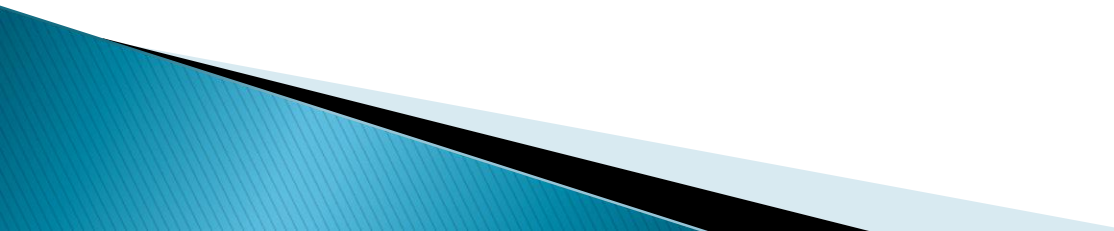


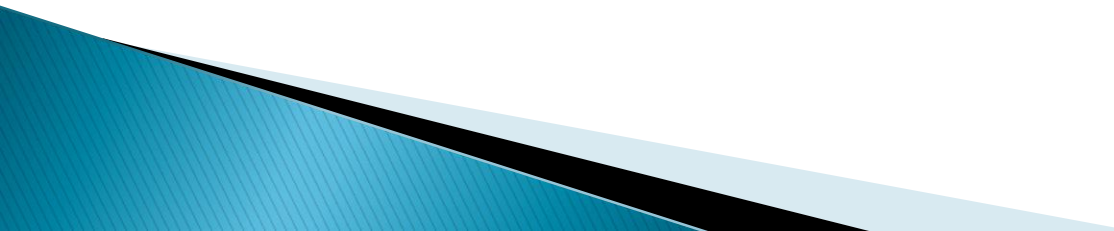
Connecticut DEP/OTC Process

SIPRAC 2/11/10

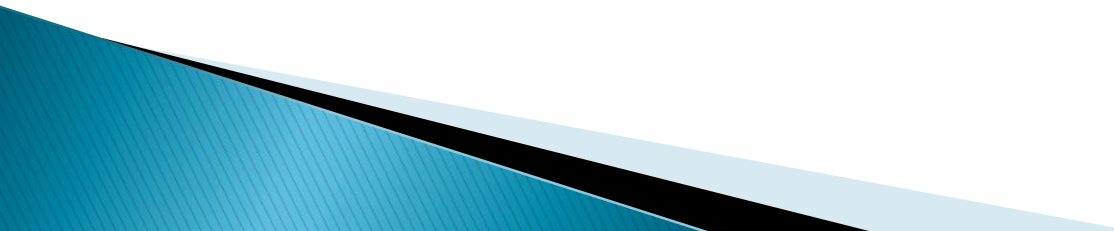
OTC Mission

- ▶ Established by federal CAA
 - ▶ Develops recommendations for control measures to be applied in the region to support attainment
 - ▶ Makes recommendations to EPA
 - ▶ Coordinates SIP development work efforts b/c ozone SIPs require significant modeling on regional platform and more efficient than each state replicating same work
- 

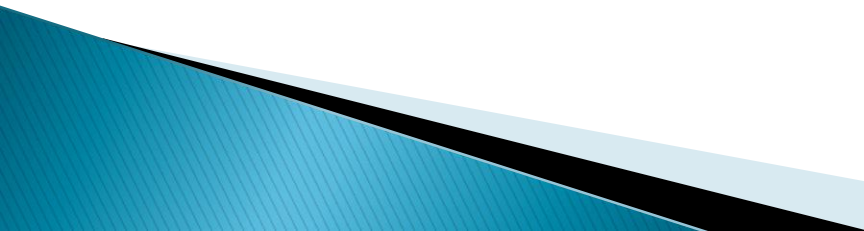
OTC Structure

- ▶ Commission members appointed by the Governors
 - ▶ Commission staff coordinate work effort as directed by the Commission
 - ▶ Committees of state technical staff do the analyses
 - ▶ Committees include: inventory, modeling, mobile, stationary/area sources
- 


The OTC SAS Committee Process

- ▶ Assess control strategies for consideration in ozone SIPs, including RACT and RACM categories to be updated or added.
 - ▶ Workgroups formed for each category.
 - ▶ Identify control measures.
 - ▶ Evaluate emission reductions.
 - ▶ Evaluate control costs.
 - ▶ Prepare white paper for recommendation.
 - ▶ Include potential reductions in modeling.
 - ▶ As needed, develop model rules.
- 

