modified stationary sources when the modification is significant enough to require a change in the process safety information defined in 40 CFR §68.65. [40 CFR §68.77]
 - s. Certify that compliance with the provisions of this subpart have been evaluated at least every three years to verify that procedures and practices developed under this subpart are adequate and are being followed. [40 CFR §68.79]
 - t. In accordance with 40 CFR §68.81, investigate each incident which resulted in, or could reasonably have resulted in a catastrophic release of a regulated substance. Prepare a report at the conclusion of the investigation that includes the information specified at 40 CFR §68.81(d). In accordance with 40 CFR 68.81(e), establish a system to promptly address and resolve the incident report findings and recommendations. Resolutions and corrective actions shall be documented. [40 CFR §68.81]
 - u. Provide to employees and their representatives access to process hazard analyses and to all other information required to be developed under this rule. [40 CFR §68.83(c)]
 - v. In accordance with 40 CFR §68.85(a), issue a hot work permit for hot work operations conducted on or near a covered process. In accordance with 40 CFR §68.85(b), the permit shall document that the fire prevention and protection requirements in 29 CFR §1910.252(a) have been implemented prior to beginning the hot work operations; it shall indicate the date(s) authorized for hot work; and identify the object on which hot work is to be performed. [40 CFR §68.85(a)]
 - w. Follow the requirements for work performed by contractors specified at 40 CFR §68.87. [40 CFR §68.87]
4. Develop and implement an emergency response program as provided in 40 CFR §§68.90 through 68.95. Such program shall include the following elements:
- a. An emergency response plan, which shall be maintained and contain at least the following elements. [40 CFR §68.95(a)(1)]:
 - i. Procedures for informing the public and local emergency response agencies about accidental releases;
 - ii. Documentation of proper first-aid and emergency medical treatment necessary to treat accidental human exposures; and
 - iii. Procedures and measures for emergency response after an accidental release of a regulated substance.
 - b. Develop and implement:
 - i. Procedures for the use of emergency response equipment and for its inspection, testing, and maintenance. [40 CFR §68.95(a)(2)]
 - ii. Training for all employees in relevant procedures. [40 CFR §68.95(a)(3)], and
 - iii. Procedures to review and update, as appropriate, the emergency response plan to reflect changes at the premises and ensure that employees are informed of changes.[40 CFR §68.95(a)(4)]
 - c. The emergency response plan shall be coordinated with the community emergency response plan developed under 42 U.S.C. 11003. Upon request of the local emergency planning committee or emergency response officials, promptly provide to the local emergency response officials information necessary for

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developing and implementing the community emergency response plan. [40 CFR §68.95(c)]

5. Submit a single RMP, as provided in 40 CFR §§68.150 to 68.185.
 - a. The RMP shall include a registration that reflects all processes that have a regulated substance present in more than a threshold quantity as determined under 40 CFR §68.115. Submit as part of the RMP the data on prevention program elements for Program 3 processes as provided in 40 CFR §68.175. If the same information applies to more than one covered process, the information may be provided only once, but shall indicate to which processes the information applies. [40 CFR §§68.115 and 68.175]
 - b. Review and update the RMP and submit it in the method and format to the central point specified by EPA as of the date of submission. [40 CFR §68.190(a)]
 - c. The RMP shall be revised and updated [40 CFR §68.190(b)]:
 - i. At least once every five years from the date of its initial submission or most recent update required by paragraphs (ii) through (vii) below, whichever is later. For purposes of determining the date of initial submissions, RMPs submitted before June 21, 1999 are considered to have been submitted on that date.
 - ii. No later than three years after a newly regulated substance is first listed by EPA;
 - iii. No later than the date on which a new regulated substance is first present in an already covered process above a threshold quantity;
 - iv. No later than the date on which a regulated substance is first present above a threshold quantity in a new process;
 - v. Within six months of a change that requires a revised PHA or hazard review;
 - vi. Within six months of a change that requires a revised offsite consequence analysis as provided in 40 CFR§68.36;
 - vii. Within six months of a change that alters the Program level that applied to any covered process.
 - d. For any accidental release meeting the five-year accident history reporting criteria of 40 CFR §68.42 and occurring after April 9, 2004, submit the data required under 40 CFR §§68.168, 68.170(j), and 68.175(l) with respect to that accident within six months of the release or by the time the RMP is updated under 40 CFR §68.190, whichever is earlier. [40 CFR §68.195(a)]
 - e. Beginning June 21, 2004, within one month of any change in the emergency contact information required in accordance with 40 CFR §68.160(b)(6), submit a correction of that information. [40 CFR §68.195(b)]

