

**Responses to Comments Concerning
PSEG Power Connecticut, LLC's Proposed Title V Permit Renewal
September 2012**

This report sets out the comments received and responses thereto concerning the Department of Energy and Environmental Protection's (the Department's) tentative determination to approve a Title V permit application submitted by PSEG Power Connecticut, LLC (PSEG) addressing activities at Bridgeport Harbor Station located at 1 Atlantic Street in Bridgeport, Connecticut.

PSEG submitted an application to renew Title V permit number 015-0217-TV on February 9, 2011, and the Department issued its tentative determination to approve the permit application on January 13, 2012. Upon receipt of requests for an informational hearing on the proposed tentative determination, the Department held an informational hearing on May 14, 2012 in Bridgeport, Connecticut, and the public comment period closed on May 21, 2012. Comments were provided orally at the hearing and in writing to the Department.

The original Title V permit for the Bridgeport Harbor Station facility was issued in 2001, and the first renewal was issued in 2007. The facility consists primarily of three electric generating units (EGUs): a 170 MW residual oil-fired cyclone unit; a 410 MW dual-fired unit (coal and oil); and a 22 MW combustion turbine.

A Title V permit combines all permit conditions and applicable requirements for air pollutant emitting sources at a major emitting facility into a single operating permit. The requirements are a collection of all applicable state and federal air quality laws and regulations and pre-construction permit requirements. A Title V permit does not independently create any additional legal requirements. The purpose of this permit is to consolidate into a single document all of the Clean Air Act requirements that apply to an individual source. Therefore, the Department is not authorized to add additional requirements to a Title V permit beyond those set out in current laws and regulations or pre-construction permits. This Title V permit renewal has incorporated any new applicable requirements and any New Source Review (NSR) permit amendments that became effective during the term of the previous permit.

A significant portion of the Department's mission is to protect the public health and environment for all Connecticut's citizens. The Department does so by ensuring all facilities operate in accordance with applicable state and federal environmental laws and regulations. However, the Department is not authorized to impose additional requirements unilaterally. As such, the scope of this proceeding is limited to the Department's proposed decision to approve the Title V permit application for the Bridgeport Harbor Station facility, given that PSEG has submitted a complete application. While the Department appreciates all the comments received and has given them all serious consideration, this process is narrow in scope.

All of the comments in this matter are set out below along with the Department's responses. Commenters are identified by a number, which is provided with the commenter's identifying information in Attachment 1 to this report.

Inconsistent Opacity Limitation

1. Comment: The draft permit does not list the applicable opacity requirement as identified in the State Implementation Plan (SIP). The draft permit incorrectly identifies the current version of section 22a-174-18 of the Regulations of Connecticut State Agencies (RCSA) as the applicable opacity requirement while the SIP refers to the opacity requirements adopted by Connecticut in 1981.

Commenters submitting this comment: 1, 5

Response: The current version of RCSA section 22a-174-18 is an applicable requirement, and the requirements for visible emission standards listed in RCSA section 22a-174-18(b)(2)(A) and (B) are appropriately included in the draft permit.

RCSA section 22a-174-33(a)(2)(B) defines “applicable requirements” as, in part, “Any term or condition of a permit issued pursuant to former section 22a-174-3 or section 22a-174-3a of the Regulations of Connecticut State Agencies . . .” The NSR permit issued to PSEG under RCSA section 22a-174-3a includes RCSA section 22a-174-18, as *currently* effective, as an applicable requirement.

The commenters correctly note that the opacity requirements approved in the SIP were adopted prior to the updated, currently effective version of RCSA section 22a-174-18. The SIP-approved requirements were adopted on July 11, 1981, while the currently effective requirements were adopted on April 1, 2004 and submitted to the U.S. Environmental Protection Agency (EPA) for approval into the SIP on December 1, 2004. The SIP-approved opacity requirements recognize only a visual determination of compliance and provide an incomplete standard. The Department revised the opacity requirements in 2004 to provide a complete standard for visual determinations of opacity as well as standards for opacity when measured with a continuous emissions monitor (CEM).

It is not uncommon for emissions units at a stationary source to be subject to several parallel sets of requirements, as is the case here (*i.e.*, the SIP approved version of RCSA section 22a-174-18 and the current version of RCSA section 22a-174-18). Some of the requirements may be redundant as a practical matter, even though the requirements legally apply to the source. To resolve this issue, EPA issued guidance for Title V permit writers on March 5, 1996, referred to as White Paper Number 2, in which the issue of redundant requirements is addressed. According to White Paper Number 2, multiple emissions limits may be streamlined into one limit, if that limit is at least as stringent as the most stringent limit.

White Paper Number 2 also explains that if no one requirement is explicitly more stringent than the others, the conditions of all the applicable requirements may be blended into a single new permit term that will assure compliance with all requirements. Moreover, in cases where compliance with a single set of requirements effectively assures compliance with all requirements, compliance with all elements of each of the overlapping requirements may be unnecessary.

The requirements of RCSA section 22a-174-18(b)(2)(A) and (B), as they currently exist, are at least as stringent as the SIP requirement for visible emissions which dates back to 1981. Opacity standards are a tool to help assess operating and maintenance practices. Measurements of opacity with Method 9, a visual method employed in the 1981 version of the regulation, are a useful indication of whether a source is operating properly and maintaining controls. However, CEMs, which are covered by the regulations as currently drafted, provide far more precise measurements of opacity and provide the best means for detection of an opacity violation.

To further demonstrate this point, visual observations of opacity are subjective and may be affected by many different parameters. For example, performing a Method 9 visual observation of opacity requires that the observer control certain variables and take other, non-controllable

variables into account. Controllable variables include the angle of the observer in relation to the sun and the point of observation of detached and attached steam plumes. In addition, the observer must be positioned perpendicular to the plume direction, and there must be no more than one plume at a time in the observer's line of sight. Non-controllable variables include luminescence and color contrast between the plume and the background against which the plume is viewed, moisture in the air and ambient air temperature. Clearly, this method, while not without any value, is less preferable to the methods provided for in the regulatory provisions as they currently exist from the 2004 update.

Furthermore, White Paper Number 2 addresses the issue of a state regulation for which the most recent version is pending EPA review and approval. EPA often takes years to review and approve/disapprove a SIP revision. Under these circumstances, state agencies typically enforce the current regulations, which are usually more stringent than the approved SIP regulations, and often, as a practical matter, no longer enforce the superseded and outdated regulations in the SIP. Although EPA only recognizes and enforces the SIP-approved regulations, White Paper Number 2 authorizes permitting authorities and source owners to base permit applications on state regulations that have been submitted for SIP approval but not approved, rather than on the potentially obsolete approved SIP provisions that the new or revised regulations would replace, provided that (1) the state regulation has been submitted to EPA as a SIP revision, and (2) the permitting authority reasonably believes that the submitted regulation will be the basis for the Part 70 permit. Such a belief is reasonable if the new regulation is more stringent than the previous version, so that compliance with the new regulation assures compliance with the earlier version of the regulation. This is the exact circumstance raised by the commenters here. RCSA section 22a-174-18 was submitted to EPA for approval into the SIP in 2004, and the Department awaits EPA's approval. Based on the guidance provided by EPA's White Paper Number 2, the opacity requirements of the draft permit are correctly and appropriately based on the currently effective version of RCSA section 22a-174-18.

