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**VIA eREGULATIONS SYSTEM**

Senator Craig Miner  
Representative Susan M. Johnson  
Legislative Regulation Review Committee  
State Capitol, Room 011  
Hartford, Connecticut 06106

***Re: Legislative Regulation Review Committee Review of Proposal to Adopt Air Quality Regulations Concerning Limitations on Premises-Wide Actual Emissions Below Title V Source Thresholds, PR2019-002***

Dear Senator Miner and Representative Johnson:

Pursuant to section 4-170 of the Connecticut General Statutes, I am pleased to submit for your consideration and approval a proposal to adopt air quality regulations concerning limitations on premises-wide actual emissions below Title V source thresholds.

This proposal provides a practical and enforceable limitation on a source's potential to emit below major stationary source thresholds, given the impending expiration of the current General Permit to Limit Potential to Emit from Major Stationary Sources of Air Pollution (GPLPE). The new approach allows certain sources of air pollution to limit potential emissions to levels below Title V source thresholds, to the benefit of the participating businesses and the Department of Energy and Environmental Protection (DEEP), while maintaining air quality protection. DEEP has identified 186 businesses currently operating under the GPLPE. Therefore, the expectation is that at least these same 186 businesses will choose to operate under the proposed regulations, thereby maintaining a less financially and administratively burdensome means to comply with Title V of the Clean Air Act.

Furthermore, consistent with DEEP's 20 By 20 initiative aimed at increasing predictability, efficiency, and transparency of DEEP's environmental permitting and regulatory processes, adoption of this proposal will allow DEEP to maximize resource allocation, and in doing so become more efficient. This effort will reduce costs to businesses by eliminating costs associated with developing and submitting permit applications. By eliminating the need to process GPLPE applications requiring technical reviews while achieving the same level of environmental protection afforded by the current GPLPE, DEEP will be able to utilize the additional staff time towards improving permit processing times. Given past reductions in DEEP's workforce and more likely for the foreseeable future, it is essential for the agency to effectively focus its resources on core programs and services.

Miner and Johnson  
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If there are any general questions regarding this submission, please contact Mandi Careathers of the Office of Government Affairs by electronic mail to [Mandi.Careathers@ct.gov](mailto:Mandi.Careathers@ct.gov) or at 860-424-3109. If you have any substantive or rule drafting questions, please contact Raquel Herrera of the Bureau of Air Management by electronic mail to [Raquel.Herrera.ct.gov](mailto:Raquel.Herrera.ct.gov) or at 860-424-3150. Thank you for your assistance with this matter.

Sincerely,



May 20, 2020

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Katherine S. Dykes  
Commissioner

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Date

cc: Mandi Careathers, DEEP