



December 24, 2012

Air Docket
U.S. Environmental Protection Agency
Mail Code 6102T
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Attention: Docket # OAR-2004-0490

Re: *Comments of the Connecticut Department of Energy and Environmental Protection on the Proposed Rule for Stationary Turbines*

Dear Docket Administrator:

The Bureau of Air Management of the Connecticut Department of Energy and Environmental Protection (DEEP) has reviewed the U.S. Environmental Protection Agency's (EPA's) proposed rule revising the *Standards of Performance for Stationary Gas Turbines; Standards of Performance for Stationary Combustion Turbines* (77 FR 52554; August 29, 2012). As turbines often operate on high electric demand days in New England, which correspond to the hot, summer days of the ozone season, it is critical to ensure that operating turbines are designed to be efficient and low emitting. The proposed revisions are helpful with respect to this aim, and we ask EPA to consider the following revisions in the final rule:

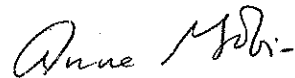
- **Focus on combustion turbine engine.** EPA's focus on the combustion turbine engine for determining applicability and whether a turbine is new or reconstructed is a helpful clarification. We recognize that turbine engine maintenance plans typically involve swapping rebuilt cores, so a focus on this portion of the facility for determining reconstruction clarifies the burden on regulated owners and operators. However, the final rule should specify that the rebuilt engine should be of identical design to the engine it replaces. If the rebuilt engine is not of the same design, the engine should then be considered a new unit.
- **Averaging times.** EPA should not specify the use of a 30-day average of nitrogen oxides (NOx) emissions. As EPA noted in the preamble, input based standards do not require such an extended averaging time. The one-hour National Ambient Air Quality Standard for NOx and the need to reduce periods of excess emissions on high ozone and high electric demand days require a shorter averaging time such as four hours or one hour.
- **Delegated permitting authority.** The term "delegated permitting authority" should be replaced with "delegated authority." While "permitting authority" may be a defined term, for an NSPS, the appropriate term is delegated authority since not all turbines subject to the NSPS will trigger permitting in all states.
- **Fuel sulfur.** EPA proposes to exempt a combustion turbine subject to a federally enforceable requirement to limit fuel sulfur content to 500 ppm for liquid fuels (§ 60.4330(f)). However, 15 ppm ultra-low sulfur diesel is widely available in the continental United States, as EPA

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acknowledges, and should be the fuel sulfur content limit that defines the exemption. Consistent with this suggestion, the exemption language proposed in 40 CFR 60.4330(f) should change from "... for liquid fuels no more than 0.05 weight percent..." to "...for liquid fuels no more than 0.0015 weight percent..." Also, the proposed emission limits in section 60.4330(a) should be recalculated to conform to 0.0040 lb SO₂/MMBtu of heat input. Such a limit is consistent with the default AP-42 emission factor for turbines firing natural gas (0.0034 lb/MMBtu) and is achievable for turbines firing ultra low sulfur diesel (0.0016 lb/MMBtu).

DEEP appreciates the opportunity to comment on the proposed rule. If you or members of your staff have any questions regarding this letter, please do not hesitate to get in touch with Ric Pirolli, Assistant Director of Engineering, at 860-424-3450.

Sincerely,



Anne R. Gobin, Chief
Bureau of Air Management