

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Pages 2 through 11 are hereby incorporated by reference into this permit

ORIGINAL

Town No. 070	Premise No. 5	Permit No. 0059	Stack No. 27
Equipment Classification		Date Issued 12/30/97	Expiration Date (none unless noted)
<input checked="" type="checkbox"/> Fuel Burning <input type="checkbox"/> Incinerator <input checked="" type="checkbox"/> Process Mfg. Other _____			

PERMIT TO: Construct Operate Other Modification

FEDERAL REQUIREMENTS:

- NSPS (40 CFR PART 60) Subpart _____
 NESHAP (40 CFR PART 61) Subpart _____
 MACT (40 CFR PART 63) Subpart II

NON-ATTAINMENT STATUS:

- Severe (Major Source if VOC or NOx > 25 TPY)
 Serious (Major Source if VOC or NOx > 50 TPY)

TYPE OF POLLUTANT
FOR WHICH A PREMISE

IS A "MAJOR SOURCE":

- SOx NOx CO TSP VOC PM-10

SOURCE CLASS:

- New Source Minor Modification Major Modification Aggregate

Equipment Description

ENCLOSED GRAVING DOCK #1

Location of Equipment (No. & Street, Town, Zip)

5 EASTERN POINT ROAD, GROTON, CONNECTICUT 06340

Firm Name

ELECTRIC BOAT CORPORATION



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PERMIT DESCRIPTION (I.D.): ENCLOSED GRAVING DOCK #1

T I. PROCESS DESCRIPTION

General Process Description

The Electric Boat Corporation in Groton has enclosed graving dock #1 to facilitate the application of Navy developed coating systems on submarine external hulls. The enclosure, composed of ten roof sections and two end pieces, must be assembled after the submarine is in a dry dock mode. Some of the pieces must be removed from the dry dock prior to flooding. Since the roof sections are not susceptible to flooding damage, only those sections that interfere with line handling need to be removed, even though individual sections may be removed during shipwork. In addition to the enclosure, there are two large air filtering baghouses and two lines of duct each for supply and return air, all of which must be removed prior to flooding the dock and re-installed after the dock has been dewatered.

Submarine hull blasting is performed in graving dock #1 as surface preparation prior to painting. The entire hull is typically blasted over a 30 - 36 hour period. Workers performing the blasting operation are either stationed along scaffolding along the ship or in Condor lifts. To minimize the potential for the submarine to "flash rust" after the surface has been blasted, a significant quantity of paint must be applied within a short period of time.

Control Equipment Specifications

Control for grit blast operations: Two (2) identical baghouse units

Maximum pressure drop across each unit: 6 inches of water

Minimum air to cloth ratio: 8.6 : 1

Records indicating continual compliance with all above conditions must be kept on site at all times and made available upon Departmental request for the duration of this permit.

Applicant Name ELECTRIC BOAT CORPORATION
Location of Equipment (No. & Street, Town, Zip) EASTERN POINT ROAD, GROTON, CONNECTICUT 06340
Signature of J. Rocque, Jr., Commissioner, or Designated Agent



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PERMIT DESCRIPTION (I.D.): ENCLOSED GRAVING DOCK #1

PART I. PROCESS DESCRIPTION, CONTINUED

Stack Parameters

Stack No.: 27

Typical gas flowrate: 90,000 cfm (42.48 m³/sec)

Minimum distance to property line: 800 ft (243.8 m)

Minimum stack height: 10 ft (3.05 m) above grade

I. OPERATING REQUIREMENTS

Notwithstanding the design specifications or description provided in Part I, above, the permittee of the subject source shall comply with the following operating requirements.

Operating Parameter Limitations

There are different limitations for different coatings that may be applied in graving dock #1. For the purposes of the Regulations of Connecticut State Agencies (hereinafter referred to as RCSA) 22a-174-20(s) applicability, any miscellaneous metal parts and products must be separate and apart from the exterior surface of the assembled submarine when being coated. Any parts being coated that are connected to the exterior surface of the assembled submarine shall not be subject to the requirements of the RCSA 22a-174-20(s).

