



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.

<b>Title V Permit Number</b>	<b>107-0041-TV</b>
<b>Client/Sequence/Town/Premises Numbers</b>	<b>8708/3/107/4</b>
<b>Date Issued</b>	May 29, 2015
<b>Expiration Date</b>	May 29, 2020

**Corporation:**

*RockTenn CP, LLC*

**Premises Location:**

*125 Depot Road, Uncasville, Connecticut 06382*

**Name of Responsible Official and Title:**

*Jeffery Locke, General Manager*

All the following attached pages, 2 through 30, are hereby incorporated by reference into this Title V permit.

/s/ Anne Gobin for \_\_\_\_\_  
Robert J. Klee  
Commissioner

\_\_\_\_\_  
May 29, 2015  
Date

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## **Title V Operating Permit**

**All conditions in Sections III, IV, and VI of this Title V permit are enforceable by both the Administrator and the commissioner unless otherwise specified. Applicable requirements and compliance demonstration are set forth in Section III of this Title V permit. The Administrator or any citizen of the United States may bring an action to enforce all permit terms or conditions or requirements contained in Sections III, IV, and VI of this Title V permit in accordance with the Clean Air Act, as amended.**

## LIST OF ABBREVIATIONS/ACRONYMS

<i>Abbreviation/Acronym</i>	<i>Description</i>
acfm	Actual cubic feet per minute
AOS	Alternative Operating Scenario
ASC	Actual Stack Concentration
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
CGS	Connecticut General Statutes
CO	Carbon Monoxide
CP/OP	Construction Permit/Operating Permit
DEEP	Department of Energy and Environmental Protection
EU	Emissions Unit
EPA	Environmental Protection Agency
FD	Forced Draft
GEU	Grouped Emissions Unit
HAP	Hazardous Air Pollutant
hr	Hour
lb	Pound
MASC	Maximum Allowable Stack Concentration Pollutants
MMBtu	Million British Thermal Units
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standard
NSR	New Source Review
OCC	Old Corrugated Containers
PM	Particulate Matter
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
RCSA	Regulations of Connecticut State Agencies
SIC	Standard Industrial Classification Code
SO <sub>x</sub>	Sulfur Oxides
SOS	Standard Operating Scenario
tpy	Tons per year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound

## **Section I: Premises Information/Description**

### **A. PREMISES INFORMATION**

Nature of Business: Pulp and Paper Making Operation  
Primary SIC: 2631  
Other SIC: none

Facility Mailing Address: 125 Depot Road, Uncasville, CT 06382  
Telephone Number: (860) 848-1500 X302 (Lewis Armstrong)

### **B. PREMISES DESCRIPTION**

RockTenn CP, LLC recycled paperboard mill (referred to herein as "RockTenn") is located at 125 Depot Road in Uncasville, Connecticut. The plant was originally constructed in 1910 producing corrugating medium from recycled fibers/paperboard. A general description of key processes is provided below.

#### **Paperboard Manufacturing Process**

The paperboard manufacturing process area consists of all the equipment and operations used to convert raw materials to paperboard. Specifically, it includes pulping processing, additives preparation, the paperboard machine, and other equipment used to finish the paperboard products, such as, cutters to size the rolls of paperboard and pack them for shipment.

The pulping processing is performed at the north end of the mill. The process is mostly mechanical with some chemical addition. Bales of old corrugated containers (OCC) and mixed stock are loaded onto a conveyor, which runs to a pulper. Here, water is added, and like a kitchen blender, the pulper mechanically breaks down the OCC into stock (wood fiber mixed with water). The stock is then cleaned of impurities, such as plastics, staples, styrofoam, baling wire, etc., by running it through separating cyclones and filtering over screens before being pumped to the paper machine (Fourdrinier). The Fourdrinier operates under Registration number 107-0035.

The paper making process is also mostly mechanical with some chemical addition to enhance paper properties and to help the system's performance. The operation is mechanical refining to increase the surface area of fibers. The stock is then diluted with water, and more impurities (such as styrofoam and sand), are separated from the stock mechanically. To maintain the process water system, pH is adjusted with caustic (Sodium Hydroxide) as needed. A foam control agent is added to the stock to reduce the foam on the paper machine, and a sizing agent is added to control the final paperboard's water absorption rate. It is then pumped to the paper machine, and mechanically formed into a sheet of paperboard (corrugating medium). Odors are controlled in paperboard manufacturing by managing anaerobic bug population. Cleaning of the paper making process is done with low VOC cleaners and is subject to RCSA 22a-174-20(ii), Industrial solvent cleaning.

#### **Steam Production**

Up until January 26, 2011 RockTenn historically received most of its steam from AES-Thames except during outage periods. RockTenn now operates their Riley/Union boiler (EU1) continuously in support of their paperboard production. The boiler was installed in 1979, and has a New Source Review (NSR) permit number of 107-0008 which was last modified on December 20, 2011. The modification to the NSR permit incorporated the requirements of Consent Order 1766 which was issued to the previous owners of the mill and it is no longer necessary to re-issue the order to RockTenn.

## Section I: Premises Information/Description

### B. PREMISES DESCRIPTION, continued

The boiler is subject to 40 CFR Part 64 Compliance Assurance Monitoring (CAM). The boiler uses flue gas recirculation (FGR) to control NO<sub>x</sub> emissions and a predictive emissions monitoring system (PEMS) to quantify NO<sub>x</sub> emissions.

In addition, RockTenn has two No. 6 fuel storage tanks with a capacity of 20,000 gallons each.