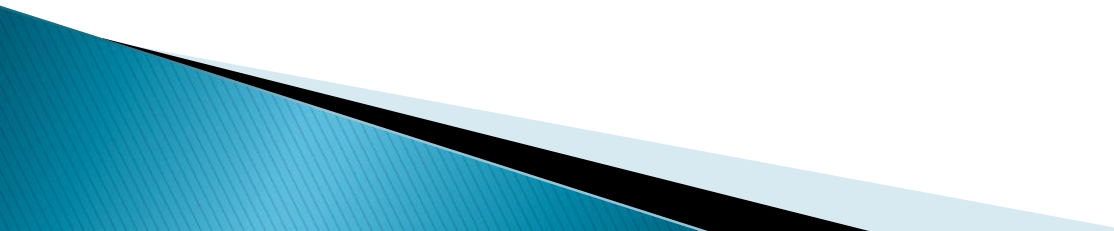
CTDEP – OTC Process

- ▶ Staff participate on OTC workgroups.
 - ▶ Evaluate CT emissions inventory and emissions reduction potentials.
 - ▶ Assist with development of OTC White Papers and Model Rules.
 - ▶ Inform SIPRAC of potential control measures and ability to comment during the OTC stakeholder meetings.
 - ▶ Evaluate each individual measure to determine if “appropriate and reasonable” for CT.
 - ▶ If reasonable and appropriate to adopt a control measure, go through stakeholder and state regulatory development process, including all public participation elements required under the Administrative Procedures Act.
- 

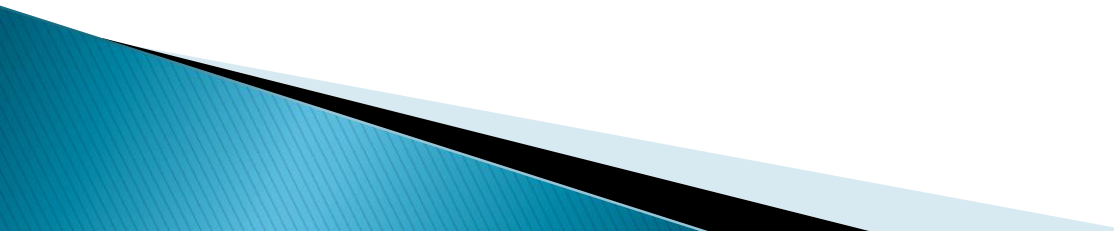
CTDEP's Enhanced Stakeholder Input Effort

- ▶ Obtain CT stakeholder input earlier in the OTC process by assuring stakeholders know what staff are working on and are better prepared to comment effectively at committee meetings.
 - ▶ Conduct targeted stakeholder meetings during the OTC process in order to learn CT industry specific concerns so state specific needs and concerns get considered before recommendations go to the Commission.
 - ▶ Include staff from field enforcement on the OTC workgroups so practical implementation experience go into strategy development.
 - ▶ As needed, schedule additional stakeholder meetings upon public release of the proposed control measures.
- 

