



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 1

1 CONGRESS STREET, SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023

June 1, 2009

Richard Pirolli, Assistant Director  
Engineering and Enforcement Division  
Bureau of Air Management  
Connecticut Dept. of Environmental Protection  
79 Elm Street  
Hartford, Connecticut 06106-5127

Dear Mr. Pirolli:

On April 16, 2009, Connecticut submitted a number of proposed regulations and amendments to existing regulations to address EPA control technique guidelines (CTGs) issued in 2006 and 2007. Our review of these proposed amendments indicate that they are generally consistent with EPA's CTGs, and as such will help your state's continued efforts to reduce VOC emissions.

We have reviewed the proposed amendments and have provided comments in the Enclosure to this letter. Upon completion of the rule adoption process, please submit these rules to EPA as a revision to the state's implementation plan.

Please call me or Bob McConnell of my staff at 617-918-1046 with any questions you may have.

Sincerely,

A handwritten signature in cursive script that reads "Anne Arnold".

Anne Arnold, Manager  
Air Quality Planning Unit

Enclosure

## Enclosure

### Comments on Connecticut's May 2009 proposed rules for EPA's 2006 and 2007 Control Technique Guidelines (CTGs)

1. Connecticut's proposal addresses all of the 2006 and 2007 CTGs, with the exception of the flat-wood paneling CTG. It is our understanding that Connecticut's review of that sector indicates there are no sources in the state that would be affected by that CTG, and so it does not intend to adopt a flat-wood paneling coating rule. If that is the case, Connecticut should submit a negative declaration to EPA for this CTG that includes a summary of the means by which Connecticut made this determination.
2. The proposed requirements include some recordkeeping provisions. In addition, although not explicitly stated in the proposal, it appears that the coating and printing operations addressed in the proposal are also subject to the requirements of subsection (aa), recordkeeping and test methods, and subsection (bb), compliance methods, of Connecticut's section 22a-174-20. Connecticut should verify this point in their response to comments, since recordkeeping provisions stated in the proposal are not sufficient to make all of the proposed requirements enforceable. Furthermore, it should be noted, that some of the provisions included in (aa) and (bb) state that they apply to subsections (m) through (s) of 22a-174-20. Therefore, those requirements would only apply to the metal furniture and paper, film, and foil coating operations addressed in the proposal, and not to the other categories included in the proposal (i.e., large appliance coating or printing operations).
3. Section 5(C) of the proposed large appliance coating rule allows a company to seek an alternative means of compliance if approved by the Commissioner. Such alternatives, however, must also be approved by EPA. Therefore, we recommend that Connecticut's proposed large appliance coating rule be revised to require those seeking alternatives to comply with the more detailed requirements of Connecticut's existing 22a-174-20(cc), as is done in Connecticut's proposed metal furniture and paper, film & foil coating rules.