



Connecticut Department of

ENERGY &
ENVIRONMENTAL
PROTECTION

BUREAU OF AIR MANAGEMENT
NEW SOURCE REVIEW PERMIT
TO CONSTRUCT AND OPERATE A STATIONARY SOURCE

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

Owner/Operator:	AMETEK, Specialty Metal Products Division
Address:	21 Toelles Road, P.O. Box 5807, Wallingford, CT
Equipment Location:	21 Toelles Road, Wallingford, CT
Equipment Description:	Ultra-Kool In-line Vapor Degreaser

Town-Permit Numbers:	189-0241
Town-Premises Numbers:	189-142
Permit Issue Date:	November 26, 2012
Expiration Date:	

/s/ Macky McCleary
Macky McCleary
Deputy Commissioner

11/26/12
Date

PERMIT FOR METAL CLEANING AND/OR SURFACE PREPARATION

DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION BUREAU OF AIR MANAGEMENT

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

PART I. DESIGN SPECIFICATIONS

A. General Description

Ametek Specialty Metal Products Division produces metal strips and specialty wire products for a variety of industrial applications. Ametek uses metal cleaning degreasers for the degreasing of rolled metal that passes directly from the degreaser into an existing annealing furnace on a semi-continuous basis.

B. Design Specifications

1. Type of Solvent Cleaning Machine: ConveyORIZED (In-line
2. Solvent Recovery Still: Yes No
3. Solvent/Air Interface Area (ft²): 47.1
4. Hourly Solvent Consumption (lb/hr): 4.3
5. This Solvent Cleaning Machine shall have:
 - i. Freeboard Ratio of 1.0 or greater.
 - ii. A safety switch to shut off sump heat if the sump liquid solvent level drops to the sump heater coils.
 - iii. A vapor level control thermostat to shut off the sump heat if the vapor level rises above the height of the primary condenser.
 - iv. A primary condenser.
 - v. A condenser flow switch and thermostat to shut off sump heat if the condenser coolant is not circulating or too warm.
 - vi. A spray safety switch which shuts off the spray pump if the vapor level drops more than 10 centimeters (4 inches) below the lowest condensing coil.

FIRM NAME: Ametek Specialty Metal Products Division
 EQUIPMENT LOCATION: 21 Toelles Road, Wallingford, CT 06492
 EQUIPMENT DESCRIPTION: Ultra-Kool In-line Vapor degreaser Model 208-32-50

PERMIT FOR METAL CLEANING AND/OR SURFACE PREPARATION

**DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT**

PART I. DESIGN SPECIFICATIONS, continued

C. Control Equipment Design Specifications

1. Control Combination: Superheated vapor
Freeboard refrigeration device
(40 CFR 63.463 Table 4, Option 1).
2. Squeegee System.

D. Stack Parameters

1. Minimum Stack Height (ft above grade): 23
2. Minimum Exhaust Gas Flow Rate (acfm): 35,000
3. Normal Stack Exit Temperature, Range (°F): 70
4. Minimum Distance from Stack to Property Line (ft): 225

PART II. OPERATIONAL CONDITIONS

A. Operational Limits

1. Allowable Solvent: Trichloroethylene (TCE)
2. Maximum Solvent Consumption (lb/12 consecutive months): 37,695

Solvent Consumption means the amount of solvent added to the degreaser during the measurement period plus any differential in the solvent contained in the reservoir at the beginning and ending of the measurement period.

Solvent Removed means the amount of solvent removed from the degreaser less contaminants during the measurement period.

Solvent Emitted means Solvent Consumption less Solvent Removed during the measurement period.

B. Work Practices

The Permittee shall meet all of the following required work and operational practices in subparagraphs "1" - "14" specified below and as having been set forth in 40 CFR §63.463(g) and RCSA §22a-174-20(1)(5):

1. Any spraying operations shall be conducted in a section of the degreaser that is not directly exposed to the ambient air (i.e. a baffled or enclosed area of the degreaser).

