

From: [Bolduc, Mark](#)
To: [Jacobs, Wendy](#)
Subject: Section 22e Comments/Questions
Date: Wednesday, September 02, 2015 12:50:14 PM

Hi Wendy,

After reviewing the latest draft, I have the following comments/questions:

1. In subsection (d), Emission limitations, where it states "...the following emissions limitations, based on a daily block average for an emission unit with a NOx CEM, *and*, as determined by NOx emission testing pursuant to subsection (l)... This statement shows up several times in subsection (d). Should the "*and*" in that statement be "*or*" since it is either one or the other in terms of using CEMs or emission testing?
2. Subsection (d)(13), related to the operation of emergency engines on forecasted ozone days, it might be helpful to note if the forecast is revised during the day from "good" to "moderate to unhealthy for sensitive groups", operation of the emergency engine is not restricted after the forecast is revised since the restriction is based on the previous day's forecast. I know on the DEEP website, it mentions if the forecast is revised from "moderate to unhealthy for sensitive groups" to "good", the operational restriction is lifted after 3 pm but I am not sure it is clear what to do in the opposite situation. This situation occurred during the current ozone season and I had notified our facilities staff to stop testing the emergency engines after the forecast was revised.
3. Also subsection (d)(13), places a restriction on routine, scheduled testing or maintenance. If the testing or maintenance is required after an emergency engine stops working and repairs are needed to fix the engine so it is available for emergency operation, can the engine be tested on a forecasted ozone day under this situation? Our facilities staff conduct routine testing and maintenance on a monthly basis, which would be restricted. However, it is unclear if testing conducted after emergency repairs of the engine would be restricted if the testing is required to ensure the engine is available for emergency operation.
4. In subsection (f), Permanent cessation of operation, will the DEEP develop a form that can be submitted to notify DEEP that a unit will be permanently shut down which could serve as the "legally enforceable cease operation agreement"?
5. In subsection (g)(3)(E), just to clarify, the enforceable cap would be the lower of 1) 40% reduction of allowable emissions or 2) actual emissions over a consecutive 12-month period between June 1, 2018 and March 1, 2020. For a ICI boiler that is a registered source, would the allowable emissions be based on PTE (8,760 hours of operation per year) using the emission factor obtained from the most recent stack test? Actual emissions would also be calculated using the most recent stack test?
6. In subsection (g)(3)(F), if I understand this correctly, if a ICI boiler is operated as a "gas-fired boiler" under Subpart JJJJJ and meets the emissions limitations of subsection (d) for either residual oil-fired or other oil-fired would satisfy this compliance option? Or are you saying if it is a "gas-fired boiler" and meets the gas-fired emissions limitation would satisfy this compliance option. Please clarify this requirement.

Let me know if you have any questions about my comments. Thanks for your help with this.

Mark

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