- Pursuant to RCSA 22a-174-20(s)(3)(c), any operation under graving dock #1 may not apply any *extreme performance coating* to any miscellaneous metal part or product which emit volatile organic compounds in excess of:

0.42 kg/l (3.5 lb/gal) of coating, excluding water and exempt volatile organic compounds listed in RCSA 22a-174-1, Table 1(a)-1.

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Fuel Burning Incinerator Process Mfg. Other _____

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EQUIPMENT DESCRIPTION (I.D.): ENCLOSED GRAVING DOCK #1

PART II. OPERATING REQUIREMENTS, CONTINUED

2. Pursuant to RCSA 22a-174-20(s)(3)(d), any operation under graving dock #1 may not apply any *adhesives, fillers, and sealants* to any miscellaneous metal part or product which emit volatile organic compounds in excess of:

0.36 kg/l (3.0 lb/gal) of coating, excluding water and exempt volatile organic compounds listed in RCSA 22a-174-1, Table 1(a)-1.

Please refer to Part IV. Monitoring, Record Keeping Requirements for the record keeping requirements.

Emission Limits

1. Criteria Pollutants

The permittee shall not exceed the emission limits stated herein at any time.

Pollutant	lb/hr	TPY	Basis
PM	8.2	0.13	a
VOC	400	12.0	b

Demonstration of compliance with the above emission limits shall be met by calculating the emission rates using emission factors from the following sources:

- a. The emission factor used (40 lbs PM/2000 lbs blast media used) was extrapolated as a conservative estimate from Table 7-1 in a report entitled, "Development of Particulate Emission Factors for Uncontrolled Abrasive Blasting Operations". The report was prepared for the U.S. EPA by the Midwest Research Institute of Kansas City, MO and was dated April 22, 1994.

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EQUIPMENT DESCRIPTION (I.D.): ENCLOSED GRAVING DOCK #1

II. OPERATING REQUIREMENTS, CONTINUED

Assuming 100% capture by the ventilation system exhausting to the baghouse prior to discharge to the atmosphere and a conservative removal efficiency of 99% for the baghouse, the maximum particulate emission rate was calculated as follows :

$(40,800 \text{ lbs grit/hr}) \times (40 \text{ lbs particulate to baghouse}/2000 \text{ lbs grit}) \times 1\% \text{ emitted} = 8.2 \text{ lbs/hr emissions}$

- b. The emission factor was conservatively based on the maximum average hourly VOC emission rate for any of the exterior hull coatings that would be applied in graving dock #1. The worst case of emissions would be applying 300 gallons of the anti-fouling coatings to coat the entire Seawolf submarine (2.8 lb VOC/gal) over a six (6) hour period. The emission factor of (400 lbs/VOC hr) is a conservative number providing a safety margin of 286% to account for fluctuations in the application rate during the six to eight hour total application period.

The above statement shall not preclude the Commissioner from requiring other means (e.g. stack testing) to demonstrate compliance with the above emission limits, as allowed by state or federal statute, law or regulation.

2. Hazardous Air Pollutants (HAPs)

The permittee shall not exceed the emission limits stated herein at any time.

Pollutant MASC

Please refer to Part IV. Monitoring, Record Keeping Requirements for maximum allowable stack concentration (MASC) compliance.

Federal Requirements

This source is subject to the shipbuilding and repair MACT (40 CFR 63, subpart II). Compliance for this existing source is required by December 16, 1997. Use of any marine surface coating defined in 40 CFR 63.782 must comply

Records indicating continual compliance with all above conditions must be kept on site at all times and made available upon Departmental request for the duration of this permit.

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PART II. OPERATING REQUIREMENTS, CONTINUED

with the applicable VOC/VOHAP limits found in Table 2 of 40 CFR 63 Subpart II for that coating.

