• Amendment of RCSA sections 22a-174-29, -33, -3c.


• Stage I/II Vapor Recovery.

Update on Section 38
**General Comments**

- Modifications should be exempted from having to obtain NSR or Title V permits or at least offer flexibility (compliance extension) to comply with RACT limits. (Wheelabrator).

- Compliance date should be within 2 years of promulgation instead of July 1, 2017. (Covanta).

- Remove reference to subdivision (l)(1)(B) from Section 38. (MIRA).
Comments on Ammonia Emission Limit

• Rather than the draft ammonia emission limit, Covanta suggests a 2-year testing program and a negotiated, facility-specific ammonia limit at the conclusion. (Covanta).

• Section 38 amendment should include provisions for utilizing either ammonia CEMS or stack testing on an annual basis, to demonstrate compliance. (MIRA).
Comments on Bag Leak Detection System

- Bag leak detection systems are redundant since all WTE units are equipped with continuous opacity monitoring system. (Wheelabrator).
- Baghouse leak detection systems will not provide any improvement in bag leak detection and cannot be technically or economically justified. (Wheelabrator).
- The requirement for bag leak detection systems is premature. (Covanta).
- More discussion is needed before requiring bag leak detection systems. (MIRA).
Next Steps

• Revise draft amendment.
• Distribute to MIRA, Covanta and Wheelabrator.
• Send to Governor and OPM for review and approval.
Update on New Section 22

• Meeting on 23 February focused on testing and monitoring.

• Some comments on draft language during meeting:
  – A unit with NOx CEMS does not need an initial stack test. The RATA serves the same function.
  – Consider the approach used in the CISWI rule to establish and change the load at which testing is conducted.
  – The repeat stack test window only needs a “no later than time.”
  – Revise the data collection requirement to include maintenance and repairs.

• Taking additional comments on draft through March 20.

See the RACT web page!
Next Steps on New Section 22

• Meeting scheduled for 25 March, 1PM, Gina McCarthy Auditorium to discuss compliance options.

• Materials including draft regulatory language will be sent to the subcommittee and posted on the RACT web page prior to the meeting.

• Subsequent meeting on 29 April at 1PM.