

# Air Task Force Status Summary

## CBIA e<sup>2</sup> Council

Revised January 15, 2021

Program	Status	Comments
CTDEEP Annual Emissions Reporting Reminder	<b>UPDATE</b> <i>Guidance for 2020 Emissions Reporting Issued</i>	<ul style="list-style-type: none"> <li>CTDEEP issued reminder annual emissions reporting issued to Title V permit holders on 1/12/2021</li> <li>EMIT online system will continue to be used and CTDEEP recommends using Google Chrome to avoid potential compatibility issues</li> <li>"Critical Procedural Guidance" -- PM-2.5 and PM-10 emissions in 2020 must include the condensable and filterable emissions in addition to the total. <ul style="list-style-type: none"> <li>In the past, certain sources have had the option to report on total "primary" PM-2.5 and PM-10 emissions without providing a specific breakdown of condensable and filterable fractions.</li> <li>New requirement not an issue if using AP-42 factors, but can be a problem for sources that use stack test results</li> </ul> </li> <li>Similar to previous years, sources at that meet the following requirements, need to be included on the annual emission statement: <ul style="list-style-type: none"> <li>Sources in Table II.A of your title V permit with source specific requirements</li> <li>Sources operating under a permit-by-rule limit, ( i.e. 3b or 3c )</li> <li>Any new source that has been added to your site since your Title V permit was issued, that has source specific requirements (i.e. is subject to a New Source Review Permit (NSR), or section 3b or 3c of our regulations, NOx RACT, VOC RACT, etc. )</li> <li>Sources already identified at your site in the DEEP inventory</li> <li>Each source or group of similar sources not covered above, for which the Permittee is subject to State or Federal air regulations requiring periodic recordkeeping of fuel or material consumption and, that emit greater than or equal to 0.5 tons/yr. of actual annual emissions of any one of the following pollutants: NOx, SO2, CO, PM10 primary, VOC or lead during the reporting period</li> <li>Note that reporting is not required for equipment and activities that would be categorized as Trivial Activities in accordance with White Papers 1 and 2, (<a href="https://www3.epa.gov/ttn/caaa/t5wp.html">https://www3.epa.gov/ttn/caaa/t5wp.html</a>) or any source listed and defined as an Insignificant Emissions Unit in section VI of the Title V application.</li> <li>Sources reporting &lt;0.5 tpy after 3 years do not need to report.</li> </ul> </li> </ul> <p><b>CTDEEP Contact:</b> AQME group / (860) 424-4152 / <a href="mailto:DEEP.Bam.TS@ct.gov">DEEP.Bam.TS@ct.gov</a> or Rick Rodrigue / (860) 424-3429 / <a href="mailto:richard.rodrigue@ct.gov">richard.rodrigue@ct.gov</a></p>

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Other Annual Reporting Reminders	<b>UPDATE</b> Reminders for reports due in the 1 <sup>st</sup> Quarter of 2021	<ul style="list-style-type: none"> <li>1/30/2021 – CEMS Quarterly Summary Report</li> <li>1/31/2021 – Subpart DDDDD Compliance Report</li> <li>3/1/2021 - Emission Statement (EMIT) – See item above</li> <li>3/1/2021 – Title V Semi-Annual Monitoring Report (Mandatory online submittal through EMIT)</li> <li>3/1/2021 – Title V Annual Compliance Certification <ul style="list-style-type: none"> <li>➤ Reminder that site-specific PDF forms provided to facilities by DEEP must be updated and submitted through EMIT</li> <li>➤ NOTE – a copy of the report still required to be submitted separately to EPA</li> </ul> </li> <li>3/1/2021 – GPLPE Annual Compliance Certification &amp; Emissions Summary (EMIT) – no reporting required for operation under RCSA 174-22a-33a &amp; 33b until next year</li> <li>3/1/2021 – RGGI Output Report</li> <li>3/1/2021 – RGGI Certify Compliance for 4th Period Send CTDEEP statement printed from RGGI-COATS (I could not do a bullet)</li> <li>3/1/2021 – CTDEEP RCSA 22a-174-19a Sulfur Dioxide Certification Report</li> <li>3/31/2021 – Part 98 Mandatory GHG Reports (e-GGRT)</li> </ul>
GPLPE Replacement Regulations	<b>No Change</b> <i>Transition Guidance for Current Registrants</i>	<ul style="list-style-type: none"> <li>Facilities can elect to report emissions for the entire 2020 calendar year or only through 11/8/2020</li> <li>Reports submitted through EMIT system and are due by 3/1/2021</li> <li>Compliance reporting will not be required for facilities operating under the new regulatory program in 2020. (Facilities must comply with emissions and recordkeeping requirements)</li> <li>The first reporting period under the new regulatory program will commence on 1/1/2021.</li> <li><b>Reminder</b> -- the first 45-day deadline for monthly recordkeeping and emission calculations under the new regulatory programs (RCSA 22a-174-33a &amp; 33b) has passed. Be sure to have required documentation in place and that calculations follow the format prescribed by the regulations</li> </ul> <p><b>CTDEEP Contact:</b> Jared Millay / (860) 418-5911 / <a href="mailto:jared.millay@ct.gov">jared.millay@ct.gov</a></p>