As a result, no revision to the draft permit is required in response to this comment.

Illegal Excuse Provision

2. Comment: In 2004, when the Department revised RCSA section 22a-174-18 to include opacity standards for measurements made with CEM, the Department also provided an exemption for measurements made with CEM. However, these amendments have not been approved by EPA as SIP revisions, and the exception would violate EPA's stated policy on excess emissions during malfunctions, startup and shutdown.

Commenters submitting this comment: 1, 5

Response: RCSA section 22a-174-18(j) provides a list of excepted activities including an exemption for periods of malfunction, startup and shutdown for certain units that measure opacity with CEM. As explained in the response to comment 1, RCSA section 22a-174-18 as adopted on April 1, 2004 has been submitted to EPA as a SIP revision, but EPA has not yet acted. Accordingly, the opacity requirements are included in the draft permit as a state-only requirement rather than a federally applicable requirement. Regarding EPA's view of the exceptions in RCSA section 22a-174-18(j), the Department has no information. The Department disagrees that the provision at issue violates EPA's policy as alleged. The Department awaits EPA action on the submitted SIP revision and has no information suggesting that EPA has taken issue with any of the submitted provisions.

For this reason, no revision to the draft permit is required in response to this comment.

Sufficient Reporting of Opacity Violations

3. Comment: PSEG failed to report non-compliance with opacity limitations and reporting requirements in the application based on a review of the continuous opacity monitoring (COMS) data from Unit 3 at

Bridgeport Harbor Station. Specific monitored data for Unit 3 and a monitoring report for January 1, 2011- June 30, 2011 is submitted with this comment and included as Attachment 2 to this report.

Commenters submitting this comment: 1, 5

Response: The selected COMS data submitted with this comment have been reviewed by the Compliance Analysis and Coordination Unit of Air Bureau of the Department, which has determined that there were no exceedances of the stack opacity limitation by PSEG.

Regarding the supposed 1-minute opacity exceedances in the Title V Monitoring Report for January 1, 2011 to June 30, 2011, Unit 3 was not operating during those months. The recorded observations resulted from a quarterly operating audit. Since this comment is based on the erroneous assumption that Unit 3 was operating during the period from January 1, 2011 to June 30, 2011, no revision to the draft permit is required in response.

4. Comment: The 2011 COMS data did not identify any exceedances at Bridgeport Harbor Station. Bridgeport Harbor Station did not operate on June 14, 2011 and, accordingly, there was no opacity exceedance on that date. Verification of non-operation on June 14, 2011 has been confirmed on three separate occasions detailed as follows:

- Opacity data for Unit 3 are provided with this comment. The data are presented in a three-column table, with date/time listed in the left column, opacity monitor status listed in the center column and opacity values in the right column. The key to whether the unit was operating and whether the opacity monitor was recording on-line data can be in the center column entry. If the unit had been operating, the value in the center column would be “1”. If the unit was not operating, the value in the center column would be “0”. All of the values in the center column are zero. The unit was not operating.
- When PSEG became aware that an opacity violation was alleged, PSEG contacted the Department’s Compliance Analysis and Coordination Unit (CACU). CACU staff examined the data and verified that the unit was not operating.
- PSEG is required to conduct quarterly audits to verify that the opacity monitors are operating properly. PSEG submitted its quarterly Neutral Density Filter Audit Report to the Department on June 21, 2012. The report stated that the opacity audit for Unit 3 was performed on June 14, 2011.

The commenter summarizes that there is no failure to report an opacity violation as no violation occurred, and this conclusion is supported by the same information submitted to the Department as an allegation.

Commenter submitting this comment: 6

Response: The Department has diligently reviewed all applicable information and submissions and agrees with PSEG’s conclusion that no opacity violation occurred at the Bridgeport Harbor Station on June 14, 2011. Therefore, no action is required in response to this comment.

Failure to Report Deviations and Prepare a Compliance Plan

5. Comment: The application must include a compliance certification that meets the requirements of 40 CFR section 70.5(c)(9) and RCSA section 22a-174-33(i). As shown by the COMS data, PSEG has been experiencing deviations from its opacity limits, but has not been reporting all deviations or providing explanations for the deviations. If a compliance report reveals that violations have occurred, the application must include a compliance plan.

Commenters submitting this comment: 1, 5, 15

Response: As explained in the responses to comments 3 and 4, PSEG has not recorded exceedances of its opacity requirements, since it has been verified that Unit 3 was not operating during those months when the alleged exceedances occurred. Therefore, no requirement to prepare a compliance certification, compliance plan, and/or a deviation report has been triggered.

Since this comment is based on the erroneous assumption that Unit 3 was operating during certain time periods, when it was actually not operating, no revision to the draft permit is required in response to this comment.

Missing Mercury and Air Toxics Rule

6. Comment: Under 40 CFR 70.1(b), "all sources subject to Title V must have a permit to operate that assures compliance by the source with applicable requirements." Applicable requirements are defined to include: "requirements that have been promulgated or approved by EPA through rulemaking at the time of issuance but have future-effective compliance dates." 40 CFR 70.2.

On February 16, 2012, EPA published the *National Emission Standards for Hazardous Air Pollutants from Coal- and Oil-Fired Electric Utility Steam Generating Units and Standards of Performance for Fossil-Fuel-Fired Electric Utility, Industrial-Commercial-Institutional, and Small Industrial-Commercial-Institutional Steam Generating Units*, also known as the Mercury and Air Toxics Standard (MATS). The Department does not even mention the applicability of MATS in the technical support document, does not require PSEG to state whether it will comply with MATS, and does not establish a compliance plan. The Department must conduct this analysis prior to issuing the Title V permit. The Department must also assess whether the current emissions limitations, control technologies and monitoring and recordkeeping requirements will assure compliance with the MATS. This evaluation should include a review of each hazardous air pollutant emitted by the facility, whether existing limitations will result in compliance with the standard, and if not, include requirements that will ensure compliance.

Commenters submitting this comment: 1, 5

Response: MATS became effective on April 16, 2012, and the affected source owners must comply no later than April 16, 2015. As is typical of a newly issued National Emissions Standards for Hazardous Air Pollutants (NESHAP) for a source category, the issued NESHAP ought to be referenced in the draft permit and the technical support document (TSD). However, because the compliance date is in the future, it is not typical to require a compliance plan for the NESHAP at this time. Should the permit be modified after April 2015 or upon renewal, the specific information concerning the MATS should be added to the permit at that juncture. To provide the commenters with a better understanding of how MATS compares to existing state requirements, the following information should prove useful.