J. ASBESTOS REQUIREMENTS

Should the premises, as defined in 40 CFR §61.145, become subject to the national emission standard for asbestos regulations in 40 CFR Part 61 Subpart M when conducting any renovation or demolition at this premises, then the owner or operator shall submit proper notification as described in 40 CFR §61.145(b) and shall comply with all other applicable requirements of, including but not limited to, Subpart M.

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K. EMISSION LIMITATIONS

For the purposes of determining New Source Review applicability, in accordance with RCSA §22a-174-3a, for a new emissions unit connected to an existing control device, the Permittee may calculate potential emissions of the new emissions unit using the control efficiency of the existing control device. The new emissions unit shall be subject to the monitoring, record keeping and reporting requirements of the emissions unit(s) currently utilizing the existing control device.

L. BATCH PROCESSES ACT REQUIREMENTS

With the exception of the process vents required to achieve 85% control in accordance with VOC RACT, all process vents will be controlled, as necessary, according to the criteria specified in the Batch Processes ACT information document. The Batch Processes ACT specifies control of VOC emissions from batch process vents in the organic chemicals industry.

The Batch Process ACT recommends the reduction of VOC emissions by 90% for individual vents, or for vent streams in aggregate, within a batch process, having an actual average flow rate below the maximum cost effective flow rate (FR) as calculated according to the following formulas:

$$\begin{aligned} \text{FR} &= 0.07(\text{AE}) - 1,821 \quad (\text{where vapor pressure} \leq 75 \text{ mm Hg}) \\ &= 0.031(\text{AE}) - 494 \quad (75 \text{ mm Hg} < \text{vapor pressure} < 150 \text{ mm Hg}) \\ &= 0.013(\text{AE}) - 301 \quad (\text{vapor pressure} \geq 150 \text{ mm Hg}) \end{aligned}$$

where : FR = the maximum flow rate at which control is cost effective (scfm)
 AE = annual mass emissions total (lb/y)

Currently, none of the emissions units contain batch process vents that, individually or in aggregate, meet the cost effectiveness criteria specified by the Batch Processes ACT. The Permittee shall reevaluate this determination each year based on the prior year's actual VOC emissions. Any batch process vents that, individually or in aggregate, meet the cost effectiveness criteria specified by the Batch Processes ACT will be controlled to achieve at least a 90% reduction of VOC emissions. A list of subject sources shall be annually updated and maintained by the Permittee based on records of emission rate and flow rate data.

Section IV: Compliance Schedule

NOT APPLICABLE

| Table IV: COMPLIANCE SCHEDULE | | | | |
|--------------------------------------|-------------------------------|---|---|--|
| Emission Unit | Applicable Regulations | Steps Required for Achieving Compliance (Milestones) | Date by which each Step is to be Completed | Dates for Monitoring, Record Keeping, and Reporting |
| n/a | n/a | n/a | n/a | n/a |

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.

- A.** This 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 permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B.** 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, 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 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: Permit Shield

NO PERMIT SHIELDS HAVE BEEN GRANTED

| Table VI: PERMIT SHIELD | | | | |
|--------------------------------|------------------------|--|--|-----------------------|
| Regulated Pollutants | Emissions Units | Applicable Requirement or Non-Applicable Requirement Descriptions | Applicable Regulatory References/ Citations | *Applicability |
| n/a | n/a | n/a | n/a | n/a |

*For "Applicability", use AR to indicate Applicable Requirement and NR for Non- Applicable Requirement

Section VII: 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.

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 Region 1; 5 Post Office Square, Suite 100; Mail Code OEP05-02; 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 §22a-175 of the Connecticut General Statutes, under §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 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,

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- 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)]

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, within 15 days of the date the Permittee becomes aware of a change in any information submitted to the commissioner under this Title V permit or of any change in any information contained in the application, or that any such information was inaccurate or misleading or that any relevant information was omitted, the Permittee shall submit the changed, corrected, or omitted information to the commissioner.

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;
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;

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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.

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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 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.

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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).

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.