



# Connecticut Department of Energy and Environmental Protection



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

SIPRAC

December 13, 2018

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# Presentation Overview

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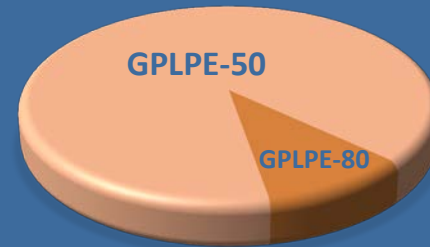
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# Background

## 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.



# Background

## 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.



Connecticut Department of Energy and Environmental Protection

# Introduction



## 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)

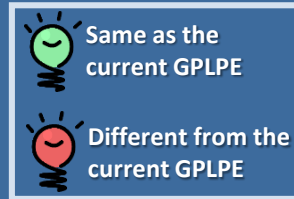
Same as the current GPLPE, including the three types of premises that are not eligible.



### 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.



# Draft Requirements

## 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.



# Draft Requirements

## 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.





# Draft Requirements

## 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.



# Draft Requirements

## 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](mailto:Raquel.Herrera@ct.gov)

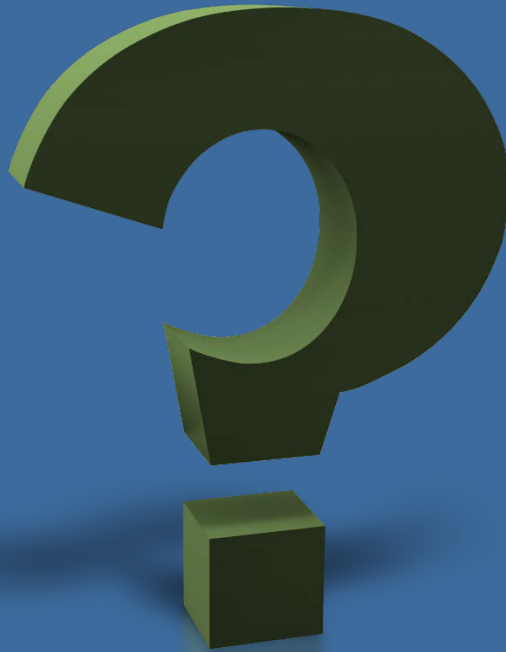


- **Meeting Requests - if additional discussion is necessary**

- By COB Friday, January 4, 2019
- Meeting requests may be submitted via electronic mail to [Raquel.Herrera@ct.gov](mailto:Raquel.Herrera@ct.gov)



# Questions



## Additional Questions

Contact Raquel Herrera at

(860) 424-3150 or

[Raquel.Herrera@ct.gov](mailto:Raquel.Herrera@ct.gov)



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