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PERMIT FOR METAL CLEANING AND/OR SURFACE PREPARATION

**DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT**

PART II. OPERATIONAL CONDITIONS, continued

2. During startup of the degreaser, the primary condenser shall be turned on before the sump heater.
3. During shutdown of the degreaser, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
4. When solvent is added or drained from the degreaser, the solvent shall be transferred using threaded or other leak-proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
5. The degreaser and associated controls shall be maintained as recommended by the manufacturer of the equipment or using alternative maintenance practices that have been demonstrated to the Commissioner's satisfaction to achieve the same or better results as those recommended by the manufacturer.
6. Sponges, fabric, wood, and paper products shall not be cleaned. This prohibition does not apply to absorbent materials used as part of the cleaning process of continuous web cleaning machines, including rollers and roller covers.
7. Waste solvent, still bottoms, sump bottoms and waste absorbent materials used in the cleaning process for continuous web cleaning machines shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container. The Permittee shall ensure that the amount of waste degreasing solvent that evaporates into the atmosphere during disposal or transfer to another party does not exceed twenty (20) percent of the solvent (by weight).
8. Rack parts to allow complete drainage.
9. Use a drying tunnel, rotating basket, or other equivalent method to prevent cleaned parts from carrying out solvent liquid.
10. Place covers over entrances and exits immediately after conveyors and exhausts are shutdown, leaving them in place until just prior to start-up.

FIRM NAME: Ametek Specialty Metal Products Division
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PERMIT FOR METAL CLEANING AND/OR SURFACE PREPARATION

**DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT**

PART II. OPERATIONAL CONDITIONS, continued

- 11. Minimize openings during operation so that entrances and exits will silhouette workloads with an average clearance between the parts and the edge of the degreasing unit opening of less than ten (10) centimeters (4 inches) or less than ten (10) percent of the width of the opening.
- 12. Prevent water from being visually detectible in solvent exiting the water separator.
- 13. Do not provide exhaust ventilation exceeding twenty (20) cubic meters per minute per square meter (65 cubic feet per minute per square foot) of degreasing unit open area, unless necessary to meet OSHA requirements.
- 14. Do not operate the unit upon the occurrence of any visible solvent leak until such leak is repaired.

PART III. MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS

A. Monitoring Requirements

The Permittee shall comply with the following monitoring and control device requirements [40 CFR §63.463 and 40 CFR §63.466]:

- 1. Conduct monitoring of each control device used to comply with the requirements in Part I.B. "Design Specifications" of this permit, and
- 2. Determine during each monitoring period whether each control device used to comply with these standards meets the requirements specified below:
 - i. Freeboard refrigeration device

The Permittee shall:

a. Operating Requirement

- (1) Ensure that the chilled air blanket temperature, measured at the center of the air blanket, is no greater than 56 °F [40 CFR 63.463(e)(2)(i)]. An exceedance occurs if this operating requirement is not maintained and not corrected within fifteen (15) days.

FIRM NAME: Ametek Specialty Metal Products Division
 EQUIPMENT LOCATION: 21 Toelles Road, Wallingford, CT 06492
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PERMIT FOR METAL CLEANING AND/OR SURFACE PREPARATION

DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT

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

b. Monitoring

- (1) Use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode. [40 CFR §63.466(a)(1)]

ii. Reduced room draft

The Permittee shall:

a. Operating Requirement

- (1) Ensure that the flow or movement of air across the top of the freeboard area of the degreaser or within the degreaser enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time [40 CFR §63.463(e)(2)(ii)(A)]. An exceedance occurs if the operating requirement is not maintained and not corrected within fifteen (15) days.
(2) Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less [40 CFR §63.463(e)(2)(ii)(B)]. An exceedance occurs if the operating requirement is not maintained.

b. Monitoring

- (1) If the reduced room draft is maintained by controlling room parameters (i.e., redirecting fans, closing doors and windows, etc.), the Permittee shall conduct an initial monitoring test of the wind speed and of room parameters, quarterly monitoring of wind speed and weekly monitoring of room parameters as specified below [40 CFR §63.466(d)(1)]:
(i) Measure the wind speed within six (6) inches above the top of the freeboard area of the degreaser using the following procedure:
• Determine the direction of the wind current by slowly rotating a velometer until the maximum speed is located;

FIRM NAME: Ametek Specialty Metal Products Division
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EQUIPMENT DESCRIPTION: Ultra-Kool In-line Vapor degreaser Model 208-32-50

PERMIT FOR METAL CLEANING AND/OR SURFACE PREPARATION

**DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT**

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

- Orient the velometer in the direction of the wind current at each of the four corners of the machine;
- Record the reading for each corner;
- Average the values obtained at each corner and record the average wind speed.

(ii) Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.

