



September 5, 2017

Deborah Szaro  
Acting Regional Administrator  
U.S. Environmental Protection Agency  
Region 1  
5 Post Office Square – Suite 100  
Boston, MA 02109-3912

***RE: Emission Statement Certification for the  
2008 Ozone National Ambient Air Quality Standard***

Dear Administrator Szaro:

This letter serves as a State Implementation Plan (SIP) revision certifying that the Connecticut Department of Energy and Environmental Protection's (DEEP's) existing emission statement requirements are adequate to satisfy the emission statement requirement of Section 182(a)(3)(B) of the Clean Air Act (CAA) for the 2008 ozone national ambient air quality standard (NAAQS).

CAA Section 182(a)(3)(B) applies to stationary sources that emit nitrogen oxides (NOx) or volatile organic compounds (VOC) in an ozone nonattainment area. The owner of each stationary source that emits NOx or VOC must provide a statement each year of its NOx and VOC emissions, and the statement must be certified as to accuracy. Stationary sources in categories for which the state provides an emissions inventory to EPA may waive the emission statement requirement for categories of sources with actual emissions of NOx or VOC below 25 tons per year.

The entire State of Connecticut was designated as nonattainment for ozone for the 1-hour 1979 ozone NAAQS and each subsequent ozone NAAQS, including the 2008 ozone NAAQS. From its initial emission statement program State Implementation Plan (SIP) filing on January 12, 1993 (approved on January 10, 1995; 60 FR 2524), Connecticut has administered its emission statement program under the record keeping and reporting requirements of section 22a-174-4 of the Regulations of Connecticut State Agencies (RCSA). RCSA section 22a-174-4(d) in its current form was adopted in 2004 and approved into the SIP effective August 15, 2014 (59 FR 41427, 16 July 2014). RCSA section 22a-174-4 was also submitted to the U.S. Environmental Protection Agency (EPA) as part of Connecticut's infrastructure SIP for the 2008 ozone NAAQS on December 29, 2012, and the infrastructure SIP was deemed complete by EPA on January 3, 2013.

Emission statements are required of owners of certain sources to assess emission fees and maintain the state's emissions inventory. Connecticut's emission statement program is implemented consistent with the air emissions reporting rule (AERR), such that the annual

emissions statements and the triennial periodic emission inventories are compliant with the AERR.

Emission statements that require a statement of NO<sub>x</sub> and VOC emissions from individual sources as well as a certification as to accuracy are required annually of all Title V sources under RCSA section 22a-174-33 and from all combustion turbines via written notice under RCSA section 22a-174-4(d). In addition, statements, certified as to accuracy, of actual NO<sub>x</sub> and VOC emissions are required annually from owners and operators of facilities operating under the General Permit to Limit Potential to Emit (GPLPE) as a condition of the GPLPE. The GPLPE is issued under the authority of RCSA section 22a-174-33(d) and is a mechanism to limit aggregate potential emissions of regulated air pollutants to below major source thresholds.

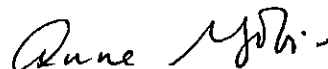
In addition, other sources that may have actual emissions of NO<sub>x</sub> or VOC in amounts of at least 25 tons per year are identified through information submitted under DEEP's minor new source review permit program authorized by RCSA section 22a-174-3a. Minor new source review permits are required for any source with potential emissions greater than 15 tons per year. Each permit requires monitoring, record keeping and reporting. Should the source emit NO<sub>x</sub> or VOC in amounts greater than 25 tons, a written notice under RCSA section 22a-174-4(d) requiring the submission of actual NO<sub>x</sub> and VOC emissions will be sent to the source owner, unless the permit includes a mandatory reporting clause. At any other time that DEEP becomes aware of a source for which the owner is not submitting an annual emission statement but that may emit actual emissions greater than or equal to 25 tons a year of NO<sub>x</sub> or VOC, DEEP requires an annual emission statement from the owner under the authority of RCSA section 22a-174-4(d). In this way, DEEP satisfies CAA section 182(a)(3)(B).

DEEP has satisfied all required federal procedures for public participation in 40 Code of Federal Regulations (CFR) Part 51 in finalizing this SIP revision. To demonstrate satisfaction of the federal public participation requirements, we have enclosed the public notice and a certification that the requirements of 40 CFR 51.102(a) and (d) were satisfied. No comments were submitted during the public comment period.

An electronic copy of this submission has also been mailed to you and the copy recipient listed below, and I certify that such copy is an exact copy of this paper submission.

If you have any questions concerning this SIP action, please feel free to get in touch with Ric Pirolli, Director, Planning & Standards Division, Bureau of Air Management, at 860-424-3450.

Sincerely yours,



Anne R. Gobin, Chief  
Bureau of Air Management

cc: Robert McConnell, EPA Region 1



**Notice of Intent to Revise the State Implementation Plan for Air Quality:  
Emission Statement Program Certification under Section 182(a)(3)(B) of the Clean Air Act**

The Commissioner of the Department of Energy and Environmental Protection (DEEP) hereby gives notice of intent to revise the State Implementation Plan (SIP) to certify that the emission statement program satisfies the requirements of Section 182(a)(3)(B) of the Clean Air Act (CAA) for the 2008 Ozone National Ambient Air Quality Standards (NAAQS). The certification and associated documentation will be submitted to the U.S. Environmental Protection Agency (EPA) as a SIP revision.

The authority to adopt this SIP revision is granted by section 22a-174 of the Connecticut General Statutes. This notice is required pursuant to 40 Code of the Federal Regulations 51.102.

