



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



May 16, 2007

U.S. Environmental Protection Agency  
EPA Docket Center, EPA West (Air Docket)  
Mail Code 6102T  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460  
Attention: E-Docket #EPA-HQ-OAR-2007-0012

Re: Connecticut Department of Environmental Protection Comment on Revisions to Definition of Cogeneration Unit in Clean Air Interstate Rule (CAIR), CAIR Federal Implementation Plan, Clean Air Mercury Rule (CAMR), and CAMR Proposed Federal Plan; Revision to National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters; and Technical Corrections to CAIR and Acid Rain Program Rules, 72 Fed. Reg. 20465, (April 25, 2007)

Dear Docket Administrator:

The Connecticut Department of Environmental Protection (CTDEP) submits this letter regarding the U.S. Environmental Protection Agency's (EPA's) *Revisions to Definition of Cogeneration Unit in Clean Air Interstate Rule (CAIR), CAIR Federal Implementation Plan, Clean Air Mercury Rule (CAMR), and CAMR Proposed Federal Plan; Revision to National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters; and Technical Corrections to CAIR and Acid Rain Program Rules*. In the proposed revisions, EPA seeks comment on a proposal to modify the CAIR and CAMR rules by changing the definition of cogeneration unit, in particular the efficiency standard, to allow additional units to qualify for exemption as cogenerators. Of importance to Connecticut, the proposal allows states to join the EPA-administered CAIR trading programs even if they continue to use the existing cogeneration unit definition from the model trading rule, and states using the existing cogeneration unit definition would not be required to revise the definition of cogeneration unit in their CAIR State Implementation Plans.

CTDEP supports such proposal, for taking into account the large number of CAIR states that, like Connecticut, do not have any existing biomass cogeneration units included in their CAIR universes. Therefore, the changes to CAIR with respect to such units are moot in Connecticut. The time and administrative resources involved to make such an insignificant regulatory change in Connecticut are not justified given all of the other air quality challenges facing CTDEP.

CTDEP appreciates the opportunity to comment on this issue. If you or members of your staff have any questions regarding this letter, please do not hesitate to contact Richard Pirolli of my staff at 860-424-4152.

Sincerely,

Anne Gobin  
Chief  
Bureau of Air Management

cc: David Conroy, Manager, EPA Region I Air Quality Planning Unit