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.
Committees seek stakeholder input before Commission meetings so they can make recommendation.

Commission meetings provide another opportunity for stakeholder comment.
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
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.
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.
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

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