

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOV 12 2009



U.S. Environmental Protection Agency
EPA Docket Center
Air & Radiation Docket, Mail Code 2221T
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Attention: Docket ID No. EPA-HQ-OAR-2009-0174

Re: *Comments from the Connecticut Department of Environmental Protection on the Advanced Notice of Proposed Rulemaking for the Emission Factors Program Improvements*

Dear Docket Administrator:

The Engineering Section of the Bureau of Air Management of the Connecticut Department of Environmental Protection (CTDEP) has reviewed the U.S. Environmental Protection Agency's (EPA's) Advanced Notice of Proposed Rulemaking for the *Emission Factors Program Improvements* (74 FR 52723; October 14, 2009). We are submitting the following comments on the proposed rule:

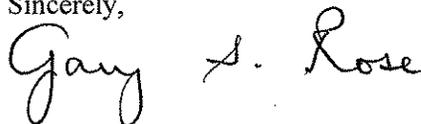
- Connecticut supports the proposal to improve the quality of emissions factors. When emissions data are not available, permit engineers have often relied on AP-42 emission factors to determine permit applicability and set allowable emission limits for a wide variety of source types. However, there has always been an uncertainty of their appropriateness and accuracy. We believe that it is a marked improvement to include state approved stack test data in the development of the emissions factors.
- Connecticut supports the use of the ERT. However, we do want to ensure that S/L/Ts are given the necessary training and resources to implement the usage of the tool. Connecticut recommends that EPA have staff assigned to modify the ERT to be responsive to S/L/T needs. In addition, we commend EPA for its proposal to broaden the use of the ERT because direct submission of stack test results allows for paperless submittals and wider distribution of the data.
- State approved stack tests and manufacturer's data are preferable to the existing generic AP-42 emissions factors if reviewed and approved by EPA or some S/L/Ts having the appropriate technical expertise. In the past, permit engineers have used AP-42 emissions factors as a default when better data were unavailable. There are too many variables (design, size, controls) associated with a new source for any generalized emissions factors to adequately determine emissions.
- Connecticut conditionally supports the use of Industry and Trade Associations data if it is reviewed and approved by EPA or some S/L/Ts having the appropriate technical expertise (perhaps certified by EPA).

Docket Administrator
Richard A. Pirolli
U.S. Environmental Protection Agency

- Connecticut does not support a rating system. The present AP-42 has a rating system that allows for use of low quality data. There would be no need for a rating system if the data submitted and accepted is well-documented with a demonstration that tests are performed using an EPA reference method or equivalent method that has been reviewed and approved by EPA.
- Connecticut supports the use of CEM data for emissions factors development. CEM is more representative of the true emissions of the source than a one-time stack test.
- Connecticut recommends that WebFIRE contain the year the test was conducted. But to be really useful, the make, model number, type of controls and year of installation are also necessary to determine whether the test data are applicable. For example, if the test was conducted in 1995 on a turbine without controls installed in 1979, the test data would have little applicability to a turbine installed in 1996 with a low-NOx burner and SCR.
- If WebFIRE utilizes data based on non-EPA references methods, EPA should make the assessment whether the methodology is equivalent to that of EPA's method. Connecticut does not recommend having different quality ratings.
- Connecticut recommends that WebFIRE be updated every three years to coincide with the periodic inventory submittals.
- Connecticut recommends that in addition to calculating the arithmetic mean of the emission factor, the range of values should be included in a tabular format.
- Connecticut does not support arbitrarily limiting the number of performance tests. However, we recommend that older tests be examined and excluded if they are no longer valid.
- Connecticut recommends that emission factors for non-point sources be improved as well.

CTDEP appreciates the opportunity to comment on the Advanced Notice of Proposed Rulemaking in furtherance of our mutual environmental goals. If you or members of your staff have any questions regarding this letter, please do not hesitate to get in touch with Ron Freeto at 860-424-3392.

Sincerely,



for

Richard A. Pirolli
Assistant Director
Engineering and Enforcement Division
Bureau of Air Management