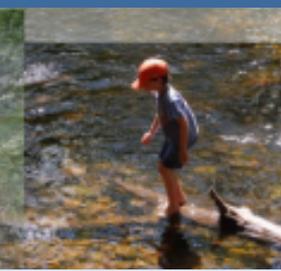
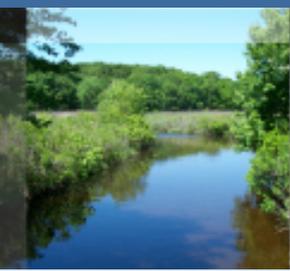




Connecticut Department of Energy and Environmental Protection



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

CAA Section 184(c) Petition Process

August 8, 2019
Tracy Babbidge



Connecticut Department of Energy and Environmental Protection

Background

- On May 30, 2019, Maryland petitioned the OTC under CAA Section 184(c).
- The petition asks the OTC to consider developing additional control measures within part of the OTR, specifically the potential need for daily limits at coal-fired EGUs in Pennsylvania, as necessary to bring areas in the OTR into attainment by the dates mandated by the CAA.
- The Maryland petition may be viewed at <https://mde.maryland.gov/programs/Air/Pages/index.aspx>



Maryland
Department of
the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor
Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

May 30, 2019

David Foerter, Executive Director
Ozone Transport Commission
800 Maine Avenue SW
Suite 200
Washington, DC 20024

RE: Petition to the Ozone Transport Commission for Additional Control Measures Pursuant to Section 184(c) of the Clean Air Act

Dear Mr. Foerter:

The purpose of this letter is to petition the Ozone Transport Commission (OTC or the Commission) under Section 184(c) of the Clean Air Act (CAA) to develop, and transmit to the administrator of the U.S. Environmental Protection Agency (EPA), recommendations for additional control measures to be applied within a part of the Ozone Transport Region (OTR). For the OTC to proceed with a 184(c) petition, it must be supported by a majority vote of the governors on the Commission (or their designees). A draft motion to vote on the petition is included as Attachment 1 and Maryland requests it be considered as a potential action at the June 11, 2019 OTC meeting. A copy of Section 184(c) of the CAA is included as Attachment 2.



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CAA Section 184(c) Summary

- Upon petition of any State within the OTR, and with a majority vote of the Governors, OTC will develop recommendations for additional control measures to be applied in all/part of the OTR if needed to bring region into attainment. Recommendations submitted to EPA Administrator.
- Notice and hearing requirements on recommendations by OTC and EPA.
- EPA shall:
 - Immediately initiate review and approve/disapprove within 9 months.
 - Disapproval requires EPA to recommend equal or more effective actions.
 - Administrator then issues finding that all approved measures be included in the applicable SIPs within 1 year.

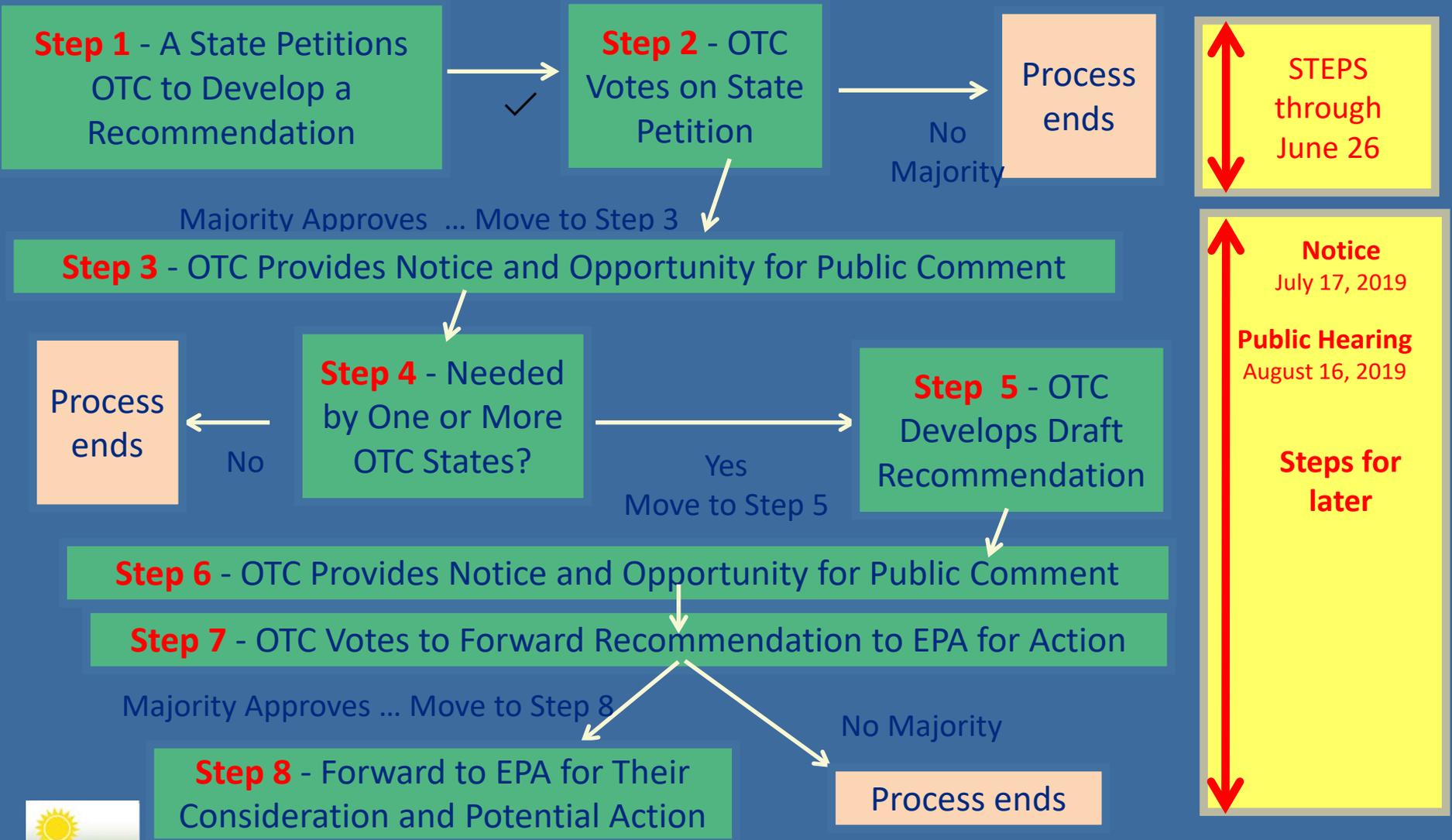


- On June 26th the OTC voted to proceed with the initial steps associated with CAA Section 184(c) petition process including:



- Analyzing recent EGU operations in Pennsylvania.
- Soliciting public comment on:
 1. whether the OTC should develop additional control measures for Pennsylvania, and if so,
 2. how those specific control measures should be structured.

How Does CAA Section 184C Work?



Public Notice and Comment Period

Comments: Submit by 5:00 p.m. on August 16, 2019
Email comments to ozone@otcair.org.

Public hearing: The OTC will hold a public hearing on:
August 16, 2019
9:00 a.m. to 5:00 p.m.

EPA Region III, Public Information Center,
1650 Arch Street, Philadelphia, Pennsylvania



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Questions?



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