

The background is a solid blue color. In the upper left and right corners, there are faint, light blue illustrations of dandelion seed heads. A trail of dandelion seeds is shown blowing from the right side towards the left, following the curve of the main title. The title text is white and centered in the upper half of the slide.

Connecticut's Approach to Implementing the Greenhouse Gas Tailoring Rule

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Consequences of Federal Requirements

- ✿ States are required to demonstrate sufficient infrastructure to permit GHG sources under their NSR and Title V programs by January 2011
- ✿ States without the necessary infrastructure to permit GHG sources will be subject to a SIP Call and FIP
- ✿ EPA will publish a finding that CT's SIP is inadequate
- ✿ Effective January 2011, unless and until we have an approved GHG permitting program, sources will be subject to dual permitting under EPA's FIP and CT's regulations
- ✿ CT DEP is expediting the regulatory revision process to incorporate GHG thresholds into our permitting programs to minimize EPA's duration as the "Permitting authority"

Permitting Program Revisions

☀ Two programs

- ✂ New source review prevention of significant deterioration (NSR PSD)
- ✂ Title V

☀ Two definitions

- ✂ **Greenhouse gas:** the aggregate of the following six component gases: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), any hydrofluorocarbon (HFC) or any perfluorocarbon (PFC)
- ✂ **Carbon dioxide equivalent emissions**

☀ New applicability thresholds

✂ Obtain a Title V permit for emissions:

- ❖ $\geq 100,000$ tpy GHGs on a CO₂e basis; and
- ❖ ≥ 100 tpy GHGs on a mass basis.

✂ Conduct a BACT review for GHG for:

- ❖ New or modified major sources for non-GHG emissions, if GHG emissions (or net increase) is $\geq 75,000$ tpy CO₂e
- ❖ New GHG sources with CO₂e emissions of $\geq 100,000$ tpy and either:
 - GHG emissions (mass basis) ≥ 100 tpy, or
 - Some other regulated NSR pollutant ≥ 100 tpy.

☀ GHG Cap in GPLPE (100,000 tons CO₂e) Focus on streamlining (e.g. GPLPE in lieu of Title V permitting)

We're on the Fast Track...

- ★ On January 2, 2011 EPA will become the "Permitting Authority" for GHG until CT submits and receives approval of SIP
- ★ Expedited amendment process for RCOSA Sections 22a-174-3a and 22a-174-33
 - ❖ Working drafts of NSR PSD and Title V regulatory revisions are available
 - ❖ Current revisions are limited to GHGs
 - ❖ Your immediate and focused attention is necessary
- ★ Intend to get proposal to notice by next month...
- ★ Send comments on proposal to Merrily by August 27, 2010
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