December 8, 2006

The Honorable Robert W. Varney
Regional Administrator
United States Environmental Protection Agency
Region I, EPA New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Re: ***8-Hour Ozone Attainment Measures***

Dear Mr. Varney:

In accordance with the provisions of Title 40 Code of Federal Regulations Section 51 Appendix V, the enclosed revision to Connecticut's State Implementation Plan (SIP) for air quality is being submitted for your approval. The revision, *8-Hour Ozone Reasonably Available Control Technology State Implementation Plan Analysis for the State of Connecticut*, includes a detailed description and analysis of Connecticut's reasonably available control technology (RACT) controls. Also included, in accordance with Appendix V, are copies of the hearing notice and hearing certification. All documents are submitted in quintuple as required.

As you are aware, Connecticut has moved well beyond merely implementing RACT, and we have included in this SIP revision a discussion of additional 8-hour ozone attainment measures currently in development that pertain to the RACT category sources but go beyond the RACT requirements. We will be submitting these rules in support of the state's 8-hour ozone attainment demonstration. You may access our progress with respect to these, and other attainment measures, at our web site at the following location: http://www.dep.state.ct.us/air2/regs/index.htm.

If you have any questions regarding this submittal, please contact Mr. Gary Rose, the Air Bureau's Director of Engineering and Technical Services, at 860-424-4152.

Yours truly,

/s/ Gina McCarthy

Gina McCarthy
Commissioner

Enclosures

cc: David Conroy, EPA Region 1
Kiernan J. Wholean, CT DEP

HEARING REPORT

Prepared Pursuant to
Code of Federal Regulations Part 40, Section 51.102

Regarding Revision to the
State Implementation Plan for Air Quality

Hearing Officer: Kiernan J. Wholean

Date of Hearing: October 18, 2006

On September 7, 2006, the Commissioner of the Department of Environmental Protection (DEP) signed a notice of intent to revise the State Implementation Plan (SIP) for air quality required by the Clean Air Act Amendments of 1990 (CAA). The revision to the SIP is a demonstration that reasonably available control technology (RACT) requirements adopted for attainment of the 1-hour ozone national ambient air quality standard (NAAQS) are sufficient to satisfy RACT for the 8-hour ozone NAAQS. Pursuant to the notice, a public hearing was held on October 18, 2006. The public comment period for the proposed SIP revision closed on October 20, 2006.

I. Hearing Report Content

This report describes the revision to the SIP as proposed for hearing; a statement of the principal reasons in support of the SIP revision; all comments made and responses thereto regarding the proposed revision to the SIP; and the final recommendation based on the proposal and comments received.

II. Summary and Text of the Revision as Proposed

The purpose of this SIP revision is to ensure that RACT requirements for attainment of the 8-hour ozone NAAQS are in place. In the SIP revision, DEP demonstrates that the control measures already in place as attainment measures for the 1-hour ozone NAAQS satisfy, and in some cases exceed, the 8-hour ozone requirements. The SIP revision as proposed is included in Attachment 1 to this report.

III. Principal Considerations for the Proposed Revision

This SIP revision satisfies the RACT requirements of Sections 172(c)(1) and 182 of the Clean Air Act (CAA) as it applies to the 8-hour ozone NAAQS. The CAA requires that states achieve the health-based 8-hour ozone NAAQS by specified dates, based on the severity of an area's air quality problem. As the entire State of Connecticut is classified as moderate non-attainment for the 8-hour ozone NAAQS, EPA's *Final Rule to Implement the 8-Hour Ozone NAAQS* [70 FR 71612, November 29, 2005] requires the DEP to submit a demonstration that the State has satisfactorily addressed EPA's 8-hour ozone RACT requirements. After identifying relevant regulations, the Department concludes in this SIP revision that existing controls on all major

stationary sources of nitrogen oxide emissions and volatile organic compound emissions and all sources and source categories addressed in control techniques guidelines meet or exceed the CAA RACT requirements.

IV. Summary of Comments

Written comments were submitted only by EPA and by the State of New Jersey (NJ). No oral comments were received at the hearing.

The comments submitted by EPA and New Jersey are summarized here and responses follow.

Comments Submitted by New Jersey:

New Jersey is concerned that the State, by following EPA guidance, could miss an opportunity to advance RACT. Specifically *"… the preamble to that [implementation] rule discusses flexibilities in application of the rule. New Jersey believes such flexibility could result in a lost opportunity for updating RACT requirements. For example, certifying that all previous 1-hour ozone RACT determinations will suffice for 8-hour ozone implementation purposes and allowing the Clean Air Interstate Rule (CAIR) to satisfy RACT requirements for Electric Generating Units (EGU) facilities, fails to adequately address advances in RACT and provide for controls that are reasonable. Although the USEPA could have provided for national RACT limits by updating its Control Technique Guidance (CTGs) and Alternative Control Techniques (ACTs) documents or by creating new CTGs and ACTs for relevant source categories, the USEPA has failed to do so in a timely fashion. Thus, this Clean Air Act-mandated obligation places the burden to update RACT on the individual states. We urge you to thoroughly evaluate your current RACT requirement and obtain additional RACT emissions reductions where feasible."* Additionally, *"…possible RACT changes are included in the New Jersey Department of Environmental Protection's 60 draft white papers posted at http://www.nj.gov/dep/airworkgroups/."* NJ encourages Connecticut to use this resource in development of its RACT rules.

Response: We recognize that the CAIR could be more effective in reducing emissions from EGUs, and we support a more stringent CAIR rule that would implement more stringent controls on EGUs nationally. We believe, however, that NJ's comment is more appropriately directed at EPA. While we agree that EPA lost an opportunity to gain emission reductions nationally from EGUs, with respect to the State of Connecticut the opportunity to advance controls for these EGU facilities still remains. As we have stated in our SIP narrative, we are continuing to work with the Ozone Transport Commission, of which New Jersey is a member, to develop a model rule to implement additional control measures for EGUs that will assist in our attainment demonstration. Though these "beyond CAIR" measures will not be implemented as RACT, they will be no less effective in reducing emissions from the State of Connecticut. We believe, that adoption of rules "beyond CAIR" (i.e. beyond RACT) is, at this point, the best route to advancing the cause of more stringent national controls on EGUs.

We disagree that any failure by EPA to update the CTGs or ACTs places the burden of doing so on the states. Section 183 of the CAA clearly states, and the implementation rule reiterates [70 FR 71652], that it is EPA's burden to update these documents as necessary. EPA cannot shift this burden onto the states. Nor has it. The CTGs which were proposed in the Federal Register on

August 4, 2006 and made final on October 5, 2006 are clear evidence of this. If EPA had expected the states to take on this burden, it would have required that the states include these CTG measures in this RACT SIP revision. It did not. Instead, "… EPA provides that States should submit their SIP revisions within 1 year of the date that the CTGs are finalized." [71 FR 58748]

We acknowledge that a burden in finding control measures does result from EPA's failure to implement a strong national rule for controlling EGU emissions and for untimely updates to the CTGs. We share this burden with NJ as fellow member state to the OTC and seek to correct for these failures through development of regional ozone attainment measures by a process which considered these source categories for which NJ wrote 60 white papers, and many other source categories as well.

No changes to the proposed SIP revision are recommended as a result of this comment.

Comments submitted by EPA:
EPA makes three comments and makes note of two updates.
Comment 1: *"The analysis indicates that Connecticut has met the RACT requirement through the implementation of rules that have already been adopted by the state and approved by EPA, as well as by rules that are currently under development (such as revisions to the state's Section 22a-174-22 NOx RACT rule and the adoption of a new CAIR rule). Therefore, Connecticut must submit to EPA as a State Implementation Plan (SIP) revision the specified rules currently under development in order for the state to fully meet its obligation under the RACT requirement."*

Response: With respect to Connecticut's Section 22a-174-22 (Section 22), Connecticut believes that the existing Section 22 meets RACT. We are pursuing revisions to Section 22 in order to further our attainment goals. It was our goal to point out the extent to which Connecticut has controlled its universe of sources through its history of nonattainment and through its efforts with respect to the 1-hour ozone NAAQS. We reiterate that the existing Section 22 already meets or exceeds RACT requirements and that the revised version, regardless of the final form it might take following its completion through the regulatory process will also meet or exceed RACT for the sources it regulates. We emphasize that Section 22 covers a broader category of sources than just the major source NOx emitters as defined by the implementation rule.

With respect to CAIR, Connecticut is adopting CAIR to replace our existing NOx Budget Program. The sources subject to these rules are considered by EPA in the implementation rule to already meet RACT and are not required to be addressed in the RACT SIP revision. "For purposes of meeting the NOx RACT requirement, the State need not perform (or submit) a NOx RACT analysis for sources subject to the state's emission cap-and-trade program where the cap-and-trade program has been adopted by the State that meets the NOx SIP Call requirements…" [70 FR 71652]. Again, due to Connecticut's historic efforts to attain the 1-hour ozone NAAQS, it has met this requirement.

The status of our rule development process is posted at the Connecticut DEP website: http://www.dep.state.ct.us/air2/regs/index.htm. When finalized, Connecticut will formally

submit the rules to EPA as part of a SIP revision in support of its ozone attainment plan.

No changes to this proposed SIP revision are recommended as a result of this comment.

