§22a-174-33a and RCSA §22a-174-33b Compliance Reporting Update

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Samantha Amaral, Environmental Analyst
Compliance Analysis & Coordination Unit
Bureau of Air Management
Dept. of Energy and Environmental Protection

Connecticut Department of Energy and Environmental Protection
Presentation Outline

- Reporting Refresher
- Why EMIT Won’t Be Used
- How to Access Forms
- Annual Compliance Certification & Instructions
- How to Submit Forms
- Questions?
Reporting Refresher

• Facilities electing to operate under §RCSA 22a-174-33a must submit an Annual Compliance Certification for the previous calendar year on or before March 1st.

• Facilities electing to operate under §RCSA 22a-174-33b must submit an Annual Compliance Certification and an Annual Emission Summary for the previous calendar year on or before March 1st.
Reporting Refresher (cont.)

• Compliance reports were not required for any period of operation under these regulations in 2020

• The first reporting period commenced on January 1, 2021 or the date of Notification of Commencement of Operation, whichever is later
Why EMIT Won’t Be Used

• The GPLPE required electronic reporting via EMIT online

• Initial plan was to modify GPLPE reporting in EMIT to accommodate reporting under 33a and 33b

• Modifications required to accommodate changes were more complex than anticipated
  – Regulations do not use a registration identification number or have an expiration date which is used by EMIT to identify active sources
  – One permit moving to two regulations required new report build rather than updating existing forms. EMIT currently only supports reporting for two source types (TV and GPLPE)
  – Limited IT resources
How to Access the Forms

• Each facility will be sent an instruction sheet and Annual Compliance Certification (ACC) Form by E-mail

• The instruction sheet and ACC form will also be available on the DEEP website
Instructions & Annual Compliance Certification

• Instructions:
  – Guidelines for filling out and submitting ACC

• Annual Compliance Certification:
  – Facility Information
  – Emissions & Recordkeeping Requirements
    • Indicate Continued Compliance (CC), Intermittent Compliance (IC), or Not Applicable (NA)
  – Certification Statement
    • Date and sign

• Emissions Summary (Only applies to 33b)
How to Submit Forms

• Forms can be submitted one of two ways:
  – Electronically by E-mail to: DEEP.CACU@ct.gov (preferred method)
  – By mail (address can be found on Instruction Sheet)

• Forms submitted electronically via E-mail must be submitted as PDFs

• Electronic signatures will be accepted either as digital signature on PDF or a printed, signed, and scanned copy of the ACC
How to Submit Forms (cont.)

• Reminder E-mails will be sent out at the end of the calendar year
• Submissions are due by March 1st, 2022
• Confirmation E-mail will be sent out once ACC is received
Questions?

Samantha Amaral
Samantha.Amaral@ct.gov
(860) 424-3683

Jared Millay
Jared.Millay@ct.gov
(860) 418-5911