Southwest Connecticut Attainment Demonstration

Staff Draft

6/8/17
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SIPRAC, DEEP
Attainment Demonstration

What is an attainment demonstration?
1. A Clean Air Act Requirement.
2. A set of analyses, budgets, strategies and contingency plans which “demonstrate” that an area currently measuring air quality above the standard will measure (or “attain”) levels below the standard by the given deadline.
When is it required?

When an ozone nonattainment area is classified as moderate severity or higher.

(\textit{CAA § 182(b) and 40 CFR 51 subpart AA})

Specific to Connecticut–

On June 3, 2016 the two nonattainment areas were reclassified from marginal to moderate. In the ruling, EPA also set an attainment deadline of July 20, 2018 and an attainment demonstration deadline of January 1, 2017.
Additionally the Southwest area is required to address a SIP call for the 1997 standard. (This was also finalized in the same action which bumped the Connecticut nonattainment areas up to moderate, 81 FR 26697)
The NY-NJ-CT Attainment Demonstration is the second of two. It covers the 3 counties to the Southwest: Middlesex, New Haven and Fairfield.

The first, **Greater Connecticut**, was noticed and submitted this past January.
The Required Elements

- Conceptual Model—A description/analysis of the problem.
- Base and Future Year Inventories *(2011 and 2017)*
- Reasonable Further Progress Goals and Demonstration *(15% Emissions Reduction by 2017)*
- Reasonably Available Control Technology/Reasonably Available Control Measure (RACT/RACM) Analysis
- Photochemical Modeling Demonstration
- Transportation Conformity -> Motor Vehicle Budgets
- Contingency Plans *(Additional 3% emissions reductions required if an area fails to meet RFP goals or if an area fails to attain)*
The Conceptual Model

Three Types of Southwest Connecticut Exceedances:

- Western
- Coastal
- Statewide
Emissions for the Southwest CT Area will have large reductions between 2011 and 2017. These reductions are driven primarily by the mobile sector.

In excess of the required RFP (15%), thus the RFP requirement is fulfilled. Excess will be used to cover the contingency requirements.
## Motor Vehicle Emissions Budgets

### Southwest Connecticut Budgets

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Southwest Connecticut MVEB (tons per summer day)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2009</strong>*</td>
<td><strong>2017</strong></td>
</tr>
<tr>
<td>VOC</td>
<td>27.4  17.6</td>
</tr>
<tr>
<td>NOx</td>
<td>54.6  24.6</td>
</tr>
</tbody>
</table>

*These values were the last set of budgets established for the 1997 standard.*
Strategies and Controls in the modeling.

<table>
<thead>
<tr>
<th>On-Road:</th>
<th>Non-Road:</th>
<th>Stationary and Area:</th>
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</thead>
<tbody>
<tr>
<td>Tier 1 Vehicle Standards</td>
<td>Compression Ignition Diesel Engines Tier 1-4</td>
<td>CSAPR (Upwind areas- Does not apply to CT)</td>
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<tr>
<td>Reformulated Gasoline</td>
<td>Spark Ignition Engines</td>
<td>RICE NESHAP</td>
</tr>
<tr>
<td>On-Board Vapor Refueling</td>
<td>• Phase I SI Engines &lt;25HP</td>
<td>ICI Boilers and Process Heater MACT</td>
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<tr>
<td>National Low Emission Vehicle Program</td>
<td>• Phase II Non- Handheld SI Engines</td>
<td>Mercury and Air Toxics Standards</td>
</tr>
<tr>
<td>Tier 2 MV Controls/30 ppm Sulfur Gasoline</td>
<td>• Phase II Handheld SI Engines</td>
<td>Portable Fuel Container Rule</td>
</tr>
<tr>
<td>Heavy-Duty Diesel Vehicle Controls and Fuels</td>
<td>• Gasoline SI Marine Engines</td>
<td>Flexible Package Printing</td>
</tr>
<tr>
<td>CT OBD-II Enhance I/M Program</td>
<td>• Large Spark Engines</td>
<td>Offset Lithographic and Letter Press Printing</td>
</tr>
<tr>
<td>2007 High Motorcycle Emissions standards</td>
<td>• Rec. Land Based Spark Engines</td>
<td>Large Appliance Coating</td>
</tr>
<tr>
<td>CT LEV2</td>
<td></td>
<td>Industrial Solvent Cleaning</td>
</tr>
<tr>
<td>CT LEV3</td>
<td></td>
<td>Spray application equipment cleaning</td>
</tr>
<tr>
<td>Tier 3 Vehicle Standards/10 ppm Sulfur Gasoline</td>
<td></td>
<td>Misc Metal and Plastics Parts Coating</td>
</tr>
<tr>
<td></td>
<td>• Marine Diesel</td>
<td>Pleasure Craft Coating</td>
</tr>
<tr>
<td></td>
<td>• APPS</td>
<td>Above ground Storage Tanks</td>
</tr>
<tr>
<td></td>
<td>• Commercial Marine Vehicles</td>
<td>Stage I</td>
</tr>
<tr>
<td></td>
<td>• Recreational Equipment</td>
<td>Sulfur Limits for heating oil</td>
</tr>
<tr>
<td></td>
<td>• Marine Diesel Engines</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Spark engines</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Locomotives</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• New and Remanufactured Locomotives</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Non-Road Diesel Fuel</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Aircraft 1-3</td>
<td></td>
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<td></td>
<td></td>
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</table>