Comment 2: *"Connecticut's analysis indicates that rules for two of the CTG (Control Techniques Guideline) categories are appropriate to update. They are cutback asphalt paving and solvent cleaning. It is not clear, however, if the state is proposing that the revised, or the existing, rules for these source categories are considered to represent RACT." … "The DEP should revise the analysis to clearly state whether Connecticut considers the revised, or the existing, rules for these two source categories to represent RACT. If the revised rules are considered to represent RACT, then Connecticut must submit these revised rules to EPA as a SIP revision in order for the state to fully meet its obligation under the RACT requirement."*

Response: The implementation rule recognizes that States which have been in non-attainment for the 1-hour standard would likely have satisfactory RACT in place. We agree, and believe that our RACT SIP analysis showed that we satisfied RACT requirements for the 8-hour standard through our existing rules. Our existing CTG rules represent RACT. Moreover, the analysis documents our continuing efforts to develop rules that build on our existing rules to garner further reductions in ozone producing emissions for the purpose of attaining the 8-hour ozone NAAQS. Therefore, though we are in the process of adopting rules that regulate CTG category sources, these rules go beyond RACT.

The status of our rule development process is posted at the Connecticut DEP website: http://www.dep.state.ct.us/air2/regs/index.htm. When finalized, Connecticut will formally submit the rules to EPA as part of a SIP revision in support of its ozone attainment plan.

No changes to the proposed SIP revision are recommended as a result of this comment.

Comment 3. EPA points out that not all of the major VOC sources listed on page 21 have received their VOC RACT orders. Specifically, EPA and DEP are currently in the process of developing RACT orders for Stone Container and Cytec/Cyro. Sumitomo Bakelite /Vyncolit and Curtis Packaging have RACT orders that are also being developed, but those sources do not appear on page 21 as sources subject to major source VOC RACT. EPA comments that, *"Connecticut must issue orders for all of the remaining Section 22a-174-32 sources, and submit these orders to EPA as a SIP revision, in order for the state to fully meet its obligation under the RACT requirement."*

Response: The finalization of the orders did not in the past prohibit the acceptance of Section 22a-174-32 to satisfy RACT [65 FR 62620], and should not now. The regulation satisfies the RACT requirement, not the implementation of the regulation through the adoption and subsequent submittal of orders. We are implementing Section 22a-174-32 as we should.

As of November 8, 2006, the status of the orders outstanding under Section 22a-174-32 is as follows: The orders for Stone Container and Cytec are with EPA for review. Cyro, now a separate facility from Cytec, has an order, which is identical to Cytec's that has completed EPA

review. The Cyro order is expected to be accepted by Cyro and signed and returned to DEP by no later than December 31, 2006.

Sumitomo Bakelite, formerly known as Vyncolit, and Curtis Packaging are both currently subject to a General Permit to Limit Potential Emissions (GPLPE) and therefore are not major sources subject to VOC RACT under the implementation rule. Therefore, these two sources should not appear on page 21.

No changes to the proposed SIP revision are recommended as a result of this comment.

EPA makes note that two updates should be made:
The CTGs proposed on August 4, 2006 were finalized in October. SIP revisions for these CTGs are due to be submitted to EPA in October 2007. We recognize this and will move forward with regulatory action as rapidly as our State process allows. To acknowledge publication of these CTGs as final, the text of page 8 of the SIP revision is changed as follows:

> **New CTG Requirements.** EPA is currently in the process of adopting new CTG requirements. On August 4, 2006, EPA published proposed CTGs for the following source categories: Lithographic Printing Materials, Letterpress Printing Materials, Flexible Packaging Printing Materials, Flat Wood Paneling Coatings, and Industrial Cleaning Solvents. These were made final by publication in the federal register on October 5, 2006 [71 FR 58745]. SIP revisions for these CTGs are due by October 4, 2007. EPA expects to propose several more CTG categories [later this year. EPA has proposed that the states address these CTGs within one year of promulgation [71 FR 44522].] in the near future. [When the CTGs for these categories are published in final form] As appropriate, Connecticut will analyze the need to adopt requirements to address these CTGs for sources in the state and pursue adoption of such requirements [and a] in subsequent SIP submittals[, as appropriate].

EPA also notes that Table 3 in the SIP should be updated to reflect that EPA gave SIP approval to our revisions to Section 30 of the regulations concerning Stage II vapor recovery at gasoline service stations on August 31, 2006. Therefore Table 3, third entry under the SIP Approval column for the Service Station Category is changed from:

05/10/04….Currently Under EPA Review

to:

05/10/04 8/31/06 71 FR 51761 ..... (c) 95

Additionally, the last sentence of the second paragraph of section III.A on page 7 of the RACT SIP revision, which discusses EPA review of the revised rule for service stations, is deleted as follows: [The most recent revision to Section 30 is currently under EPA review.]

No other changes to the proposed RACT SIP revision result from EPA's comments. However,

the following updates were also made:

- In Table 1 on page 4, the following sentence was added to the status section on the amendment to Section 22: "A public hearing was held on a proposed amendment to the existing regulation on October 19, 2006."

- A missing word was added to the first sentence on page 6: "Despite Connecticut's noteworthy success in reducing emissions of ozone precursors, it is important to…"

- The second sentence of the first full paragraph on page 11 was changed from: *"CTDEP current proposed draft regulation, R.C.S.A. section 22a-174-22c, to implement that CAIR trading program, are scheduled for public hearing on October 19, 2006."* to: *"Public hearing was held on October 19, 2006 for CTDEP's current proposed draft regulation, R.C.S.A. section 22a-174-22c, to implement that CAIR trading program."*

- Figure 3 on page 13 was updated to include data for the 2006 ozone season.

V. Final Text of Proposed Revision

The final text of the Revision as changed from the proposed version is included as Attachment 2 to this report.

VI. Conclusion

Based upon the comments submitted by interested parties and addressed in this Hearing Report, I recommend the final version of the revision, as contained herein in Attachment 2, be submitted to EPA by the Commissioner for approval as a revision to the SIP.

/s/ Kiernan J. Wholean — 16 Nov 06

Kiernan J. Wholean — Date
Hearing Officer

Attachment 1
Text of Revision as Proposed

State Implementation Plan Revision

8-Hour Ozone Reasonably Available Control Technology State Implementation Plan Analysis for the State of Connecticut

September 1, 2006

Attachment 2
Final Text of Revision

State Implementation Plan Revision

8-Hour Ozone Reasonably Available Control Technology State Implementation Plan Analysis for the State of Connecticut

FINAL

November 3, 2006

Appendix A
Public Hearing Materials

Notice of Public Hearing
Certification of Public Hearing

8-Hour Ozone Reasonably Available Control Technology State Implementation Plan Analysis for the State of Connecticut

FINAL

Connecticut Department of Environmental Protection
Bureau of Air Management
November 3, 2006

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Tables and Figures

SUMMARY

In satisfaction of the reasonably available control technology (RACT) requirements of Sections 172(c)(1) and 182 of the Clean Air Act (CAA) for the 8-hour ozone national ambient air quality standard (NAAQS), the Connecticut Department of Environmental Protection (CTDEP) has reviewed, and here documents, specific control measures, including those already in place under the 1-hour ozone NAAQS, required of the major nitrogen oxides (NOx) and volatile organic compound (VOC) emitting sources and of all sources and source categories addressed in control techniques guidelines (CTGs). As a result of a long and successful history of implementing aggressive local and regional controls to reduce emissions of NOx and VOCs, CTDEP now applies levels of control that meet or exceed RACT to a broad range of source categories including those for which RACT is not federally required. Thus, CTDEP concludes that controls on all relevant stationary sources of NOx and VOC emissions meet or exceed CAA RACT requirements.

I. RACT OVERVIEW

On June 15, 2004, Connecticut's designation as non-attainment for the 8-hour ozone NAAQS became effective. This designation resulted from a change in the standard from 0.12 ppm averaged over one hour to 0.08 ppm averaged over eight hours. The entire state was classified as moderate non-attainment. Under the 1-hour ozone NAAQS, the southwest portion of Connecticut was classified severe non-attainment while the rest of the State was classified serious non-attainment. These prior classifications, established under the 1-hour NAAQS, carried with them more stringent requirements for reducing emissions of ozone precursors under the CAA than does the current moderate classification.

The Environmental Protection Agency (EPA) revoked the 1-hour ozone NAAQS effective June 15, 2005, prior to Connecticut's projected 1-hour ozone attainment date of June 2007. Having been designated non-attainment for the 8-hour ozone NAAQS, Connecticut is required to transition its planning efforts to attainment of the 8-hour ozone NAAQS by June 2010. The transition is being conducted in accordance with guidance set forth by EPA in the "Final Rule To Implement the 8-Hour Ozone National Ambient Air Quality Standard" [the Implementation Rule: 70 FR 71612] published on November 29, 2005.

The Implementation Rule requires a state to apply all reasonably available control measures (RACM) that will assist the state in timely attainment of the ozone standard. RACM are those readily implemented measures that are economically and technologically feasible and that contribute to the advancement of attainment. Determining RACM requires an area-specific analysis. The State is required to consider RACM for any source of VOCs or NOx that occur in the state. The plan to implement these RACM is due June 15, 2007, together with the demonstration of attainment.

A subset of RACM are the reasonably available control technology (RACT) requirements. EPA has defined RACT as the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility [44 FR 53762; September 17, 1979]. Unlike RACM, RACT is limited to sources for which EPA has developed Control Technique Guidelines (CTGs) and the major non-CTG sources. As the analytical work for implementing the CTGs is readily available, and because the RACT sources are *a priori* a significant focus for implementing control strategies, EPA expects requirements limiting emissions from RACT sources to be addressed more immediately than the other control options. Under the CAA, Connecticut is to submit a state implementation plan (SIP) demonstrating that RACT levels of control are required of all CTG sources and major non-CTG sources of NOx and VOC. This RACT SIP is due to EPA on September 15, 2006. The state is to require sources to implement RACT no later than May 1, 2009.