OTC Opportunities

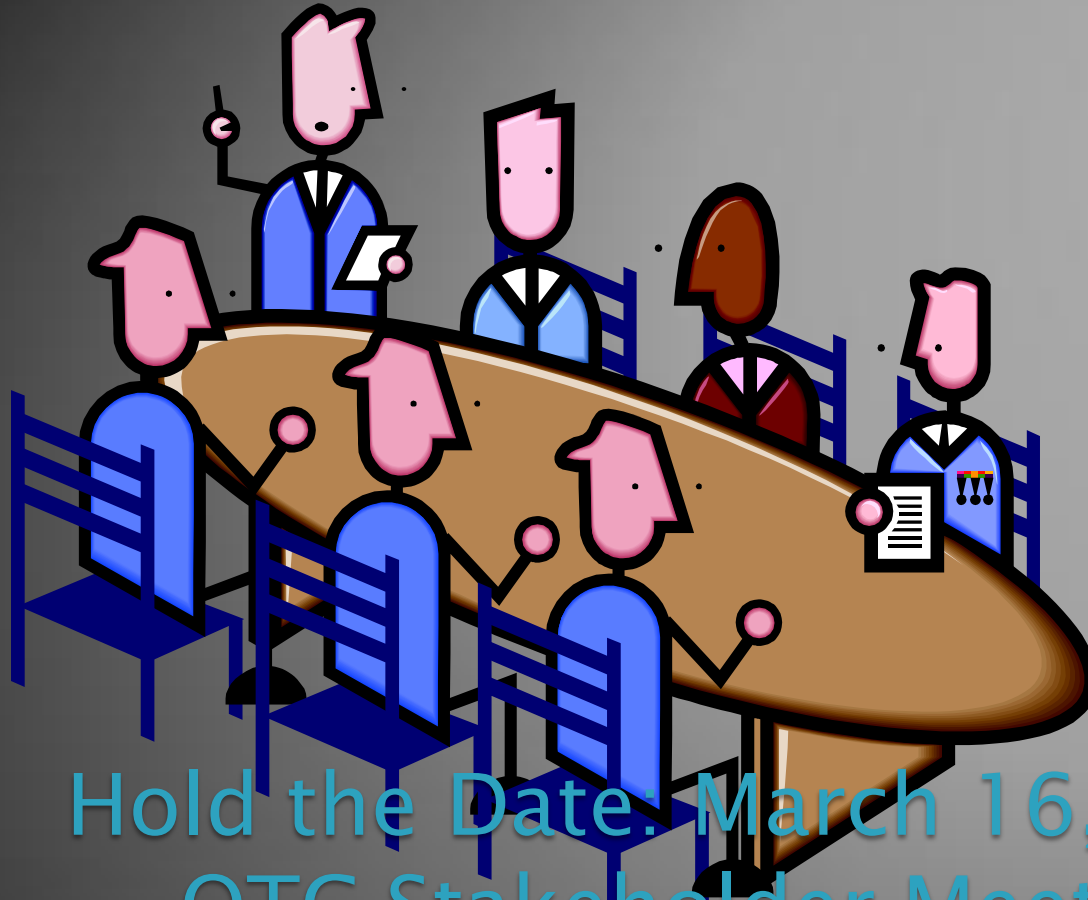
- ▶ Obtain CT stakeholder input earlier in OTC process.
 - ▶ Work with CT stakeholders to help them more effectively participate in evaluation of control measures and development of model rules.
 - ▶ CTDEP will continue to participate in regional efforts to encourage additional “upwind” reductions.
 - ▶ Stakeholders need to comment on OTC on model rules or control measures.
- 

OTC Formal Public Participation

- ▶ Committees seek stakeholder input before Commission meetings so they can make recommendation
 - ▶ Commission meetings provide another opportunity for stakeholder comment
- 

OTC Activity in 2009

- ▶ February 2009, Committee Meeting
 - Presented SIP timeline & requested ideas for control measures
- ▶ June 2009, OTC Annual Meeting
 - Distributed white papers and provided info for evaluating control measures
- ▶ September 2009, Committee Meeting
 - Presented guidelines and described recommended provisions
- ▶ November 2009, OTC Fall Meeting
 - Stakeholder comment opportunity and autobody action



Hold the Date: March 16, 2010 OTC Stakeholder Meeting

- Control measures under consideration by the committees will be presented
- Stakeholder comments encouraged



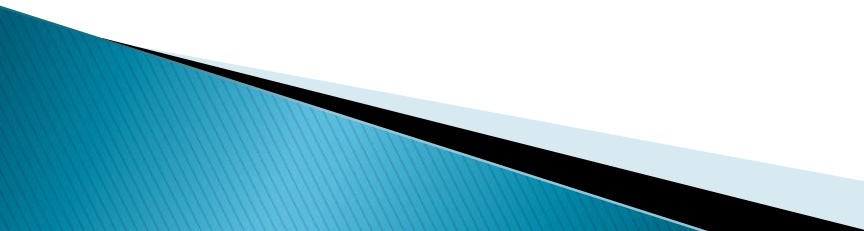
OTC Stationary Source Control Measures

- ▶ Small boilers, generators and heaters
 - ▶ Large above-ground storage tanks
- ▶ Stationary generators (i.e., distributed generators)
- ▶ Update to the consumer product rule
 - ▶ Update to the AIM rule
 - ▶ Low VOC solvent for degreasers
 - ▶ Oil- and gas-fired boilers