RockTenn removed EU3 & EU4 in July 2013 and replaced them with two units that use non-VOC cleaners. No NSR permits are required for these units.

Two Modine natural gas fired heaters were installed in 2012. Potential NO<sub>x</sub> emissions are 0.17 tpy, therefore no NSR permits are required.

RockTenn is:

- A major source for nitrogen oxides (NO<sub>x</sub>) and therefore, subject to RCSA Section 22a-174-22.
- No longer a major source of volatile organic compounds (VOC). RockTenn emitted 68 tons of actual VOC emissions in 1996. Since 1996, RockTenn implemented a program of reformulation pursuant to Section 22a-174-32(e)(1)(b) of the Regulations and has reduced their premises' VOC emissions from 68 tons per year to 6 actual tons in 2010.

Additionally, since GEU-2 became subject to RCSA Section 22a-174-20(ii) in 2012, the VOC potential-to-emit for the premises is significantly less than 50 tons/year.

- Not a major source of HAP and therefore not subject to 40 CFR Part 63 Subpart S "National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry" and 40 CFR Part 63 Subpart DDDDD "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers".
- Not subject to 40 CFR part 63 Subpart JJJJJ "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers". The boiler is considered a gas-fired boiler and therefore not subject to this subpart.

## Section II. Emissions Units Information

### A. EMISSIONS UNITS DESCRIPTION

Emissions units are set forth in Table II.A. It is not intended to incorporate by reference these NSR Permits, Orders, Registrations, or Regulations into this Title V permit.

<b>TABLE II.A: EMISSIONS UNITS DESCRIPTION</b>			
<b>Emissions Unit/ Grouped Emissions Unit</b>	<b>Emissions Unit Description</b>	<b>Control Unit Description</b>	<b>Permit, Order, Registration, or Regulation Number</b>
EU-1	108 MMBtu/hr (natural gas); 103 MMBtu/hr (No. 6 oil) Riley Union Boiler Installed October 1979	Low Nox Burner, Flue Gas Recirculation, Reduced Combustion air preheat, Control of the % O <sub>2</sub> in the combustion air.	Permit No. 107-0008
EU-8	Residual Oil Storage Tanks – Two 20,000 Gallon	Not Applicable	None
EU-9	Delta Cooling Tower – One 150 gal/min unit	Not Applicable	None
GEU-2	EU-5: L.G. Industries Fourdrinier Paper machine used in Paperboard Manufacturing Process	Not Applicable	Registration No. 107-0035
	EU-6: Process Storage Tank System used in the Paperboard Manufacturing Process	Not Applicable	None
	EU-7: OCC Stock Preparation used in the Paper Board Manufacturing Process	Not Applicable	None

## Section II. Emissions Units Information

### B. OPERATING SCENARIO IDENTIFICATION

The Permittee shall be allowed to operate under the following Standard Operating Scenarios (SOS) and Alternative Operating Scenarios (AOS) without notifying the commissioner, provided that such operations are explicitly provided for and described in Table II.B.

<b>TABLE II.B: OPERATING SCENARIO IDENTIFICATION</b>		
<b>Identification of Operating Scenario</b>	<b>Emissions Units Associated with the Scenario</b>	<b>Description of Scenario</b>
SOS	EU1	The Permittee operates a 108 MMBtu/hr Riley/Union boiler when firing natural gas and fires residual oil (103 MMBtu/hr) only when natural gas is interrupted.
	GEU2	The Permittee operates a Paperboard Manufacturing Source Group (EU5 through EU7).
	EU8	The Permittee stores residual oil in two 20,000 gallon capacity storage tanks.

### Section III. Applicable Requirements and Compliance Demonstration

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

#### A. EMISSIONS UNIT 1 (EU-1)

**108 MMBtu/hr (natural gas); 103 MMBtu/hr (No. 6 oil) RILEY/UNION BOILER  
Permit Number 107-0008**

##### 1. Allowable Fuel Usage and General Requirements

###### a. Limitation or Restriction [Permit 107-0008]

###### i. Natural Gas Firing:

- A. Maximum Gross Heat Input: 108 MMBtu/hr.
- B. Maximum firing rate: 105,882 ft<sup>3</sup>/hr
- C. Maximum Fuel Consumption over any consecutive 12 month period: 927.5263 MMft<sup>3</sup>
- D. The Permittee shall only operate EU-1 using interruptible natural gas.

###### ii. Residual Oil Firing:

- A. Maximum Gross Heat Input: 103 MMBtu/hr.
- B. Maximum firing rate: 664 gal/hr
- C. The Permittee shall burn liquid fuel only during periods of natural gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.
- D. Maximum Fuel Consumption over any consecutive 12 month period: 2,376,200 gallons
- E. The sulfur content of the residual oil shall not exceed 0.3% by weight (dry basis).

###### iii. Stack Parameters:

- A. Minimum Stack Height: 77 ft
- B. Minimum Exhaust Gas Flow Rate: 33,400 acfm
- C. Stack Exit Temperature: 350<sup>0</sup>F
- D. Minimum Distance from Stack to Property Line: 300 ft

###### iv. The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations.

###### v. The Permittee shall properly operate the control equipment at all times that this equipment is in operation and emitting air pollutants.