II. REGIONAL AND STATE EFFORTS TO LIMIT OZONE PRECURSOR EMISSIONS

This document includes in section III a detailed description and analysis of Connecticut's RACT controls for CTG sources and major non-CTG sources of NOx and VOC. To put that analysis in perspective, we first describe in this section, the regional and state efforts that have established RACT and beyond RACT levels of control for Connecticut sources.

A. REGIONAL EFFORTS

The 1990 CAA amendments recognized the significant role of interstate transport of NOx and VOCs in influencing the ability of a downwind state to attain the ozone NAAQS. As part of that recognition, the United States Congress established the Ozone Transport Commission (OTC) to help coordinate control plans for reducing ground-level ozone in the Northeast and Mid-Atlantic states.

As a member of the OTC, Connecticut has worked jointly with the other eleven member states and the District of Columbia to assess the nature and magnitude of the ozone problem in the region, evaluate potential new control approaches and recommend regional control measures to ensure attainment and maintenance of the ozone NAAQS. This regional approach recognizes that all states benefit from coordinated attainment planning efforts to reduce ozone precursors.

Connecticut has, in part, relied on this regional effort to determine if the current RACT controls implemented to meet our 1-hour ozone NAAQS obligations continue to represent RACT for the 8-hour NAAQS. The regional effort encompassed the goal of attainment with the 8-hour NAAQS together with compliance with the Clean Air Interstate Rule (CAIR), the fine particulate (PM2.5) NAAQS, and the federal regional haze requirements. The regional process therefore considered a broader category of sources than the RACT sources (major and CTG) and anticipated controls more stringent than RACT.

The OTC staff and member states formed several workgroups to identify and evaluate candidate control measures. Initially, the workgroups compiled and reviewed a list of over 1,000 candidate control measures. These control measures were identified through published sources such as EPA's Control Technique Guidelines, STAPPA/ALAPCO "Menu of Options" documents, the AirControlNET database, emission control initiatives in other states including California, state/regional consultations, and stakeholder input. The workgroups developed a preliminary list of approximately fifty candidate control measures to be considered for more detailed analysis with respect to the potential for emissions reductions, cost effectiveness, and ease of implementation [MACTEC, 2006]. Thus, these measures were anticipated to be most effective in reducing ozone air quality levels in the Northeastern and Mid-Atlantic States.

Based on the analyses presented by the OTC workgroups, the OTC Commissioners made several recommendations at the June 2006 Commissioner's meeting in Boston [OTC 2006a, OTC 2006b, OTC 2006c and OTC 2006d]. The Commissioners recommended that States pursue emission reductions from the following source categories:

Table 1. Control measures recommended by the OTC to pursue as regional ozone attainment measures and the status of Connecticut's efforts toward measure implementation.		
VOC Control Measures	**Connecticut regulation (if applicable)**	**Status of Control Measure Implementation in Connecticut**
Reformulation of Consumer Products	New R.C.S.A. section 22a-174-40	The Connecticut regulation adoption process is now underway. A public hearing was held on a proposed new state regulation on June 27, 2006.
Design Improvements to Portable Fuel Containers	Amendment of R.C.S.A. section 22a-174-43	The Connecticut regulation amendment process is now underway. A public hearing was held on a proposed amendment to an existing regulation on June 27, 2006.
Restrictions on Asphalt used for Paving Operations	Amendment of R.C.S.A. section 22a-174-20(k)	Amendment of existing Connecticut regulation now under development.
Restrictions on the Manufacture and Use of Adhesives and Sealants	New R.C.S.A. section 22a-174-44	New Connecticut regulation now under development.
Regional Fuel (Reformulated Gasoline)	Not applicable	Federal Phase II RFG in place statewide since 2000.
NOx Control Measures		
Reductions in the Sulfur Content of Heating Oil to Improve Combustion and Reduce NOx Emissions	Connecticut Public Act 06-143	Reduction in heating oil fuel sulfur content will occur when such reductions are effective in surrounding states.
Emissions Limitations and Operation Practices for Industrial Commercial and Institutional Boilers	Amendment of R.C.S.A. section 22a-174-22	The Connecticut regulation amendment process is now underway. A public hearing was held on a proposed amendment to the existing regulation on October 19, 2006.
Standards for Cement Kilns	Not applicable	No applicable sources in Connecticut.
Standards for Glass Furnaces	Not applicable	No applicable sources in Connecticut.
Standards for Asphalt Plants	TBD	OTC outline of requirements under development.
Standards for Electric Generating Units	TBD	OTC Model Rule development continuing.
Diesel Truck Chip Reflash	TBD	Regional approach under development.
Standards for Refineries	Not applicable	No applicable sources in Connecticut.
Standards for Municipal Waste Combustion	R.C.S.A. section 22a-174-38	Existing rule consistent with OTC recommendation and 2006 federal MACT revision [71 FR 27324, May 10, 2006] with respect to NOx.
NOTE: A link to CTDEP's proposed regulations can be found at: http://www.dep.state.ct.us/air2/regs/index.htm under the heading of "Proposed State Regulations". The complete final regulations for the abatement of air pollution can be found at: http://www.dep.state.ct.us/air2/regs/mainregs.htm.		

Details of the OTC regional model rules and control measures identified in **Table 1** can be found at the OTC website: http://www.otcair.org.

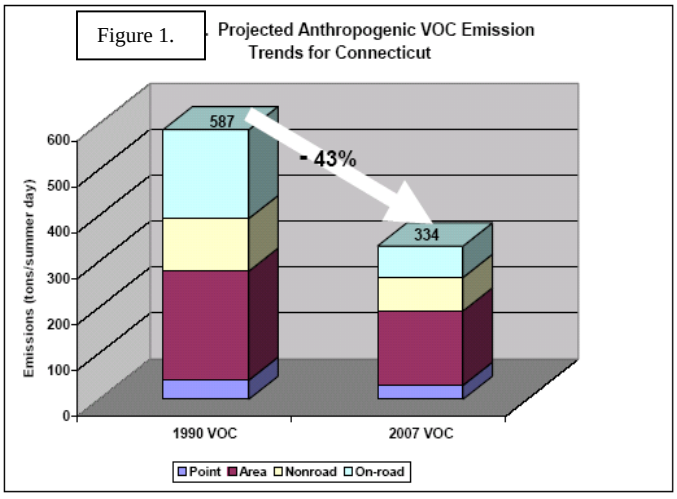
Though the goal of the OTC process was to find control measures that the states could readily implement and would result in the greatest regional gains, the OTC process encompassed sources and measures that went beyond RACT. Therefore, not all of the selected measures are RACT eligible, either because they are not directed at major stationary sources, or at the CTG sources. Thus, for example, diesel chip reflash, the reprogramming of the pollution control module on diesel truck engines, is not RACT eligible because it is directed at a mobile source category which is not a CTG category.

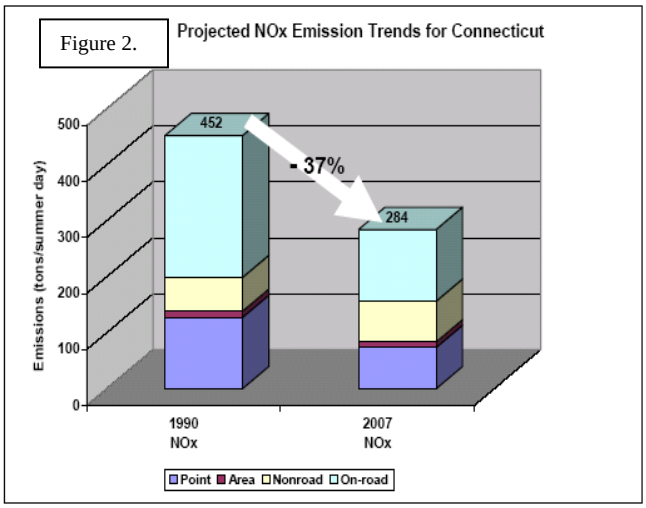
Connecticut has already adopted, or is in the process of adopting some of these control measures as part of its 8-hour ozone attainment plan. Those measures for which rule adoption is now proceeding are identified in Table 1. Table 1 also indicates those control measures with no applicability to Connecticut or for which development at the regional level continues.

B. STATE EFFORTS

Connecticut has a long history of implementing local and regional control measures to reduce NOx and VOC emissions to meet our 1-hour ozone attainment obligations. Under the 1-hour ozone NAAQS, Connecticut was divided into two non-attainment areas classified as "serious" and "severe". These classifications carried more stringent requirements than the 8-hour ozone NAAQS "moderate" non-attainment classification, which applies statewide. Among the more stringent requirements are the lower major source thresholds. Under the 1-hour ozone NAAQS, the major source thresholds for NOx and VOC were set at 25 tons per year (tpy) in the severe area and at 50 tpy in the serious area. Under anti-backsliding provisions, Connecticut is committed to retain these more stringent major source thresholds in implementing its current programs. However, for the purpose of this document and demonstrating that RACT is satisfied, we address only those major sources as required under the 8-hour "moderate" classification and associated thresholds, namely 50 tpy VOC and 100 tpy NOx.

Evaluation of efforts implemented to reduce ozone precursor emissions and their success in meeting that goal is an ordinary and necessary component of the attainment planning cycle. As part of that cycle, for the 1-hour ozone NAAQS, CTDEP prepared a Mid-Course Review to document Connecticut's success in reducing ambient ozone levels. Figures 1 and 2 from that Mid-Course Review show the dramatic reductions in VOC and NOx emissions obtained and projected from 1990 through 2007 by control measures already in place.