MATS regulates emissions of 11 metals and two acid gases, by setting emission limits and/or concise work practice requirements. Work practice requirements that regulate organic hazardous air pollutants in lieu of emission limits are compulsory for all affected EGUs. With regard to mercury, RCSA section 22a-174-3a(n) already requires Unit 3 to meet a 0.6 lb/TBtu limitation, something which PSEG has operated in compliance with since 2008. Therefore Connecticut's own applicable mercury limitation is more stringent than the applicable limitations of MATS. With regard to the other pollutants regulated by MATS, the Department expects that PSEG is now evaluating its compliance options and will operate in compliance as of the deadline.

In response to this comment, the draft permit and TSD will be revised by the addition of MATS as a general applicable requirement, although the bulk of the commenters' concerns are already addressed by applicable (and incorporated), more stringent state law.

Mercury Monitoring

7. Comment: PSEG is subject to state regulations regarding mercury and other hazardous air pollutants. *See* Conn. Gen. Stat. 22a-199; RCSA section 22a-174-29. The current Draft Permit does include Connecticut General Statutes (CGS) section 22a-199(b)(3)(B), which requires PSEG to install continuous emission monitors for mercury if the Commissioner determines that they are commercially available and can perform in accordance with National Institute of Technology Standards or other methodology approved by EPA. *See* III.C.4.b.iii., Draft Title V Permit at 39. However, the Department does not

address the need for Bridgeport Harbor Station to install a continuous emissions monitor for mercury even though the Department has determined that:

These units [Bridgeport Harbor 3 and AES Thames] will likely face an additional requirement for implementation of Hg continuous emissions monitoring systems (CEMS) based on the Commissioner finding that CEMS for Hg in flue gases are commercially available and can perform in accordance with National Institute of Standards and Technology (NIST) or other EPA-approved methodology.

Draft 2012 IRP Report, Appendix E, Page E-14. Coal plants in Massachusetts have been operating Hg CEMS since as early as 2008 pursuant to 310 CMR 7.29. Therefore, the Draft Permit should have included Hg CEMS, or the Department should have established a compliance plan for the installation of Hg CEMS and established new monitoring, recordkeeping and reporting requirements as required by CGS section 22a-199(b)(3)(B). The Department must address this issue before issuing the final Title V permit.

Commenters submitting this comment: 1, 5

Response: As required by RCSA section 22a-174-3a(n), PSEG conducts stack testing for mercury on a calendar quarter basis in accordance with EPA Method 29. No additional monitoring is presently required. The Commissioner has not yet made a determination on the availability of CEM for mercury, so PSEG may continue to show compliance with the 0.6 lbs/TBtu mercury emissions limitation by quarterly stack testing, which is also consistent with the compliance requirements of the MATS. The commenter mistakenly interprets a portion of the 2012 Draft IRP Report for the proposition that such a determination has already been made, when it actually has not. The cited report excerpt merely refers to obligations that will likely result in the future, after such a determination is made. Further, activities in another jurisdiction such as Massachusetts are not relevant and do not constitute a determination by the Connecticut Department's Commissioner.

Based on the misreading of the Draft IRP Report and the confusion regarding jurisdiction, no revision to the draft permit is required in response to this comment.

8. Comment: PSEG has determined that Unit 3 qualifies as a low emission unit (LEE) and is eligible to demonstrate compliance with the standard in MATS through annual stack testing. A unit with a potential to emit mercury mass emissions of 29.0 or fewer pounds per year and meeting the 1.2 lb/TBtu MATS standard qualifies as a LEE for mercury. Unit 3 can qualify as a LEE for mercury based on its compliance with the state limit of 0.6 lb/TBtu, which is below the MATS standard. The annual potential to emit mercury emissions, using the maximum heat input of the unit is 21.6 pounds. Therefore, Unit 3 qualifies to conduct stack testing in lieu of installation and operation of mercury CEMS.

Commenter submitting this comment: 6

Response: The Department has received and has noted PSEG's evaluation of its ability to comply with MATS as a LEE for mercury. This information does not necessitate a change to the draft permit.

Inadequate Statement of Basis

9. Comment: The statement of basis is intended to provide the permitting authority, the public and EPA with a record of the applicability and technical issues surrounding issuance of the permit. According to U.S. EPA Region 3, the statement of basis should include:

- Descriptions of the facility and manufacturing process
- Summary of emissions, emission units, and control devices
- Explanation of why the source is subject to Title V (e.g. PTE for NOx is greater than 100 TPY)
- Attainment status of the area
- Summary of applicable requirements
- Explanations for applicability and non-applicability determinations

- Justification for any "streamlining"
- Basis for periodic monitoring regime chosen, including appropriate calculations
- Basis for determining that emission units/operations are "insignificant activities"

See Region 3, Title V Permit Writer's Tips - Statement of Legal and Factual Basis. The current statement of basis does not adequately address these issues.

The Department explains that it is using the Title V Permit to streamline state adopted rules with EPA-approved Connecticut regulations found at 40 CFR 52.385, but it does not list or describe the regulations that it is proposing to streamline. While it is permissible for a permit authority to engage in "streamlining," the Bridgeport Title V permit fails to describe or list the regulations and applicable requirements that it is proposing to streamline. Not only must the permit describe these regulations and requirements but it must also explain why compliance with the streamlined permit condition assures compliance with the subsumed requirements. This rationale must be incorporated into the Statement of Basis.

Commenters submitting this comment: 1, 5

Response: The Department's statement of basis, known as a Technical Support Document (TSD), is created in this matter as a continuation of the original TSD prepared for the initial Title V permit issued for Bridgeport Harbor Station. The original TSD includes all of the following elements:

- Facility Description (which includes attainment status of the area, overview of the regulations that the facility is subject to, why the facility is subject to Title V etc)
- Emission Units, Pollution Control Device and Monitoring Device Description
- Grouped Emission Units
- Operating Scenario
- Applicable Requirements and Compliance Demonstrations
- Other Applicable Requirements
- Premise-Wide General Requirements
- Gap Filling
- Flexibility
- Streamlining
- Pre Approvals
- Compliance Plan
- Permit Shield

To avoid repetition with each permit renewal or modification, the Department includes only the changes made since the last renewal or modification in the new TSD. All of the former TSDs for Bridgeport Harbor Station are available to the public. No substantive revision to the draft permit or TSD is required in response to this comment. However, a clarification that the current TSD is a continuation of the original TSD will be added to the TSD document.

Removal of Emissions Unit 1 from the Title V permit

10. Comment: Emissions Unit 1 should be removed from the draft permit. Unit 1 has not operated since August 1998 when it was placed on deactivated reserve status.

Commenter submitting this comment: 1

Response: The permit for Unit 1 was revoked on PSEG's initiative on May 14, 2012. The information concerning Unit 1 will be removed from the draft permit.

