

CAA Stationary Source Section 114 Inspection and Reporting Requirement Findings, Alleged Violations and Proposed Penalty for APS Technology, Inc.

CLEAN AIR ACT STATIONARY SOURCE SECTION 114 INSPECTION AND REPORTING REQUIREMENT FINDINGS, ALLEGED VIOLATIONS AND PROPOSED PENALTY FORM

Table 1 - Inspection Information	
Inspection Date/Reporting Requirement Finalized Date:	Docket Number:
January 22, 2020/July 23, 2020	C A A - 0 1 - 2 0 2 2 - 0 0 5 8
Respondent Address:	Facility Name(s):
7 Laser Lane	APS Technology, Inc.
City:	Inspector/Reporting Requirement Reviewer's Name:
Wallingford	Inspector - Abdi Mohamoud, 617-918-1858 RR Reviewer - Tom McCusker, (617) 918-1862
State: Zip Code:	EPA Delegated Official:
CT 06492	Karen McGuire
Respondent Name:	EPA Attorney Contact(s):
Denis Biglin	Christine Foot, (617) 918-1333

Table 2 – Alleged Violations
<p>APS Technology, Inc. (“APS”) operates one Caterpillar, Model 3412, compression ignition (“CI”), 570 horsepower, reciprocating internal combustion engine (“RICE”).</p> <p>This engine is fitted with an oxidation catalyst for the purpose of limiting or reducing carbon monoxide (“CO”) emissions. This engine does not meet the definitions of an emergency stationary RICE or black start engine. <i>See</i> 40 C.F.R. § 63.6675. This engine has operated over 100 hours per year, and thus, does not meet the definition of limited use stationary RICE. <i>See</i> 40 C.F.R. § 63.6675.</p> <p>This engine is an affected source under 40 C.F.R. Part 63, Subpart ZZZZ (“Subpart ZZZZ”) and subject to the provisions for existing, non-emergency, non-black-start, stationary, CI RICE, greater than 500 horsepower, located at an area source of hazardous air pollutants. <i>See</i> 40 C.F.R. § 63.6590(a)(1)(iii). The Subpart ZZZZ compliance deadline for this engine was May 3, 2013. <i>See</i> 40 C.F.R. § 63.6595(a).</p> <p>EPA alleges that APS violated the following Subpart ZZZZ provisions:</p> <ol style="list-style-type: none"> Forty C.F.R. §§ 63.6612, 63.6615 and 63.6620 and Table 3 Item 4 and Table 5 Item 1 or 2 by failing to test/retest its engine, in accordance with Subpart ZZZZ, by no later than October 30, 2013, and every three years thereafter (<i>i.e.</i>, on, or around, October 30, 2016, and October 30, 2019).

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2. Forty C.F.R. §§ 63.6620(i), 63.6645 and 63.9(h) by failing to submit to EPA a Notification of Compliance Status (“NOCS”) and Average Percent Load Report regarding testing that should have been performed on its engine by no later than October 30, 2013, and every three years thereafter (*i.e.*, on, or around, October 30, 2016, and October 30, 2019).
3. Forty C.F.R. § 63.6625(b)(1) by failing to prepare a complete site-specific monitoring plan (“SSMP”) required for its engine.
4. Forty C.F.R. § 63.6625(b)(5) by failing to conduct annual performance evaluations, system accuracy audits, or other audit procedures on the CPMS (*i.e.*, the catalyst inlet temperature monitor and the catalyst pressure differential monitor) associated with its engine.
5. Forty C.F.R. § 63.6650 by failing to submit to EPA semiannual compliance reports for its engine.

Table 3 - Penalty and Required Corrective Action

Penalty	\$45,828
Required Corrective Action	All corrective action has been completed.