- (2) If an enclosure (full or partial) is used to achieve the reduced room draft, the Permittee shall conduct an initial monitoring test and, thereafter, monthly monitoring tests of the wind speed within the enclosure and monthly visual inspection of the enclosure to determine if it is free of cracks, holes, and other defects. The direction of the wind current within the enclosure shall be determined by slowly rotating a velometer inside the entrance to the enclosure until the maximum speed is located. The maximum wind speed shall then be recorded [40 CFR §63.466(d)(2)].

iii. Superheated Vapor

a. Operating Requirement

The Permittee shall:

- (1) Ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 197 °F [40 CFR §63.463(e)(2)(vi)(A)]. An exceedance occurs if the operating requirement is not maintained and not corrected within fifteen (15) days.
- (2) Ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system are followed [40 CFR §63.463(e)(2)(vi)(B)]. An exceedance occurs if the operating requirement is not maintained.

FIRM NAME: Ametek Specialty Metal Products Division
EQUIPMENT LOCATION: 21 Toelles Road, Wallingford, CT 06492
EQUIPMENT DESCRIPTION: Ultra-Kool In-line Vapor degreaser Model 208-32-50

PERMIT FOR METAL CLEANING AND/OR SURFACE PREPARATION

**DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT**

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

- (3) Ensure that parts remain within the superheated vapor for at least the minimum proper dwell time [40 CFR §63.463(e)(2)(vi)(C)]. An exceedance occurs if the operating requirement is not maintained.

b. Monitoring

- (1) The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the superheated solvent vapor zone while the degreaser is in the idling mode [40 CFR §63.466(a)(2)].

iv. Squeegee System

a. Operating Requirement

The Permittee shall:

- (1) Determine the appropriate maximum product throughput for the squeegees used in the squeegee system.
- (2) Conduct daily monitoring as specified in Part III.A.2.iv.b(1).
- (3) Calculate the total amount of continuous web product processed since the squeegees were replaced and compare to the maximum product throughput for the squeegees.
- (4) Ensure squeegees are replaced at or before the maximum product throughput is attained.
- (5) Re-determine the maximum product throughput for the squeegees if any solvent film is visible on the continuous web part immediately after it exits the cleaning machine. [40 CFR §63.463(e)(2)(ix)]

b. Monitoring

- (1) The Permittee shall visually inspect the continuous web part exiting the degreaser to ensure that no solvent film is visible on the part [40 CFR §63.466(a)(3)].

FIRM NAME: Ametek Specialty Metal Products Division
EQUIPMENT LOCATION: 21 Toelles Road, Wallingford, CT 06492
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PERMIT FOR METAL CLEANING AND/OR SURFACE PREPARATION

**DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT**

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

- (2) The Permittee shall continue daily monitoring until a visible solvent film is noted on the continuous web part [40 CFR §63.465(f)(2)].
- (3) The Permittee shall determine the length of continuous web product that has been cleaned using the squeegee system from the time of replacement of the squeegee until the first visible solvent film is noted on the continuous web part [40 CFR §63.465(f)(3)].
- (4) The maximum product throughput shall be equal to the time it takes to clean 95% of the length of product determined in Part IV.A.2.iv.b.(1) [40 CFR §63.465(f)(4)].

B. Record Keeping Requirements

- 1. The Permittee shall maintain records in written or electronic form specified below for the lifetime of the degreaser [40 CFR §63.467(a)]:
 - i. Owner's manuals, or if not available, written maintenance and operating procedures, for the degreaser and control equipment.
 - ii. The date of installation for the degreaser and all of its control devices. If the exact date for installation is not known, a letter certifying that the degreaser and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
 - iii. Records of the halogenated HAP solvent content for each solvent used.
 - iv. Records of the test used and results obtained in determining the maximum product throughput for the squeegees; as well as the monitoring for visual inspections as outlined in Part III.A.2.iv.b.(1) and the length of continuous web product cleaned during the previous week.
- 2. The Permittee shall maintain the following records in written or electronic form specified below for a period of 5 years [40 CFR §63.467(b)]:

FIRM NAME: Ametek Specialty Metal Products Division
EQUIPMENT LOCATION: 21 Toelles Road, Wallingford, CT 06492
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PERMIT FOR METAL CLEANING AND/OR SURFACE PREPARATION

**DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT**

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

- i. The documentation and results of control device monitoring and testing required under Part III.A, "Monitoring Requirements" of this permit.
 - ii. Information on the actions taken to comply with the requirements under Part III.A, "Monitoring Requirements" of this permit. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - iii. Records of annual solvent consumption for the degreaser.
3. The Permittee shall obtain a certification from the waste disposer certifying the quantity of waste solvent and the percentage of trichloroethylene present in the waste solvent for each shipment of waste solvent. The certification shall include the name of the waste disposer, the percentage of trichloroethylene in the waste solvent and the method used to determine the trichloroethylene content.
 4. The Permittee shall post a permanent, conspicuous label on or near the degreaser summarizing the applicable operating requirements [RCSA §22a-174-20(1)].
 5. For each continuous web part processed through the degreaser, the Permittee shall record the speed, in feet per minute, at which the web part is processed.
 6. The Permittee shall calculate the solvent emitted using the following equation:

$$\text{Solvent Emitted} = (\text{Solvent Consumption}) - [(\text{Waste Solvent} * \% \text{TCE})]$$

Solvent Emitted (gal/yr) means Solvent Consumption less Solvent Removed during the measurement period.

Solvent Consumption (gal/yr) means the amount of solvent added to the degreaser during the measurement period plus any differential in the solvent contained in the reservoir at the beginning and ending of the measurement period.

Waste Solvent (gal/yr) means the amount of solvent and contaminants removed from the degreaser.

FIRM NAME: Ametek Specialty Metal Products Division
 EQUIPMENT LOCATION: 21 Toelles Road, Wallingford, CT 06492
 EQUIPMENT DESCRIPTION: Ultra-Kool In-line Vapor degreaser Model 208-32-50

PERMIT FOR METAL CLEANING AND/OR SURFACE PREPARATION

**DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT**

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

% TCE means the percentage of trichloroethylene present in the quantity manifested as determined by the manifest disposer.

gal/yr means gallons per twelve (12) consecutive months.

- 7. The Permittee shall calculate and record the monthly and consecutive 12 month solvent consumption, solvents removed and solvents emitted, in pounds and tons (lb/month, lb/yr, ton/yr). The consecutive 12 month solvent consumption, solvents removed and solvents emitted shall be determined by adding each month's solvent consumption, solvents removed and solvents emitted to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the previous month.
- 8. The Permittee shall keep records on premises indicating continual compliance with all above conditions at all times and shall make them available upon request by the Commissioner for the duration of this permit, or for the previous five (5) years, whichever is less. [RCSA §22a-174-20(1)]
- 9. The Permittee shall keep records of degreaser operator training.

C. Reporting Requirements

- 1. The Permittee shall submit, to EPA, an initial statement of compliance no later than 150 days after startup. This statement shall include the following requirements [40 CFR 63.468(d)]:
 - i. The name and address of the Permittee.
 - ii. The address (i.e. physical location of the degreaser).
 - iii. A list of the control equipment used to achieve compliance for the degreaser.
 - iv. For each piece of control equipment to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.
 - v. Conditions to maintain the wind speed requirements as specified in Part III.A.2.ii of this permit.
- 2. The Permittee shall report all exceedances and all corrections and adjustments made to avoid an exceedance [40 CFR §63.463(e)(4)].

FIRM NAME: Ametek Specialty Metal Products Division
 EQUIPMENT LOCATION: 21 Toelles Road, Wallingford, CT 06492
 EQUIPMENT DESCRIPTION: Ultra-Kool In-line Vapor degreaser Model 208-32-50

PERMIT FOR METAL CLEANING AND/OR SURFACE PREPARATION

**DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT**

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

3. The Permittee shall submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include the requirements specified below [40 CFR §63.468(f)]:
 - i. A signed statement from the Permittee or his/her designee stating that, "All operators of the degreaser have received training on the proper operation of degreaser and its control devices sufficient to pass the test required in 40 CFR Part 63, Subpart T, Appendix A."
 - ii. An estimate of solvent consumption for the degreaser during the reporting period.

