



# Stationary Source Control Group Regulatory Updates

March 12, 2015



Connecticut Department of Energy and Environmental Protection

# Regulatory Updates

- Amendment of RCSA sections 22a-174-29, -33, -3c.

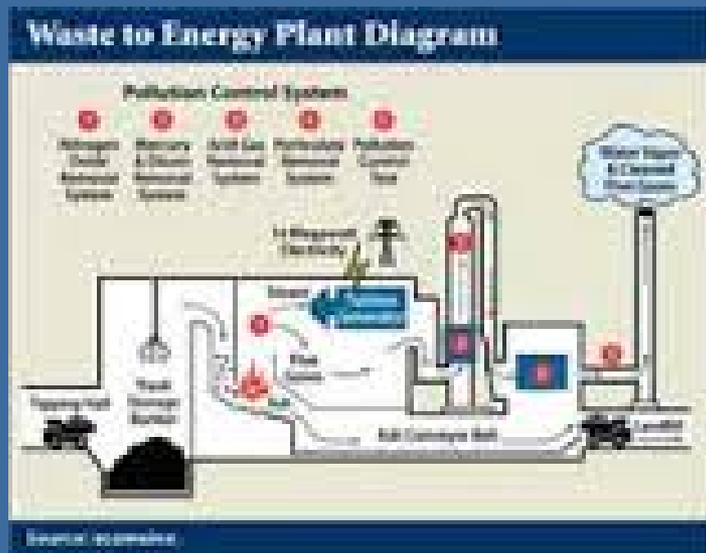
<http://www.sots.ct.gov/sots/cwp/view.asp?a=4431&q=525786>

- Stage I/II Vapor Recovery.

[http://www.ct.gov/deep/cwp/view.asp?a=2684&q=331220&deepNav\\_GID=1619](http://www.ct.gov/deep/cwp/view.asp?a=2684&q=331220&deepNav_GID=1619)



# Update on Section 38



# General Comments

- Modifications should be exempted from having to obtain NSR or Title V permits or at least offer flexibility (compliance extension) to comply with RACT limits. (Wheelabrator).
- Compliance date should be within 2 years of promulgation instead of July 1, 2017. (Covanta).
- Remove reference to subdivision (l)(1)(B) from Section 38. (MIRA).



# Comments on Ammonia Emission Limit

- Rather than the draft ammonia emission limit, Covanta suggests a 2-year testing program and a negotiated, facility-specific ammonia limit at the conclusion. (Covanta).
- Section 38 amendment should include provisions for utilizing either ammonia CEMS or stack testing on an annual basis, to demonstrate compliance. (MIRA).



# Comments on Bag Leak Detection System

- Bag leak detection systems are redundant since all WTE units are equipped with continuous opacity monitoring system. (Wheelabrator).
- Baghouse leak detection systems will not provide any improvement in bag leak detection and cannot be technically or economically justified. (Wheelabrator).
- The requirement for bag leak detection systems is premature. (Covanta).
- More discussion is needed before requiring bag leak detection systems. (MIRA).



# Next Steps

- Revise draft amendment.
- Distribute to MIRA, Covanta and Wheelabrator.
- Send to Governor and OPM for review and approval.



# Update on New Section 22

- Meeting on 23 February focused on testing and monitoring.
- Some comments on draft language during meeting:
  - A unit with NO<sub>x</sub> CEMS does not need an initial stack test. The RATA serves the same function.
  - Consider the approach used in the CISWI rule to establish and change the load at which testing is conducted.
  - The repeat stack test window only needs a “no later than time.”
  - Revise the data collection requirement to include maintenance and repairs.
- Taking additional comments on draft through March 20.



See the [RACT web page](#)!

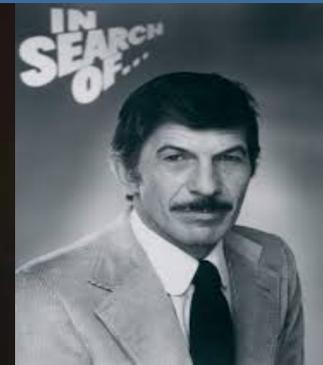
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# Next Steps on New Section 22

- Meeting scheduled for 25 March, 1PM, Gina McCarthy Auditorium to discuss compliance options.
- Materials including draft regulatory language will be sent to the subcommittee and posted on the RACT web page prior to the meeting.
- Subsequent meeting on 29 April at 1PM.



Connect





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