Incomplete/Inadequate Permit Application

11. Comment: PSEG did not include the requirements from preconstruction/operating permits of P-015-0089, P-015-0190 and P-015-0191 in the permit application. The application should provide a sufficient

citation to and description of all applicable requirements, including permits issued to the facility owner under the SIP.

Commenter submitting this comment: 1

Response: This comment contains several factual errors. Permit numbers P-015-0190 and P-015-0191 do not belong to PSEG. Those permits are issued to Bridgeport Energy LLC, which is a separate and distinct legal entity from PSEG. Permit P-015-0089 is issued to PSEG for Emissions Unit #3 (EU-3). That particular permit is referenced in Attachments D and D2 of the application, and all applicable requirements from P-015-0089 have been incorporated in the draft permit.

Since this comment is based on erroneous factual assertions, no revision to the draft permit is required in response to this comment.

Compliance Certification Fails to Meet the Requirements of 40 CFR 70.5

12. Comment: The compliance certification must include not only a certification of compliance, but also a statement of the methods used for determining compliance including a description of the monitoring, recordkeeping and reporting requirements and test methods.

Commenters submitting this comment: 1, 5

Response: PSEG supplied the methods used to determine compliance in Attachments D and D2 of the application forms provided by the commissioner. Additionally, Attachment J of the application includes the monitoring and testing, record keeping and reporting requirements. PSEG used the application forms correctly to provide the necessary information.

Consequently no revision to the draft permit is required in response to this comment.

13. Comment: 40 CFR 70.5(c) describes the form and required information for a Title V permit application as part of a state operating permit program. 40 CFR 70.5(c)(9)(i) requires the permit application to include a certification of compliance with all applicable requirements. Attachment D of the permit application is a certification of compliance with requirements under the existing Title V permit. Attachment G of the permit application is a compliance certification plan for the future Title V permit. 40 CFR 70.5(c)(9)(ii) requires the applicant to state in the permit application those methods used to determine compliance. Section II of Attachment D of the permit application contains a column labeled “Applicable Test Method.” The Department’s instructions for filling out this column are as follows:

Applicable Test Method – Provide the pertinent applicable test method for determining compliance with all applicable requirements including any applicable MACT source category.

Some applicable test methods are mass balance, emissions factor, CEM, stack test or record keeping depending on the applicable requirement. Merely state the name of the method. If other test methods are used, provide the name and description of the other methods used.

PSEG’s permit application contains the exact information requested by the Department in its Title V permit application instructions. As a result, PSEG has satisfied the requirement to provide a statement of methods for determining compliance.

Commenter submitting this comment: 6

Response: The Department has diligently reviewed all of the applicable information, and agrees with PSEG’s description of its compliance with the requirements of 40 CFR 70.5(c) in the application for Bridgeport Harbor Station’s Title V permit renewal. No revision of the draft permit or other action is required in response to this comment.

Untimely Application

14. Comment: Applications for the renewal of a Title V permit must be filed no later than 12 months prior to the expiration of the permit. RCSA section 22a-174-2a(i)(2). The Department notified PSEG that the application for renewal would be due on February 2, 2011. However, Department documents show that the Title V permit application was not received until February 9, 2011. *See* Letter from Richard A. Pirolli, Assistant Director, Engineering Bureau of Air Management to Robert Silvestri, PSEG Power Connecticut LLC (March 9, 2011).

Commenter submitting this comment: 1

Response: The commenter is correct that the Title V permit application was not received by the Department staff until February 9, 2011. This date was still approximately 12 months prior to the expiration of the permit. No revision of the draft permit or other action is required in response to this comment.

Permit Improperly Incorporates Revised Trading Agreements and Orders (TAOs)

15. Comment: On April 30, 2010, the TAOs for PSEG were revised. The Department granted PSEG's request to include the TAOs in its Title V renewal application. This is not an appropriate method for the approval and incorporation of revised TAO. TAOs must be submitted to the EPA for incorporation in the SIP.

Commenter submitting this comment: 1

Response: This comment is based partially on incorrect facts. TAOs revised in April 30, 2010, including that of PSEG, were submitted to the EPA for incorporation into the SIP on November 23, 2011, following all required public notification and hearing requirements. EPA has not yet acted on that submission. As explained above in the response to comment 1, White Paper Number 2 provides that a permitting authority may base a permit application on state requirements that have been submitted for SIP approval, rather than on a potentially obsolete, aging SIP-approved version of the same state requirements. Therefore, the April 30, 2010 TAO for PSEG is appropriately included in the draft permit as a state requirement. Therefore, no revision of the draft permit is required in response to this comment.

Specific Revisions to Draft Permit

16. Comment: PSEG submitted a number of specific, minor comments on the draft permit including corrections to the descriptions of the emissions units in Table II.A; a suggestion to remove the phrase "after the initial stack test" in several instances in which an initial stack test is not required; and other minor revisions and editorial suggestions.

Commenter submitting this comment: 6

Response: The Department has accepted and acted on PSEG's suggested minor revisions and corrections to the draft permit.

Compliance with the Emergency Planning and Community Right-to-Know Act (EPCRA)

17. Comment: Given that the Bridgeport Harbor Station facility is the site of a coal storage pile with a capacity of 200,000 tons, and that the Bridgeport Harbor Station regularly receives Indonesian coal tanker shipments via Long Island Sound, and that one of the coal tanker shipments caught fire in August of 2011, requiring assistance from the Coast Guard, the Applicant's Title V Permit should expressly state the mechanisms by which the applicant will demonstrate compliance with all applicable sections of the *Emergency Planning and Community Right-to-Know Act (EPCRA)*, 42 U.S.C. §11001, *et seq.*, and federal and state regulations promulgated pursuant to this statute.

Commenter submitting this comment: 1

Response: While the Department appreciates the commenter's concerns, PSEG's efforts under EPCRA are outside the scope of this proceeding as the comment does not address the draft Title

V permit or an applicable requirement in any way. Consequently, no revision of the draft permit or other action is required in response to this comment.

Failure to Comply with the Connecticut Environmental Justice Act (P.A. 08-94)

18. Comment: The applicant has failed to comply with the requirements of Public Act 08-94, An Act Concerning Environmental Justice Communities and the Storage of Asbestos-Containing Material.

The Department should refrain from taking action on the draft permit until the applicant demonstrates that it has complied with Connecticut's environmental justice requirements. The applicant must demonstrate (1) that it has actively engaged with the public on the permit application, and (2) it has made good faith efforts to discuss the negotiation of a community environmental benefit agreement with Bridgeport.

Commenter submitting this comment: 1

Response: The requirements of CGS section 22a-20a do not apply to a simple Title V operating permit renewal application. Although PSEG is an affected facility as defined by the cited statute, the facility is not expanding, which would be necessary to trigger the environmental justice requirements under the cited statute. Therefore, no revision of the draft permit or other action is required in response to this comment.

Health Impacts in the Community

19. Comment: This antiquated coal plant produces life-threatening health problems, with soaring asthma rates among children in Bridgeport.

