



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION, MID-ATLANTIC
1510 GILBERT ST.
NORFOLK, VA 23511-2737

IN REPLY REFER TO:

5090
EVN40/05/331
JUN 1 2009

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

Dear Ms. Gere:

SUBJECT: SUBMISSION OF COMMENTS FOR PROPOSED AMENDMENTS TO SECTION 22A-174-20 (ii) OF THE REGULATIONS OF CONNECTICUT STATE AGENCIES REGARDING CONTROL OF VOLATILE ORGANIC COMPOUND (VOC) EMISSIONS

As the Department of Defense (DoD) Regional Environmental Coordinator for EPA Region I, and on behalf of all the military services, we are responsible for coordinating responses to various environmental policies or regulatory matters of interest. We appreciate the opportunity, as part of the regulated community, to comment on the subject amendments. The DoD supports Connecticut Department of Environmental Protection's (CTDEP) effort to reduce VOC emissions in the state and further supports the proposed amendments, however, DoD believes certain portions of the proposed amendments require clarification. The following comments pertain:

1. Solvent cleaning is broadly defined in the proposal with specific exemptions listed under subsection 20(ii)(3). Military facilities such as the Naval Submarine Base (SUBASE) located at Groton, Connecticut perform many functions in support of their primary mission, including: maintenance of barracks, living spaces, equipment and vehicles; food preparation; operation of recreational facilities such as a gym, swimming pool, bowling alley, golf course, and movie theater; and operation of a gas station, medical and dental center, and submarine school. As general solvent cleaning is performed during the performance of these various functions, and many of the products used are the same products otherwise regulated as consumer or institutional products under Section 22a-174-40, we believe further clarification is needed regarding applicability of the proposed regulations under subsection 20 (ii). We request that "solvent cleaning" as defined under subsection 20 (ii)(1)(F) be revised to clarify what types of solvent cleaning operations are covered. We also request subsection 20 (ii)(3) include an exemption for solvent cleaners regulated under Section 22a-174-40.

2. Request clarification on the following definitions under 20 (ii) (1):
 - a. Whether "liquid" cleaning solvent under paragraph (C) would include: an aerosol cleaning solvent; a solvent laden (pre-moistened) towelette.
 - b. Whether "Janitorial Cleaning" as defined under paragraph (D) would include cleaning of: furnishings; food service equipment (e.g. ovens, microwaves).
 - c. Whether cleaning of personal protective equipment, such as respirators, would be considered "solvent cleaning" under paragraph (F).
3. Subsection 20 (ii) (4) (A) (ii) imposes a vapor pressure limit of 8 mm Hg at 20C. Material Safety Data Sheets (MSDS) for solvents typically report vapor pressure either as "mm Hg" or "pounds per square inch absolute (psia)" and reference varying temperatures including 20C, 25C, 68F, 70F, and 77F. Additionally, solvents are often sold as concentrates and are mixed with water prior to application. To assist with compliance determinations, request subsection 20 (ii) (4) include: a conversion table or formula for comparison of MSDS vapor pressure units and reference temperatures to the regulatory limit; a formula for calculating as applied vapor pressure for solvent-water mixtures.
4. Subsection 20 (ii) (5) (E) language requiring performance of cleaning "to minimize associated VOC emissions" is ambiguous. Request clarification on practices required to meet this requirement.

If you have any questions, please do not hesitate to contact Ms. Leal Boyd at leal.boyd@navy.mil or (757) 444-6857.

Sincerely,



CHRISTINE H. PORTER
Director, Regional Environmental
Coordination Department
By direction of the Commander

Copy to:

U.S. Army Regional Environmental Coordinator (Robert Muhly)
U.S. Air Force Regional Environmental Coordinator (John Hoertz)
NAVFAC MIDLANT (PWD New London, Michael Brown)