



Connecticut Department of Energy and Environmental Protection



Small Sources at a Title V Premises

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SIPRAC



Connecticut Department of Energy and Environmental Protection

What Sources Go Where

- Goal: Better define the types of sources and what sources to include in a Title V application and permit
- Title V applicability determination includes all emissions units; insignificant, trivial, significant and small. (no change)



Source Types

- Insignificant: RCOSA §22a-174-33(g)(3)
- Trivial: EPA White Paper 1, Attachment A
- Significant: registered or permitted (former RCOSA §22a-174-2 or -3); or subject to RCOSA §22a-174-3a, -3b, -3c, -3d, -18, -19, -19a, -20, -22, -22c, -29, -30, -31, -31a, -32, -38 or -42; or any other with a source specific applicable requirement.
- Small: Additional Emissions Units - only general applicable requirements



Changes Overview

- Title V Application Changes:
 - Small sources **will not be** included.
 - Other Activities Checklist **will not be** included.
 - Define what emissions units to include.
 - Attachment D
- Title V Permit Changes: Small sources
 - **Will not be** included in Section II, Table II.A: Emissions Units Description. Remove next issuance.
 - **Will be** included by Section V: State Enforceable Terms and Conditions, record keeping. Add next issuance.



Title V Main Application Changes

- Part VII : Other Activities Checklist – REMOVED
 - EPA Trivial List
 - Limited value
- Attachment A: Executive Summary
 - Same information rearranged and formalized
 - Section 1: Facility Description
 - Section 2: Table of Contents
 - Section 3: Emissions Unit Summary



Title V Main Application Changes

- Attachment D: Emissions Unit Information Within Operating Scenarios Instructions
 - **NOTE:** Complete Attachment D for each emissions unit at the premises with a registration or permit issued in accordance with former RCSA section 22a-174-2 or -3, respectively; or that are subject to RCSA section 22a-174-3a, -3b, -3c, -3d, -18, -19, -19a, -20, -22, -22c, -29, -30, -31, -31a, -32, -38 or -42; or any other source specific applicable requirement as defined in RCSA section 22a-174-33.



Title V Main Application Changes

- Attachment D, continued:
- Emissions units which are subject only to general premises-wide applicable requirements need not be included in Attachment D. Such emissions units include:
 - any insignificant emissions unit as listed in Part VI of the application form;
 - any emissions unit or activity listed in *White Paper for Streamlined Development of Part 70 Permit Applications, Attachment A* (EPA guidance memorandum, July 10, 1995); or
 - any emissions unit that is subject to only requirements that apply identically to all emissions units at the premises.



Title V Permit Changes

Section II: Emissions Units Information

- Table II.A: Emissions Units Description
 - Include only significant sources
 - Remove small sources, if applicable



Title V Permit Changes

Section V: State Enforceable Terms and Conditions

- **New! C. Additional Emissions Units**

1. The Permittee shall make a record by March 31 of each year of each emissions unit, or group of similar or identical 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 exempt from such record by Section V.C.3 of this Title V permit.
2. For each emissions unit, or group of emissions units, the record shall include:
 - a. Description, including make and model;
 - b. Year of construction or if group, range of years of construction;
 - c. Maximum throughput or capacity; and
 - d. Fuel type, if applicable.



Title V Permit Changes

- New! C. Additional Emissions Units, continued
 3. The following emissions units are exempt from such record:
 - a. any insignificant emissions unit as defined in RCSA §22a-174-33; and
 - b. any 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).



Summary

- All sources fall into one of the following:
 - Insignificant (application checklist)
 - Trivial
 - Small or Additional (permit - record keeping)
 - Significant/Specific Applicable Requirement (application and permit)
 - All sources included in Attachment D are to be summarized in Attachment A, Section 3 and will be listed in Table II.A of the Title V permit.
- Each category is defined and it is clear what sources are to be included and where.



Last Call

- Please submit any comments by December 19, 2013 to susan.amarello@ct.gov.
- Implement immediately on pending and incoming applications.
- Revised forms should be on the web by end of December.



Questions?

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