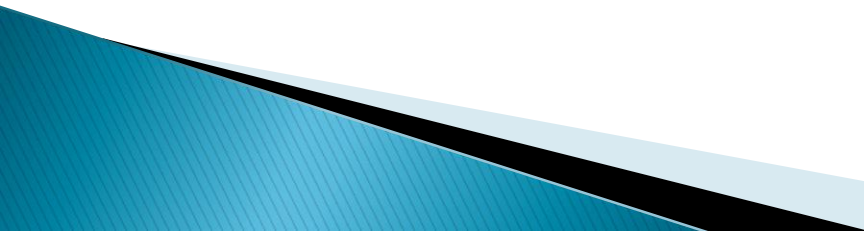
Small Boilers, Generators and Heaters

- ▶ Based on San Joaquin Valley Air Pollution Control District Rule 4308 and Rule 4307, California Air Resources Board Regulations and Texas Air Control Board Regulations.
- ▶ Does not apply to, among other things, units located in residential dwellings designed for 4 or fewer families.
- ▶ Applies to units between 75 MBtu/hr–5 MMBtu/hr manufactured, supplied, sold, offered for sale, installed or solicited to be installed on or after January 1, 2013.

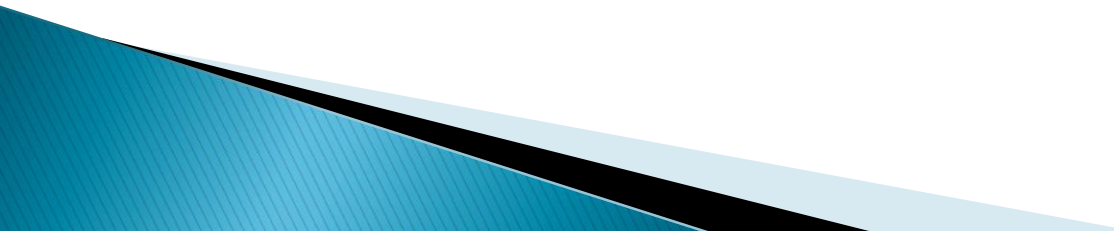
Stationary Generators

- ▶ Purpose: Ensure that small distributed generators that generate on high electric demand days are properly controlled
 - ▶ Loosely based on the Regulatory Assistance Project Model Rule for Smaller Scale Electric Generation Resources
 - ▶ Currently, no agreement on definitions of “emergency” and “emergency generator”
 - ▶ In CT, considering notification or registration for all existing generators with no new emissions limitations in the near-term.
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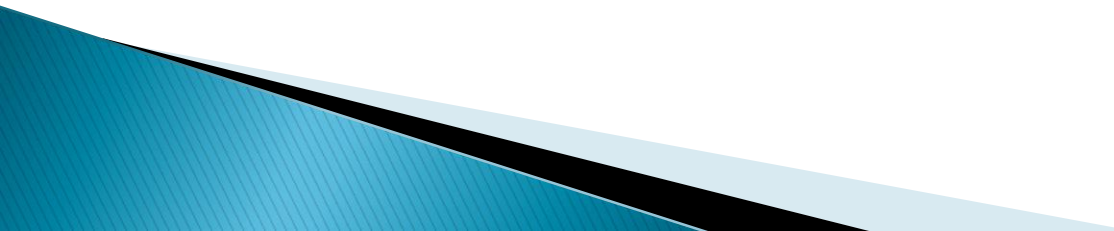
Large Above Ground Storage Tanks

- Based on the updated New Jersey regulation ([N.J.A.C. 7:27-16.2](#))
 - Level of control dependant on tank capacity and vapor pressure of the material stored
 - Most requirements only apply to tanks with capacities $> 40,000$ gallons
 - Phased compliance over 10 years for upgrades that require removing tank from service
- 

Consumer Product Rule Update

- ▶ Adds product categories (e.g., fabric softener, furniture maintenance products, oven cleaner) and revises VOC content limits for several products.
 - ▶ Based on regulatory revisions in California's consumer product program.
 - ▶ Revisions are generally supported by the national Consumer Specialty Products Association.
- 

Potential OTC Transportation Emission Reduction Strategies

- ▶ Non-road Equipment Idling
 - ▶ Catalytic Converters
 - ▶ Seaports
 - ▶ Lightering
 - ▶ Transportation Conformity
- 

Questions

- ▶ Contact Ric Pirolli at 860-424-3450 or ric.pirolli@ct.gov