



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

AUG 07 2009



U.S. Environmental Protection Agency  
Air and Radiation Docket and Information Center  
Mail Code 2822T  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460  
Attention: Docket ID No. EPA-HQ-OAR-2009-0027

**Re: *Comments from the Connecticut Department of Environmental Protection on the Proposed Rule for Area Source NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing***

Dear Docket Administrator:

The Engineering Section of the Bureau of Air Management of the Connecticut Department of Environmental Protection (CTDEP) has reviewed the U.S. Environmental Protection Agency's (EPA's) Proposed Rule for the *National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing* (74 FR 32822; July 9, 2009). We are submitting the following comments on the proposed rule:

- Pressure Drop Range for High Efficiency Filters. Part 2.b of Table 4 of the proposed rule requires the source to maintain "the 3-hour average pressure drop across device at or below the operating value established during the initial emission test." If after the initial test, the filter develops a tear or it is removed, the pressure drop would be lower than as measured during the initial test. In this scenario, the filter removal or tear would not cause a violation of the operating limit, but the air pollution control device would not be operating properly. Alternatively, operation at a pressure drop slightly higher than the average established during the initial emission test would not necessarily indicate poorer performance of the filter. Therefore, we recommend that Part 2.b of Table 4 be changed to require maintenance of the 3-hour average pressure drop to within a specified range established during the initial emission test.
- Definition of Saturator. Saturator is defined in proposed 40 CFR §63.11566 as "...the equipment in which substrate (predominately organic felt) is impregnated with asphalt..." The process description for asphalt roofing in EPA's AP-42 (Volume I, Fifth Edition, Chapter 11.2, January 1995) states that when using fiberglass (polyester) as a substrate, a saturator is not used and an impregnation vat is substituted for a coater. Therefore, AP-42 equates an impregnation vat to a coater. However, the definition of saturator in the proposed rule implies that an impregnator vat is a saturator. The distinction is important because emission limits in Table 2 of the proposed rule are different for coater-only lines and saturator-only lines. EPA should clarify the definition of saturator.

Docket Administrator  
Richard A. Pirolli  
U.S. Environmental Protection Agency

In addition, the CTDEP is aware of, and supports, the comments on this proposed rule submitted by the National Association of Clean Air Agencies (NACAA).

CTDEP appreciates the opportunity to comment on the proposed rule in furtherance of our mutual environmental goals. If you or members of your staff have any questions regarding this letter, please do not hesitate to get in touch with Ms. Valerie Galo at 860-424-3433.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard A. Pirolli". The signature is fluid and cursive, with the first name being the most prominent.

Richard A. Pirolli  
Assistant Director  
Engineering and Enforcement Division  
Bureau of Air Management

RAP: vag