



Connecticut Department of Energy and Environmental Protection



RCSA Sections 22a-174-22e and -22f: Update Since October 8 Meeting or

Are We Frustrated Yet?

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

Uh oh...

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VS.



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*Will the new movie make the
Captains' struggle inconsequential?*

Comments

- External comments on the September 28 draft of Section 22e were received from the following:
 - NRG
 - Pratt & Whitney, East Hartford
 - EPA
 - PSEG
- The comments are posted on the RACT webpage.



Changes to Section 22e since Sept. 28 Draft

Subsection (a) Definitions

- Minor changes to “Boiler serving an EGU”, “Combined cycle combustion turbine”, “Duct burner”, “Emergency”, “Emergency engine”, “ICI boiler”, “Reciprocating engine”, and “Simple cycle combustion turbine.”
- Addition of “Force majeure.”

Subsection (b) Applicability

- Provision added for units subject to Section 22f that are affected units or that exceed a daily NOx emission threshold.

Subsection (c) Exemptions and exceptions

- (c)(7) – Added ozone forecast language and clarifying language to (c)(7)(A).
- (c)(9) – Added non-road engine citation.
- (c)(10) – Added demand response restriction.



More Changes to Section 22e

Subsection (d) Emissions limitations

- ***Reduced Phase I daily block average emissions limitations for coal-fired boilers and gas-fired cyclone boilers.***
- Added Phase 1 daily block average emissions limitation for reciprocating engines burning landfill gas or digester gas.
- Minor revision to ozone forecasting language in (d)(13).
- Added 15% O₂ correction as (d)(15).
- Added more stringent emissions limitation provision as (d)(16).

Subsection (f) Permanent cessation of operation

- (f)(1)(B) – Replaced the word “license” with “permit or registration.”



Still More Changes to Section 22e

Subsection (g) Compliance options

- Revised gas curtailment language in (g)(2)(F) and (g)(5)(B).
- Replicated last sentence of (g)(2) in (g)(3), (g)(4), (g)(5), and (g)(6).
Last sentence = deadlines to implement compliance options.
- Updated ISO-NE OP-4 effective date in (g)(4)(E) and (g)(6)(D).
- Add emission reduction comparison language in subsection (g)(7)(F).
- (g)(11) – All compliance options end May 1, 2028. Changed date from May 31 to May 1, 2028 to align with moderate attainment deadline of a theoretical EPA update to the ozone NAAQS in 2020.



...the Last of the Changes to Section 22e

Subsection (h) Case-by-case RACT demonstration

- (h)(1)(C) – Added emission reduction comparison if comply language.
- (h)(4) – Changed date from May 31 to May 1, 2028 to align with moderate attainment deadline of a theoretical EPA update to the ozone NAAQS in 2020.
- Additional information on the cost analysis under development.

Subsection (l) Emission testing

- (l)(8) – Added force majeure language.



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New, Improved Section 22f!

- Structure is streamlined but purpose (limiting high short-term emitters at non-major sources of NO_x) is unchanged.
- Applicability:
 - Only for emission units at a facility that is not a major source of NO_x; and
 - Subject emission units must have a maximum rated capacity that could result in emissions \geq 137 lb NO_x/day (severe non-attainment area)/274 lb NO_x/day (serious non-attainment area).
 - Applicability thresholds are based on unit capacity and fuel type.



Requirements

- Emergency engines.
 - Only notification, tune-ups, record keeping and reporting are required.
- Affected units.
 - Comply with RCSA section 22a-174-22e.
- An emission unit that is not an emergency engine and not an affected unit.
 - Only notification, tune-ups, record keeping and reporting are required until --
The emission unit exceeds actual ozone season NOx emissions of 137/274 lb/day, when the emission unit must be operated to comply with RCSA section 22a-174-22e.



Why is Section 22f Still Not Public?

- Focus on Section 22e.
- Internal and Governor's office criticism of the previous approach to Section 22f for creating a great deal of structure for little result.
- The new approach to the applicability was designed by our enforcement staff.
 - Streamlines the structure and requirements considerably for units at non-major sources of NOx that do not exceed the daily emission thresholds.
- Additional internal review occurring now.



Next Steps

- November
 - Release draft of Section 22f in next week. More detail on the case-by-case cost analysis will be available at the end of the month or early December.
 - We will accept comments on the November drafts, but we are unlikely to hold additional meetings to explain any changes.
 - Brief Mike Sullivan, Deputy Commissioner about changes since September.
- December
 - Transmit to Governor and OPM for approval to notice.
 - Once in eRegulations, there will be a presentation at a general SIPRAC meeting to introduce you to eRegulations.

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*The struggle to replace
the old with the new
continues*