From "Mid-Course Review", CTDEP, January 10, 2005.

Despite Connecticut's noteworthy success in reducing emissions of ozone precursors, it important to recognize the limits of obtaining additional emissions reductions from these sources to reduce ambient ozone levels. A comparison of contributions from all sources in the Connecticut inventory is instructive. **Table 2** shows the total VOC and NOx emissions from the thirteen major categories of emissions (Tier 1 Source Categories). These categories include all anthropogenic sources included in the 2002 National Emissions Inventory (NEI). Note that biogenic sources in Connecticut are estimated to emit an additional 55,980 tons of VOC annually. Thus 264,729 tons of VOC were emitted statewide in 2002.

Table 2. Connecticut State Emissions Summary by Tier 1 Source Category (NEI 2002).

2002 Annual NEI Emissions (TPY)		
Tier Category	**VOC**	**NOx**
01 Fuel Comb. Elec. Utility	253	6,225
02 Fuel Comb. Industrial	167	2,786
03 Fuel Comb. Other	82,774	13,543
04 Chemical & Allied Product Mfg	3,576	1
05 Metals Processing	0	28
06 Petroleum & Related Industries	0	0
07 Other Industrial Processes	1,328	0
08 Solvent Utilization	53,259	26
09 Storage & Transport	5,433	3
10 Waste Disposal & Recycling	2,203	3,973
11 Highway Vehicles	30,911	64,028
12 Off-Highway	28,534	23,173
14 Miscellaneous	309	11
TOTALS:	**208,749**	**113,796**

Report Produced 4/25/06

From: http://www.emissionsonline.org/nei2002/state/ct/stctt1.htm accessed on June 28, 2006.

Note: According to the Connecticut 2002 inventory an additional 55,980 tons per year of VOC are emitted from biogenic sources.

Connecticut's major stationary sources of NOx emitted less than 12,000 tons according to the 2002 state inventory. These stationary sources account for approximately ten percent of the NOx emissions inventory. Connecticut's major stationary sources of VOC emitted approximately 1500 tons according to the 2002 inventory. This amounts to approximately one percent of the statewide total annual VOC emissions. Thus, opportunities for Connecticut to reduce ambient ozone levels through control of its major stationary sources are severely limited. The importance of mobile and area source emissions, and, in particular, emissions transported from other states cannot be overstated. Significant reductions from sources in upwind states are crucial to Connecticut's ability to attain and maintain the ozone NAAQS.

III. CONNECTICUT'S RACT ANALYSIS FOR CTG AND MAJOR NON-CTG SOURCES

Section 182 of the CAA sets forth two separate RACT requirements for ozone non-attainment areas. The first requirement, the RACT "fix-up", calls for the state to correct RACT rules for which EPA identified deficiencies before the CAA was amended in 1990. Connecticut has no such deficiencies to correct. The second requirement calls for the state to implement RACT controls on all major VOC and NOx emission sources and on all sources and source categories covered by an EPA published CTG, the presumptive norm establishing RACT for the covered sources. EPA has also documented alternative control techniques (ACTs) to serve as guidance for controls of VOC and NOx emissions from stationary sources. The ACTs describe control techniques and their cost effectiveness, but unlike the CTGs, they do not define RACT. A complete list of the CTGs and ACTs can be found at EPA's website: http://www.epa.gov/ttn/naaqs/ozone/ctg_act/index.htm

Connecticut and other states previously designated non-attainment under the 1-hour ozone NAAQS, already have rules in place to reduce emissions of VOC and NOx for attainment purposes. Recognizing that additional controls may only achieve small incremental emission reductions that are not cost effective, the Implementation Rule allows states to review and certify that RACT controls implemented under the 1-hour ozone NAAQS continue to represent RACT under the 8- hour NAAQS. Such a review and certification follows. In addition, in anticipation of the submission of Connecticut's 8-hour ozone NAAQS attainment demonstration in June 2007, an overview of some of the measures Connecticut has developed, or is considering, to satisfy the CAA's RACM requirement for the 8-hour ozone NAAQS is also provided.

A. CTG Category Sources

For sources for which a CTG has been published, RACT is considered met if a state imposes controls equivalent to the CTG for that source or source category. **Table 3** (attached) lists the current CTG documents and identifies the corresponding regulations that Connecticut has adopted to achieve emissions reductions equivalent to the CTGs. Table 3 also includes the effective dates of the state regulations and the date of SIP approval. As explained further below, Connecticut reasserts that these regulations are consistent with the CTGs, or where appropriate, recertifies that the source category does not exist within the state.

CTDEP has addressed the majority of the CTG source categories and requirements through three sections of the Regulations of Connecticut State Agencies (R.C.S.A.): 22a-174-20 (Section 20); 22a-174-30 (Section 30) and 22a-174-32 (Section 32). Section 20, for the control of organic compound emissions, was first promulgated in the early 1970's and has undergone numerous revisions since. Section 20 generally contains the requirements for the source categories covered by the CTGs established prior to 1990. After the Clean Air Act Amendments of 1990, EPA promulgated additional CTGs and Connecticut updated its VOC RACT rules with the implementation of RCSA §22a-174-32 (Section 32). Section 32, entitled "Reasonably Available Control Technology for Volatile Organic Compounds", includes control measures for additional CTG categories and for major sources of VOC. Section 32 was first promulgated in 1993 and was revised again in 1999. The CTG category for Stage I Vapor Recovery, as well as for Stage II, is implemented through RCSA §22a-174-30 (Section 30). Section 30 is entitled "Dispensing of Gasoline/Stage I and Stage II Vapor Recovery" and was implemented in late 1992 and revised in 2004.

Connecticut regulations for the CTG sources are consistent with the CTG documents and therefore meet the RACT requirements. However, individually and through its proceedings with the OTC, Connecticut has concluded that two of these categories are appropriate to update. A discussion of these two categories follows.

Cutback Asphalt Paving. The 1977 CTG recommended substitution of cutback asphalt, which was expected to contain between 20 and 50 percent VOC, with emulsified asphalts (i.e. asphalt which is liquefied by being held in a low VOC suspension). Emulsified asphalts were just gaining in acceptability in Connecticut when the asphalt paving CTG was established in 1977. In Connecticut's original SIP submittal for this CTG, it was anticipated that water-based emulsions would largely replace cutback asphalt by 1987 [CTDEP, 1979]. That prediction has proved true; the asphalt industry now widely accepts and uses emulsified asphalt. These emulsified asphalts can entirely replace cutback asphalt during the ozone season and are available with zero VOC content. Therefore,

Connecticut plans to pursue adoption of an amendment to the current Connecticut regulation for asphalt paving, R.C.S.A. section 22a-174-20(k) (see Table 1). The existing rule, based on the 1977 CTG, allows restricted use of cutback asphalt during the ozone season to that which emits, under test conditions, less than five percent of the total solvent contained in the asphalt. The existing rule also provides exemptions for specific uses such as penetrating prime coats and long-term storage. Removing these exemptions and providing more stringent VOC content limits for cutback and emulsified asphalt will not require equipment retrofits, as other CTG source category rule updates might. Connecticut projects that the estimated emissions of 234 tons per year from emulsified asphalt and 177 tons per year from cutback in its 2002 inventory will be significantly reduced by updating this rule.

Solvent Cleaning (Metal Degreasing). This CTG was originally applicable to units which clean/degrease metal in cold cleaners, open top vapor degreasers and conveyorized degreasers. To address the varied designs of degreasing units, the CTG requirements are based on operating practices rather than establishment of an emission limit.

In 2001, solvent cleaning was identified by the OTC as a control measure for which many states in the region could achieve further VOC emission reductions by implementing measures which went beyond the original CTG requirements. A model rule was developed that includes hardware and operating requirements and alternative compliance options for vapor cleaning machines used to clean metal parts. These requirements are based on the Federal maximum achievable control technology (MACT) standard for chlorinated solvent vapor degreasers. The requirements of the OTC Model Rule for Solvent Cleaning, available at: http://www.otcair.org/interest.asp?Fview=stationary#, exceed the CTG by establishing a limitation on the vapor pressure of solvents used in cold cleaning and additional operating practices to further limit VOC emissions from metal cleaning.

Connecticut is now in the process of pursuing the adoption of an amendment to R.C.S.A. section 22a-174-20(*l*) that includes the vapor pressure limitation for solvents used in cold cleaning plus additional operating requirements recommended by the OTC Model Rule. A copy of that amendment as proposed is available at http://www.dep.state.ct.us/air2/regs/index.htm under the heading of "Proposed State Regulations". The complete final regulations for the abatement of air pollution can be found at: http://www.dep.state.ct.us/air2/regs/mainregs.htm. Upon completion of this rule amendment process, the requirements of R.C.S.A. section 22a-174-20(*l*) will represent at least a RACT level of control for this source category.

New CTG Requirements. EPA is currently in the process of adopting new CTG requirements. On August 4, 2006, EPA published proposed CTGs for the following source categories: Lithographic Printing Materials, Letterpress Printing Materials, Flexible Packaging Printing Materials, Flat Wood Paneling Coatings, and Industrial Cleaning Solvents. These were made final by publication in the federal register on October 5, 2006 [71 FR 58745]. SIP revisions for these CTGs are due by October 4, 2007. EPA expects to propose several more CTG categories in the near future. As appropriate, Connecticut will analyze the need to adopt requirements to address these CTGs for sources in the state and pursue adoption of such requirements in subsequent SIP submittals.

