

Cinda,

Thank you for your message. We appreciate the opportunity to provide input into your policy/guidance.

There was one other matter that we wanted to discuss with you with regard to the guidance on VOC quantification. We recognize that this is CT DEEP's guidance but we are concerned that there could be situations where an undelegated federal standard applies to a facility, at the same time as a CT regulation/permit, and we might not agree with a test protocol submitted with certain types of mass balance methods for determining compliance. If CTDEEP is trying to address the need for actual mass emissions (instead of "as carbon"), we suggest that any mass emissions calculation should be determined by Method 18 or Method 320. We feel that those are the only ways to determine mass emissions directly.

We suggest a footnote that would alert readers of the guidance that in cases where both state and undelegated federal standards apply, EPA may have a different requirement and the company should contact EPA before proceeding with those types of VOC tests.

Would it be helpful to meet to discuss? We would be happy to meet in Hartford if that would be helpful.

Thanks again for coordinating with us.

Steve

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**From:** Lautenschlegar, Cinda [<mailto:Cinda.Lautenschlegar@ct.gov>]  
**Sent:** Monday, May 14, 2018 1:34 PM  
**To:** Rapp, Steve  
**Cc:** Lancey, Susan ; Osbahr, Bill ; Keefe, Jerome C. ; Bobbs, Nicholas ; Girard, Robert  
**Subject:** RE: Draft SEMS forms for Comment

Thank you for your input, Steve.

I'll make the necessary updates and will contact you should I need clarification.

Have a nice day.  
Cinda

**From:** Rapp, Steve [<mailto:Rapp.Steve@epa.gov>]  
**Sent:** Wednesday, May 09, 2018 4:13 PM  
**To:** Lautenschlegar, Cinda <[Cinda.Lautenschlegar@ct.gov](mailto:Cinda.Lautenschlegar@ct.gov)>

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**Subject:** Draft SEMS forms for Comment

Cinda,

Good afternoon. EPA appreciates the opportunity to review CT's SEMS forms. The forms and guidelines clearly show a tremendous amount of work that your office has done. Connecticut DEEP should be recognized for creating a system that will assist both the regulated community and the regulators in reviewing stack test information efficiently. Thanks for all of your efforts in this area.

We did have a number of questions and suggestions in the attached document that we hope will provide further clarity. Please let us know if you have any questions or would like to discuss any of the suggestions.

Thanks again for the preview.

Steve

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