Connecticut Department of Energy and Environmental Protection
Additional Strategies/Controls...

- Municipal Waste Combustor (MWC) Revisions
- Architectural Coatings Update
- Control of NOx from major sources (22e and 22f)
- Electric Vehicle Memorandum of Understanding
- Consumer Products Update
- CSAPR Update from upwind states
- CSAPR Full Remedy/Complete Good Neighbor SIPs

...not accounted for in the modeling but needed.
Modeling Indicates Nonattainment

2016 Preliminary Monitored Design Values
and Modeled Design Values (ppb ozone)

- 1997 Standard
- 2008 Standard

Cities: Greenwich, Danbury, Stratford, Westport, Middletown, New Haven, Madison

- Preliminary 2016 Monitored DV
- OTC 2017 DV
- OTC 2017 DV with Land/Water Grid Manipulation
- EPA 2017 BaseCase Average Design Value
The Monitoring: Does it Support the Modeling?

For the Southwest Connecticut Area the analyses indicated that it is:

- Unlikely the area will meet the 2008 NAAQS
- But likely the area will meet the 1997 NAAQS

<table>
<thead>
<tr>
<th></th>
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<th></th>
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<td>80</td>
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<td>69</td>
<td>81</td>
<td>80</td>
<td>66</td>
<td>93</td>
</tr>
</tbody>
</table>

As of May 19th we already exceeded this.

In short yes; both monitoring and modeling indicate same attainment status for each standard.
EPA’s Final CSAPR Update Modeling for the 2008 Ozone NAAQS

<table>
<thead>
<tr>
<th>Contributions applied to the 2016 Design Value (ppb)</th>
<th>Preliminary 2016 Design Value</th>
<th>Connecticut Contribution</th>
<th>≥0.75 ppb State’s Contribution</th>
<th>&lt;0.75 ppb State’s Contribution</th>
<th>Bio and Fires</th>
<th>Initial and Boundary Conditions*</th>
<th>Remaining Design Value if CT shut off every source</th>
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<tr>
<td></td>
<td>83</td>
<td>4.2</td>
<td>48.3</td>
<td>5.6</td>
<td>4.5</td>
<td>20.1</td>
<td>78.8</td>
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</table>

*Initial and Boundary Conditions also includes Mexico, Canadian and Offshore Contributions
In-State Reductions May Be Necessary

CT sources play a bigger role in inland and eastern sites.

Remember: CT also has to address the 2015 Standard.
Contributions

Connecticut has analyzed the available contribution modeling to assess a better way to address transport.

How do we shrink this?
### What if scenarios

#### Scenario 1 – applying the 1% threshold to nonattainment monitors

<table>
<thead>
<tr>
<th>Contributor</th>
<th>Westport</th>
<th>Greenwich</th>
<th>Danbury</th>
<th>Stratford</th>
<th>Middletown</th>
<th>Madison</th>
<th>New Haven</th>
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<tbody>
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</tr>
<tr>
<td>NJ</td>
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<td>0.75</td>
<td>0.75</td>
<td>0.75</td>
<td>0.75</td>
<td>0.75</td>
<td>0.75</td>
</tr>
<tr>
<td>PA</td>
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<td>0.75</td>
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<td>0.75</td>
</tr>
<tr>
<td>CT</td>
<td>4.22</td>
<td>6.52</td>
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<td>5.56</td>
<td>8.03</td>
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</tr>
<tr>
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<td>0.75</td>
<td>0.75</td>
<td>0.75</td>
<td>0.75</td>
<td>0.75</td>
<td>0.75</td>
</tr>
<tr>
<td>VA</td>
<td>0.75</td>
<td>0.75</td>
<td>0.75</td>
<td>0.75</td>
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<td>0.75</td>
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<tr>
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<td>0.75</td>
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<td>NA</td>
<td>0.75</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>IN</td>
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<td>0.75</td>
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<td>0.75</td>
<td>NA</td>
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<td>KY</td>
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<td>0.75</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>IL</td>
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<td>NA</td>
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<td>NA</td>
</tr>
<tr>
<td>&lt;0.75 ppb</td>
<td>5.6</td>
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<td>5.46</td>
<td>6.4</td>
<td>6.57</td>
<td>6.55</td>
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<tr>
<td>Other</td>
<td>24.58</td>
<td>22.44</td>
<td>23.46</td>
<td>24.64</td>
<td>25.12</td>
<td>24.37</td>
<td>23.22</td>
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<tr>
<td>Resulting  DV</td>
<td>41</td>
<td>40</td>
<td>41</td>
<td>42</td>
<td>47</td>
<td>42</td>
<td>42</td>
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</tbody>
</table>

