

**Emission Statement Certification for the
2015 Ozone National Ambient Air Quality Standard
21 April 2023**

This State Implementation Plan (SIP) revision certifies that the Connecticut Department of Energy and Environmental Protection's (DEEP's) existing emission statement requirements are adequate to satisfy the emission statement requirements of Section 182(a)(3)(B) of the Clean Air Act (CAA) for the 2015 ozone national ambient air quality standard (NAAQS) for the initial designations of marginal (Greater Connecticut area) and moderate (Southwest Connecticut area)¹ and the subsequent reclassification of the marginal area to moderate nonattainment.²

CAA Section 182(a)(3)(B) applies to stationary sources that emit nitrogen oxides (NO_x) or volatile organic compounds (VOC) in an ozone nonattainment area. The owner of each stationary source that emits NO_x or VOC must provide a statement each year of its NO_x and VOC emissions, and the statement must be certified as to accuracy. For stationary sources in categories for which the state provides an emissions inventory to the U.S. Environmental Protection Agency (EPA), the state may waive the emission statement requirement for sources with actual emissions of NO_x or VOC below 25 tons per year.

The entire State of Connecticut was designated as nonattainment for ozone for the 1-hour 1979 ozone NAAQS and each subsequent ozone NAAQS, including the 2015 ozone NAAQS. Beginning with its initial emission statement program SIP filing on January 12, 1993 (approved on January 10, 1995; 60 FR 2524), Connecticut administered its emission statement program under the record keeping and reporting requirements of section 22a-174-4 of the Regulations of Connecticut State Agencies (RCSA). RCSA section 22a-174-4 was repealed effective 28 October 2022 and replaced on the same date with RCSA section 22a-174-4a. RCSA section 22a-174-4a retains the elements necessary to administer the emission statement program in RCSA section 22a-174-4a(b)(1). RCSA section 22a-174-4a was submitted to EPA as a SIP revision on November 17, 2022 but has not been approved into the SIP.

Emission statements are required of owners of certain sources to assess emission fees and maintain the state's emissions inventory. Connecticut's emission statement program is implemented consistent with the air emissions reporting rule (AERR), such that the annual emissions statements and the triennial periodic emission inventories are compliant with the AERR.

¹ Additional Air Quality Designations for the 2015 Ozone National Ambient Air Quality Standards. 83 FR 25776 (4 June 2018).

² Determinations of Attainment by the Attainment Date, Extensions of the Attainment Date and Reclassification of Areas Classified as Marginal for the 2015 Ozone National Ambient Air Quality Standards. 87 FR 60897 (October 7, 2022).

Emission statements that require a statement of NO_x and VOC emissions from individual sources as well as a certification as to accuracy are required annually of all Title V sources under RCSA section 22a-174-33. Such statements are also required of the owners of all combustion turbines via written notice under the authority, historically, of RCSA section 22a-174-4(d). Future statements will be required under the authority of RCSA section 22a-174-4a(b)(1). In addition, statements, certified as to accuracy, of actual NO_x and VOC emissions are required annually from owners and operators of facilities operating under RCSA section 22a-174-33a or section 22a-174-33b. These two sections provide a mechanism for a source owner to limit aggregate potential emissions of regulated air pollutants to levels below major source thresholds.

In addition, other sources that may have actual emissions of NO_x or VOC in amounts of at least 25 tons per year are identified through information submitted under DEEP's minor NSR permit program authorized by RCSA section 22a-174-3a. Minor NSR permits are required for any source with potential emissions greater than 15 tons per year. Each permit requires monitoring, record keeping and reporting. Should the facility have potential emissions of NO_x or VOC equal to or greater than 25 tons per year per pollutant, the permit requires the facility owner to monitor NO_x or VOC emissions, as applicable, and calculate annual emissions. If the actual annual emissions of NO_x or VOC are equal to or greater than 25 tons per year, the facility owner must submit an annual emission statement to the DEEP Commissioner.

At any other time that DEEP becomes aware of a source for which the owner is not submitting an annual emission statement but that may emit actual emissions greater than or equal to 25 tons per year of NO_x or VOC, DEEP requires an annual emission statement from the owner under the authority of RCSA section 22a-174-4a(b)(1). Through all the described procedures, DEEP satisfies CAA section 182(a)(3)(B).