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Air Inspections & Enforcement	<b>NO CHANGE</b> <i>CTDEEP conducting virtual air inspections</i>	<ul style="list-style-type: none"> <li>Virtual air inspections to be conducted at least into “some part” of 2021</li> <li>8-10 virtual air inspections thus far and CTDEEP developed SOP for conducting these <ul style="list-style-type: none"> <li>Inspectors to develop preliminary list of questions and areas to focus on and have initial kick off call/e-mail with facility</li> <li>Virtual inspection meeting using screen sharing where possible; followed by additional information requests</li> <li>CTDEEP expects all requested records and information to be provided within a week of request (exceptions considered)</li> <li>1-2 additional virtual meetings or calls to review additional questions and review any findings from the inspection with formal report to follow</li> <li>Virtual inspection calls will not be recorded</li> <li>Depending on the type of source, DEEP may conduct an on-site inspection if it can be accomplished with limited personal interaction</li> </ul> </li> <li><b>NEWS: PIQs are no longer required for Title V facilities</b> <ul style="list-style-type: none"> <li>CTDEEP did note that facilities are still required to maintain an inventory of small / insignificant sources not listed in Title V permit</li> </ul> </li> </ul> <p><b>CTDEEP Contact:</b> Mark Potash / (860) 424-33547/ <a href="mailto:mark.potash@ct.gov">mark.potash@ct.gov</a></p>
Incinerator Permitting Requirements	<b>No Change</b> <i>Comment Period Closed &amp; Under Review by AG Office</i>	<ul style="list-style-type: none"> <li>Proposed regulatory changes issued for public comment on 7/2/2020</li> <li>CTDEEP has proposed revisions to RCSA 22a-174-1 &amp; -3a designed to exempt certain incinerators from categorical requirement to obtain NSR permits</li> <li>Five new categories of incinerators to be exempt from categorical NSR permit requirement, provided PTE &lt; 15 tpy for any regulated air pollutant <ol style="list-style-type: none"> <li>Burn-off Oven (must meet new definition, including specification for secondary combustion chamber and operating temperature)</li> <li>Bench Scale R&amp;D Operations (as currently defined in 22a-174-33(a)(8))</li> <li>Quality Control or Performance Testing (combustion of non-halogenated materials only)</li> <li>Contraband or Confiscated Goods (burned in portable unit operated by government agency)</li> </ol> </li> <li>Very similar to version reviewed with stakeholders back in October 2018</li> <li>Comment period closed and CTDEEP issued revised proposed rule incorporating most changes.</li> <li>Proposal submittal to the AG office on 10/30/2020</li> <li>Submitted to LRRC meeting on 1/26/21 with decision due on 2/4/2021</li> </ul> <p><b>CTDEEP Contact:</b> Raquel Herrera / (860) 424-3150 / <a href="mailto:raquel.herrera@ct.gov">raquel.herrera@ct.gov</a></p>

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Once In, Always In Policy	<b>NO CHANGE</b> Final Rule Published in Federal Register on 11/19/2020	<ul style="list-style-type: none"> <li>EPA published the “Major MACT to Area” or “MM2A” rule in Federal Register on 11/19/2020 to formally withdraw the Once In, Always In Policy</li> <li>Notifications of reclassification required to be submitted to EPA electronically through CEDRI System <ul style="list-style-type: none"> <li>➤ Any facility that reclassified from major to area sources of HAPs between 1/25/2018 and 1/19/2021 must provide this notification retroactively prior to 2/2/2021</li> </ul> </li> <li>EPA is removed the word “federally” from the phrase “federally enforceable” in the PTE definition. This interim ministerial revision is consistent with the 1995 District of Columbia Circuit Court remand that directed EPA to explain how federal enforceability enhanced effectiveness. PTE limitations must continue to be both legally enforceable by a state or local permitting authority and practicably enforceable. <ul style="list-style-type: none"> <li>➤ EPA still considering comments on this issue and plans to address them in a separate action.</li> </ul> </li> <li>Link to regulation and supporting information:  <a href="https://www.epa.gov/stationary-sources-air-pollution/documentation-reclassification-major-sources-area-sources-under">https://www.epa.gov/stationary-sources-air-pollution/documentation-reclassification-major-sources-area-sources-under</a> </li> </ul> <p><b>EPA Contact:</b> Ms. Elineth Torres, Sector Policies and Programs Division (919) 541-4347 / <a href="mailto:torres.elineth@epa.gov">torres.elineth@epa.gov</a></p>