



Connecticut Department of Energy and Environmental Protection



Testing/Monitoring Provisions of New (RCSA) Section 22a-174-22

SIPRAC New Section 22 Workgroup (i.e., SIPRAC Section 22- TNG Workgroup)



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Overview

- Today
 - Testing and monitoring
 - Draft regulatory language
 - Limited summary of NSPS/NESHAP testing/monitoring
 - March 25, 1-3 PM
- Gina McCarthy Auditorium
- *Compliance Options*



Today

- Overview of draft language
 - (xx) = performance testing
 - (xxx) = monitoring
- Issues addressed
- Discussion



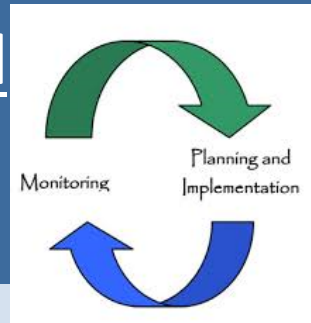
Performance Testing Highlights (xx)

- Tests may be conducted in accordance with an applicable NSPS.
 - If no periodic testing in NSPS, defaults to the 5 year frequency.
- Repeat tests allowed in a window of 57-63 calendar months.
 - Subsection (xx)(4) allows existing sources to “count” testing done under current Section 22 as a previous test. Alternative to testing at 90% MRC acceptable.
 - Similar to flexibility provided now.



Monitoring Highlights (xxx)

- States what emissions data are used to determine compliance. Emissions during startup and shutdown are excluded.
 - Definitions of startup/shutdown similar to those in the NESHAPs for Coal- and Oil-Fired Electric Utility Steam Generating Units and Major Source Industrial, Commercial, and Institutional Boilers and Process Heaters.
- Cites to 40 CFR 75 as well as 40 CFR 60 for performance and quality assurance specifications.
- Correction: (xxx)(2). Data should be collected at all of these times.



Test Creep

- Prevent test creep.
- Solution in subsection (xx), subdivisions (4) and (5)

. . . . Following the initial emission test conducted under this section, subsequent emission tests shall be conducted no less than 57 calendar months and no more than 63 calendar months following the date the previous emission test was conducted or the date the previous emission test was required to be conducted, whichever is earlier. . . .



Flexibility on 90% of MRC

- Allow variation from testing at 90% of MRC. Clearly allowed in Current Section 22 and in DEEP/EPA guidance.
- Solution:
 - Allows testing in accordance with NSPS.
 - Allows testing at an alternative maximum capacity.
- Question:
 - Does the language need to be more explicit that maximum capacity may be determined based on load, heat input, fuel burn rating?



Issues Not Addressed

- Limited use or low capacity factor boilers – MACT testing exemption or longer timeframes between tests?
 - Not specifically addressed. Default is testing once every 5 years.
- Don't require a unit to run just to test.
 - Not addressed unless there are provisions in applicable NO_x NSPS.



Areas Possibly Worthy of Discussion

- Should subsection (xx)(7)(B) be more explicit on alternatives to 90% MRC?
- Do we need any provisions for CHP?
- Should subsection (xx)(6)(B) be less restrictive for those units that cannot run for 15 minutes?



Draft Language for Discussion Purposes – Do Not Be Alarmed

- Draft testing/monitoring language has not yet been internally vetted, but the enforcement side is aware that we are having this discussion with you.
- If you have comments on the draft language, please submit them to Merrily Gere (merrily.gere@ct.gov) or Wendy Jacobs (wendy.jacobs@ct.gov) by COB March 20, 2015.



Next Meeting – Compliance Options

- March 25, 2015 from 1-3 PM in the Gina McCarthy Auditorium



Merrily's Best Classic Trek Episodes

- City on the Edge of Forever
- Mirror, Mirror
- Squire of Gothos
- Piece of the Action
- Amok Time
- Shore Leave
- Balance of Terror
- Enemy Within
- Bread and Circuses
- Trouble with Troubles
- Arena
- Devil in the Dark