Commenters submitting this comment: 9, 14, 15, 17, 18, 20, 22, 24, 27, 29, 30, 33, 34, 41, 43, 44, 46, 47, 53, 54

Response: As stated earlier in this report, the Department's role in this proceeding is to determine if the applicant has complied with the requirements necessary to obtain a Title V operating permit renewal. While specific epidemiological concerns are outside the scope of this hearing, the Department, in other capacities, continues to track developments in the field of public health that may lead to a better understanding of asthma and its causes. As such, the Department offers the following information concerning the comment.

According to the Centers for Disease Control, asthma is one of the most common long-term diseases of children. In most cases, the cause is unknown. Each person has certain exposures that will cause an asthma attack, but these triggers vary among people and even for a single person over time. Given the limits of scientific knowledge concerning asthma and the individual and specific nature of the condition, the causation for a city's worth of asthma cannot be linked to the operation of any single facility that meets state and federal air quality standards.

Further, the Department's work, including several suits brought against Mid-West coal plants, and research over the last decade or more demonstrates that the quality of the outdoor air in Bridgeport is not determined only by the contributions of the local sources including industrial facilities, commercial buildings and automobiles. Rather, Bridgeport's air quality is often largely determined by pollution transported from upwind states. On a hot summer day, even if every source of emissions in the city was shut down, the city could still experience a bad air quality day – a day on which the national ambient air quality standard for ozone was exceeded – as a result only of transported emissions. Connecticut is presently investigating all available options to continue to address the problem of transported air pollution.

No revision of the draft permit or other action is required in response to this comment.

20. Comment: Many of the public comments made during the public information hearing cited statistics related to asthma impacts to children and elderly adults in the City of Bridgeport and related deaths.

PSEG appreciates and understands the seriousness of such health risks but would emphasize that a balanced review of those statistics would recognize the numerous other factors in the City. The City of Bridgeport's air quality is significantly impacted by out-of-state sources of pollution as well as other manufacturing, industry and transportation sources in and in the vicinity of the City. PSEG has invested significant resources in reducing its air emissions and has maintained regulatory compliance with its air emission limits in its Title V permit, which are based on standards developed by the Department and EPA to be protective of human health and the environment.

Commenter submitting this comment: 6

Response: The Department has received and noted PSEG's discussion of the many factors contributing to the City of Bridgeport's air quality, and has noted these same issues in responding to other comments including comment 19. No revision of the draft permit or other action is required in response to this comment.

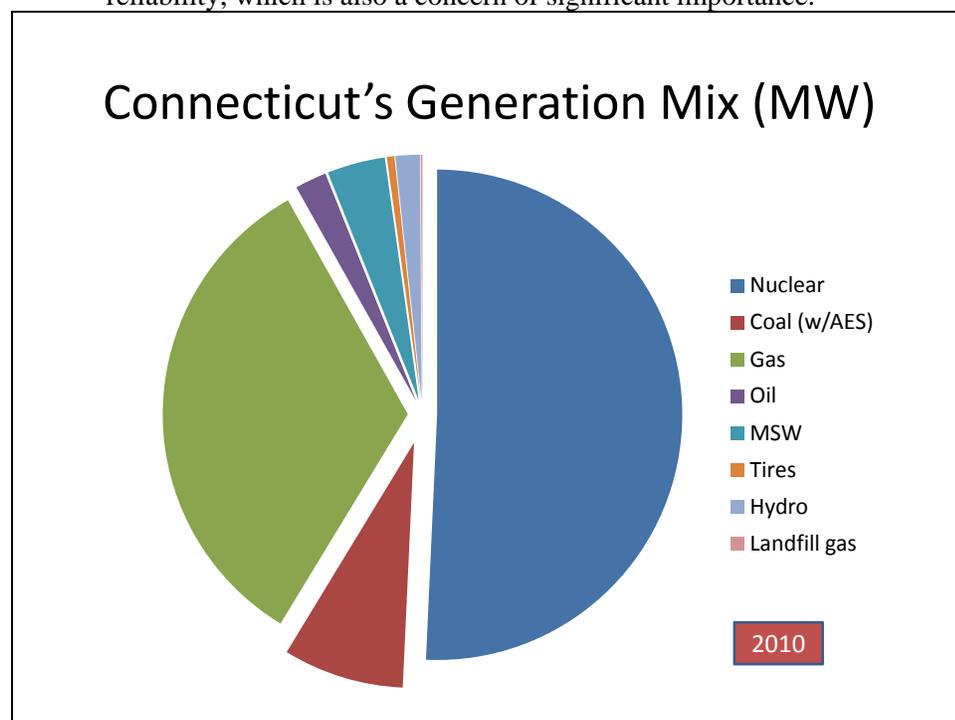
Replacement of Power Plant with Clean Energy Alternatives

21. Comment: The Department should not renew any permit for the PSEG Bridgeport Harbor Station power plant. This is the last coal-fired plant in Connecticut. It is long past time to shut it down. PSEG and the Department should invest in a clean energy future, with solutions that will support our state's economy as well as protect our health.

Commenters submitting this comment: 8, 10, 11, 13, 14, 20, 21, 29, 30, 36, 38, 39, 41-43, 49, 52, 57-76

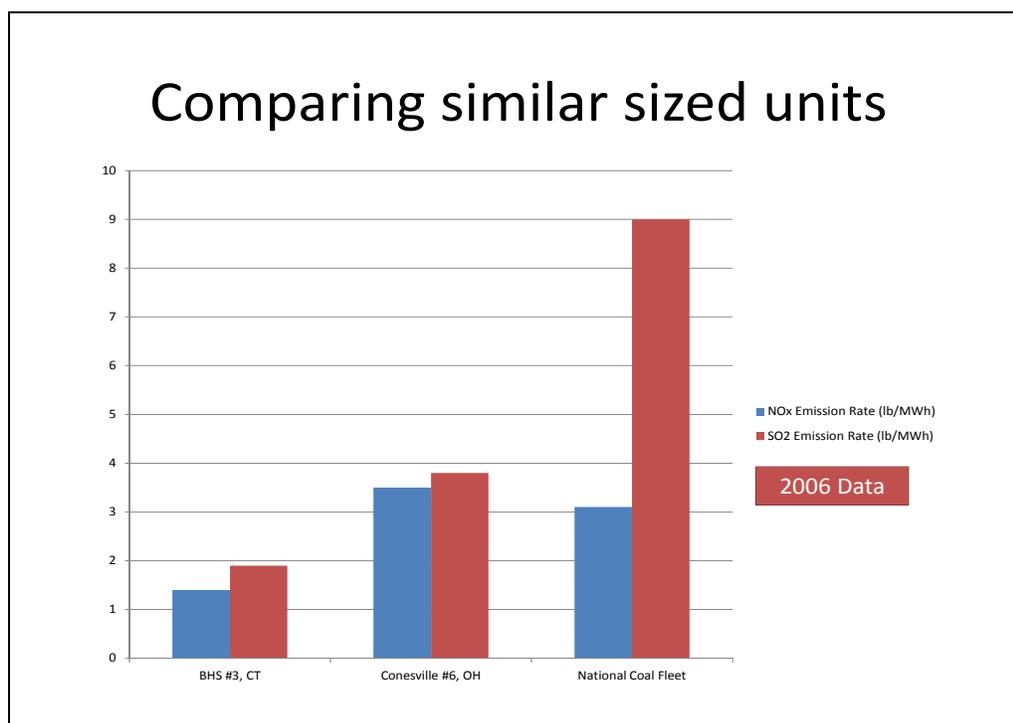
Response: As stated earlier in this report, the Department's role in this proceeding is to determine if the applicant has complied with the requirements necessary to obtain a Title V operating permit renewal, which is a narrow review. While specific concerns about the state's energy policies are outside the scope of this hearing, the Department is addressing such policy issues in other capacities and is taking active steps to promote clean energy, and energy efficiency as well as reduce electricity demand, appropriately in its other roles. As such, the Department offers the following information concerning the comment.