Negative Declarations. Connecticut reviewed its inventory of sources and interviewed its field staff to determine if any CTG sources, which were previously determined not to be located in the state, have since located in the state. Searches of telephone directories and Internet web pages (including other state government databases) were used to supplement this determination. All known operating

stationary sources for which a CTG has been issued are subject to an appropriate form of regulation. Therefore, Connecticut reaffirms its negative declarations for the categories so designated in Table 3.

B. Major Non-CTG Sources of NOx and VOC

According to the Implementation Rule, the State is required to conduct a RACT analysis for each major stationary source of VOC and for each major stationary source of NOx. Major stationary source is as defined in section 302 of the Clean Air Act, as modified by sections 182(b), (c), (d) or (e) of the CAA, as applicable to the classification of the attainment areas in which a stationary source is located. Additionally, Connecticut is in an Ozone Transport Region and subject to CAA section 184. Therefore, the term "major source" for the purposes of this review is limited to facilities that have the potential to emit 100 tons per year or more of NOx or 50 tons per year or more of VOC.

The guidance in the Implementation Rule gives states the discretion either to conduct individual source-specific RACT determinations or to perform RACT determinations or certifications collectively for groups of sources. Therefore, emissions averaging or controls applied throughout a group of sources can be used to show that the source group meets RACT.

In addition to RACT, individual sources may also be subject to more stringent technology control measures such as LAER, BACT and MACT. LAER, applicable to new and modified major sources located in non-attainment areas, is the lowest achievable emission rate of the non-attainment pollutant that can be achieved by the source without respect to cost. BACT, or best available control technology, is applicable to new and modified sources located in attainment areas. BACT may be less stringent than LAER because consideration is given to energy, environmental and economic impacts, as well as other costs when evaluating the lowest emission rate. MACT, or maximum achievable control technology, is generally applicable to major sources of hazardous air pollutants. MACT is the control achieved by the best performing twelve percent of sources in a source group. For sources emitting volatile organic hazardous air pollutants subject to MACT, the control device employed by the MACT rule is equally effective in controlling VOC emissions.

Each of these control requirements, LAER, BACT and MACT, at the time of review, would necessarily be more stringent than RACT. These control requirements would also be applied at thresholds, at least in Connecticut, lower than the major source threshold required for this RACT analysis. As these controls are generally more stringent, it is unlikely that any source that has recently undergone one of these control technology reviews would not meet RACT. Furthermore, to the extent that a source had already undergone one of these reviews, it is generally unlikely that the marginal reductions achievable through further control measures will be cost effective. Only in cases where the technology review is significantly outdated and the source has sufficient actual emissions and useful life remaining, is it plausible that RACT, the control measure with the least associated burden, will be warranted. Note, however, that such a source might still warrant controls as part of an attainment plan or through future, necessarily more stringent, BACT, LAER, or MACT determinations as may become applicable.

Table 4 (attached) lists the major sources of NOx and VOC located in Connecticut. In general, all major sources of NOx are regulated under Section 22 while stationary sources of VOC are regulated by Sections 20 and 32. Section 32 explicitly regulates major sources of VOC for the purpose of implementing RACT, and allows the Department to conduct individual RACT analyses for sources.

These regulations apply to major sources as that term was defined for the 1-hour ozone NAAQS non-attainment classifications, namely 25 tons per year in Connecticut's southwestern "severe" section and 50 tons per year in the remainder of the state. These thresholds apply to both VOC and NOx sources and are more stringent that the respective 50 and 100 tpy thresholds that apply under the current classification of moderate 8-hour ozone non-attainment for Connecticut and for the purpose of conducting this RACT analysis. Due to EPA's anti-backsliding requirements, and Connecticut's desire to come into attainment with the 8-hour ozone NAAQS as expeditiously as practical, the more stringent 25 and 50 tpy thresholds will not be relaxed for applicability and other requirements in existing rules even though the non-attainment area classification has changed.

SIP-Approved NOx Trading and CAIR Sources. Connecticut has participated in two distinct NOx Budget Programs (NBPs): the OTC NBP and the Federal NBP. Both programs are market-based emission cap-and-trade plans created to reduce emissions of NOx from power plants and other large combustion sources in the eastern United States. Connecticut and seven other states in the OTC implemented the original OTC NBP from 1999 through 2002 and the Federal NBP beginning in 2003; eleven non-OTC states began compliance with the Federal NBP in 2004. A brief summary of the evolution of Connecticut's program is provided in the following paragraphs.

The Federal NBP originated from EPA's determination in the late 1990s that NOx emissions from large stationary sources in twenty-three jurisdictions significantly contribute to non-attainment of the 1-hour ozone NAAQS in one or more downwind states in the eastern portions of the United States. [62 FR 60317: November 7, 1997; 63 FR 25902: May 11, 1998; and 63 FR 57356: October 27, 1998] EPA issued the NOx SIP Call in 1998, requiring affected states to amend their SIPs and limit NOx emissions during each ozone season beginning in 2003. Connecticut and most of the other OTC states implemented the Federal NBP on May 1, 2003.

Connecticut's NOx Budget Program was modified slightly to reflect the Federal NBP requirements. The underlying regulation, R.C.S.A. section 22a-174-22b, was approved by EPA as a SIP-strengthening measure on December 27, 2000 [65 FR 81743]. R.C.S.A. section 22a-174-22b established a statewide NOx budget and NOx allowance trading program for large electric generators and other industrial sources beginning with the 2003 ozone season. The budget cap is consistent with EPA's NOx SIP Call and the September 1994 OTC Memorandum of Understanding establishing the OTC NOx Budget Program. In Connecticut, the OTC program was conducted pursuant to R.C.S.A. section 22a-174-22a. As a result of the OTC NBP, the Acid Rain program and other CAA requirements, by 2000 the OTC states had already reduced NOx emissions by approximately 55% from 1990 levels, thereby reducing the level of reductions necessary to meet the Federal NBP targets. [EPA, 2004a: the EPA NBP Report] With the further implementation of the Federal NBP in 2003, the OTC states' ozone season NOx emissions from subject sources were reduced 30% from 2002 levels and were 18% less than the number of NBP allowances allocated in 2003.[EPA, 2004b] In addition, NOx highest daily emissions and average daily emissions in the OTC states have decreased approximately 25% and 35%, respectively, from 1997 to 2003.[1]

On May 12, 2005, EPA promulgated the Clean Air Interstate Rule (CAIR). EPA has determined that NOx emissions from electric generating units in 25 eastern states and the District of Columbia contribute to unhealthy levels of 8-hour ozone in other downwind states. Based on an assessment of the emissions contributing to interstate transport of air pollution and available control measures, EPA

[1] 1997 and 1998 data from the Acid Rain Program; 1999-2002 data from the OTC trading program; 2003 data from the NBP.

has determined that achieving required reductions in the identified states by controlling emissions from power plants is highly cost effective. States must achieve the required emission reductions using one of two compliance options: 1) meet the state's emission budget by requiring power plants to participate in either an annual or ozone-season EPA-administered interstate cap-and-trade system, as applicable, that caps emissions in two stages, or 2) meet an individual state emissions budget through measures of the state's choosing.

Connecticut plans to comply with CAIR by participating in the federal CAIR ozone-season NOx trading program. Public hearing was held on October 19, 2006 for CTDEP's current proposed draft regulation, R.C.S.A. section 22a-174-22c, to implement that CAIR trading program. When that program becomes effective on May 1, 2009, shortly thereafter the current NBP implemented under R.C.S.A. section 22a-174-22b will be repealed. All the sources that now participate in the R.C.S.A. section 22a-174-22b NBP will be subject to Connecticut's CAIR ozone season NOx trading program.

EPA believes [70 FR 71652] those CAIR sources and sources subject to the State's emission cap and trade program where the program has been adopted by the state and approved by EPA as meeting the NOx SIP Call requirements, meet the NOx RACT requirement. Those major sources subject to CAIR requirements and the trading program are listed in Table 4. No further RACT analysis is required for these sources.

Municipal Waste Combustors (MWCs). Connecticut has six facilities that burn municipal waste to create electricity. These six facilities account for approximately thirty percent of the actual annual NOx emissions from the major NOx emitters in the state and are regulated by RCSA §22a-174-38 (Section 38). Section 38 became effective on June 28, 1999 and included NOx emission limits that were equivalent to the emission limits established in the federal emissions guidelines for MWCs. An October 26, 2000 amendment to Section 38 reduced the NOx emission limits beyond the 1999 levels. The amended regulation and associated emissions reductions were approved by EPA on December 6, 2001 [66 FR 63311].

EPA recently promulgated amendments to the federal MACT-based emissions [71 FR 27324, May 10, 2006]. While CTDEP is currently preparing an amendment to Section 38 to make certain necessary changes based on the federal requirements, Connecticut's existing requirements with respect to NOx and VOC emissions limits are now as stringent as the 2006 revisions to the federal standards. Therefore, Connecticut's emissions limits represent RACT for the MWCs.

State Restrictions on Major NOx Sources. Any facility in Connecticut that has the potential to emit at least fifty tons per year of NOx is regulated by RCSA §22a-174-22 (Section 22). Section 22 also applies to sources in the southwestern part of the State, the "severe" area, that have the potential to emit at least twenty-five tons per year of NOx. Therefore, all major NOx RACT sources (i.e. potential emissions of at least 100 tpy) are regulated by this section. Section 22 was approved as part of Connecticut's 1-hour ozone attainment demonstration. Consistent with OTC model rule already developed, CTDEP has proposed for public hearing on October 19, 2006, an amended Section 22 to include more stringent emission and control requirements such that all major NOx sources will meet or exceed RACT. Additionally, CTDEP is committed to continue to work with the OTC to further develop this model rule and will pursue rulemaking as needed and appropriate.

