



State of New Jersey

DEPARTMENT of ENVIRONMENTAL PROTECTION

Division of Air Quality

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BOB MARTIN
Commissioner

June 30, 2014

State of Connecticut
Department of Energy and Environmental Protection
Bureau of Air Management, 5th Floor
79 Elm Street
Hartford, CT 06106-4064

RE: June 10, 2014, Draft Reasonably Available Control Technology Analysis under the 2008 8-Hour Ozone National Ambient Air Quality Standard

Dear Ms. Jacobs:

Thank you for the opportunity to comment on the Draft Reasonably Available Control Technology Analysis for the 2008 8-Hour Ozone National Ambient Air Quality Standard, posted on June 10, 2014. The New Jersey Department of Environmental Protection supports Connecticut's proposed commitment to evaluate Reasonably Available Control Technology (RACT) level NO_x control options for boilers, turbines, engines and municipal waste combustors, and urges Connecticut to adopt RACT limits that are at least equivalent to those adopted by New Jersey five years ago (2009).

Of particular relevance to Connecticut's proposed RACT commitments are the NO_x performance standards for High Electric Demand Day (HEDD) electric generating units (EGUs). HEDD units are those units that are mostly operating during high electric demand days, which tend to be high ozone days. HEDD units are typically smaller, less efficient, older turbines and boilers, many of which have little or no NO_x control. To reduce emissions during high electric demand days, New Jersey implemented short term and long term emission control strategies to allow sufficient time for facilities to implement an emission control strategy or replace old units. In New Jersey, all HEDD units are required to be in compliance with the 2009 performance standards by May 1, 2015, six years after the rule was adopted to provide sufficient time to build new units to replace those that would be shut down.

New Jersey's NO_x RACT limits are reasonable performance standards to attain and maintain the 75 ppb NAAQS throughout the region. Implementing up to date RACT limits, especially NO_x performance limits for HEDD EGUs, would help us all achieve clean air. A copy of New

Jersey's NO_x rule can be found at: <http://www.state.nj.us/dep/aqm/Sub19.pdf>. Thank you for considering New Jersey RACT rules when evaluating those in your state.

If you have any questions regarding the 2009 RACT rule, please contact Margaret Gardner at (609) 292-7095.

Sincerely,



William O'Sullivan
Director
Division of Air Quality

- c: Anne Gobin, Chief, Bureau of Air Management, CTDEEP
- Jane Kozinski, Assistant Commissioner, Environmental Management
- Chris Salmi, Assistant Director, AQM
- Francis Steitz, Assistant Director, AQPP
- Richard Ruvo, Chief, Air Programs Branch, USEPA Region II
- David Conroy, Chief, Air Programs Branch, USEPA Region I