

DRAFT

DATE, 2009

Ira Leighton, Acting Regional Administrator
U.S. Environmental Protection Agency
EPA New England Regional Office
One Congress Street, Suite 1100 (Mail Code CAQ)
Boston, MA 02114-2023

**Re: *Reasonably Available Control Technology Update to Address
Control Techniques Guidelines Issued in 2006, 2007 and 2008***

Dear Administrator Leighton:

On February 1, 2008, the Connecticut Department of Environmental Protection (CTDEP) submitted to the U.S. Environmental Protection Agency (EPA) an attainment demonstration for the 1997 8-hour ozone national ambient air quality standard (NAAQS). That attainment demonstration includes an analysis of how Connecticut complies with the reasonably available control measures and reasonably available control technology (RACT) requirements of the federal Clean Air Act. This letter is intended as a revision to the State Implementation Plan (SIP) concerning the RACT requirements for volatile organic compounds (VOC), given EPA's adoption of eleven control techniques guidelines (CTGs) in 2006 through 2008.

Negative Declarations

CTDEP hereby submits negative declarations for the three source categories identified in Table 1. For these three source categories, CTDEP has determined that there are no sources or no sources that meet the applicability threshold of the applicable CTG in Connecticut.

CTDEP staff reviewed the inventory of sources for facilities with North American Industrial Classification System codes that correspond to the 2006 through 2008 CTG categories; interviewed its field staff; and searched telephone directories and Internet web pages (including other state government databases) to determine if any sources meeting the applicability requirements for the 2006 through 2008 CTGs are located in the state. Staff have determined that there are no sources or no sources that meet the applicability thresholds for each of the three CTGs listed in Table 1.

Table 1. CTG Categories for Negative Declaration.

<i>Source category</i>	<i>CTG title</i>	<i>Document number</i>
Flat wood paneling coating	Control techniques guidelines for flat wood paneling coatings	EPA-453/R-06-004 2006/09
Fiberglass boat manufacturing	Control techniques guidelines for fiberglass boat manufacturing materials	EPA-453/R-08-004 2008/09
Automobile and light-duty truck assembly coating	Control techniques guidelines for automobile and light-duty truck assembly coatings	EPA-453/R-08-006 2008/09

Equivalent Level of Control

For the *Control Techniques Guidelines for Miscellaneous Industrial Adhesives* (EPA 453/R-08-005 2008/09), CTDEP has determined that an equivalent level of control is satisfied with an existing air quality regulation, Regulations of Connecticut State Agencies (RCSA) section 22a-174-44. RCSA section 22a-174-44, concerning adhesives and sealants, was adopted on October 3, 2008 and submitted to EPA on November 18, 2008 as an appendix to the Annual Fine Particulate Matter Attainment Demonstration. RCSA section 22a-174-44 is based on a model rule of the Ozone Transport Commission (OTC). The OTC model rule is, in turn, based on a reasonably available control technology determination prepared by the California Air Resources Board in 1998 and regulations adopted in the California local air pollution control districts.

RCSA section 22a-174-44 achieves VOC reductions through two basic components: sale and manufacture restrictions that limit the VOC content of specified adhesives, sealants and primers sold in the state; and use restrictions that apply primarily to commercial/industrial operations. In addition to the VOC content limits and use requirements, this section includes requirements for cleanup and preparation solvents and allows for compliance through the use of add-on air pollution control equipment.

RCSA section 22a-174-44 includes all of the CTG-recommended approaches to controlling VOC emissions from the application and cleanup of miscellaneous industrial adhesives (adhesive VOC content limits, cleaning solvent VOC content limits, work practices, optional air pollution control equipment requirements, surface preparation, spray gun cleaning) and exceeds the recommendations of the CTG by establishing VOC content limits for sealants and sealant primers and by regulating sellers and manufacturers, not just applicators, of regulated adhesives, adhesive primers and sealants. The exemptions of RCSA section 22a-174-44 are similar to those recommended in the CTG. While there are minor differences in the named adhesive categories regulated in the CTG and RCSA section 22a-174-44,¹ those differences are inconsequential compared to the inclusion of a number of categories of sealants and sealant primers in RCSA section 22a-174-44, which are not included in the CTG, and the broader applicability of RCSA section 22a-174-44. CTDEP does not believe any RACT deficiency exists.

CTG Requirements undergoing Regulatory Adoption

CTDEP has determined that regulatory revisions are necessary to address the requirements of the seven CTGs listed in Table 2; the status of regulatory revision efforts is also provided in Table 2. CTDEP will continue to pursue adoption of regulations through the required state procedures and, upon completion of the process, will submit the revised regulations to EPA as a revision to the SIP.

¹ RCSA section 22a-174-44 does not include a general adhesive-to-wood VOC content limit and thus would regulate such adhesives at a higher VOC content than recommended in the CTG. RCSA section 22a-174-44 does not include motor vehicle adhesives or motor vehicle weatherstrip adhesives, although comparable categories of adhesives are regulated in RCSA section 22a-174-40, concerning consumer products.

Table 2. CTG Categories Requiring a Regulatory Update

<i>CTG document</i>	<i>CTG document number</i>	<i>Regulation to be revised</i>	<i>Status of regulatory revision</i>
Control techniques guidelines for industrial cleaning solvents	EPA-453/R-06-001 2006/09	RCSA section 22a-174-20, new subsection (ii)	A public hearing was held on May 28, 2009. Staff is responding to comment and preparing a final proposal.
Control techniques guidelines for offset lithographic printing and letterpress printing	EPA-453/R-06-002 2006/09	RCSA section 22a-174-20, new subsection (gg)	A public hearing was held on May 28, 2009. Staff is responding to comment and preparing a final proposal.
Control techniques guidelines for flexible package printing	EPA-453/R-06-003 2006/09	RCSA section 22a-174-20, new subsection (ff)	A public hearing was held on May 28, 2009. Staff is responding to comment and preparing a final proposal.
Control techniques guidelines for paper, film and foil coatings	EPA-453/R-07-003 2007/09	RCSA section 22a-174-20, revision of subsection (q)	A public hearing was held on May 28, 2009. Staff is responding to comment and preparing a final proposal.
Control techniques guidelines for large appliance coatings	EPA-453/R-07-004 2007/09	RCSA section 22a-174-20, new subsection (hh)	A public hearing was held on May 28, 2009. Staff is responding to comment and preparing a final proposal.
Control techniques guidelines for metal furniture coatings	EPA-453/R-07-005 2007/09	RCSA section 22a-174-20, revision of subsection (p)	A public hearing was held on May 28, 2009. Staff is responding to comment and preparing a final proposal.
Control techniques guidelines for miscellaneous metal and plastic parts coatings	EPA-453/R-08-003 2008/09	RCSA section 22a-174-20, revision of subsection (s)	Draft prepared; undergoing pre-publication review

We look forward to working with EPA as a critical partner in our continuing mission to conserve, improve and protect the environment and public health for the citizens of Connecticut. If you require additional information or have any questions about this submission, please get in touch with Ric Pirolli, Assistant Director, Engineering and Enforcement Division of the Bureau of Air Management.

Yours truly,

Amey Marrella
Acting Commissioner

cc: Anne Arnold, EPA Region 1
Ric Pirolli, CTDEP