

# Update on the Proposed RACT State Implementation Plan Revision and the Nonattainment New Source Review Certification

Merrily A. Gere  
Stationary Source Control Group  
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Connecticut Department of Energy and Environmental Protection

# Two SIP Revisions Proposed

- A notice of intent was posted August 10, 2020 inviting comment on two State Implementation Plan (SIP) revisions. <https://portal.ct.gov/DEEP/Public-Notices/Public-Notices-Proposed-Actions---Opportunity-for-Comment/Proposed-State-Implementation-Plan-SIP-Revisions/Notice-of-Intent-to-Revise-the-State-Implementation-Plan-for-Air-Quality>
- Both SIP revisions are required under the Clean Air Act as a result two actions:
  - Reclassification of Connecticut to serious nonattainment for the 2008 ozone national ambient air quality standards (NAAQS).
  - Classification of Connecticut as marginal (Greater CT area) and moderate (NY-NJ-LI area) nonattainment for the 2015 ozone NAAQS.



# RACT SIP

- The last reasonably available control technology (RACT) review was completed in 2014 for the initial designations under the 2008 ozone NAAQS.
  - Adoption of RCSA sections 22a-174-22e and 22a-174-22f.
  - NOx standards in RCSA section 22a-174-38 updated.
- This review finds no RACT deficiencies in existing NOx and VOC standards for major sources of NOx or VOC or sources subject to a Control Techniques Guideline.
  - One caveat: If the OTC recommends a new control strategy in the near future, we need to consider it for the 2015 ozone NAAQS.



# Nonattainment New Source Review Program Adequacy

- A certification that the existing nonattainment new source review (NNSR) program meets the requirements of 40 CFR 51.165.
- Our NNSR program uses the serious and severe classifications from the 1-hour ozone NAAQS, which is why no change is required, despite the reclassification to serious nonattainment for the 2008 ozone NAAQS.



# Next Steps

- Comments on both proposed SIP revisions may be submitted through September 30, 2020 via electronic mail to [merrily.gere@ct.gov](mailto:merrily.gere@ct.gov).
- A response-to-comment document will be prepared, and the final SIP revisions will be submitted to the US Environmental Protection Agency for approval.
- Any questions can be submitted to [merrily.gere@ct.gov](mailto:merrily.gere@ct.gov).

