

SEM Update - New Report Submittal Requirements & Ammonia CEMS

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SIPRAC



Connecticut Department of Energy and Environmental Protection

Emissions Test Reporting

1. Current State:

- E-mailed reports to group (DEEP.SEM@ct.gov) or individuals;
- Hand delivered/Fed Ex;
- CD submissions with and without hardcopy pages;
- Mailed via USPS
- Reports often addressed to wrong addressee/group

2. Time consuming looking into multiple places;

3. Challenge to track and file multiple formats;

4. Lack of transparency and access to test results within and outside of DEEP (ex. FOIA)



DEEP.SEM@ct.gov - Limitations

Intent of new forms was to require protocol and test report submissions to the DEEP.SEM@ct.gov was recognized as a *problem for sources*:

1. Large reports sometimes get bounced back to sender;
2. Testers often have to split the reports into multiple attachments;
3. Sometimes reports get sent to the case manager (test auditor/protocol reviewer);
 - Results in overlooked reports
 - Delayed assignments

File Transfer Protocol - FTP

To resolve these issues:

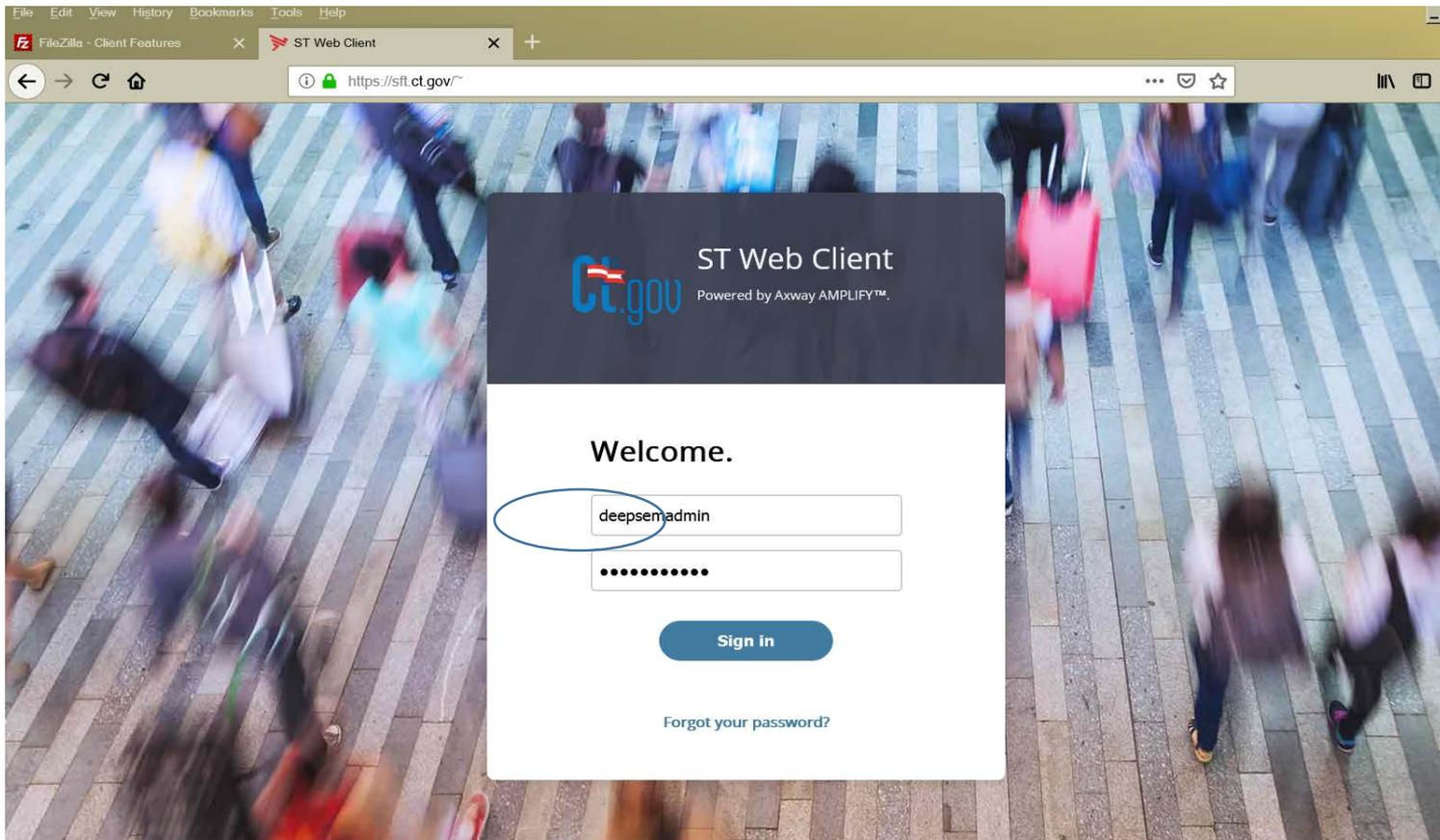
1. File transfer protocol was established (FTP);
2. Aligns with other Bureaus in the Department (UST reports);
3. Large documents can be uploaded – size not restricted (5 GB limit!);
4. Electronic Reports in the ERT format can be uploaded (a tool required by EPA for Federal Rules);
5. Peace of mind and easy;
6. No more dealing with storage devices; and
7. No more last minute paper report deliveries to 79 Elm!



FTP → https://sft.gov.ct

User = DEEPSEMUpload

Password = \$air2018



New Forms and Guidelines

Target for release by February:

1. New ITT and Report Certification Forms;
2. Test Guidelines version 2.0;
3. FTP reporting instructions;
4. Response to public comments



Don't Worry



Step by step:

1. New forms once finalized will be gradually phased in but strongly encouraged;
 - Will expedite protocol approvals!
2. Submittals of test reports will be required to our FTP site but generous time will be provided to acclimatize to it;
3. FTP instructions will be provided via Ms. Knight, on the SIPRAC website, on the DEEP website, and will also be emailed.

Other Update

Relative Accuracy Test Audit Issue

1. Ammonia CEMS – No promulgated PS
2. However, RCSA Section 22a-174-4 requires that a PS be identified and used in a CEMS Plan and annual RATA;
3. Compliance is required with this PS;
4. We will be doing outreach to ensure that sources have updated CEMS plans with the DEEP

Initial outreach will be to combustion turbines equipped with
NH₃ CEMS



Questions?

Please submit questions to:

Email: Cinda.Lautenschlegar@CT.gov

Subject Line: “[New ITT Forms](#)” or “[FTP Report Submittals](#)”

Thank you!

