Overview

We asked you to:
- Identify portions of RCSA sections 22a–174–2a and 22a–174–3a that are not effective or are unclear.
- Bring examples of regulatory approaches in other states that are preferable to Sections 22a–174–2a and –3a.

We expected many ideas for improvement, including overall program changes and reformatting.

Surprised by what we heard should be done:
- Minor regulatory changes to Sections 22a–174–2a and –3a to delete obsolete requirements, make certain provisions clearer
- Adjust procedures and forms, especially for minor modifications
- Improve consistency of outcomes with shared information
- Revise the permit–by–rule regulations (22a–174–3b and –3c)
Suggested Regulatory Changes

- Definition of incinerator in Section 1 is too broad given requirement to obtain a permit in Section 3a(a)(1)(G)
- Develop procedures for an “administrative modification”
- Obsolete (?):
  - Section 3a(a)(4) concerning permits issued under Section 3
  - Subsections (n) and (m) of Section 3a
  - Section 2a(a)(2)(A) reference to second quarter 1980 dollars
- Other minor changes were suggested
  - Improve clarity
  - Eliminate redundancy
Inconsistent Outcomes, Unexplained Phenomena and Requested Options

• Minor modifications
  – Different engineer, different information required
  – Unclear what is required in an application
  – Different fee amounts charged
  – Completeness and the 21-day waiting period

• Permit revision for a fuel conversion
  Additional requirements are often added to the permit beyond the scope of the revision

• Allow applications with generic equipment and estimates of characteristics

• Develop a turbine replacement policy
Permits–by–Rule

- Add new equipment
  - Degreasers
  - Non–road engines
- Improve the existing requirements
  - Plasma spray booths and Section 3b(g)
  - Section 3b(c)(1)(D) is not clear about stack height with regard to neighboring buildings
  - Section 3c should allow for purchase records or use records to demonstrate compliance
Focus on actions that:
- Improve consistency of outcomes;
- Satisfy a federal mandate; or
- Improve air quality.

Non-regulatory actions
- Creating minor modification forms and instructions
- NSR LEAN implementation
- Communication of procedures internally and externally
Likely regulatory actions

- Evaluate revising Section 3a or Section 1 concerning incinerators for which a permit must be obtained
- Hold an issue identification session on the permits–by–rule regulations (RCSA sections 22a–174–3b and –3c), likely after SIPRAC in April
- Other “clean up” items will fit in with higher priority regulatory work (see the regulatory agenda presentation from January 11, 2011 SIPRAC meeting)
Questions/Comments

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