### **Section III. Applicable Requirements and Compliance Demonstration**

#### *b. Monitoring Requirements*

- i. The Permittee shall use a non-resettable totalizing fuel metering device to continuously monitor fuel feed to this permitted source. [Permit 107-0008; RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall monitor the hourly use of liquid fuel during performance testing. [Permit 107-0008]

#### *c. Record Keeping Requirements*

- i. The Permittee shall keep records of monthly and annual fuel consumption. Annual fuel consumption shall be based on any consecutive twelve (12) month period and shall be determined by adding the current month's fuel usage to that of the previous eleven (11) months. The Permittee shall make these calculations within thirty (30) days of the end of the previous month. [Permit 107-0008]
- ii. The Permittee shall keep records of the fuel certification for each delivery of fuel oil from a bulk petroleum provider or a copy of the current contract with the fuel supplier supplying the fuel used by this equipment that includes the applicable sulfur content of the fuel as a condition of each shipment. The shipping receipt or contract shall include the date of delivery, the name of the fuel supplier, type of fuel delivered, the percentage of sulfur in such fuel, by weight, dry basis, and the method used to determine the sulfur content of such fuel. [Permit 107-0008]
- iii. The Permittee shall record and retain the total daily residual oil and natural gas usage. [RCSA 22a-174-33(j)(1)(K)(ii)]
- iv. The Permittee shall record and retain the total daily number of hours residual oil is burned during both natural gas curtailment and periodic testing. [Permit 107-0008]
- v. The Permittee shall keep records of all natural gas curtailment and natural gas supply emergency episodes, including the reason and length of time of the disruption. [Permit 107-0008; RCSA 22a-174-33(j)(1)(K)(ii)]
- vi. The Permittee shall make and keep records sufficiently demonstrating that the equipment is maintained and operated in accordance with the requirements specified in sections 1.a.ii, 1.a.iii, and 1.a.iv above. [RCSA 22a-174-33(j)(1)(K)(ii)]
- vii. The Permittee shall maintain records of boiler maintenance to verify the boiler is being properly maintained according to manufacturer's written specifications. [RCSA §§ 22a-174-4(c)(1) and -33(j)(1)(K) and 40 CFR Section 70.6(a)(3)]

#### *d. Reporting Requirements*

The Permittee shall submit all required reports in accordance with Section VI.E of this Title V permit.

## **2. Opacity**

#### *a. Limitation or Restriction*

- i. Visible emissions of no greater than 10% opacity when firing natural gas and;

### **Section III. Applicable Requirements and Compliance Demonstration**

- ii. 20% opacity when firing No. 6 fuel oil during any six minute block average as measured by 40 CFR 60, Appendix A, Reference Method 9 or 40% opacity reduced to a one-minute block average

#### *b. Monitoring Requirements*

Testing shall be conducted concurrent with the next required NO<sub>x</sub> testing in July 2015, using EPA Method 9 (or equivalent EPA approved Method). Recurring tests shall be every five years concurrent with the required NO<sub>x</sub> testing. [Permit 107-0008; RCSA §22a-174-33(j)(1)(K)(ii)]

#### *c. Record Keeping Requirements*

- i. The Permittee shall maintain records of the dates and times of all opacity testing including the operating conditions at the time of the test in accordance with Section VII.F of this permit. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall maintain records of the dates, times, and places of visible emissions observations, persons performing the observations, test methods used, the operating conditions at the time of observation, and the results of such observation. [RCSA §22a-174-4(c)(1)]

#### *d. Reporting Requirements*

- i. The Permittee shall submit reports of opacity testing within 30 days of such tests. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall submit all required reports in accordance with the requirements of Section VI.E of this permit.

### **3. PM-10**

#### *a. Limitation or Restriction*

- i. PM-10 emissions shall be less than or equal to:
  - A. 0.1 lb/MMbtu of heat input when operating on natural gas.
  - B. 0.14 lb/MMbtu of heat input when operating on residual oil.
  - C. 47.3 tons/yr for natural gas firing or both fuels combined.
  - D. 25.8 tons/yr for No. 6 oil firing.

#### *b. Monitoring Requirements*

If required by the Commissioner, the Permittee shall measure PM-10 emissions using EPA Method 5 or other equivalent EPA approved test method. [RCSA §22a-174-5(e)(2)]

#### *c. Record Keeping Requirements*

Calculate and record the monthly and consecutive 12 month PM-10 emissions in units of tons. The

### Section III. Applicable Requirements and Compliance Demonstration

consecutive 12 month emission shall be determined by adding the current month's emissions to that of the previous 11 months. Such records shall include a sample calculation for each pollutant using fuel consumption, AP-42, or stack testing results if required by the commissioner. The permittee shall make these calculations within 30 days of the end of the previous month. [RCSA §22a-174-33(j)(1)(K)(ii)]

#### *d. Reporting Requirements*

- i. At which time stack testing is required by the Commissioner, the Permittee shall submit reports within 30 days after such tests are conducted. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall submit all required reports in accordance with Section VI.E of this permit.

#### **4. NO<sub>x</sub>**

##### *a. Limitation or Restriction [Permit 107-0008; RCSA §22a-174-22(e)(1)]*

- i. NO<sub>x</sub> emissions shall be less than or equal to:
  - A. 0.20 lb/MMbtu of heat input when operating on natural gas.
  - B. 0.25 lb/MMbtu of heat input when operating on residual oil.
  - C. 94.6 tons/yr for natural gas firing or both fuels combined.
  - D. 46.1 tons/yr for No. 6 oil firing.

