



Connecticut Department of Energy and Environmental Protection



RCSA Sections 22a-174-22e and -22f: Current Drafts and Changes Since September Meeting

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

8 October 2015
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Connecticut Department of Energy and Environmental Protection

Changes to August Draft of Section 22e

Changes included in draft distributed September 28:

- Subsection (d). Non-ozone season limit reappears for all fuel types. Necessary for dual-fuel units to determine compliance. (Bob Silvestri)
- Subsection (d). Specificity about reliance on the forecast added to emergency engine prohibition on operation on ozone exceedance days. (UCONN)
- Subsection (f). Clarification to permanent cessation of operation. (UCONN)
- Subsection (g). Compliance option to limit operations to ISO-NE capacity deficiency events broadened to include NY-ISO capacity deficiency events. (Paul Farrell)
- Subsection (g). Dates for qualifying retirements revised. (Paul Bodner, Sierra Club)
- Subsection (g). Interruptible contract allowed for units complying by combusting gas only. (Bob Girard)



More Changes to August Draft of Section 22e

- More changes included in draft distributed Sept. 28:
 - Subsections (g) and (h). Compliance options and case-by-case RACT determinations sunset on May 31, 2028. (Paul Bodner *et al.*)
 - Subsection (h). Case-by-case RACT determinations.
 - \$/ton threshold to designate RACT increased. (Sierra Club)
 - Authority for commissioner to add a design, equipment, work practice or operational standard is removed. (Merrily Gere)
 - Subsection (l)(1) revised to allow testing according to 40 CFR 60 subpart KKKK, if applicable. (Multiple comments)



More Changes to August Draft of Section 22e

- Additional changes made after Sept. 28 (not in draft, will be in an October draft):
 - Subsection (a), Definition of “emergency engine.” Subparagraph (D) broadened to match intent. (Dominion)
 - New subsection (d)(15). Adds a 15% O₂ correction for the simple cycle and combined cycle turbine emission limits. (Chris Shepard)
 - Addition of a statement of purpose.



Section 22f

- Initial full draft will be sent to you soon.



What it feels like to
wait for drafts . . .



Process

- RACT briefing for the Governor's Office and OPM on Sept. 29, 2015.
 - Now reviewing Section 38 amendment on paper because of the problems with the existing air regulations in eRegulations.
- If you have corrections or comments on the current drafts, please send those to Wendy Jacobs or Merrily Gere as soon as possible.
- We plan to publish the public notices for Sections 22e and 22f (and Section 38 amendment) before the year ends.
 - We will have Section 22f to you soon. We are completing internal discussions.
 - We will be releasing an October draft of Section 22e.
 - The noticed versions of the regulations will likely be close to those you see in October.



Halloween Costume Ideas



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