



Connecticut Department of Energy and Environmental Protection



Draft RCSA Section 22a-174-22f: Explanation/Information to Facilitate Review and Comment

December 16, 2015

Merrily A. Gere

Wendy Jacobs



Connecticut Department of Energy and Environmental Protection

Purpose

- Maintains current restrictions on short-term high emitting units = emission units subject to RCSA section 22a-174-22 through subsection (b)(1)(B). Thereby, the section:
 - Prevents backsliding under CAA section 110(l); and
 - Addresses high electric demand day concerns.
- Note that, with the exception of affected units, RCSA section 22a-174-22f emission units are not at major sources of NO_x and are not subject to RACT emissions limits as long as daily emissions are below the applicable threshold (137/274 pounds).

Section 22a-174-22(b)(1):

(B) Fuel-burning equipment, a waste combustor, or a process source that has potential emissions of NO_x in excess of the following:

- (i) One hundred thirty-seven (137) pounds during any day from May 1 to September 30, inclusive, of any year, if such source is located in a severe nonattainment area for ozone; or
- (ii) Two hundred seventy-four (274) pounds during any day from May 1 to September 30, inclusive, of any year, if such source is located in a serious nonattainment area for ozone.



Connecticut

Applicability

- An emission unit that is at a facility that is not major for NO_x where the maximum rated capacity of the emission unit is at or greater than a capacity that would have potential emissions of NO_x over the 137/274 pound per day threshold for a particular fuel.
 - Example from subsection (b)(1) of RCSA section 22a-174-22f:
 - (1) This section applies to the owner or operator of a boiler serving an EGU or an ICI boiler that meets any one of the following criteria:
 - (A) The boiler is gas-fired and has a maximum rated capacity:
 - (i) Greater than 76 MMBtu/hr and is located in a serious non-attainment area for ozone, or
 - (ii) Greater than 38 MMBtu/hr and is located in a severe non-attainment area for ozone;
 - (B) The boiler is residual oil-fired and has a maximum rated capacity:
- An affected unit that is located at a facility that is not major for NO_x.



Emergency Engines

The owner or operator is required to do the following:

- Maintain records
 - Daily NO_x emissions during the ozone season; and
 - Distinguish emergency/non-emergency operation, reason for emergency/non-emergency operation.
- Prohibit operation for routine, scheduled testing or maintenance on a day with an ozone forecast of “moderate to unhealthy for sensitive groups” or greater.
 - Prohibition does not apply to emergency engines that are Tier 4 NO_x compliant.



Emission Unit that is Not an Emergency Engine

- And is not an Affected Unit:
 - Tune-up (subsection (f)).
 - Recordkeeping (subsection (g)), including daily NO_x emissions during the ozone season.
 - Maintain NO_x emissions below the applicable 137/274 pound/day limit. If the threshold is exceeded:
 - Submit a notification per subsection (h); and
 - Comply with RCSA section 22a-174-22e.
- And is an Affected Unit:
 - Comply with RCSA section 22a-174-22e

“Affected unit” means a fossil fuel-fired:

(A) Stationary source that serves a generator with a nameplate capacity of 15 MW or more; or

(B) Boiler or indirect heat exchanger with a maximum heat input capacity of 250 MMBtu/hr or more.



Limiting Out of Sections 22e and 22f

- If an emission unit that is not an emergency engine and not an affected unit exceeds the applicable daily NOx emission threshold of Section 22f(e)(2), the owner or operator must either:
 - Operate the emission unit in compliance with the emission limits of Section 22e (may use compliance options, case-by-case RACT), or
 - Request/receive an enforceable limitation on daily NOx emissions below 137/274 lbs/day set out in an order or permit. Such a unit is then exempt from Section 22e (see Section 22e(c)(11)).
- An emission unit that is not an emergency engine and not an affected unit and is subject to Section 22f may request/receive an enforceable limitation on daily NOx emissions below 137/274 lbs/day set out in an order or permit. Such a unit is no longer required to comply with Section 22f.



More Interactions of Sections 22e and 22f

- The owner of an affected unit must operate the unit in compliance with Section 22e whether the emission unit is located at a source that is major or non-major for NO_x.
 - An affected unit at a non-major source of NO_x cannot limit below the daily emission thresholds of Section 22f to avoid the requirement to comply with Section 22e.
- Sections 22e and 22f are written on a per emission unit basis. A facility that is not major for NO_x may have some fuel-burning emission units that are subject to Section 22f and some fuel-burning emission units that are subject to Section 22e. A facility that is major for NO_x will only have fuel-burning emission units that are subject to Section 22e.



Additional Notification Requirement?

- An additional notification is under discussion. The notification would be required of the owner or operator of every subject emission unit that is not an emergency engine and not an affected unit.
- The notification would be submitted once and would include basic information about the emission unit including the location, capacity and fuel.
- Whether the notification will be included in the final draft regulation is under consideration by Air Bureau management.



Comments

- Your comments on the draft of RCSA section 22a-174-22f are invited through January 6, 2016. Submit comments to wendy.jacobs@ct.gov and merrily.gere@ct.gov.
- Subsequently, both Sections 22a-174-22e and 22a-174-22f will be submitted to the Governor's Office and OPM for approval to move to formal public notice.



Questions?

Merrily A. Gere

merrily.gere@ct.gov

860-424-3416

Wendy Jacobs

wendy.jacobs@ct.gov

860-424-3457