Exempt from the standards is any individual coating with an annual usage less than 200 liters (53 gal) up to a total exemption of 1000 liters (264 gal). Coatings applied by non-refillable, hand-held, aerosol cans, or unsaturated polyester resin coatings, i.e. fiberglass lay-up, are also exempt.

The source shall maintain for 5 years all records necessary to demonstrate compliance with these standards. Records shall include any Method 24 tests, VOC content certifications, VOHAP tests, VOHAP content certifications, calculations of allowable dilution solvent usage, and actual paint and dilution solvent usage by month.

III. STACK EMISSION TEST REQUIREMENTS (see Appendix B for General Requirements if applicable)

stack emission/performance testing shall be required at this time.

PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS

records necessary to demonstrate compliance with this permit shall be maintained for a minimum of 5 years and be available to the Department upon request.

Material Usage Records

The permittee shall maintain a log of all coatings used. Prior to the first use of any material, an analysis shall be conducted and included in the log to demonstrate a material's compliance with the MASC. The permittee shall execute each surface coating operation in a manner that ensures compliance with the calculated MASC. Any operational limitations that result from such compliance calculations shall limit all future applications involving such materials.

Records indicating continual compliance with all above conditions must be kept on site at all times and made available upon Departmental request for the duration of this permit.

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Work shall be constructed/operated in accordance with the specifications listed in the permit application, with the terms of the permit letter, and all applicable sections of the Regulations of Connecticut State Agencies.

PERMIT DESCRIPTION (I.D.): ENCLOSED GRAVING DOCK #1

PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS, CONTINUED

For each coating, the following information shall be logged:

1. Coating name, material density (lb/gal), maximum quantity to be applied (gal), minimum application time (hrs), and maximum percent VOC by weight;
2. list the hazardous air pollutants (HAP) for each coating and the origin of that information, e.g. MSDS or vendor certification. If the origin of the information is vendor certification, retain the certification document for the duration of the records retention;
3. for each HAP listed, log which RCSA 22a-174-29 table each HAP is subject, the actual emission rate (lb/hr), actual stack concentration ($\mu\text{g}/\text{m}^3$) as calculated from PART IV.C of this permit, and the maximum allowable stack concentration ($\mu\text{g}/\text{m}^3$) as calculated from PART IV.C of this permit.

These calculations may be put into table form to avoid redundant information. Total VOC emissions shall be calculated on a monthly basis to demonstrate compliance with the annual emission limit. These records should be consistent with the record keeping requirements found in 40 CFR 63.788 of the Shipbuilding and Ship Repair MACT. Annual usage records shall be based on any consecutive twelve (12) month period and shall be calculated by adding the current month's quantity of material processed to that of the previous eleven (11) months.

Continuous Emission Monitoring (see Appendix A for General Requirements if applicable)

CEM shall not be required at this time for any pollutant or operational parameter.

Hazardous Air Pollutants (HAPs) MASC

Chemical compounds, e.g., coatings, solvents, etc., used by this source now or in the future, either for production or on a trial basis, which contain hazardous air pollutants (HAPs) that are regulated under Section 22a-174-29 of the RCSA are allowed provided that:

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PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS, CONTINUED

1. the permittee can demonstrate that the HAP's actual stack concentration (ASC) does not exceed the maximum allowable stack concentration (MASC) using Equation 1,

$$\text{MASC} = 118.8256 \times \text{HLV} \times (5 - 4((T - 0.5)/7.5)) \quad (\text{Equation 1})$$

where : MASC = Maximum Allowable Stack Concentration (ug/m³ or ppmv)

HLV = Hazard Limiting Value (ug/m³ or ppmv)

T = the cumulative hours of operation in an 8 hour period, not to be less than 0.5 hours and not to exceed 8 hours

The MASC is derived using the HAP's corresponding HLV as listed in RCSA Section 22a-174-29 and is based on the stack parameters given in Part I of this permit.