It should be noted that Bridgeport Harbor Station's Unit 3 contributes to the diversity of electricity generation for Connecticut (*see* pie chart below) and assists in maintaining regional reliability, which is also a concern of significant importance.



Bridgeport Harbor Station's Unit 3 is a 410 MW tangentially-fired boiler. When producing electricity, Unit 3 is capable of burning either coal or #6 oil. The unit is the largest coal-fired unit in Connecticut, and the third largest in the New England Power Pool.

While coal-fired units are typically high emitters compared to other fossil fuel-fired generators and alternative fuels, Unit 3 is a well-controlled unit that has been operating in compliance with all state and federal air quality limitations. See the following graph for a comparison of emissions from Unit 3 with similar coal-fired boilers. ISO New England recognizes the reliability issues posed by New England's increasing dependence on natural gas-fired generators and is looking for solutions to mitigate the risks associated with extreme reliance on any one given source category. As Connecticut's last coal-fired generator, the continued operation of Unit 3 increases fuel diversity among Connecticut's traditional fossil fuel-fired generators and thereby contributes to increased system reliability.



Connecticut has a history of encouraging both diversity and clean generation in its energy planning. Governor Rell's energy plan in 2009 recognized the importance of maintaining fuel diversity, including coal, while also providing incentives for energy efficiency and alternatives to fossil fuel-fired electricity generation. Even before 2009, Connecticut had in place a number of energy planning organizations and programs. Since 2009, primarily through Public Act 11-80, Connecticut's energy planning efforts have increased, providing significant requirements and incentives for energy efficiency and clean energy.

Several government offices in Connecticut focus on increasing energy efficiency and clean generation and improving energy planning in Connecticut.

- Created in 1998, the Connecticut Energy Efficiency Board (EEB) advises and assists utility distribution companies in the development and implementation of comprehensive and cost-effective energy conservation and market transformation plans. EEB also guides the distribution of the Connecticut Energy Efficiency Fund, money raised to support energy efficiency programs and initiatives through a surcharge on customer electric bills.
- The Clean Energy Finance and Investment Authority (CEFIA), the successor organization to the Connecticut Clean Energy Fund (CCFEF), was created by the Connecticut Legislature as a part of Public Act 11-80. CEFIA invests its resources in an array of enterprises, initiatives

- and projects aimed to attract and deploy capital to finance the clean energy goals of Connecticut, develop and implement strategies that lower the cost of clean energy to make it more accessible and affordable to consumers and reduce reliance on grants, rebates and other subsidies and move toward innovative low-cost financing of clean energy deployment. During its existence, CCEF funded more than \$150 million in renewable energy projects, emerging technology investments and education and awareness programs statewide.
- From 2004 to 2007, the Connecticut Energy Advisory Board (CEAB) submitted an annual comprehensive energy plan to the Connecticut General Assembly. CEAB's goal was to provide a blueprint for Connecticut's state policymakers of the key long-term visionary goals and strategies that will help to create a successful state energy policy.

Public Act 11-80 significantly revised and increased Connecticut's commitments to a clean energy future. Several planning efforts are now underway:

- The 2012 Integrated Resource Plan (IRP) for Connecticut presents a comprehensive plan for improving Connecticut's electric energy future. Based on analyses of projected future electricity supply and demand, the 2012 IRP outlines a plan for securing resources to meet the state's energy needs in a way that will minimize the cost to Connecticut customers over time and maximize consumer benefits consistent with the state's environmental goals and standards. The strategies identified in the IRP will help to make electricity cheaper, cleaner, and more reliable, while supporting in-state employment.
- The Comprehensive Energy Plan is now in preparation for its first issuance in 2012. This Plan will be an assessment and plan for all energy needs, including electricity, heating, cooling and transportation. The Plan will draw from the conclusions reached in the IRP as well as the findings from the energy efficiency plan and the renewable energy plan.

As demonstrated by all of the above, the continued operation of Bridgeport Harbor Station, including operation of Unit 3, does not hinder efforts to plan for Connecticut's clean energy future, and also provides necessary fuel diversity. No revision of the draft permit or other action is required in response to this comment.

22. Comment: Coal is important to energy diversity and reliability in Connecticut, which ensures the availability of electricity to consumers. At this time, renewable energy facilities are significantly more expensive than fossil fuel facilities and would require significant subsidies from ratepayers or the government. In contrast to Bridgeport Harbor Station's current ability to generate sufficient electricity to supply half a million residential customers, full use of the site for solar would, at best, supply 3-4 MW of solar to a fraction of these customers. Further, it is not appropriate to use the Title V process to force investment in renewable technologies.

Commenter submitting this comment: 6

Response: As stated earlier in this report, the Department's role in this proceeding is limited to determining if the applicant meets the requirements necessary for Title V permit renewal. No revision of the draft permit or other action is required in response to this comment.

Safeguarding the Health of Our State's Citizens

23. Comment: The Department should not renew any permit for the PSEG Bridgeport Harbor Station power plant. PSEG's Title V permit application would allow this facility to continue to pollute at unacceptable levels for another five years. The Department needs to safeguard the health of our state's citizens by denying this permit.