##### *b. Monitoring Requirements*

- i. The Permittee shall conduct stack testing for NO<sub>x</sub> according to the requirements in RCSA §22a-174-22(k). The Permittee shall conduct NO<sub>x</sub> testing at least once every five years.
- ii. The emission testing method for NO<sub>x</sub> emissions from stationary sources shall be that specified as Method 7E in Title 40 Code of Federal Regulations Part 60. [RCSA §22a-174-5(b)(7)]
- iii. 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. [RCSA §22a-174-22(k)(1)]
- iv. Sampling and analytical procedures of test data shall be in accordance with procedures approved under 40 CFR Part 60, Appendix A. Sampling shall be conducted when the source is at normal operating temperature and operating at or above ninety percent (90%) of maximum rated capacity. [RCSA §22a-174-22(k)(2)]
- v. For the purposes of demonstrating compliance with the NO<sub>x</sub> emissions rates of this Title V permit, any test shall be performed with the prior approval of the commissioner as to the test method, sampling protocol and sample analysis procedures. The commissioner shall provide forms for obtaining prior approval of testing methods, sampling protocol and sample analysis procedures. [RCSA §22a-174-5(d)]

### **Section III. Applicable Requirements and Compliance Demonstration**

#### *c. Record Keeping Requirements*

- i. The Permittee shall demonstrate compliance with the emissions limits by calculating the emission rates using the latest Bureau approved stack test data. [RCSA 22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall make and keep records of monthly and annual NOx emissions in accordance with Section VII.F of this permit. [RCSA 22a-174-33(j)(1)(K)(ii); RCSA 22a-174-22(1)]
- iii. The Permittee shall keep records of the dates, times, and places of all emission testing done on this unit, 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(1)(1)(H)]
- iv. The Permittee shall keep any other records or reports required by an order or permit issued by the commissioner pursuant RCSA §22a-174-22. [RCSA §22a-174-22(1)(1)(J)]
- v. The Permittee shall retain all records and reports produced for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records and reports shall be retained at the source, unless the commissioner approves in writing the use of another location in the State. [RCSA §22a-174-22(1)(5)]

#### *d. Reporting Requirements*

- i. The Permittee shall submit a written report to the Commissioner of any testing results within thirty (30) days of the completion of such NOx test. [RCSA 22a-174-22(1)(2)]
- ii. The Permittee shall submit reports in accordance with the requirements of Section VI.E of this permit.

### **5. Compliance Assurance Monitoring (CAM) Plan Flue Gas Recirculation (FGR)**

#### *a. CAM Plan Justification*

A PEMS algorithm/model is used in lieu of a continuous emissions monitoring system (CEMS) to calculate NOx emissions. The fuel flow rate, boiler exhaust O<sub>2</sub>, and FGR damper position parameters are monitored for this PEMS and are based on this specific application.

The hourly fuel flow rate is monitored as an input to the PEMS model. Fuel heat content is obtained from the fuel supplier. (Steam output is used to predict heat input if fuel flow data are unavailable) Fuel flow rate is factored into the PEMS algorithm.

The boiler exhaust gas O<sub>2</sub> concentration, used as a check of the boiler operating condition, is measured at the boiler outlet. Target values for the stack O<sub>2</sub> concentration are used to maintain proper boiler operation since a definite correlation exists between O<sub>2</sub> and NOx formation.

The position of the FGR damper is determined by the remote indicator valve through the boiler operating program. The FGR percent has an impact on NOx emissions. Generally, the greater the percent FGR the greater the NOx reduction which is also correlated to fuel firing rate. The position of the FGR damper is controlled automatically by the PEMS algorithm.

This PEMS was developed from data collected during an on-site compliance stack test conducted on May 10,

### Section III. Applicable Requirements and Compliance Demonstration

2005 and July 28, 2010.

#### *b. Operational Restrictions*

- i. An excursion is defined as the following:
  - A. A predicted NO<sub>x</sub> emissions greater than 0.10 lb/MMBtu for natural gas combustion; or
  - B. A predicted NO<sub>x</sub> emissions greater than 0.25 lb/MMBtu for No. 6 fuel oil combustion; or
  - C. An exhaust oxygen concentration greater than 5.8% for natural gas; or
  - D. An exhaust oxygen concentration greater than 7.1% for No. 6 fuel oil; or
  - E. When the FGR damper fails to respond to the boiler operating program, an audible alarm sets off in the boiler control room and an automatic boiler shutdown occurs.
- ii. When there is an excursion, the Permittee shall:
  - A. Make a record;
  - B. Investigate cause of excursion;
  - C. Take corrective action; and
  - D. Take preventative action

#### *c. Monitoring Requirements*

- i. Fuel Flow Meter
  - A. The permittee shall monitor fuel flow continuously. The NO<sub>x</sub> emissions rate is calculated hourly and on a 24-hour rolling basis by the PEMS model.
  - B. Fuel flow rate for both natural gas and No. 6 fuel oil are measured with Rosemount anubar meters with  $\pm 0.5\%$  accuracy.
  - C. Annual calibration acceptance criteria:  $\pm 1\%$
  - D. Data availability criteria: minimum 75% of the operating hours and the operating days
- ii. Boiler Oxygen Exhaust
  - A. The permittee shall monitor exhaust gas oxygen concentration continuously.
  - B. The in-situ oxygen monitor minimum accuracy:  $\pm 0.1\%$
  - C. The permittee shall conduct weekly zero and calibration
- iii. FGR Damper Position

The permittee shall check the FGR damper position visually by an operator at the remote indicator valve and in boiler control room on a daily basis.

