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Transition from the GPLPE to RCSA §22a-174-33a and RCSA §22a-174-33b

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Presentation Outline

- GPLPE Background
- GPLPE Replacement
- What's New?
- Notification Forms
- Reporting
- Questions?



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GPLPE Background

- The General Permit to Limit Potential to Emit was signed on November 9, 2015
 - One permit under which facilities registered with the option to limit premises actual emissions below 50% or 80% of Title V thresholds
 - Required submission of an application for registration which included calculations of potential and actual emissions and a registration fee



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GPLPE Background (cont.)

- The GPLPE expired on November 8, 2020
- All facilities registered under the GPLPE in 2020 are required to submit an Annual Compliance Certification
 - Certification must be submitted via the EMIT online reporting application by March 1, 2021
 - Certification Period will be 1/1/2020 – 11/8/2020
 - Part 2 of the certification must include all emissions up to and including 11/8/2020.
 - Facilities may elect to report emissions for the entire calendar year.



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GPLPE Replacement

- In lieu of reissuing the GPLPE the Department adopted two regulations allowing facilities to limit actual premises-wide emissions below Title V source thresholds
 - RCSA 22a-174-33a Limit on Premise-Wide Emissions below 50% of Title V Source Thresholds
 - RCSA 22a-174-33b Limit on Premise-Wide Emissions below 80% of Title V Source Thresholds
 - Emission limits, monitoring, recordkeeping and reporting requirements are structured similarly to the GPLPE



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What's New?

- Facilities electing to operate under Section 33a or 33b continue to do so until submitting notification to the Department ceasing coverage under the regulation
 - GPLPE Permits expired 5 years from the date signed by the Commissioner
- Notification Form vs. Application.
 - Notifications for 33a and 33b do not require emissions calculations, equipment lists, fees or Department approval



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What's New ? (cont.)

- Sections 33a and 33b do not include a limit for Greenhouse Gas.
- All sources will be required to maintain records of the total monthly and consecutive 12 month period actual emissions
 - GPLPE <50% were required to maintain monthly usage records, but actual emissions were only required to be calculated for the calendar year



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Notification Forms

- Facilities electing to operate under 33a or 33b must submit notification to the Department
- Facilities ceasing to operate under 33a or 33b must submit a notification to the Department within 30 days
- Facilities may elect to change coverage between 33a and 33b
 - must submit the appropriate notifications to cease coverage under one regulation and to commence operating under the other regulation



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Notification Forms (cont.)

- The notification must be submitted on forms provided by the commissioner
- Notification forms are regulation specific
- Current GPLPE registrants were provided copies of the notification forms and instructions via e-mail
- Forms and instructions are available on the DEEP Air Compliance Assurance page

<https://portal.ct.gov/DEEP/Air/Compliance-Assurance/Air-Compliance-Assurance---Forms>



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Reporting

- Facilities electing to operate under RCSA 22a-174-33a must submit an Annual Compliance Certification for the previous calendar year on or before March 1st
- Facilities electing to operate under RCSA 22a-174-33b must submit an Annual Compliance Certification and an Annual Emission Summary for the previous calendar year on or before March 1st



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Reporting (cont.)

- Compliance reports will not be required for any period of operation under these regulations in 2020. The first reporting period will commence on January 1, 2021 or the date of Notification of Commencement of Operation, whichever is later.
 - Facilities that commence operation in accordance with 22a-174-33a or 22a-174-33b between November 9, 2020 and December 31, 2020 shall comply with the emissions and recordkeeping requirements



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Questions?

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