VOC Emissions From Fuel Burning Sources. Section 32 excludes fuel burning sources from consideration for VOC RACT. Generally, good combustion practices, rather than add-on control

technology, is considered the appropriate control measure for VOC from fuel burning sources. Good combustion practices also help reduce other pollutants such as CO and NOx. Connecticut's proposed amended NOx control regulations, Section 22, scheduled for public hearing on October 19, 2006, include tune-up requirements to promote good combustion practices.

VOC Sources Subject to Maximum Achievable Control Technology (MACT) Standards. The MACT standards were developed following the 1990 amendments to the CAA and are generally contained in Part 63 of Title 40 of the Code of Federal Regulations. EPA developed the MACT standards for categories of sources which emit large amounts of hazardous air pollutants. The standards represent the controls achieved by the best performing twelve percent of sources in a source category. The sources listed in Table 4 under the MACT category are sources with VOC emissions that are subject to the MACTs for gasoline distribution, halogenated solvents, and aerospace. Where these standards are designed to control volatile organic hazardous air pollutants, CTDEP considers these controls sufficient to satisfy RACT for the sources so designated in Table 4.

Additional VOC Sources and Sources with VOC RACT Orders. Section 32 requires certain major sources of VOC to undergo individual RACT review. In those cases VOC RACT Orders, which are federally enforceable, have been issued to the source. These sources are also subject to requirements that limit VOC emissions pursuant to various provisions of Section 20.

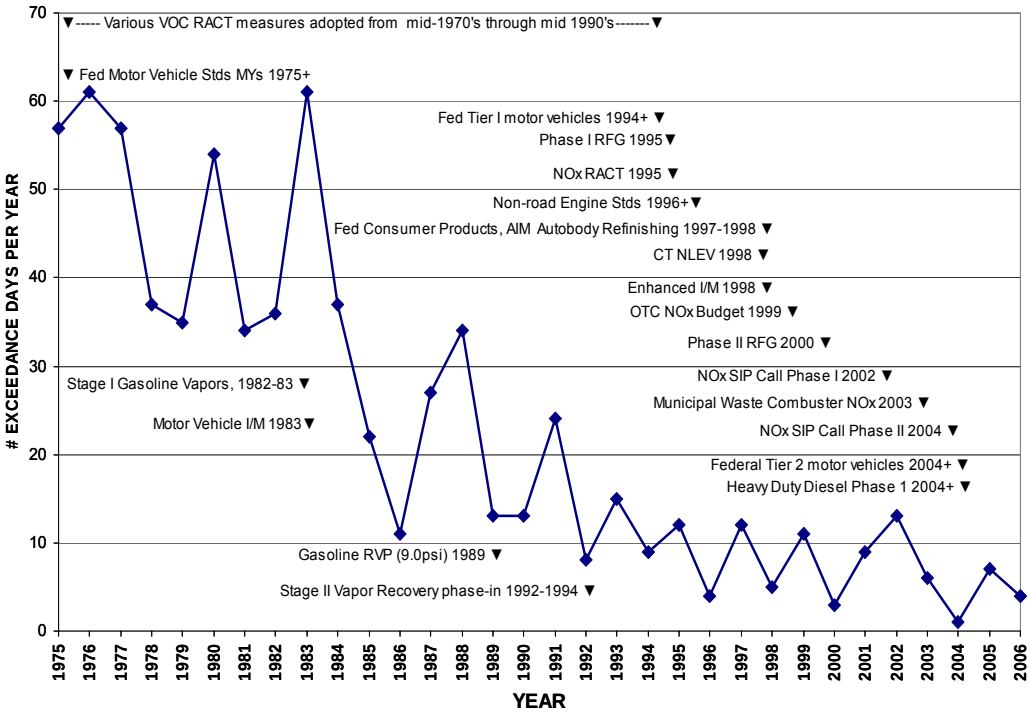
Overall the major non-CTG sources of VOC, which account for approximately one percent of the entire state inventory, currently meet RACT. Nevertheless, we recognize that certain major non-CTG VOC sources which depend on reformulation to limit emissions, rather than application of control technology, may yield further reductions as a result of more stringent generic VOC rules. Therefore, CTDEP is evaluating the feasibility of rule changes affecting these sources as part of its attainment planning efforts.

IV. CONCLUSION

Connecticut has implemented all emission control programs mandated by the 1990 CAA, as well as other measures necessary to ensure adequate progress toward compliance with the 1-hour ozone standard. Additional emissions control measures have also been adopted and submitted to EPA as part of our Mid-Course Review [CTDEP, 2005]. These additional control measures were required to offset the EPA-identified shortfall in emissions reductions necessary to attain the 1-hour ozone standard by November 2007. In addition to the shortfall measures, other strategies that have been adopted but not fully implemented (such as vehicle turnover) will provide substantial further emissions reductions and continued improvements in ambient ozone levels through 2007 and beyond.

Federal, regional and state rules have been generally successful in helping to bring Connecticut closer to its original goal of meeting the 1-hour ozone NAAQS by 2007. This is clearly demonstrated in Figure 3. These measures remain in place, and air quality improvements continue to accrue, as Connecticut implements additional attainment measures to reach the goal of attainment with the 8-hour ozone NAAQS.

Figure 3. Connecticut 1-Hour Ozone Exceedance Day Trend and Implemented Control Strategies 1975 - 2006



Substantial further emissions reductions are projected to occur as the result of currently mandated controls as well as recently proposed and promulgated Federal controls and measures being developed by the OTC for state implementation. Some of these adopted measures represent RACT. Others, due to factors such as cost of implementation, time necessary to implement, or the category of sources to which the control measure is applicable, are more representative of RACM. A more detailed description of these RACM measures will be included in the State's attainment plan due in June of 2007.

Connecticut's planning and regulatory efforts to reduce NOx and VOC emissions are being implemented successfully, resulting in reduced ambient ozone levels throughout the state and downwind. These reductions were expected to result in attainment of the 1-hour ozone NAAQS. CTDEP continues to take aggressive action to develop local and regional control measures and influence national strategies to further reduce ozone levels as necessary to attain the 8-hour ozone NAAQS. As a result all Connecticut's CTG sources and major non-CTG sources are controlled by RACT or better standards, and Connecticut's RACT requirement has been satisfied for the 8-hour ozone NAAQS.

Table 3. CTG categories documenting Connecticut's adoption of the CTG rules consistent with the CTG documents.

CTG Category	***CTG Document***	***Applicable Connecticut Regulation.***	***SIP Approval of Connecticut Regulation or Negative Declaration*** *Adopted by State/ Approved by EPA/ FR Cite/ 52.370*	***Comments***
Aerospace	Aerospace (CTG & MACT) (see 59 FR 29216, June 6, 1994); CTG (Final), EPA-453/R-97-004, December 1997.	*22a-174-32 Reasonably Available Control Technology (RACT) for volatile organic compounds.*	11/18/93 3/10/99 64 FR 12024 ..... (c)(76) 8/27/99 10/19/00 65 FR 62624 ..... (c)(84)	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard.*
Automobile Coating	Control of Volatile Organic Emissions from Existing Stationary Sources, Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks, EPA-450/2-77-008, May 1977.	*Not Applicable*	*Negative Declaration for Coating of Automobile and Light-Duty Trucks*	*Connecticut Reaffirms its Declaration that No Sources Fitting this CTG Category are Located within the State.*
Cutback Asphalt	Control of Volatile Organic Compounds from Use of Cutback Asphalt, EPA-450/2-77-037, December 1977	*22a-174-20(k) Restrictions on cutback asphalt*	10/10/80 1/17/82 47 FR 762 ..... (c) 20 12/13/84 7/18/85 50 FR 29229 ..... (c) 34 10/31/89 10/18/91 56 FR 52205 ..... (c) 58	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard.* *Nevertheless, Connecticut is pursuing revision of this regulation as an attainment measure for the 8-Hour Ozone Standard.*
Dry Cleaning	Control of Volatile Organic Compound Emissions from Large Petroleum Dry Cleaners, EPA-450/3-82-009, September 1982	*Not Applicable*	40 CFR § 52.375 (a) Certification of no Large Petroleum Dry Cleaner sources.	*Connecticut Reaffirms its Declaration that No Sources Fitting this CTG Category are Located within the State.*
Gasoline Plants	Control of Volatile Organic Emissions from Bulk Gasoline Plants, EPA-450/2-77- 035, December 1977	*22a-174-20(b) Loading of gasoline and other volatile organic compounds.*	4/4/72 5/31/72 37 FR 23085 ..... (b). 8/31/79 12/23/80 45 FR 84769 ..... (c) 11 10/10/80 2/17/82 47 FR 6827 ..... (c) 25 4/1/98 10/19/00 65 FR 62624 ..... (c)(84) 9/24/83 3/21/84 49 FR 10542 ..... (c) 32 12/13/84 7/18/85 50 FR 29229 ..... (c) 34 10/31/89 10/18/91 56 FR 52205 ..... (c) 58 4/1/98 10/19/00 65 FR 62624 ..... (c)(84)	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard*
Graphic Arts	Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VIII: Graphic Arts - Rotogravure and Flexography, EPA-450/2-78-033, December 1978.	*22a-174-20(v) Graphic arts rotogravures and flexography.*	10/10/80 2/17/82 47 FR 6827 ..... (c) 25 10/31/89 10/18/91 56 FR 52205 ..... (c) 58 11/18/93 3/10/99 64 FR 12024 ..... (c)(75) 8/1/95 10/19/00 65 FR 62624 ..... (c)(84)	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard*