4. The Permittee shall submit an exceedance report to the Commissioner semi-annually, except when, the Commissioner determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency, as outlined under this section, is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information below [40 CFR §63.468(h)]:
 - i. Information on the actions taken to comply with Part III.A, "Monitoring Requirements" of this permit. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - ii. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
 - iii. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
 - iv. The Permittee, if required to submit an exceedance report on a quarterly (or more frequent) basis, may reduce the frequency of reporting to semiannual if the following conditions are met [40 CFR §63.468(i)]:

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

FIRM NAME: Ametek Specialty Metal Products Division
 EQUIPMENT LOCATION: 21 Toelles Road, Wallingford, CT 06492
 EQUIPMENT DESCRIPTION: Ultra-Kool In-line Vapor degreaser Model 208-32-50

PERMIT FOR METAL CLEANING AND/OR SURFACE PREPARATION

**DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT**

- a. The source has demonstrated a full year of compliance without an exceedance.
- b. The Permittee continues to comply with all relevant record keeping and monitoring requirements specified in Subpart A of 40 CFR part 63 (General Provisions) and 40 CFR Part 63, Subpart T.
- c. The Commissioner does not object to a reduced frequency of reporting for the degreaser.

PART IV. OPERATION AND MAINTENANCE REQUIREMENTS

- A. The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations.
- B. The Permittee shall properly operate the control equipment at all times that this equipment is in operation and emitting air pollutants.
- C. All equipment operators shall be trained in the proper operation and maintenance of both the degreaser and control devices.

PART V. ALLOWABLE EMISSION LIMITS

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

A. Criteria Pollutants

	<u>lb/month</u>	<u>tons/12 consecutive months</u>
VOC/HAP (Trichloroethylene)	3,141	18.8

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

- 1. VOC: Material balance per Part III.B.7 of this permit.

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.

FIRM NAME: Ametek Specialty Metal Products Division
 EQUIPMENT LOCATION: 21 Toelles Road, Wallingford, CT 06492
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PERMIT FOR METAL CLEANING AND/OR SURFACE PREPARATION

**DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT**

PART V. ALLOWABLE EMISSION LIMITS, continued

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

PART VI. SPECIAL REQUIREMENTS

- A.** The Permittee shall comply with all applicable sections of the following National Emission Standard(s) at all times.

Title 40 CFR Part 63, Subparts T and A

Copies of the Code of Federal Regulations (CFR) are available online at the U.S. Government Printing Office website.

- B.** STATE ONLY REQUIREMENT: The Permittee shall operate in compliance with the regulations for the control of noise, as set forth in RCSA Sections 22a-69-1 through 22a-69-7.4.
- C.** STATE ONLY REQUIREMENT: The Permittee shall operate in compliance with the regulations for the control of odor, as set forth in RCSA Section 22a-174-23.

PART VII. ADDITIONAL TERMS AND CONDITIONS

- A.** This permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the regulated activity in compliance with all applicable requirements of any federal, municipal or other state agency. Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B.** Any representative of DEEP may enter the Permittee's site in accordance with constitutional limitations at all reasonable times without prior notice, for the purposes of inspecting, monitoring and enforcing the terms and conditions of this permit and applicable state law.
- C.** This permit may be revoked, suspended, modified or transferred in accordance with applicable law.
- D.** This permit is subject to and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut and conveys no property rights in real estate or material, nor any exclusive privileges, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby. This permit shall neither create nor affect any rights of persons or municipalities who are not parties to this permit.

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PERMIT FOR METAL CLEANING AND/OR SURFACE PREPARATION

**DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT**

PART VII. ADDITIONAL TERMS AND CONDITIONS, continued

- E.** Any document, including any notice, which is required to be submitted to the commissioner under this permit shall be signed by a duly authorized representative of the Permittee and by the person who is responsible for actually preparing such document, each of whom shall certify in writing as follows: "I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under section 22a-175 of the Connecticut General Statutes, under section 53a-157b of the Connecticut General Statutes, and in accordance with any applicable statute."
- F.** 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.
- G.** Within 15 days of the date the Permittee becomes aware of a change in any information submitted to the commissioner under this permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the Permittee shall submit the correct or omitted information to the commissioner.
- H.** The date of submission to the commissioner of any document required by this permit shall be the date such document is received by the commissioner. The date of any notice by the commissioner under this permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three days after it is mailed by the commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" means calendar day. Any document or action which is required by this permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.
- I.** Any document required to be submitted to the commissioner under this permit shall, unless otherwise specified in writing by the commissioner, be directed to: Office of Director; Engineering & Enforcement Division; Bureau of Air Management; Department of Energy and Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

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 EQUIPMENT LOCATION: 21 Toelles Road, Wallingford, CT 06492
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