Commenters submitting this comment: 7, 13, 16, 24, 31, 37, 48, 50, 51, 53, 55, 57-76

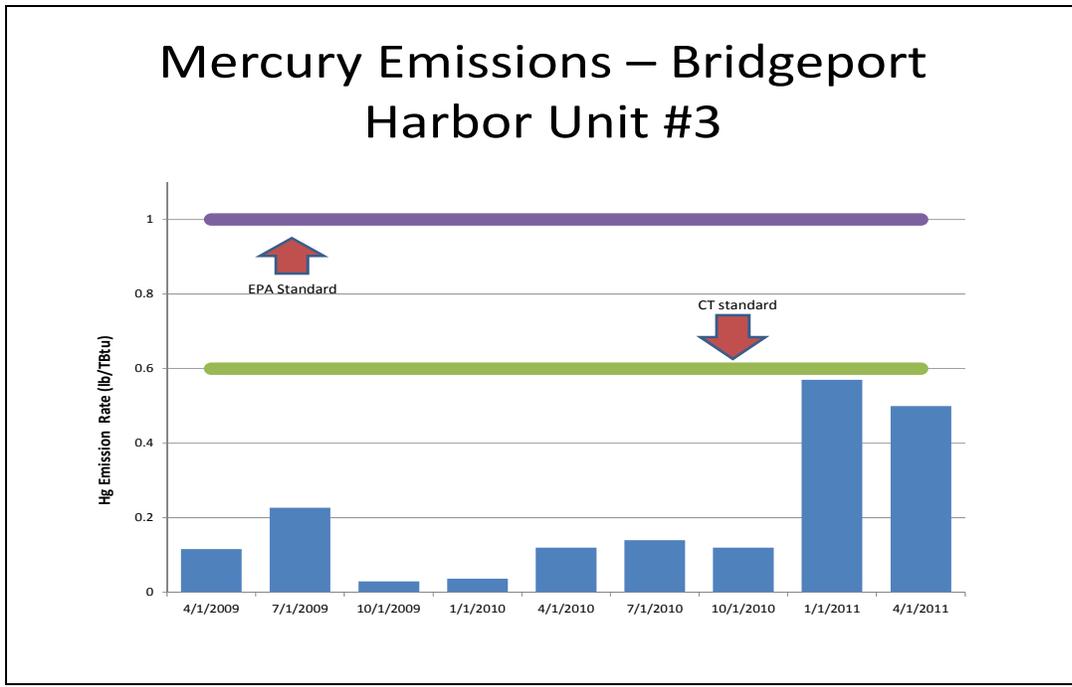
Response: As stated earlier in this report, the Department's role in this proceeding is to determine if the applicant has complied with the requirements necessary to obtain a Title V permit renewal. The commissioner has the responsibility to both control air pollution to enhance

the health, safety and welfare of the people of the state and to ensure an adequate supply of reliable and affordable energy. These responsibilities are not mutually exclusive. The Title V permit for PSEG and, indeed, every operating and construction air quality permit issued by the Department conform to strict state and federal air pollution control laws and regulations, the majority of which are designed to protect public health as well as the environment. The draft permit for PSEG's Bridgeport Harbor Station limits pollutant emissions in accordance with state and federal air quality laws and regulations.

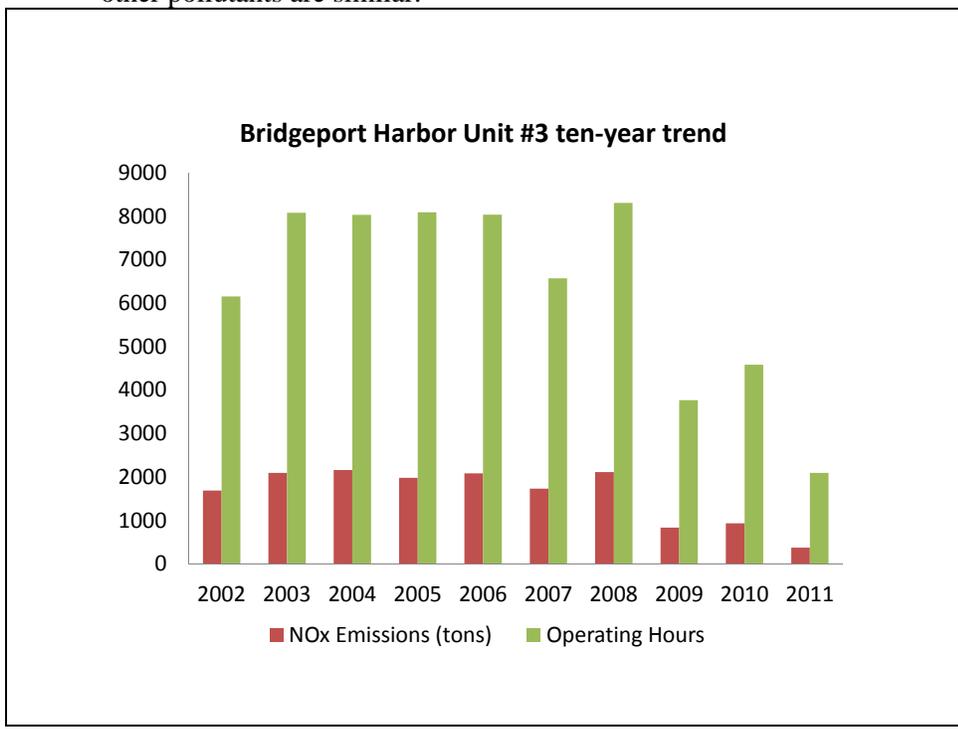
The Department is proposing to renew the Title V permit originally issued to PSEG in 2001 and previously renewed in 2007. The Title V permit is a facility-wide operating permit issued after the source has begun to operate. The Title V permit collects into a single document all the air quality requirements that apply to the facility. The Title V program is intended to improve compliance by providing a single, comprehensive statement of all the air pollution control requirements that apply to a facility. In issuing the Title V permit, the Department does not change the level of pollution control from that provided in NSR permits or current state and federal air quality regulations and laws.

All of the requirements of the Title V permit are provided by either a state or federal law or regulation or the NSR permits issued for Bridgeport Harbor Station. The majority of the requirements are developed to protect public health as well as the environment. For example, EPA establishes national ambient air quality standards (NAAQS) for six pollutants named in the Clean Air Act. The NAAQS are health-based standards that designate the acceptable level of the pollutants in the ambient air. Every state is required to monitor the levels of these six pollutants in the air, and, if the level is exceeded, to develop a state implementation plan to bring the state into attainment with the NAAQS within a timeframe set in the federal Clean Air Act. EPA is required to review each NAAQS every five years to determine if the level is sufficiently protective of public health. EPA has been steadily making the NAAQS more stringent. Connecticut's air quality regulations prevent the Department from issuing a permit to a source that will contribute to or cause an exceedance of any NAAQS. The NAAQS are an example of just one of many protective standards incorporated into the Title V permit program and the PSEG draft permit.

In addition to the legal restrictions that ensure that any Title V permit issued is protective of public health and the environment, PSEG's operation of Bridgeport Harbor Station has demonstrated a great deal of concern for the Station's environmental impacts. Since 2001, when a Title V permit was first issued, PSEG has made considerable investments in pollution controls and has achieved significant emissions reductions as a result. In 2002, Unit 3 began to use Adaro sub-bituminous coal from Indonesia to comply with Connecticut's strict regulatory requirements to limit sulfur emissions, set out in RCSA section 22a-174-19a. Adaro coal has a lower sulfur content, ash content and mercury content than domestic bituminous coal. To comply with CGS section 22a-199, in 2008, PSEG began operating an activated carbon injection system with a pulse-jet fabric filter baghouse to control mercury. While installed to assist in mercury control, the baghouse also provides significant reductions in particulate matter emissions. As a result of all of these efforts, Bridgeport Harbor Station has reduced its mercury emissions by 95% (*see* chart below); reduced coarse and fine particulate matter emissions by 95%; reduced nitrogen oxides by 67% and reduced sulfur dioxide emissions by 76%. All of these reductions will be maintained in future operations. The proposed Title V permit renewal does not allow for any emission increases above these levels.