**Description.** An emission statement program is required in a state with an ozone nonattainment area that is classified as marginal or higher. The entire State of Connecticut is designated as moderate nonattainment for the 2008 ozone NAAQS. As Connecticut has been designated as marginal nonattainment or higher for prior ozone NAAQS, DEEP has in place the necessary regulatory authority and procedures for issuing emission statements. Thus, DEEP must certify the adequacy of the emission statement program with respect to the 2008 ozone NAAQS.

The emission statement program is administered under the record keeping and reporting requirements of section 22a-174-4(d) of the Regulations of Connecticut State Agencies (RCSA) and reporting requirements of the Title V permit program (RCSA section 22a-174-33), the New Source Review permit program (RCSA section 22a-174-3a) and the General Permit to Limit Potential to Emit. Connecticut's emission statement program requires each owner of a stationary source of air emissions that could emit nitrogen oxides (NOx) or volatile organic compounds (VOC) in an amount of 25 tons or more to submit an annual statement of the actual emissions of NOx and VOC.

A copy of the proposed SIP revision is available for public inspection during normal business hours at DEEP's Bureau of Air Management, Planning and Standards Division 5th Floor, 79 Elm Street, Hartford, CT and may be reviewed by contacting Merrily Gere at 860-424-3416. The SIP Revision is also available on the DEEP website at the following link:

<http://www.ct.gov/deep/cwp/browse.asp?A=2586&BMDRN=2000&BCOB=0&C=21510>

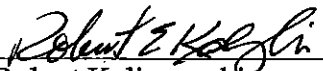
**Written comments.** All interested persons are invited to comment on the proposed SIP revision. Comments should be submitted via electronic mail to [merrily.gere@ct.gov](mailto:merrily.gere@ct.gov) or via postal carrier to Merrily Gere at DEEP, Bureau of Air Management, 5th Floor, 79 Elm Street, Hartford, CT 06106-4064. All comments should be received by 4:30 PM on August 30, 2017.

**Public hearing by request.** In accordance with 40 CFR 51.102, DEEP will hold a hearing at the time and location set out below **only if a request for a hearing is submitted by 4:30PM on August 16, 2017.**

August 30, 2017 at 11:00 AM  
Department of Energy and Environmental Protection, 5th Floor,  
Holcombe Room, 79 Elm Street  
Hartford, CT 06106

A request to hold the scheduled public hearing must be submitted to Merrily A. Gere in writing to [merrily.gere@ct.gov](mailto:merrily.gere@ct.gov) by 4:30PM on August 16, 2017. If no such request is submitted, the cancellation of the hearing will be posted on the DEEP website at the following link: <http://www.ct.gov/deep/cwp/browse.asp?A=2586&BMDRN=2000&BCOB=0&C=21510> On and after August 17, 2017, cancellation of the hearing may also be confirmed by calling Merrily Gere at 860-424-3416.

DEEP is an Affirmative Action/Equal Opportunity Employer that is committed to complying with the requirements of the Americans with Disabilities Act. Any person with a disability who may need a communication aid or service may contact DEEP's ADA Coordinator at 860-424-3194 or at [deep.hrmed@ct.gov](mailto:deep.hrmed@ct.gov). Any person needing a hearing accommodation may call the State of Connecticut relay number - 711. Any person with limited proficiency in English, who may need information in another language, may contact DEEP's Title VI Coordinator at 860-424-3035 or at [deep.aaoffice@ct.gov](mailto:deep.aaoffice@ct.gov). ADA or Title VI discrimination complaints may be filed with DEEP's EEO Manager at 860-424-3035 or at [deep.aaoffice@ct.gov](mailto:deep.aaoffice@ct.gov). Requests for accommodations must be made at least two weeks prior to any agency hearing, program or event.

  
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Robert Kaliszewski  
Deputy Commissioner

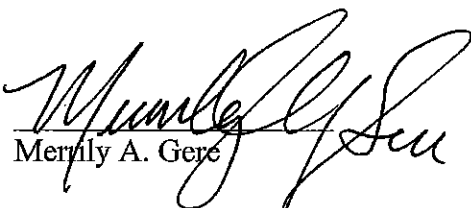
Date July 19, 2017



## **CERTIFICATION OF SATISFACTION OF 40 CODE OF FEDERAL REGULATION SECTION 51.102**

This certifies in accordance with the provisions of 40 Code of Federal Regulations Section 51.102 that the following actions were taken regarding the proposed State Implementation Plan (SIP) revision:

- 1) A notice of intent was published on the Connecticut Department of Energy and Environmental Protection's (DEEP's) website on July 19, 2017. The notice provided the opportunity to submit written comments through August 30, 2017.
- 2) The notice of intent announced a public hearing on August 30, 2017 at 11AM at DEEP Headquarters, 79 Elm Street, Hartford, CT. The notice specified that the hearing would be held only if requested and provided the location on the DEEP website on which the cancellation would be announced. No request was submitted for the hearing, so it was cancelled as announced in the notice.
- 3) In addition to posting on DEEP's website, the SIP revision was available for inspection at DEEP Headquarters at 79 Elm Street, Hartford, CT. This availability was described in the notice of intent.
- 4) On July 19, 2017, copies of the notice were mailed electronically to the directors of the air pollution control agencies in New York, New Jersey, Rhode Island and Massachusetts along with a copy to the Director of the Air Management Division of Region I of the U.S. Environmental Protection Agency.



Mervyn A. Gere

August 30, 2017