

Pamela F. Faggert  
Vice President and Chief Environmental Officer

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By Electronic Delivery: <mailto:merrily.gere@ct.gov>

October 18, 2010

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

Re: Comments of Dominion Nuclear Connecticut, Inc. on the State of Connecticut Department of Environmental Protection Request for Comments on Proposed Regulatory revisions to Include Greenhouse Gases in Title V and NSR PSD Permitting Programs and to Revise Connecticut's State Implementation Plan for Air Quality.

Dear Ms. Gere:

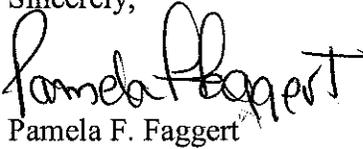
Dominion Nuclear Connecticut, Inc. ("Dominion") appreciates the opportunity to submit comments to the Connecticut Department of Environmental Protection ("the Department") relative to the request for comments on Proposed Regulatory revisions to Include Greenhouse Gases in Title V and NSR PSD Permitting Programs. As the Department is aware, Dominion owns and operates the Millstone Power Station in Waterford, Connecticut.

The proposed amendments consist of the addition of definitions of "greenhouse gases" and "carbon dioxide equivalent emissions" to the air quality regulations plus levels of greenhouse gas emissions that require a source owner to apply for a permit under DEP's new source review prevention of significant deterioration (NSR PSD) and Title V operating permit programs. We are pleased that these proposed Connecticut amendments are consistent with the Federal Tailoring Rule requirements and beyond the requirement to obtain a permit, the proposed amendments do not include any emissions standards or control requirements for greenhouse gases.

The Tailoring Rule requires that Connecticut adopt the necessary requirements as of January 2, 2011, or EPA may impose the requirements directly on Connecticut sources through a Federal Implementation Plan (FIP). In a separate rulemaking, EPA has already proposed such a FIP. If implemented, we are concerned that such a FIP would result in dual permitting by EPA and DEP, which could significantly slow the issuance of permits and modifications and increase costs to Connecticut businesses. Therefore, we support the expeditious promulgation of Connecticut's proposed regulatory revisions to include greenhouse gases in Title V and NSR PSD Permitting Programs and to amend the State Implementation Plan (SIP) for Air Quality to reflect these provisions.

Dominion appreciates the Department's consideration of these important issues and if you have any questions, please call Paula Hamel at 401-457-9234 or e-mail at [paula.a.hamel@dom.com](mailto:paula.a.hamel@dom.com) or Daniel Weekley at 860-444-5271 or e-mail at [daniel.a.weekley@dom.com](mailto:daniel.a.weekley@dom.com).

Sincerely,



Pamela F. Faggert

CC:

A. Morrella, Commissioner  
A. Gobin, Director Air Bureau  
R. Blue, Dominion  
A. Price, Dominion  
R. Griffin, Dominion  
D. Weekley, Dominion