UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE

MAY 04 2016

Michael Rall
Connecticut Municipal Electric Energy Cooperative
30 Scott Avenue
Norwich, CT 06360

Re: Clean Air Act Reporting Requirement

Dear Mr. Rall:

The United States Environmental Protection Agency ("EPA") is evaluating whether the Connecticut Municipal Electric Energy Cooperative ("CMEEC") is in compliance with the Clean Air Act ("CAA" or "Act") and requirements promulgated under the Act.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether such person is in compliance with the Act and its implementing regulations.

In particular, EPA is evaluating the facility's compliance with the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, found at 40 C.F.R. Part 63, Subpart ZZZZ, the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines, found at 40 C.F.R. Part 60, Subpart IIII, and the New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines, found at 40 C.F.R. Part 60, Subpart JJJJ.

Reporting Requirement

Within 45 calendar days of receiving this letter, CMEEC is required to:

1. Provide the information requested in each sub-paragraph below for each stationary internal combustion engine that CMEEC owns and/or operates. (Note: for the purposes of this reporting requirement, stationary shall mean any and all engines that remain, or have remained in the past, in the same location for 12 consecutive months or more).

   a. The designation and location;
   b. The purpose (e.g., to provide mechanical power, to provide primary electrical power, emergency generator, fire pump, etc.);
   c. If the engine participates in an ISO New England Operating Procedure then state which procedure and the date the engine first operated under it;
   d. The manufacturer, model number, and serial number;
   e. The month, day, and year of manufacture;
   f. The month, day, and year of purchase (the date when a binding contract was in place to purchase the engine);
   g. The month, day, and year of installation;
   h. The ignition type (i.e., spark or compression);
   i. The maximum output capacity (in brake horsepower, horsepower and kilowatts);
   j. The displacement value of the cylinders (liters/cylinder);
   k. Itemized hours of operation, including the purpose for operation, for calendar years 2013, 2014 and 2015;
   l. Whether the engine has an emissions control system, such as a catalytic oxidizer;
   m. Whether the engine has an open or closed crankcase ventilation system. If the engine has an open crankcase ventilation system, provide information on whether the engine is equipped with an open crankcase filtration emission control system (e.g., properly functioning "breather cap" or some other type of device); and
   n. Whether you have a "Certificate of Conformity" for the engine provided by the manufacturer. Provide copies of each certificate to EPA and indicate which certificate is associated with which engine.

2. For all of the stationary internal combustion engines described in your response to Question 1 above, indicate whether you submitted to EPA and/or CT DEEP any of the following documents pursuant to 40 C.F.R. Parts 60 and 63. If you answer "yes" to any sub-paragraph below, provide copies of each document:

   a. Initial notifications;
   b. Notifications of intent to test;
   c. Initial performance test reports or other initial compliance demonstrations;
   d. Notifications of compliance status;
   e. Percent load reports;
   f. Site specific monitoring plans;
   g. Performance evaluations of the continuous parameter monitoring systems (e.g., the temperature monitors measuring temperature at the inlet to the oxidation catalysts associated with the engines); and
   h. Semiannual or annual compliance reports.

Be aware that if CMEEC Industries does not provide the information required in this Reporting Requirement in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

Provide the above-required information to:

Susan Studlien, Director
Office of Environmental Stewardship
US EPA Region 1
Mail Code OES04-2
5 Post Office Square Suite 100
Boston, Massachusetts, 02109-3912
Attn: Darren Fortescue

If you have any questions regarding this Reporting Requirement, please contact Darren Fortescue at (617) 918-1162, or have your attorney call Tom Olivier at (617) 918-1737.

Sincerely,

Susan Studlien

Susan Studlien, Director
Office of Environmental Stewardship

cc: Robert Girard, CT DEEP