#### *d. Record Keeping Requirements*

- i. The permittee shall record the hourly and 24-hour rolling NO<sub>x</sub> emissions rate using the data acquisition system (DAS) using the PEMS model

### Section III. Applicable Requirements and Compliance Demonstration

- ii. The permittee shall record the hourly and 24-hour rolling oxygen concentration using the DAS.
- iii. The permittee shall record the position of the FGR damper in the boiler operating log daily.
- iv. The permittee shall maintain records of all indicator measurements, inspections and corrective actions taken in response to any excursions.

*e. Reporting Requirements*

The permittee shall, as part of the semi-annual monitoring report and/or annual compliance certification submit a report on the number, duration, cause of any excursion and the corrective action taken.

#### 6. SO<sub>x</sub>

*a. Limitation or Restriction [Permit 107-0008; RCSA §22a-174-22(e)(1)]*

- i. SO<sub>x</sub> emissions shall be less than or equal to:
  - A. 0.0006 lb/MMbtu of heat input when operating on natural gas.
  - B. 0.31 lb/MMbtu of heat input when operating on residual oil.
  - C. 0.28 tons/yr for natural gas firing.
  - D. 57.14 tons/yr for No. 6 oil firing or both fuels combined.

*b. Record Keeping Requirements*

The permittee shall keep records of compliance with the SO<sub>x</sub> emission limits by calculating SO<sub>x</sub> emissions based on fuel usage and fuel sulfur content in each fuel. [RCSA 22a-174-33(j)(1)(K)(ii)]

*c. Reporting Requirements*

The Permittee shall submit reports in accordance with the requirements of Section VI.E of this permit.

#### 7. VOC

*a. Limitation or Restriction [Permit 107-0008]*

- i. VOC emissions shall be less than or equal to:
  - A. 0.005 lb/MMbtu of heat input when operating on natural gas.
  - B. 0.005 lb/MMbtu of heat input when operating on residual oil.
  - C. 2.55 tons/yr for natural gas firing or both fuels combined.
  - D. 0.90 tons/yr for No. 6 oil firing.

*b. Monitoring and Testing Requirements*

If required by the Commissioner, the Permittee shall measure VOC emissions using EPA Method 25A or other equivalent EPA approved test method.

### Section III. Applicable Requirements and Compliance Demonstration

[RCSA §22a-174-5(e)(2); RCSA §22a-174-33(j)(1)(K)(ii)]

*c. Record Keeping Requirements*

The Permittee shall calculate and record the monthly and consecutive 12 month VOC emissions in units of tons. The consecutive 12 month emission shall be determined by adding the current month's emissions to that of the previous 11 months. Such records shall include a sample calculation for each pollutant using fuel consumption, AP-42, or stack testing results if required by the commissioner. The permittee shall make these calculations within 30 days of the end of the previous month.

[RCSA §22a-174-33(j)(1)(K)(ii)]

*d. Reporting Requirements*

i. At which time stack testing is required by the Commissioner, the Permittee shall submit reports within 30 days after such tests are conducted. [RCSA §22a-174-33(j)(1)(K)(ii)]

ii. The Permittee shall submit all required reports in accordance with Section VI.E of this permit.

### 8. CO

*a. Limitation or Restriction [Permit 107-0008]*

i. CO emissions shall be less than or equal to:

A. 0.08 lb/MMbtu of heat input when operating on natural gas.

B. 0.03 lb/MMbtu of heat input when operating on residual oil.

C. 37.84 tons/yr for natural gas firing or both fuels combined.

D. 5.94 tons/yr for No. 6 oil firing.

*b. Monitoring and Testing Requirements*

If required by the Commissioner, the Permittee shall measure CO emissions using EPA Method 10, 10A, 10B or other equivalent EPA approved test method.

[RCSA §22a-174-5(e)(2); RCSA §22a-174-33(j)(1)(K)(ii)]

*c. Record Keeping Requirements*

The Permittee shall calculate and record the monthly and consecutive 12 month CO emissions in units of tons. The consecutive 12 month emission shall be determined by adding the current month's emissions to that of the previous 11 months. Such records shall include a sample calculation for each pollutant using fuel consumption, AP-42, or stack testing results if required by the commissioner. The permittee shall make these calculations within 30 days of the end of the previous month.

[RCSA §22a-174-33(j)(1)(K)(ii)]

### Section III. Applicable Requirements and Compliance Demonstration

#### d. Reporting Requirements

- i. At which time stack testing is required by the Commissioner, the Permittee shall submit reports within 30 days after such tests are conducted. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall submit all required reports in accordance with Section VI.E of this permit.

### 9. Lead (Pb)

#### a. Limitation or Restriction [Permit 107-0008]

- i. Pb emissions shall be less than or equal to:
  - A. 4.89 E-7 lb/MMbtu of heat input when operating on natural gas.
  - B. 9.7 E-6 lb/MMbtu of heat input when operating on residual oil.
  - C. 1.79 E-3 tons/yr for No. 6 oil firing or both fuels combined.
  - D. 2.23E-4 tons/yr for natural gas firing.

#### b. Monitoring and Testing Requirements

If required by the Commissioner, the Permittee shall measure Pb emissions using EPA Method 29 or other equivalent EPA approved test method. [RCSA §22a-174-5(e)(2); RCSA §22a-174-33(j)(1)(K)(ii)]

#### c. Record Keeping Requirements

The Permittee shall calculate and record the monthly and consecutive 12 month Lead emissions in units of tons. The consecutive 12 month emission shall be determined by adding the current month's emissions to that of the previous 11 months. Such records shall include a sample calculation for each pollutant using fuel consumption, AP-42, or stack testing results if required by the commissioner. The permittee shall make these calculations within 30 days of the end of the previous month. [RCSA §22a-174-33(j)(1)(K)(ii)]

#### d. Reporting Requirements

- i. At which time stack testing is required by the Commissioner, the Permittee shall submit reports within 30 days after such tests are conducted. [RCSA §22a-174-33(j)(1)(K)(ii)]
- ii. The Permittee shall submit all required reports in accordance with Section VI.E of this permit.