CTG Category	***CTG Document***	***Applicable Connecticut Regulation.***	***SIP Approval of Connecticut Regulation or Negative Declaration*** *Adopted by State/ Approved by EPA/ FR Cite/ 52.370*	***Comments***
Large Appliances	Control of Volatile Organic Emissions from Existing Stationary Sources, Volume V: Surface Coating of Large Appliances, EPA-450/2-77-034, December 1977.	*Not Applicable*	*Negative Declaration for Surface Coating of Large Appliances.*	*Connecticut Reaffirms its Declaration that No Sources Fitting this CTG Category are Located within the State.*
Magnet Wire	Control of Volatile Organic Emissions from Existing Stationary Sources, Volume IV: Surface Coating for Insulation of Magnet Wire, EPA-450/2-77-033, December 1977	*22a-174-20(r) Wire coating.*	8/31/79 12/23/80 45 FR 84769 ..... (c) 11 10/31/89 10/18/91 56 FR 52205 ..... (c) 58	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard*
Metal Coil, Container and Closure	Control of Volatile Organic Emissions from Existing Stationary Sources, Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks, EPA-450/2-77-008, May 1977.	*22a-174-20(m) Can coating;* *22a-174-20(n) Coil coating;*	8/31/79 12/23/80 45 FR 84769 ..... (c) 11 10/31/89 10/18/91 56 FR 52205 ..... (c) 58	*Regulations are consistent with the CTG and Represent RACT under the 8-Hour Ozone Standard*
Metal Furniture	Control of Volatile Organic Emissions from Existing Stationary Sources, Volume III: Surface Coating of Metal Furniture, EPA-450/2-77-032, December 1977	*22a-174-20(p) Metal furniture coating.*	8/31/79 12/23/80 45 FR 84769 ..... (c) 11 10/31/89 10/18/91 56 FR 52205 ..... (c) 58	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard*
Metal Parts & Products	Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VI: Surface Coating of Miscellaneous Metal Parts and Products, EPA-450/2-78-015, June 1978	*22a-174-20(s) Miscellaneous metal parts and products*	10/10/80 2/17/82 47 FR 6827 ..... (c) 25 10/31/89 10/18/91 56 FR 52205 ..... (c) 58 11/18/93 3/10/99 64 FR 12024 ..... (c)(75) 8/1/95 10/19/00 65 FR 62624 ..... (c)(84)	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard*
Natural Gas / Gasoline	Control of Volatile Organic Compound Equipment Leaks from Natural Gas/Gasoline Processing Plants, EPA-450/2-83-007, December 1983.	*Not Applicable* .	40 CFR § 52.375 (b) Certification of no Natural Gas/Gasoline Processing Plant sources.	*Connecticut Reaffirms its Declaration that No Sources Fitting this CTG Category are Located within the State.*
Paper & Fabric	Control of Volatile Organic Emissions from Existing Stationary Sources, Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks, EPA-450/2-77-008, May 1977.	*22a-174-20(q) Paper coating;* *22a-174-20(o) Fabric and vinyl coating;*	8/31/79 12/23/80 45 FR 84769 ..... (c) 11 10/31/89 10/18/91 56 FR 52205 ..... (c) 58	*Regulations are consistent with the CTG and Represent RACT under the 8-Hour Ozone Standard*
Pharmaceutical Products	Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products, 450/2-78-029, December 1978.	*22a-174-20(t) Manufacture of synthesized pharmaceutical products.*	10/10/80 2/17/82 47 FR 6827 ..... (c) 25 10/31/89 10/18/91 56 FR 52205 ..... (c) 58	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard*

CTG Category	***CTG Document***	***Applicable Connecticut Regulation.***	***SIP Approval of Connecticut Regulation or Negative Declaration*** *Adopted by State/ Approved by EPA/ FR Cite/ 52.370*	***Comments***
Polyester Resin	Control of Volatile Organic Compound Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins, EPA-450/3-83-008, November 1983 AND Control of Volatile Organic Compound Fugitive Emissions from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment, EPA-450/3-83-006, March 1984	*22a-174-20(y) Manufacture of Polystyrene Resins.*	2/2/87 5/19/88 53 FR 17934 ..... (c) 38 10/31/89 10/18/91 56 FR 52205 ..... (c) 58 AND 40 CFR § 52.375 (d) Certification of no Manufacturers of High-density Polyethylene and Polypropylene Resins.	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard*
Refineries	Control of Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds, EPA-450/2-77-025, October 1977. AND Control of Volatile Organic Compound Leaks from Petroleum Refinery Equipment, EPA-450/2-78-036, June 1978.	*22a-174-20(c) "Volatile organic compound" water separation.*	*Negative Declaration of Refineries.*	*Connecticut Reaffirms its Declaration that No Sources Fitting this CTG Category are Located within the State.*
Rubber Tires	Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires, EPA-450/2-78-030, December 1978.	*22a-174-20(u) Manufacture of pneumatic rubber tires.*	10/10/80 2/17/82 47 FR 6827 ..... (c) 25 10/31/89 10/18/91 56 FR 52205 ..... (c) 58	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard*
Service Stations	Design Criteria for Stage I Vapor Control Systems - Gasoline Service Stations, November 1975.	*22a-174-30 Dispensing of Gasoline/Stage I and Stage II Vapor Recovery.*	1/12/93 12/17/93 58 FR 65930 ..... (c) 62 1/12/93 1/18/94 59 FR 2649 ..... (c) 62 05/10/04 8/31/06 71 FR 51761 ..... (c) 95	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard*
Ships	Shipbuilding/repair ACT (EPA 453/R-94-032, April 1994) and CTG, see 61 FR 44050, August 27, 1996	*22a-174-32 Reasonably Available Control Technology (RACT) for volatile organic compounds.*	11/18/93 3/10/99 64 FR 12024 ..... (c)(76) 8/27/99 10/19/00 65 FR 62624 ..... (c)(84)	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard.*

CTG Category	***CTG Document***	***Applicable Connecticut Regulation.***	***SIP Approval of Connecticut Regulation or Negative Declaration*** *Adopted by State/ Approved by EPA/ FR Cite/ 52.370*	***Comments***
Solvent Cleaning	Control of Volatile Organic Emissions from Solvent Metal Cleaning, EPA-450/2-77-022, November 1977	*22a-174-20(l) Metal cleaning*	8/31/79 12/23/80 45 FR 84769 ..... (c) 11 10/10/80 6/7/82 47 FR 24452 ..... (c) 23 12/10/82 2/1/84 49 FR 3989 ..... (c) 29 9/24/83 2/1/84 49 FR 3989 ..... (c) 29 9/24/83 3/21/84 49 FR 10542 ..... (c) 32 8/31/79 3/21/84 49 FR 10542 ..... (c) 32 10/31/89 10/18/91 56 FR 52205 ..... (c) 58 8/23/96 10/19/00 65 FR 62624 ..... (c)(84)	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard. Additionally, Connecticut is finalizing changes to this regulation to provide for more restrictive vapor pressure standards.*
Synthetic Organic Chemical	Control of Volatile Organic Compound Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry, EPA-450/3-84-015, December 1984. AND SOCMI Distillation and Reactor Processes CTG (EPA 450/4-91-031, August 1993).	*22a-174-20(x) Control of Volatile Organic Compound Leaks from Synthetic Organic Chemical & Polymer Manufacturing Equipment.*	2/2/87 5/19/88 53 FR 17934 ..... (c) 38 10/31/89 10/18/91 56 FR 52205 ..... (c) 58 *AND* 40 CFR § 52.375 (c) Certification of no Air Oxidation Processes/SOCMI.sources 40 CFR § 52.375 (e) Certification of no sources of Synthetic Organic Chemical Manufacturing Industry (SOCMI) distillation. 40 CFR § 52.375 (f) Certification of no sources of Synthetic organic chemical manufacturing industry (SOCMI) reactor vessels	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard*

CTG Category	***CTG Document***	***Applicable Connecticut Regulation.***	***SIP Approval of Connecticut Regulation or Negative Declaration*** *Adopted by State/ Approved by EPA/ FR Cite/ 52.370*	***Comments***
Tanks	Control of Volatile Organic Emissions from Storage of Petroleum Liquids in Fixed Roof Tanks, EPA-450/2-77-036, December 1977 AND Control of Volatile Organic Emissions from Petroleum Liquid Storage in External Floating Roof Tanks, EPA-450/2-78-047, December 1978.	*22a-174-20(a) Storage of "volatile organic compounds" and restrictions for the Reid Vapor Pressure of gasoline.* *22a-174-20(c) "Volatile organic compound" water separation.*	8/31/79 12/23/80 45 FR 84769 ..... (c) 11 9/24/83 3/21/84 49 FR 10542 ..... (c) 32 12/13/84 7/18/85 50 FR 29229 ..... (c) 34 12/30/88 6/2/89 54 FR 23650 ..... (c) 50 10/31/89 10/18/91 56 FR 52205 ..... (c) 58	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard*
Tank Trucks	Control of Hydrocarbons from Tank Truck Gasoline Loading Terminals, EPA-450/2-77-026, December 1977. AND Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems, EPA-450/2-78-051, December 1978.	*22a-174-20(b) Loading of gasoline and other volatile organic compounds.*	8/31/79 12/23/80 45 FR 84769 ..... (c) 11 9/24/83 3/21/84 49 FR 10542 ..... (c) 32 12/13/84 7/18/85 50 FR 29229 ..... (c) 34 10/31/89 10/18/91 56 FR 52205 ..... (c) 58 4/1/98 10/19/00 65 FR 62624 ..... (c)(84)	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard*
Wood Coating	Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VII: Factory Surface Coating of Flat Wood Paneling, EPA-450/2-78-032, June 1978	*Not Applicable*	*Negative Declaration of sources of Surface Coating of Flat Wood Paneling.*	*Connecticut Reaffirms its Declaration that No Sources Fitting this CTG Category are Located within the State.*
Wood Furniture	Wood Furniture (CTG-MACT) - draft MACT out 5-94; Final CTG, EPA-453/R-96-007, April 1996; see also 61 FR 25223, and, 61 FR 50823, September 27, 1996.	*22a-174-32 Reasonably Available Control Technology (RACT) for volatile organic compounds.*	11/18/93 3/10/99 64 FR 12024 ..... (c)(76) 8/27/99 10/19/00 65 FR 62624 ..... (c)(84)	*Regulation is consistent with the CTG and Represents RACT under the 8-Hour Ozone Standard*

Table 4. Listing of the non-CTG major sources of nitrogen oxides (NOx) and/or volatile organic compounds (VOC) located in Connecticut. Major sources are those with the potential to emit 100 tons per year or more of NOx or 50 tons per year or more of VOC. The sources are grouped by RACT category.

