



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912**

December 27, 2012

Merrily A. Gere
Department of Energy & Environmental Protection
Bureau of Air Management
79 Elm Street
Hartford, CT 06106-5127

Dear Ms. Gere:

Thank you for the opportunity to review your proposed "General Permit to Limit Incompatibility Excess Emissions and Provide an Exemption from Stage II Vapor Recovery Requirements."

We have reviewed the proposed general permit and you will find the Agency's comments in the Enclosure.

If you have any questions regarding this matter, please contact Ariel Garcia of my staff at 617-918-1660.

Sincerely,

A handwritten signature in cursive script, which appears to read "Anne Arnold".

Anne Arnold, Manager
Air Quality Planning Unit

cc: Timothy Marsh, CT DEEP

Enclosure

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**EPA Comments on Connecticut's Proposed
"General Permit to Limit Incompatibility Excess Emissions and Provide an
Exemption from Stage II Vapor Recovery Requirements"**

1) For consistency with decommissioning procedures referenced later in the document, we suggest the definition of "Decommission" be revised to read as follows:

"...Decommissioning requires a permanent disconnection of Stage II vapor recovery equipment and sealing of all vapor/liquid paths that may release to the ambient air, although below-ground Stage II vapor recovery piping may be left in place, **so long as it remains under a vapor-tight seal;**"

2) This general permit and Connecticut's February 2012 compliance waiver for newly constructed gasoline dispensing facilities provide exemptions from the Stage II vapor recovery system requirements of Connecticut's section 22a-174-30. This regulation has been approved into the Connecticut State Implementation Plan (SIP). Therefore, Connecticut should revise its SIP accordingly. Furthermore, in order for EPA to be able to approve these exemptions, Connecticut must demonstrate that it meets the anti-backsliding requirements of Section 110(l) of the Clean Air Act (CAA), as well as the CAA's requirement for states in the Ozone Transport Region to implement Stage II or "comparable measures." Connecticut's SIP revision should include a demonstration to satisfy the necessary CAA requirements in accordance with EPA's "Guidance on Removing Stage II Gasoline Vapor Control Programs from State Implementation Plans and Assessing Comparable Measures," issued August 7, 2012. EPA Region I staff can provide assistance to the CT DEEP in the preparation of this SIP revision.