### Section III. Applicable Requirements and Compliance Demonstration

#### B. GROUPED EMISSION UNIT 2 (GEU-2)

**EU-5: L.G. Industries Fourdrinier Paper machine used in Paperboard Manufacturing Process  
(Registration No. 107-0035)**

**EU-6: Process Storage Tank System used in the Paperboard Manufacturing Process**

**EU-7: OCC Stock Preparation used in the Paper Board Manufacturing Process**

##### 1. Pollutant or Process Parameter

###### a. Limitation or Restriction

- i. The Permittee shall use only cleaning solvents that comply with one of the following limitations:  
[RCSA §22a-174-20(ii)(4)]
  - a. As-applied, has a VOC content that does not exceed 50 grams per liter (0.42 lbs/gal), or
  - b. As-applied, has a vapor pressure no greater than 8 mm Hg at 20<sup>0</sup> C.
- ii. The Permittee shall not use more than 55 gallons per any twelve-month rolling aggregate of cleaning solvents with a VOC content greater than allowed by RCSA 22a-174-20(ii)(4).
- iii. The Permittee shall use the following work practices to control industrial cleaning solvents:  
[RCSA §22a-174-20(ii)(5)]
  - a. New and used cleaning solvent, including those mixed on premises, shall be stored in a non-absorbent, non-leaking container. Such a container shall be kept closed at all times except when the container is being filled, emptied or otherwise actively in use;
  - b. Spills and leaks of cleaning solvent shall be minimized. Any leaked or spilled cleaning solvent shall be absorbed and removed immediately;
  - c. Absorbent applicators, such as cloth and paper, which are moistened with cleaning solvent, shall be stored in a closed, non-absorbent, non-leaking container for disposal or recycling; and
  - d. Cleaning solvent shall be conveyed from one location to another in a closed container or pipe.
- iv. Implement a program of reformulation or process change pursuant to RCSA §22a-174-32(e)(3) such that aggregate VOC emissions from GEU 2, including emissions from solvent wipe cleaning and from wire and fabric belt cleaning activities shall not exceed 12.2 tons of VOC per calendar year.  
[RCSA §22a-174-32(e)(1)(B)]

###### b. Monitoring Requirements

- i. The Permittee shall calculate monthly and annual VOC emissions for the affected facility. The monthly VOC emissions shall be based on the monthly usage of all materials containing VOC. The annual usage shall be determined by adding the current month's material usage to that of the previous 11 months on a 12 month rolling average. These calculations shall be made available for inspection by the Department upon request. [RCSA §22a-174-33(j)(1)(K)]
- ii. The Permittee shall calculate monthly and annual aggregate VOC emissions from GEU 2, solvent wipe cleaning and wire and fabric belt cleaning activities. The monthly VOC emissions shall be

### **Section III. Applicable Requirements and Compliance Demonstration**

based on the monthly usage of all materials containing VOC. The annual usage shall be determined by adding the current month's material usage to that of the previous 11 months on a 12 month rolling average. These calculations shall be made available for inspection by the Department upon request. [RCSA §22a-174-33(j)(1)(K)]

#### *c. Record Keeping Requirements*

- i. The Permittee shall maintain daily and monthly records of the materials, which contain VOC. The records shall be used, by the Permittee, in calculating the monthly VOC emissions and shall contain: [RCSA §§22a-174-20(ii)(6)(B)]; [RCSA §§22a-174-32(g)(1)(B)]
  - a. The name and address of the material manufacturer,
  - b. The date the material is used,
  - c. The description of the material including the material name and the material density in pounds per gallon,
  - d. The percent VOC content by weight, as applied and associated calculations,
  - e. The amount of each material used in gallons,
  - f. A Material Safety Data Sheet for each VOC and/or cleaning solvent.
- ii. The Permittee shall maintain monthly records of the name, type, solvent content, and quantity of any solvent that is used for wipe cleaning that exceeds the allowable solvent limitations found in Section III.B.1.a.ii of this permit. [RCSA 22a-174-20(ii)(3)(A)(xiii)]
- iii. The Permittee shall keep purchase records for all materials containing VOC which are used or stored at the premises for use in GEU-2, wipe cleaning, and wire and fabric belt cleaning activities. [RCSA §22a-174-32(g)(1)(A)]
- iv. The Permittee shall keep records of the monthly and aggregate annual VOC emissions from GEU-2 and wipe cleaning expressed in terms of tons/year. [RCSA §22a-174-32(d)(4)(B)]
- v. The Permittee shall maintain the results of any VOC emissions testing performed pursuant to Section VII.F of this Title V permit. [RCSA §22a-174-32(g)(1)(C)]
- vi. The Permittee shall keep the material safety data sheets (MSDS) or technical data sheets for all materials used. [RCSA §22a-174-32(g)(1)(B)]
- vii. The Permittee shall maintain all records for at least five years at the premises, and make available at the premises for the commissioner's inspection upon demand. [RCSA §22a-174-32(g)(1)]

