



# Connecticut Department of Energy and Environmental Protection



# Clarifications: Title V Minor and Non-Minor Modifications

09/13/2018

Jaimeson Sinclair

SIPRAC



Connecticut Department of Energy and Environmental Protection

# Topics

- Non-Minor Mod – definition
- Minor Mod – definition
- Procedural Requirements
- How to deal with new sources/requirements not listed in the current Title V permit?
- Questions?



# Non-Minor Permit Modification

“Non-minor permit modification” means a change to a permit that is required for the permittee to lawfully engage in any of the activities or proposed activities at a stationary source as identified in 22a-174-2a(d) of the RCSA, namely:

- (A) To incorporate the requirements of any new source review permit issued to the permittee pursuant to former section 22a-174-3(k) or (l) of the Regulations of Connecticut State Agencies or section 22a-174-3a(k) or (l) of the Regulations of Connecticut State Agencies;
- (B) To change a Title V permit term or condition which had prevented a Title V source from being subject to an otherwise applicable requirement;
- (C) To relax the form or type of or any reduction in the frequency of any monitoring, reporting or record keeping required by the Title V permit; or
- (D) To incorporate a change to an applicable requirement not otherwise subject to subsections (e) or (f) of this section or not otherwise allowed as an off-permit change pursuant to [40 CFR 70.4\(b\)\(14\)](#), as amended from time to time, or as operational flexibility pursuant to [40 CFR 70.4\(b\)\(12\)](#), as amended from time to time.



# Minor Permit Modification

- “Minor permit modification” means a change to a permit that is required for the permittee to lawfully engage in any of the activities or proposed activities at a stationary source as identified in section 22a-174-2a(e) of the Regulations of Connecticut State Agencies, namely:
  - (A) Any modification not covered by permit revisions in subsection (f)(2)(A) to (F), inclusive, of this section; and
  - (B) Any modification allowed pursuant to the Title V minor permit modification criteria pursuant to 40 CFR 70.7 (e)(2)(i)(A)(1) to (6), inclusive, as amended from time to time.



# Procedures and Timelines

- Non-Minor Permit Mod – must apply for and obtain modified Title V permit prior to commencement
- Minor Permit Mod – apply first, 21 days later source may operate in accordance with proposed changes.



# Examples: What's needed and when?

- New emission unit with PTE > 15 tpy at existing Title V source?
- New federally enforceable regulation (for which CT has delegated authority) takes effect?
- A new or modified emission unit that is part of a major modification?
- Removal of opacity CEMS due to converting an oil fired boiler to a natural gas only fired boiler.

Please hover over the questions for the answers.



# Questions?

Engineer of the Day Hotline:  
860-424-4152



Connecticut Department of Energy and Environmental Protection