



July 10, 2015

Ms. Merrily Gere
Bureau of Air Management
Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Re: Pratt & Whitney, East Hartford Facility
Proposed NOx RACT: Subsections (a), (b), (c), (i), (j), and (k)
Written Comments Regarding Draft

Dear Ms. Gere:

Pratt & Whitney, East Hartford (PW) is providing written comments regarding the updated draft document “testingmonitoringdraft” which represents the proposed changes to RCSA Section 22a-174-22 Control of Nitrogen Oxides Emissions (NOx RACT). PW appreciates the CTDEEP effort to improve RCSA and the offer to industry to make comments during the development process. PW comments are as follows:

- PW appreciates the exemption presented for test cells and test stands in section (c)(6), which recognizes the effort that PW expended to test an untestable source. CTDEEP has raised two issues in the last available draft.

1. “Does this cover the support equipment for test cells? If so, expand the category list.”

If the current language could be interpreted to not include test cell support equipment, an addition to the “...this section shall not apply to the owner or operator of a test stand or test cell, for emissions from the use of such test stand or test cell” would be helpful. An addition to the existing draft could clarify intent to include support equipment by adding a phrase such as: “including emissions from test cell support equipment” or “including emissions from support equipment providing test cell atmospheric conditions.”

2. “Or, we could include test cell support equipment in subdivision (7) of subsection (c) of this section.”

This option is not a viable option for PW; this would require the test cell operation schedule to be dependent upon weather conditions forecasted the prior day. Many of the CTDEEP forecasts are not available until 3:00 pm for the next day. Test cell use for a test program is typically planned months prior to an event with daily management up to the test date. Tests are witnessed by multiple people sometimes including FAA officials and customers. Putting a test on hold for any length of time would cause major disruption not only to that specific engine development test process, but any engine test program schedule after that date.

Test delays would result in severe penalties and other ramifications. The financial costs would be difficult to estimate and it really depends on the particular test. Some delays might cost tens of thousands dollars per day, while delays to certain critical tests could prove to be far more costly, ultimately cost well into the millions of dollars. In addition, a test could be hours into a program when a forecast is received and the test program would have to stop and start again once the weather pattern cleared (one day? two days?) and the program would have to start from the beginning. If an active test

is suspended, it would result in unnecessary emissions from the waste of test engine fuel and support equipment fuel.

- In (c)(9) the regulatory citation referenced could match the same regulatory citation referenced (40 CFR Part 89) for non-road engine requirement in 22a-174-3a(a)(2)(C).

If you have any questions or comments, please contact Steven C. Eitelman at (860) 565-7929.

Sincerely,

Steven Eitelman
Specialist, EH&S