#### *d. Reporting Requirements*

The Permittee shall provide the records specified above to the commissioner within 30 days after of receipt of a written request from the commissioner. [RCSA §§22a-174-4(c)]

## Section III. Applicable Requirements and Compliance Demonstration

### C. PREMISES-WIDE GENERAL REQUIREMENTS

#### Premises-Wide General Requirements

1. **Annual Emission Statements:** The Permittee shall submit annual emission statements requested by the commissioner as set forth in RCSA §22a-174-4(d)(1).
2. **Emergency Episode Procedures:** The Permittee shall comply with the procedures for emergency episodes as set forth in RCSA §22a-174-6.
3. **Reporting of Malfunctioning Control Equipment:** The Permittee shall comply with the reporting requirements of malfunctioning control equipment as set forth in RCSA §22a-174-7.
4. **Prohibition of Air Pollution:** The Permittee shall comply with the requirement to prevent air pollution as set forth in RCSA §22a-174-9.
5. **Public Availability of Information:** The public availability of information shall apply, as set forth in RCSA §22a-174-10.
6. **Prohibition Against Concealment/Circumvention:** The Permittee shall comply with the prohibition against concealment or circumvention as set forth in RCSA §22a-174-11.
7. **Violations and Enforcement:** The Permittee shall not violate or cause the violation of any applicable regulation as set forth in RCSA §22a-174-12.
8. **Variances:** The Permittee may apply to the commissioner for a variance from one or more of the provisions of these regulations as set forth in RCSA §22a-174-13.
9. **No Defense to Nuisance Claim:** The Permittee shall comply with the regulations as set forth in RCSA §22a-174-14.
10. **Severability:** The Permittee shall comply with the severability requirements as set forth in RCSA §22a-174-15.
11. **Responsibility to Comply:** The Permittee shall be responsible to comply with the applicable regulations as set forth in RCSA §22a-174-16.
12. **Particulate Emissions:** The Permittee shall comply with the standards for control of particulate matter and visible emissions as set forth in RCSA §22a-174-18. (Section 18 approved by EPA on 9-23-1982, current Regulation submitted to EPA on 12-1-2004.)
13. **Sulfur Compound Emissions:** The Permittee shall comply with the requirements for control of sulfur compound emissions as set forth in RCSA §22a-174-19.
14. **Organic Compound Emissions:** The Permittee shall comply with the requirements for control of organic compound emissions as set forth in RCSA §22a-174-20.

### **Section III. Applicable Requirements and Compliance Demonstration**

- 15. Nitrogen Oxide Emissions:** The Permittee shall comply with the requirements for control of nitrogen oxide emissions as set forth in RCSA §22a-174-22.
- 16. Ambient Air Quality:** The Permittee shall not cause or contribute to a violation of an ambient air quality standard as set forth in RCSA §22a-174-24(b).
- 17. Emission Fees:** The Permittee shall pay an emission fee as set forth in RCSA §22a-174-26(d).

### Section IV: Compliance Schedule

<b>TABLE IV: COMPLIANCE SCHEDULE</b>				
<b>Emissions Unit</b>	<b>Applicable Regulations</b>	<b>Steps Required for Achieving Compliance (Milestones)</b>	<b>Date by which Each Step is to be Completed</b>	<b>Dates for Monitoring, Record Keeping, and Reporting</b>
		<b>No steps are required for achieving compliance at this time.</b>		

## Section V: State Enforceable Terms and Conditions

Only the Commissioner of the Department of Energy and Environmental Protection has the authority to enforce the terms, conditions and limitations contained in this section.

### State Enforceable Terms and Conditions

- A. This Title V permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the emissions units in compliance with all applicable requirements of any other Bureau of the Department of Energy and Environmental Protection or any federal, local or other state agency. Nothing in this Title V permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B. Nothing in this Title V permit shall affect the commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, investigate air pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the Permittee by the commissioner.
- C. Additional Emissions Units
  - 1. The Permittee shall make and submit a written record, at the commissioner's request, within 30 days of receipt of notice from the commissioner, or by such other date specified by the commissioner, of each additional emissions unit or group of similar or identical emissions units at the premises.
  - 2. Such record of additional emissions units shall include each emissions unit, or group of emissions units, at the premises which is not listed in Section II.A of this Title V permit, unless the emissions unit, or group of emissions units, is:
    - a. an insignificant emissions unit as defined in RCSA §22a-174-33; or
    - b. an emissions unit or activity listed in *White Paper for Streamlined Development of Part 70 Permit Applications, Attachment A* (EPA guidance memorandum dated July 10, 1995).
  - 3. For each emissions unit, or group of emissions units, on such record, the record shall include, as available:
    - a. Description, including make and model;
    - b. Year of construction/installation or if a group, range of years of construction/installation;
    - c. Maximum throughput or capacity; and
    - d. Fuel type, if applicable.
- D. Odors: The Permittee shall not cause or permit the emission of any substance or combination of substances which creates or contributes to an odor that constitutes a nuisance beyond the property boundary of the premises as set forth in RCSA §22a-174-23.
- E. 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.
- F. 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.

## **Section V: State Enforceable Terms and Conditions**

- G.** Open Burning: The Permittee is prohibited from conducting open burning, except as may be allowed by CGS §22a-174(f).
- H.** Fuel Sulfur Content: The Permittee shall not use No. 2 heating oil that exceeds three-tenths of one percent sulfur by weight as set forth in CGS §16a-21a.

## Section VI: Title V Requirements

The Administrator of the United States Environmental Protection Agency and the Commissioner of the Department of Energy and Environmental Protection have the authority to enforce the terms and conditions contained in this section.