Municipal Waste Combustor Sources:

American Ref Fuel Co. of Southeast Connecticut
Covanta Bristol, Inc.
CRRA / Mid-Connecticut
CRRA/ Wallingford
Wheelabrator Lisbon Inc.
Wheelabrator Bridgeport LP

Clean Air Interstate Rule Sources:

A E S Thames, LLC
Algonquin Windsor Locks LLC
Bridgeport Energy LLC
Capitol District Energy Center
Connecticut Jet Power, LLC
Devon Power, LLC
Exeter Energy LP
Lake Road Generating Co, L.P.
Milford Power Co, LLC
NRG Middletown Operations, Inc
NRG Montville Operations, Inc
NRG Norwalk Harbor Operations
Pfizer Inc
Pratt & Whitney Div UTC, East Hartford
PSEG Fossil LLC/ Power CT LLC
PSEG Power CT LLC/Bridgeport Harbor Station
Sprague Paperboard Inc

Sources Conducting NOx Trading under a SIP-Approved Program (NOx Budget Sources):

Algonquin Windsor Locks LLC
Capitol District Energy Center
Connecticut Jet Power, LLC
Devon Power, LLC
Pfizer Inc
Pratt & Whitney Div UTC, East Hartford
PSEG Fossil LLC/ Power Ct LLC
PSEG Power CT LLC/Bridgeport Harbor Station
Sprague Paperboard Inc
Algonquin Gas Transmission Co

Cytec Industries Inc / Cyro Industries Inc
Dominion Nuclear Ct., Inc.
Hamilton Sundstrand Corp
Pratt & Whitney Div UTC, Willgoos
Pratt & Whitney Div UTC, Middletown
Sikorsky Aircraft
Stone Container Corp
U S Naval Submarine Base/Power Plant
University Of CT / Storrs
Yale University, School Of Medicine aka Sterling

Other Major Sources of NOx (RCSA 22a-174-22):

Allegheny Ludlum Corp
Connecticut Natural Gas Corp
Connecticut Valley Hospital
Electric Boat Corp
Frito-Lay Inc
Hartford Steam Company
Kimberly-Clark Corp
M D C /Hartford WPCF
Norwalk Hospital Association
Pratt & Whitney Div UTC, North Haven
Simkins Industries Inc
Somers Thin Strip
Whyco Finishing Tech., Inc.
Yale University /Central Power Plant

Major Sources of VOC due to Fuel Burning:

A E S Thames, LLC
Algonquin Windsor Locks LLC
Bridgeport Energy LLC
C R R A / Mid-Connecticut
Capitol District Energy Center
Covanta Bristol, Inc
Devon Power, LLC
Lake Road Generating Co, L.P.
NRG Middletown Operations, Inc
NRG Montville Operations, Inc
NRG Norwalk Harbor Operations
Pratt & Whitney Div UTC, Willgoos
PSEG Fossil LLC/ Power CT LLC
PSEG Power CT LLC/Bridgeport Harbor Station
University Of CT / Storrs
Wheelabrator Bridgeport LP
Yale University /Central Power Plant

Major Sources of VOC Subject to MACT Standards:

Gulf Oil L.P.
Hamilton Sundstrand Corp
Motiva Enterprises LLC, New Haven
Motiva Enterprises LLC, Bridgeport
Pratt & Whitney Div UTC, Middletown
Vishay Vitramon,Inc
Whyco Finishing Tech, Inc.

Additional VOC Sources and Sources Subject to VOC RACT Orders:

Bic Consumer Products Manufacturing Co. .
Cytec Industries Inc /Cyro Industries Inc
Electric Boat Corp
Kimberly-Clark Corp
M D C /Hartford WPCF
Pfizer Inc
Quebecor, Northeast Graphic Inc
Ross & Roberts Inc
Sartomer Co Inc
SCA Packaging North America Inc
Sikorsky Aircraft
Spongex Corporation
Stanley Tools Division
Stone Container Corp
Wasley Products Inc

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Notice of Intent to Revise the State Implementation Plan for Air Quality

The Commissioner of the Connecticut Department of Environmental Protection (the Department) hereby gives notice of a public hearing regarding proposed revisions to the State Implementation Plan (SIP) for air quality to satisfy the reasonably available control technology (RACT) requirements of Section 182 of the Clean Air Act (CAA). The proposed SIP revision, described below, will be submitted to the U.S. Environmental Protection Agency (EPA) for review and approval.

8-Hour Ozone Reasonably Available Control Technology State Implementation Plan Analysis for the State of Connecticut: The CAA requires that states achieve the health-based 8-hour ozone National Ambient Air Quality Standard (NAAQS) by specified dates, based on the severity of an area's air quality problem. As the entire State of Connecticut is classified as moderate non-attainment for the 8-hour ozone NAAQS, EPA's *Final Rule to Implement the 8-Hour Ozone NAAQS* (70 FR 71612, November 29, 2005) requires the Department to submit a demonstration that the State has satisfactorily addressed EPA's 8-hour ozone RACT requirements. After identifying relevant regulations, the Department concludes in this SIP revision that controls on all major stationary sources of nitrogen oxides and volatile organic compounds emissions and all sources and source categories addressed in control techniques guidelines meet or exceed the CAA RACT requirements.

All interested persons are invited to comment on the proposed SIP revision. Comments should be submitted to the Department of Environmental Protection, Bureau of Air Management, Planning and Standards Division, 79 Elm Street, Hartford, Connecticut 06106-5127. All comments should be directed to the attention of Patricia Downes and must be received by 4:30 p.m. on October 20, 2006. Comments may be submitted by post, facsimile to (860) 424-4063 or by electronic mail to patricia.downes@po.state.ct.us.

In addition to accepting written comments on this proposal, the Department will also hold the public hearing described below. Any person appearing at the hearing is requested to submit a written copy of his or her statement. However, oral comments will also be made a part of the hearing record and are welcome.

PUBLIC HEARING
October 18, 2006 at 9:00 a.m.
Department of Environmental Protection, 5th Floor, Ensign Room
79 Elm Street, Hartford, CT

Copies of the SIP revision are available for public inspection during normal business hours and may be obtained from Patricia Downes at the Bureau of Air Management, Planning and Standards Division, 5th Floor, 79 Elm Street, Hartford, CT. Additional copies are also available for review at the Law Reference Desk at the Connecticut State Library, Torrington Public Library, New London Public Library and Bridgeport Public Library. For further information,

contact Patricia Downes of the Bureau of Air Management at (860) 424-3027 or by electronic mail to patricia.downes@po.state.ct.us.

The Department is an affirmative action/equal opportunity employer, providing programs and services in a fair and impartial manner. In conformance with the Americans with Disabilities Act of 1990, individuals with disabilities who need information in an alternative format to allow such individuals to benefit from and/or participate in the Department's programs and services should call TDD (860)-424-3000 and make their request to the receptionist. Requests for accommodations to attend the noticed hearing must be made at least two weeks prior to the hearing date to Marcia Z. Bonitto, ADA Coordinator, via electronic mail to Marcia.Bonitto@po.state.ct.us.

The authority to adopt the proposed SIP revision is granted by C.G.S. sections 22a-6 and 22a-174. This notice is required pursuant to 40 Code of Federal Regulations Section 51.102.

September 7, 2006
Date

/s/ Gina McCarthy
Gina McCarthy
Commissioner

HEARING CERTIFICATION

This certifies in accordance with the provisions of Title 40 Code of Federal Regulations Part 51.102 that the actions listed below were taken regarding the proposed 8-Hour Ozone Reasonably Available Control Technology State Implementation Plan Analysis for the State of Connecticut:

1) The public hearing was held on October 18, 2006 as announced in the notice of hearing (copy attached);

2) In accordance with the notice, materials were available for review in each Air Quality Control Region (AQCR) in Connecticut;

3) Copies of the notice were mailed to the directors of the air pollution control agencies in New York, New Jersey, Rhode Island and Massachusetts along with a copy to the Director of the Air Management Division of Region I of the U.S. Environmental Protection Agency; and

4) The notice of hearing was published in newspapers as follows:

Newspaper	AQCR	Date
Connecticut Post (Bridgeport)	43	September 12, 2006
Hartford Courant	42	September 12, 2006
New London Day	41	September 12, 2006
The Register Citizen (Torrington)	44	September 12, 2006

16 Nov 06
_____
Date

/s/ Kiernan J. Wholean
_____
Kiernan J. Wholean
Bureau of Air Management