Furthermore, PSEG’s currently permitted emissions levels assume hours of operation far greater than the actual hours of operation for Unit 3. While historically coal has been the cheapest of fossil fuels, in recent years, natural gas prices have dropped significantly, to a level that is more competitive than coal. The U.S. Energy Information Administration predicts the trend of low natural gas prices to continue for the duration of the PSEG Title V permit renewal. Primarily as a result of fuel prices, Unit 3’s operating hours have decreased dramatically in recent years. While the plant complies with all required air quality limits, its actual emissions have been very low in recent years because Unit 3 has operated far fewer hours than in previous years of operation. For example, in 2008, Unit 3 operated for 8304 hours, while in 2011, Unit 3 operated for 2095 hours (only 25% of its prior hours of operation). For demonstrative purposes, ten years of operating hours and NOx emissions (2002-2011) are summarized in the following chart. The trends for other pollutants are similar.



In sum, the legal requirements incorporated into the Title V permit, Bridgeport Harbor Station's historical operation and the company's commitment to environmental compliance all ensure that Bridgeport Harbor Station's continued operation will be in accordance with Connecticut and federal environmental laws and regulations. No revision of the draft permit or other action is required in response to this comment.

Request for Public Hearing

24. Comment: We urge the Department to hold a public hearing on the Title V operating permit for Bridgeport Harbor generating station and extend the deadline for public comment.

Commenters submitting this comment: 1-4

Response: A public hearing was held on May 14, 2012, and the deadline for filing public comments was extended for seven days as requested. This document, consisting of responses to all received comments, is part of the continued and ongoing public process in this matter, in which many members of the public have participated.

Town Officials Were Not Notified about the Permit Renewal

25. Comment: Town officials and residents that I contacted about this in the impact zone to the northeast of the power plant had no idea that their towns were being impacted at all by the stack emissions. No town officials I spoke to had been informed that the power plant was up for permit renewal either. It concerns me greatly that the people most affected have not been informed of the danger this plant poses and has posed to their residents health.

Commenter submitting this comment: 56

Response: The Department has strictly complied with all legal notice requirements with regard to this permit renewal. As required by the Title V program and Connecticut's regulations, letters were sent on January 10 and 11, 2012, to Mayor Bill Finch of the City of Bridgeport; the Greater Bridgeport Regional Planning Agency; the air quality regulatory agencies in the surrounding states; the affected Indian governments; and EPA Region 1. In addition to this, a copy of the notice of the tentative determination regarding the PSEG Title V permit renewal was included with the communications. Also, the notice of tentative determination was available on the Department's website for a number of weeks and, also was published in the *Connecticut Post* (a paper of general circulation in the area) on January 13, 2012. No revision of the draft permit or other action is required in response to this comment.

Reducing Carbon Dioxide (CO2) Emissions

26. Comment: It is long overdue that our state reduce CO2 producing energy sources particularly such dirty ones as coal plants. Bridgeport Harbor Station should install CO2 controls.

Commenters submitting this comment: 2, 7, 12

Response: The Department has permitting requirements in its NSR permit program addressing the control of CO2 and other greenhouse gases. At this time, our diligent review of the facts indicates that PSEG is not required to install controls or change operations as a result of these requirements. However, PSEG does presently participate in the CO2 budget trading program established by RCSA section 22a-174-31, also known as the Regional Greenhouse Gas Initiative, which is an important component of the state's climate change planning efforts and a significant element of the state's response to the Connecticut Global Warming Solutions Act (Public Act 08-98). No revision of the draft permit or other action is required in response to this comment.

Persistent Air Quality Violations

27. Comment: The Department should address Bridgeport Harbor Station's history of persistent air quality violations.

Commenter submitting this comment: 5

Response: This comment contain erroneous factual assertions. The Department is not aware that Bridgeport Harbor Station has a history of persistent air quality violations. As the owner and operator of a Title V source, PSEG is under a significant burden to report emissions and violations, so the Department has a thorough understanding of Bridgeport Harbor Station's emissions and compliance history which is inconsistent with what the commenter asserts. The only evidence of violations that the commenter provides is opacity monitoring data from a unit that was not even operating during the period of the suggested exceedances. (See also, comments 3 and 4 and responses thereto.) The Department's enforcement policies allow the most significant penalties for persistent violators of standards, and the Department puts significant efforts into pursuing such violators. PSEG is not known to be as a persistent violator of the air quality requirements.

Since this comment is based on erroneous information that is inconsistent with the facts demonstrated in the record of this proceeding, no revision to the draft permit is required in response to this comment.

Provide Adequate Assurances

28. Comment: The Department should provide adequate assurances that any Title V operating permit issued to PSEG for Bridgeport Harbor Station will address:

- All of the concerns articulated at the informational hearing on this matter; and
- All of the concerns filed in comments on this matter.

Commenter submitting this comment: 5

Response: The Department will issue any Title V permit renewal in strict adherence to all applicable federal and state environmental laws and regulations pertaining to air quality. In doing so, the Department will give and has given due attention to all public comments received as part of the process.

Issue the Title V Permit Renewal

29. Comment: The Department should issue the Title V permit renewal for PSEG's Bridgeport Harbor Station facility.

Commenters submitting this comment: 19, 23, 25, 26, 28, 32, 40

Response: The Department notes the support for the renewal of the Title V permit for the Bridgeport Harbor Station facility.

Conclusion

PSEG's Title V permit for Bridgeport Harbor Station should be issued as proposed, with the minor revisions described in this hearing report. The content of the draft permit and procedures followed in issuing the permit accord with applicable state and federal laws and regulations.

Attachment 1
List of Commenters

1. Connecticut Fund for the Environment- Conservation Law Foundation - Fairfield County
Environmental Justice Network - Sierra Club - Toxics Action Center

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5. Healthy Connecticut Alliance
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Bridgeport, CT
78. Michele Brennan
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Stratford, CT

Attachment 2
Opacity Data and Monitoring Report submitted by
Connecticut Fund for the Environment- Conservation Law Foundation - Fairfield County
Environmental Justice Network - Sierra Club - Toxics Action Center

[3, 1-minute Opacity Data, submitted to the Department by PSEG \(Excerpt: recording exceedances of opacity limitations on June 14, 2011\)](#)

[Title V Monitoring Report for January 1, 2011 through June 30, 2011 \(July 12, 2011\) and Letter from Michael Stagliola to Daniel C. Esty \(July 12, 2011\) \("Progress Report for April 1, 2011 through June 30, 2011\)](#)