



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	Braxton Manufacturing Company, Inc.
Address	858 Echo Lake Road, Watertown, CT 06795
Equipment Location	858 Echo Lake Road, Watertown, CT 06795
Equipment Description	Durr Model 95S, Combined Flood Wash and Vapor Vacuum Degreaser
Town-Permit Numbers	200-0056
Premises Number	0052
Stack Number	N/A
Permit Issue Date	August 23, 2019
Expiration Date	None

/s/ Betsey C. Wingfield
Betsey C. Wingfield
Deputy Commissioner

8/23/19
Date

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

Braxton Manufacturing Company, Inc. manufactures precision deep-drawn metal eyelets, deep-drawn metal enclosures and housings for the communications, aerospace, specialty automotive and electronics industries. Braxton operates a Durr 95S combined flood wash and vapor vacuum degreaser, which uses perchloroethylene as the cleaning solvent. There is no stack associated with this unit due to the unit being totally self-contained. The unit is operated in an exhaust free mode during parts cleaning, distillation, drying and air displacement. This unit is subject to 40 CFR Part 63 Subpart T, the National Emissions Standards for Halogenated Solvent Cleaning and will use the alternate compliance standards found in 40 CFR §63.464 for compliance.

B. Equipment Design Specifications

1. Type of Solvent Cleaning Machine: Vacuum process air volume displacement technology
2. Solvent Recovery Still: Yes No
3. Solvent Cleaning Machine:
 - a. Shall operate under vacuum during all degreasing of parts, distillation, drying and air displacement;
 - b. Immersion Cycle Temperature: 60-95°C
 - c. Vapor Degreasing Cycle Temperature: 115-120°C
 - d. Total cleaning solvent capacity: 1,400 liters

C. Control Equipment Design Specifications

Enclosed Design:

Working chamber shall not open until parts are dry and solvent concentration is less than 1 g/m³.

PART II. OPERATIONAL CONDITIONS

A. Equipment

1. Allowable Solvent: Perchloroethylene
2. The Permittee, on the first operating day of every month, shall ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soils.
3. The solvent level within the solvent cleaning machine must be returned to the same fill point each month, immediately prior to calculating monthly emissions.

B. Work Practices

The Permittee shall comply with the following work practices:

1. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).
2. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed.
3. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.
4. During startup of the solvent cleaning machine, the primary condenser shall be turned on before the sump heater.
5. During shutdown of the vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
6. When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
7. The solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the Administrator's satisfaction to achieve the same or better results as those recommended by the manufacturer.
8. Waste solvent, still bottoms, and sump bottoms 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.
9. Sponges, fabric, wood, and paper products shall not be cleaned.
10. Keep the chamber closed at all times except when processing workloads through the solvent cleaning machine.
11. Shall not operate the solvent cleaning machine upon the occurrence of any visible solvent leak until such leak is repaired.

C. OPERATION AND MAINTENANCE REQUIREMENTS

1. The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations.
2. All equipment operators shall be trained in the proper operation and maintenance of the solvent cleaning machine.

PART III. ALLOWABLE EMISSION LIMITS

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

A. Hazardous Air Pollutants

Pollutant	kg/month (3-Month Rolling Average)	Tons/year
Perchloroethylene	160	2.2

B. Demonstration of compliance with the above emission limits shall be met by calculating the emission rates using the following:

- Perchloroethylene: Material balance

Solvent Consumption means the amount of solvent added to the solvent cleaning machine 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 solvent cleaning machine less contaminants during the measurement period.

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

The commissioner may require other means (e.g. emission testing) to demonstrate compliance with the above emission limits, as allowed by state or federal statute, law or regulation.

PART IV. MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS

A. Monitoring Requirements

The Permittee shall monitor the monthly solvent consumption, solvent removed, and solvent emitted.

B. Record Keeping Requirements

1. The Permittee shall calculate and record the following:
 - a. The monthly solvent consumption, solvents removed and solvents emitted.
 - b. The 3 month rolling average monthly solvent emitted shall be calculated by adding each month's solvent emitted with that of the previous two months and then taking the average of the three.
 - c. The consecutive 12 month solvent emitted shall be determined by adding each month's solvent emitted to that of the previous 11 months.

The Permittee shall make these calculations on the first operating day of every month.

2. The Permittee shall maintain records of the following:
 - a. The dates and amounts of solvent that are added to the solvent cleaning machine.
 - b. The solvent composition of wastes removed from the solvent cleaning machine.

3. The Permittee shall keep records of solvent cleaning machine operator training.
4. The Permittee shall keep records on the method used to determine the cleaning capacity of the solvent cleaning machine.
5. The Permittee shall keep a Material Safety Data Sheet (MSDS), or equivalent, for perchloroethylene.
6. The Permittee shall keep all records required by this permit for a period of no less than five years and shall submit such records to the commissioner upon request.

C. Reporting Requirements

The Permittee shall submit to EPA and the commissioner all reports required by 40 CFR §63.468.

PART V. 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. Premises Emissions Summary

1. On January 1st of each calendar year, if the potential emissions of NO_x and/or VOC from the premises are equal to or greater than 25 tons per year per pollutant, then for such pollutant(s), the Permittee shall:
 - a. Monitor NO_x and/or VOC emissions, as applicable, from the premises for such calendar year.
 - b. Calculate and record annual NO_x and/or VOC emissions, as applicable, from the premises for such calendar year, in units of tons. The Permittee shall make these calculations on or before February 1st of the following year with respect to the previous calendar year. Such records shall include a sample calculation(s).
 - c. If actual NO_x and/or VOC emissions, as applicable, from the premises are equal to or greater than 25 tons for such calendar year, the Permittee shall submit to the commissioner, on or before March 1st of the following year, an annual emissions summary with respect to the premises for the previous calendar year. Such summary shall be submitted on forms prescribed or provided by the commissioner.
2. A Permittee with either of the following premises is exempt from Part V.B.1 requirements of this permit if, on January 1st of the subject year, the:
 - a. Premises is operating in accordance with a valid Title V permit issued pursuant to RCSCA section 22a-174-33; or
 - b. Premises is operating in accordance with a valid Approval of Registration issued pursuant to the General Permit to Limit Potential to Emit from Major Stationary Sources of Air Pollution issued on November 9, 2015.

- C. The Permittee shall not cause or permit the emission of any substance or combination of substances which creates or contributes to an odor beyond the property boundary of the premises that constitutes a nuisance as set forth in RCSA Section 22a-174-23. [STATE ONLY REQUIREMENT]
- D. The Permittee shall operate this facility at all times in a manner so as not to violate or contribute significantly to the violation of any applicable state noise control regulations, as set forth in RCSA Sections 22a-69-1 through 22a-69-7.4. [STATE ONLY REQUIREMENT]

PART VI. 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.
- 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.