### Title VI Requirements

#### A. SUBMITTALS TO THE COMMISSIONER & ADMINISTRATOR

The date of submission to the commissioner of any document required by this Title V permit shall be the date such document is received by the commissioner. The date of any notice by the commissioner under this Title V permit, including, but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is delivered or the date three days after it is mailed by the commissioner, whichever is earlier. Except as otherwise specified in this Title V permit, the word "day" means calendar day. Any document or action which is required by this Title V permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.

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

Any submittal to the Administrator of the Environmental Protection Agency shall be in a computer-readable format and addressed to: Director, Air Compliance Program; Attn: Air Compliance Clerk; Office of Environmental Stewardship; EPA 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 Section 22a-175 of the Connecticut General Statutes, under Section 53a-157b of the Connecticut General Statutes, and in accordance with any applicable statute.”

#### C. SIGNATORY RESPONSIBILITY [RCSA §22a-174-2a(a)]

For purposes of signing any Title V-related application, document, report or certification required by RCSA §22a-174-33, any corporation's duly authorized representative may be either a named individual or any individual occupying a named position. Such named individual or individual occupying a named position is a duly authorized representative if such individual is responsible for the overall operation of one or more manufacturing, production or operating facilities subject to RCSA §22a-174-33 and either:

1. The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding 25 million dollars in second quarter 1980 dollars; or

## Section VI: Title V Requirements

### Title VI Requirements

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,
  - ii. Such written authorization is submitted to the commissioner and has been approved by the commissioner in advance of such delegation. Such approval does not constitute approval of corporate procedures, and
  - iii. If a duly authorized representative is a named individual in an authorization submitted under subclause ii. of this subparagraph and a different individual is assigned or has assumed the responsibilities of the duly authorized representative, or, if a duly authorized representative is a named position in an authorization submitted under subclause ii. of this subparagraph and a different named position is assigned or has assumed the duties of the duly authorized representative, a new written authorization shall be submitted to the commissioner prior to or together with the submission of any application, document, report or certification signed by such representative.

#### **D. ADDITIONAL INFORMATION** [RCSA §22a-174-33(j)(1)(X), RCSA §22a-174-33(h)(2)]

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier, including information to determine whether cause exists for modifying, revoking, reopening, reissuing, or suspending this Title V permit or to determine compliance with this Title V permit.

In addition, the Permittee shall submit information to address any requirements that become applicable to the subject source and shall submit correct, complete, and sufficient information within 15 days of the applicant's becoming aware of any incorrect, incomplete, or insufficient submittal, during the pendency of the application, or any time thereafter, with an explanation for such deficiency and a certification pursuant to RCSA §22a-174-2a(a)(5).

#### **E. MONITORING REPORTS** [RCSA §22a-174-33(o)(1)]

A Permittee, required to perform monitoring pursuant this Title V permit, shall submit to the commissioner, on forms prescribed by the commissioner, written monitoring reports on March 1 and September 1 of each year or on a more frequent schedule if specified in such permit. Such monitoring reports shall include the date and description of each deviation from a permit requirement including, but not limited to:

1. Each deviation caused by upset or control equipment deficiencies; and
2. Each deviation of a permit requirement that has been monitored by the monitoring systems required under this Title V 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;

## Section VI: Title V Requirements

### Title VI Requirements

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;
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 Section VI.D 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).

## Section VI: Title V Requirements

### Title VI Requirements

#### **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 -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 -33(g)(3)(B) unless imposition of such limits is required by an applicable requirement.

#### **M. INSPECTION TO DETERMINE COMPLIANCE** [RCSA §22a-174-33(j)(1)(M)]

The commissioner may, for the purpose of determining compliance with this Title V permit and other applicable requirements, enter the premises at reasonable times to inspect any facilities, equipment, practices, or operations regulated or required under such permit; to sample or otherwise monitor substances or parameters; and to review and copy relevant records lawfully required to be maintained at such premises in accordance with this Title V permit. It shall be grounds for permit revocation should entry, inspection, sampling, or monitoring be denied or effectively denied, or if access to and the copying of relevant records is denied or effectively denied.

#### **N. PERMIT AVAILABILITY**

The Permittee shall have available at the facility at all times a copy of this Title V permit.

#### **O. SEVERABILITY CLAUSE** [RCSA §22a-174-33(j)(1)(R)]

The provisions of this Title V permit are severable. If any provision of this Title V permit or the application of any provision of this Title V permit to any circumstance is held invalid, the remainder of this Title V permit and the application of such provision to other circumstances shall not be affected.

#### **P. NEED TO HALT OR REDUCE ACTIVITY** [RCSA §22a-174-33(j)(1)(T)]

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Title V permit.

#### **Q. PERMIT REQUIREMENTS** [RCSA §22a-174-33(j)(1)(V)]

The filing of an application or of a notification of planned changes or anticipated noncompliance does not stay the Permittee's obligation to comply with this Title V permit.

#### **R. PROPERTY RIGHTS** [RCSA §22a-174-33(j)(1)(W)]

This Title V permit does not convey any property rights or any exclusive privileges. This Title V permit is subject to, and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby, including CGS §4-181a(b) and RCSA §22a-3a-5(b). This Title V permit shall neither create nor affect any rights of persons who are not

## Section VI: Title V Requirements

### Title VI Requirements

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.

#### **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

## **Section VI: Title V Requirements**

### **Title VI Requirements**

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.