



# Connecticut Department of Energy and Environmental Protection



# What's Changed Since April 29, 2015: New RCSA Section 22a-174-22e, and Introducing...

## New RCSA Section 22a-174-22f

SIPRAC New Section 22 Workgroup  
(i.e., SIPRAC Section 22-TNG Workgroup)

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Connecticut Department of Energy and Environmental Protection

# Overview

- You provided comments on the draft definitions, applicability, exemptions and exceptions, tune-up, record keeping and reporting subsections of Section 22e by May 20, 2015.
- We met with our Enforcement and Planning Division managers and some staff numerous times since April 29, 2015 on all areas of Section 22e.
- Today we will review and hear your initial reaction to a revised draft Section 22e (entire rule, more or less).
- Materials for today:
  - Revised Section 22e with changes highlighted in red and areas still being discussed internally highlighted in blue,
  - Draft applicability for section 22f, and
  - April 29 meeting notes.



# Revisions to Draft from Your May 20 Comments

## – Subsection (a) Definitions.

- Revised “Boiler serving an electric generating unit.”
- Added “Cogeneration.”
- Added provision to “Emergency” for construction, facility maintenance or repair for a period of time not to exceed 72 hours.
- Added language to “Ozone forecast” to address other possible forms of Department notification.
- Removed “Process heater, “Startup” and “Shutdown.”

## – Subsection (b) Applicability.

- Added applicability threshold for ICI boilers.

## – Subsection (c) Exemptions and exceptions.

- Added subsection/subdivision specificity and clarifying language.
- Added non-road engine exemption.
- Removed schedule mod naval boiler provision.



# Revisions to Draft from Your May 20 Comments (cont.)

- Subsection (f) Permanent cessation of operation.
  - Changed June 1, 2019 date to June 1, 2020 for shutdown of a unit in Phase 1.
- Subsection (i) Tune-up requirements.
  - Added NSPS/MACT synchronization capability.
- Subsection (j) Record keeping.
  - Changed wording of subparagraph (j)(2) regarding costs of parts and labor, CEMS data and maintenance performed.
  - Removed record keeping related to startup/shutdown.
- Subsection (k) Reporting.
  - Added provision to subdivision (k)(3) concerning excess emissions reporting for CEMs. (but will remove because did not really address comment)



# Revisions from Internal Discussion

Old  
regulatory  
draft  
language



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# Revisions to Draft from Internal Discussion

## – Subsection (a) Definitions.

- Revised “Industrial/commercial/institutional boiler.”
- Added “Natural gas.”
- Removed “Startup”, “Shutdown”, “Useful thermal energy.”

## – Subsection (d) Emissions limitations.

- Lowered Phase 2 coal limit for boilers serving an EGU.
- Added requirement for boilers serving an EGU to operate installed air pollution control technology or combustion controls that reduce NO<sub>x</sub> at all times the unit is operating and emitting NO<sub>x</sub>.
- Added requirement that ICI boilers with an MRC  $\geq 5$  and  $< 25$  MMBtu/hr meet current Section 22 emission limits in both Phase 1 and Phase 2.
- Removed 700 ppmvd “catch all” emission limit and added air as a possible heated material to 180 ppmvd limit for emission units that combust fuel for heating materials.
- Added emission limits for fuels not listed in tables of emissions limits.



# Revisions to Draft from Internal Discussion (cont.)

- Subsection (d) Emissions limitations (continued).
  - Added that non-CEM system emission unit compliance demonstration will be done through NOx emission testing as required by subsection (l).
- Subsection (g) Compliance options.
  - Removed averaging as a compliance option in both Phase 1 and Phase 2.
- Subsection (j) Record keeping.
  - RICE record keeping sufficient for emergency engines if subject?
  - Removed NOx DERC record keeping (will be addressed in trading orders).
  - Removed startup/shutdown record keeping.





# Revisions to Draft from Internal Discussion (cont.)

And (second to) last, but not least...

– Subsection (l) Emission testing.

- Removed load level link to NSPS.
- Changed 90% maximum capacity language to be more similar to current Section 22.

– Subsection (m) Monitoring.

- Removed startup/shutdown monitoring language.



# Revision Since Draft was Distributed – Naming Convention for Fuels

- Fuel identification changed to be similar to current RCSA section 22a-174-22.
  - “Natural gas” will become “gas” or “gaseous fuel” = natural gas, propane, etc.
  - “Distillate oil” will become “other oil” = kerosene, Jet A and B, etc.
- Will be in next version.



# Still Under Internal Discussion

- Definition of “Emergency.” New provision is limited to resolve inconsistency in current Section 22 provision for emergency generators.
- New proposed alternative to the new provision under discussion:
  - No subsection (F) to definition of “Emergency.”
  - Revised definition of “Emergency engine:”

**“Emergency engine” means a stationary reciprocating engine or a gas turbine engine that is used as a means of providing mechanical or electrical power only during the following periods:**

    - (A) During an emergency;**
    - (B) Periods of testing;**
    - (C) Periods of scheduled maintenance; or**
    - (D) When the facility owner or operator interrupts power to the facility to perform construction, maintenance or repair of the primary power distribution system at the facility.**

**PLEASE PROVIDE COMMENT ON THE NEW PROPOSED ALTERNATIVE!**



# Still Under Internal Discussion (cont.)

- Phase 2 coal emission limit.
- Details of process for reviewing a compliance option plan.
- Will add “bounding” (constraints) to some of the compliance options. (including likely removal of January 1, 2010 date in subsections (g)(2)(I), (g)(3)(H), (g)(4)(G), (g)(5)(G), and (g)(6)(E))
- Case-by-case RACT. Details of the required demonstration and the approval process.



# Outline of Draft Section 22f Applicability

- Applies to the owner or operator of a fuel burning emissions unit located at a non-major stationary source of NO<sub>x</sub>, where:
  - The emission unit is listed in Table 22f-1, unless located at a facility that is subject to RCSA section 22a-174-22e;
  - The unit emits 137/274 pounds of NO<sub>x</sub> during any day during the ozone season; or
  - The unit is an affected unit that is not subject to RCSA section 22a-174-22e.
- Does not apply to emission units below the thresholds identified in draft RCSA section 22a-174-22e.
- Other subsections in Section 22f will be very similar to Section 22e. Separation is for clarity of applicability.



# Next Steps (internal)

- Continue to meet with the Enforcement Section and Planning Division on draft language (**draft language for entire regulation not yet internally vetted**).
- Provide draft case-by-case RACT language for stakeholder comment.
- Provide rest of draft Section 22f for stakeholder comment.



# Next Steps (workgroup)

- **August 13** meeting, Gina McCarthy Auditorium. Time to be announced. (Will either follow the general SIPRAC meeting immediately or occur in the afternoon.)
- Provide comments on latest draft Section 22e and draft Section 22f applicability by July 10, 2015 to [wendy.jacobs@ct.gov](mailto:wendy.jacobs@ct.gov)



# I'm a doctor not a . . .



- Doorstop
- Bricklayer
- Escalator
- Magician
- Mechanic
- Moon shuttle conductor
- (Air pollution control) engineer
- Physicist
- Coal miner

