GPLPE Replacement Regulations:
Draft Sections 22a-174-33a and 22a-174-33b of the Regulations of Connecticut State Agencies

SIPRAC
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Transition to a Regulatory Format

- The first GPLPE was issued in 1996.
- There have been four renewals, the current one expires on November 8, 2020.
- Currently, 173 sources are covered under the GPLPE.
  - 155 under the “GPLPE-50”
  - 18 under the “GPLPE-80”
- Over the years, high compliance rates have been observed.
Transition to a Regulatory Format

- EPA will not approve a renewal of the GPLPE.
- Pursuant to section 22a-6aa of the Connecticut General Statutes, the GPLPE cannot be extended beyond its expiration date, since the commissioner does not intend to renew it.
- A replacement program, the GPLPE replacement regulations, needs to be in effect on or before November 8, 2020.
Introduction

**Purpose:** To provide a practicably enforceable alternative to comply with Title V of the Clean Air Act given the impending expiration of the current GPLPE.
Highlights

• Same terms and provisions as the current GPLPE, with some minor changes and/or new requirements.

• Two new sections: RCSA section 22a-174-33a and section 22a-174-33b to replace “GPLPE-50” and “GPLPE-80,” respectively.

• Operation under RCSA section 22a-174-33a or section 22a-174-33b is **OPTIONAL**.

• Not limited to major stationary sources.

• No registration fee.
Draft Requirements

Applicability Requirements

**RCSA §22a-174-33a(b)**
Same as the current GPLPE, including the three types of premises that are not eligible.

**RCSA §22a-174-33b(b)**
New and/or amended requirement:
The owner or operator of any premises with equipment that conducts a chemical manufacturing process shall obtain approval of their monitoring plan and record keeping plan prior to operating in accordance with this section.
Draft Requirements

Emissions Requirements - Source of data for calculating emissions

RCSA §§22a-174-33a(d) and 22a-174-33b(d)

New and/or amended requirement:
Approval from the commissioner and the Administrator of the use of another source of emissions data shall be obtained prior to operating in accordance with these sections.
Monitoring Requirements

RCSA §22a-174-33a
Same as the current GPLPE: None

RCSA §22a-174-33b(e)
New and/or amended requirement:
Chemical Manufacturing Process (VOC or HAP Emissions) - Implementation of an approved monitoring plan, and record keeping in accordance with this section.
Record Keeping Requirements

RCSA §22a-174-33a(e)

New and/or amended requirements:

• Records of installation and removal dates, maximum rated capacity, location of the unit (if applicable), and a description for all emission units, air pollution control equipment, and emission monitoring equipment at the premises.

• Monthly records required by this section shall be created no later than 30 days after the end of each month.
Draft Requirements

Record Keeping Requirements

RCSA §22a-174-33b(f)

New and/or amended requirements:

• Total monthly and consecutive 12 month actual emissions records for all regulated air pollutants.

• Records of a MSDS, Environmental Data Sheet, Certified Product Data Sheet, or an equivalent data sheet for each HAP containing material used (for each source of VOC and/or HAP and for each chemical manufacturing process).

• For each chemical manufacturing process:
  ▪ Copies of the approved monitoring plan and approved record keeping plan, and copies of such approvals;
  ▪ Records of any changes made to the monitoring plan or record keeping plan;
  ▪ Records included in the approved record keeping plan; and
  ▪ Records of any process changes made at the premises that affect the information submitted in the approved monitoring plan or approved record keeping plan.
Reporting Requirements

RCSA §22a-174-33a(f)
Same as the current GPLPE.

RCSA §22a-174-33b(g)
New and/or amended requirement:
Requirement to submit potential emissions calculations, when requested in writing, within 14 days of receipt of such request or within a later time frame if indicated in such request.
Notification Requirements

RCSA §§22a-174-33a(g) and 22a-174-33b(h)

New and/or amended requirements:

- **Initial Notification** - Committing to operate a premises pursuant to RCSA section 22a-174-33a or section 22a-174-33b.
  - Additional information as outlined in RCSA section 22a-174-33b(h)(2) for Chemical Manufacturing Process sources.

- **Cessation Notification** - Ceasing to operate a premises pursuant to RCSA section 22a-174-33a or section 22a-174-33b.
Next Steps

• Informal Comments
  ▪ By COB Friday, January 4, 2019
  ▪ Informal comments may be submitted via electronic mail to Raquel.Herrera@ct.gov

• Meeting Requests - if additional discussion is necessary
  ▪ By COB Friday, January 4, 2019
  ▪ Meeting requests may be submitted via electronic mail to Raquel.Herrera@ct.gov
Additional Questions

Contact Raquel Herrera at
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