Transition from the GPLPE to RCSA §22a-174-33a and RCSA §22a-174-33b

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Presentation Outline

- GPLPE Replacement
- GPLPE Reporting
- Transition to “Permit by Rule”
- 33a and 33b Notification Forms
- Useful Links
- Questions?
In lieu of reissuing the GPLPE the Department adopted two regulations allowing facilities to limit actual premises-wide emissions below Title V source thresholds

- RCSA 22a-174-33a Limit on Premise-Wide Emissions below 50% of Title V Source Thresholds
- RCSA 22a-174-33b Limit on Premise-Wide Emissions below 80% of Title V Source Thresholds
- Emission limits, monitoring, recordkeeping and reporting requirements are structured similarly to the GPLPE
GPLPE Reporting

• The General Permit to Limit Potential to Emit expired on November 8, 2020
  – All GPLPE registrants were sent an email reminder on 10/2/2020 regarding reporting obligations for 2020
    • All registrants are required to report for calendar year 2020 using the EMIT online electronic reporting application
    • The compliance period for 2020 will be January 1, 2020 through the expiration of the permit, November 8, 2020.
    • Calculations for the actual emissions reported in Part 2 of the compliance certification may be reported for a period extending beyond the permit expiration date if it works best with a registrant’s existing record keeping practices.
Transition to “Permit by Rule”

- Email notification sent to GPLPE registrants on 10/8/2020 regarding the transition to new regulations as an option to limit premise-wide potential emissions
  - Included copies of the new regulations, forms to commence operating and to cease operating under the new regulations
  - Provided guidance that compliance reporting required under new regulations would not be required for the period of 11/9/2020 – 12/31/2020
Notification Forms

• Facilities electing to operate under 33a or 33b must submit notification to the Department

• Facilities ceasing to operate under 33a or 33b must submit a notification to the Department within 30 days

• Facilities may elect to change coverage between 33a and 33b
  – must submit the appropriate notifications to cease coverage under one regulation and to commence operating under the other regulation
Notification Forms (cont.)

• The notification must be submitted on forms provided by the commissioner
• Notification forms are regulation specific
• Forms and instructions are available on the DEEP Air Compliance Assurance page

https://portal.ct.gov/DEEP/Air/Compliance-Assurance/Air-Compliance-Assurance---Forms
Other Useful Links

• DEEP ezFile Homepage: https://filings.deep.ct.gov/DEEPPortal/
• Link to Section 22a-174-33a
• Link to Section 22a-174-33b
Questions?

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