

New RCSA section 22a-174-22e/22f Subcommittee
Changes to draft of Section 22e since last meeting
10/8/15
Summary of Discussion

Tanja Ashlin (UTC): Add language about ozone forecast after 3 PM from section (d)(13) to section (c)(7) as well.

Erin Gorman (PSEG): We appreciate the option for case-by-case RACT for existing sources. Why did you select maximum capacity rather than actual emissions? Dan Vesa (CT DEEP): We calculate to full load capacity. Calculating to < 8760 hour selection should be justified. Merrily Gere (CT DEEP): Unless you have a limit you could run 8760 hours. Erin: Regarding the simple cycle turbine older units – we're probably leading down the path of taking enforceable operating restrictions. Merrily: Yes, and that could allow you to have a higher \$/ton level.

Corine Hellerman (Sikorsky): How was the \$13,000/ton number derived? Dan: That number came from DE and was adjusted for the Consumer Price Index (CPI) by the Sierra Club. Merrily: That was DE's estimate for its NOx RACT regulation. There are very few published numbers. The northeast tends to have higher \$/ton values. Dan: One objective of our cost exercise is to see if that number is valid. We asked DE for justification and they have not responded. That is one of the primary reasons for going through this process.

Steve Horn (Dominion): I echo the previous comment about using actual data for cost estimates. Jack Dunne (Pfizer): It sounds like you could take an enforceable limit. Tanja: What if you have a fuel limit or limit on hours of operation? Steve: Using actuals seems like it artificially inflates the number. PSEG asks another question about the limit. Merrily: An annual limit would do it. Dan: Using total annual cost also increases the operation and maintenance costs since those costs are also figured on an annual basis. The total annual cost should be included. For example, for water injection, you would include the cost of water for the entire year. Merrily: We understand that we can't have it both ways. If we require 8760 hours to determine the tons reduced, we also have to use that in the maintenance cost estimates.

Jim Romanski (Yale): This wasn't a recent change. I have a question about section (g)(3)(F) on page 17. I'm lost on the language about operating on gas and quantifying annual emissions by combusting residual oil or other oil/gas. Then I look at (d)(3). Does that mean 3 things? Merrily: Other oil is distillate. Jim: So as long as operating on gas meets the limit on all 3... Merrily: There has to be an emission reduction operating on gas only compared with operating on other fuels. Jim: How different is operating on gas compared with other limits? Merrily: This is really about applicability. Steve Eitelman (UTC): I have a gas boiler. If my boiler complies with natural gas limits I don't have to test for other oil/gas. Merrily: I would say no and compliance with limits is achieved.

Chris Shepard (MIRA): I have a question about the meaning of "existing, banked DERCs". Merrily and Wendy Jacobs (CT DEEP) explain how the existing trading orders that expire May 31, 2017 will likely be extended through May 31, 2018 and allow for DERC generation. DERCs generated during that timeframe can be used during Phase 1 along with other existing, approved DERCs so long as vintage restriction requirements are met. Bob Silvestri (PSEG): It's almost a panic situation now about DERCs. Merrily: How can we allay that panic? Bob S: People are trying to buy DERCs. Allowing generation until 2018 is a concern. Timing is critical for the extensions (people would like extensions ASAP). Merrily:

We will bring that up to Mike LaFleur and will try to get a statement from Bob Girard regarding the plan moving forward. Chris: Does that imply no transfers can occur during Phase 1? Merrily: Transfers can occur, but no creation.

Jim: Regarding section (l)(6)(B) – 120 days is a long time. We'll haggle back and ask for 60 days. That's what EPA has in its rules. We bought property subject to NOx RACT when it wasn't before. 120 days is 4 months so you're backing into the clock for newly subject facility testing. It's a long time to approve.

Jack: We were discussing streamlining testing for LEAN. We discussed timing. We talked about different lead times in the rules. No one said they were pondering 120 days. Merrily: If you could write comments specifically on that and cc Bob, Cinda Lautenschlegar (CT DEEP) and Jaimeson Sinclair (CT DEEP) and reference LEAN. Jack: The report due date can vary too. Permits are silent on due date for subsequent stack test. Particulate samples going to outside lab for analysis tacks another bunch of days onto that. Jim: I thought Bob said 90 days at our meeting and now it's 120, so that's why we're haggling. I understand if it's new you need more time. Jack: At LEAN they said if you're using a controversial method you should come in early. But a timely reply to the protocol is important, too. Could the regulation distinguish controversial from ordinary tests?

Tanja: There is a lot of overlapping content in sections (j)(2)(B) and (j)(2)(E) for tune-ups. Merrily: That does look to be overlapping.

Jim: Did you say you would take informal comments through October 25? Merrily: We did say that originally, but we would prefer comments much sooner given the need to move the regulation forward.

After the meeting: Tanja: Combustion test rigs – schedule mod order included the combustion test rig and FT4. The air heater is part of the combustion test rig, not the test cell. It is support equipment for research and development equipment. We discuss adding the phrase “or used for” to subsection (c)(7)(A).

Tanja: Non road engines – There are 2 different fuel types, so there should be 2 different regulatory references. Merrily: We used the part 89 reference but we should add the other one from Steve Eitelman.

Tanja: Why isn't JJJ cited in section (j)(2)(A) along with ZZZZ?

Merrily: Does it have recordkeeping equivalent to ZZZZ?

Tanja: I don't know.

Merrily and Wendy: We will look into it.