The ASC shall be derived using the maximum HAP content as applied (lb HAP/gal), the maximum application rate (gal/hr), and minimum application time as a worst case, and any applicable controls. This gives the actual stack emissions in lb/hr which can be converted to a concentration in ug/m³ or ppmv;

2. the change does not otherwise constitute a modification, as defined in RCSA Section 22a-174-1;
3. the permittee keeps records of all compounds used, and MSDS's or technical data sheets; and,
4. the permittee submits a report of any changes with permit limits, within thirty (30) days of such changes, to the Department of Environmental Protection, Bureau of Air Management, Permit Section, 79 Elm Street, Hartford, Connecticut 06106-5127. A reportable change is one that would involve limiting the operational parameters for a particular coating for compliance reasons, an increase in the HAP concentration in a coating previously reported, the introduction of a material containing a new HAP that has not been previously identified, an increase in the HAP application rate, or an increase in the HAP emissions.

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ART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS, CONTINUED

NOTE: The emissions from any new compounds, for production or trial runs, shall be counted toward any applicable emission limit in this permit.

ART V. PREMISE REQUIREMENTS

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 premise that constitutes a nuisance as set forth in RCSA Section 22a-174-23.

At all times, operations of this facility shall be carried out in a manner so as not to violate or contribute significantly to the violation of any applicable state noise control regulations under RCSA Section 22a-69-1 through 22a-69-7.4, inclusive.

The permittee shall operate in compliance with fugitive dust regulations in RCSA Section 22a-174-18.

The permittee is prohibited from conducting open burning, except as may be allowed by RCSA Section 22a-174-17(a) through (g), inclusive.

ART VI. ADDITIONAL TERMS AND CONDITIONS

This permit does not relieve the permittee of the responsibility to conduct, maintain and operate the regulated activity in compliance with all applicable requirements of any federal, municipal or other state agency. Nothing in this permit shall relieve the permittee of other obligations under applicable federal, state and local law.

Any representative of the DEP may enter the permittee's site in accordance with constitutional limitations at all reasonable times without prior notice, for the purposes of inspecting, monitoring and enforcing the terms and conditions of this permit and applicable state law.

This permit may be revoked, suspended, modified or transferred in accordance with applicable law.

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ART VI. ADDITIONAL TERMS AND CONDITIONS, CONTINUED

This permit is subject to and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut and conveys no property rights in real estate or material, nor any exclusive privileges, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby. This permit shall neither create nor affect any rights of persons of municipalities who are not parties to this permit.

Any document, including any notice, which is required to be submitted to the Commissioner under this permit shall be signed by a duly authorized representative of the permittee and by the person who is responsible for actually preparing such document, each of whom shall certify in writing as follows: "I have personally examined and am familiar with the information submitted in the documents and all attachments and 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, and I understand that any false statement made in this document or its attachments may be punishable as a criminal offense." Any false statement in any information submitted pursuant to this permit may be punishable as a criminal offense in accordance with Connecticut General Statutes §22a-6, under §53a-157 of the Connecticut General Statutes.

Nothing in this permit shall affect the Commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the permittee by the Commissioner.

Within fifteen days of the date the permittee becomes aware of a change in any information submitted to the Commissioner under this permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the permittee shall submit the correct or omitted information to the Commissioner.

The date of submission to the Commissioner of any document required by this permit shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three days after it is mailed by the Commissioner, whichever is

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ARTICLE VI. ADDITIONAL TERMS AND CONDITIONS, CONTINUED

Earlier. Except as otherwise specified in this permit, the word "day" means calendar day. Any document or action which is required by this permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.

Any document required to be submitted to the Commissioner under this permit shall, unless otherwise specified in writing by the Commissioner, be directed to: Office of Assistant Director; Engineering & Enforcement; Bureau of Air Management; Department of Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

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