**Notes:**
1) If a state's contribution is “NA”, it is not significant for that monitor and its contributions are included in the <0.75ppb category.
2) “Other” includes Initial/Boundary Conditions, Biogenics, Off-shore Marine, Canada/Mexico, and Fires.

Reductions are to contributions not to emissions.
### Scenario 2 – applying the 25% reduction to top three contributors

#### Table 9-6. Scenario 2
25% reduction in contributions from NY, NJ and PA

<table>
<thead>
<tr>
<th>Contributor</th>
<th>Westport</th>
<th>Greenwich</th>
<th>Danbury</th>
<th>Stratford</th>
<th>Middletown</th>
<th>Madison</th>
<th>New Haven</th>
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<tbody>
<tr>
<td>NY</td>
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<td>15.23</td>
<td>10.9</td>
<td>13.53</td>
<td>12.15</td>
<td>13.84</td>
<td>12.71</td>
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<td>NJ</td>
<td>7.75</td>
<td>7.6</td>
<td>7.17</td>
<td>6.55</td>
<td>4.67</td>
<td>5.44</td>
<td>5.34</td>
</tr>
<tr>
<td>PA</td>
<td>7.55</td>
<td>6.3</td>
<td>7.02</td>
<td>7.06</td>
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<td>5.51</td>
<td>6.22</td>
</tr>
<tr>
<td>CT</td>
<td>4.22</td>
<td>6.52</td>
<td>3.33</td>
<td>5.56</td>
<td>8.03</td>
<td>7.53</td>
<td>7.16</td>
</tr>
<tr>
<td>MD</td>
<td>2.3</td>
<td>1.74</td>
<td>3.02</td>
<td>2.26</td>
<td>2.44</td>
<td>1.6</td>
<td>2.09</td>
</tr>
<tr>
<td>VA</td>
<td>2.08</td>
<td>1.86</td>
<td>2.26</td>
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<td>2.16</td>
<td>1.11</td>
<td>1.64</td>
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<td>OH</td>
<td>1.99</td>
<td>1.53</td>
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<td>1.25</td>
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<td>0.86</td>
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<td>NA</td>
<td>NA</td>
<td>NA</td>
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<tr>
<td>IN</td>
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<td>0.8</td>
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<td>24.64</td>
<td>25.12</td>
<td>24.37</td>
<td>23.22</td>
</tr>
</tbody>
</table>

| Resulting DV | 68      | 70       | 63      | 67       | 66       | 62      | 62       |

**Notes:**
1) If a state's contribution is “NA”, it is not significant for that monitor and its contributions are included in the <0.75ppb category.
2) “Other” includes Initial/Boundary Conditions, Biogenics, Off-shore Marine, Canada/Mexico, and Fires.

**Reductions are to contributions not to emissions.**
### Scenario 3 – applying the Min% reduction to top three contributors

Table 9-7. Scenario 3
Minimum contribution reduction needed from NY, NJ and PA to attain the 2008 NAAQS

<table>
<thead>
<tr>
<th>Contributor</th>
<th>Southwest CT Monitor (ppb)</th>
<th>Resulting Reduction = 18%</th>
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<tr>
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<td>MI</td>
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<tr>
<td>MI</td>
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<td>NA</td>
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</tr>
<tr>
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<td>5.89</td>
</tr>
<tr>
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<td>5.46</td>
</tr>
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<td>6.57</td>
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<td>6.55</td>
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</tr>
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<td>24.64</td>
</tr>
<tr>
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<td>24.37</td>
</tr>
<tr>
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<td></td>
</tr>
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<td>72</td>
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<tr>
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<td>74</td>
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<td>69</td>
</tr>
<tr>
<td>Resulting DV</td>
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</tr>
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</table>

Notes:
1) If a state's contribution is “NA”, it is not significant for that monitor and its contributions are included in the <0.75ppb category.
2) “Other” includes Initial/Boundary Conditions, Biogenics, Off-shore Marine, Canada/Mexico, and Fires.
### Scenario 4 – applying the min% reduction to all significant contributors

Table 9-8. Scenario 4
Minimum contribution reduction needed from significantly contributing upwind states to attain the 2008 NAAQS (with 0.75 ppb floor limit)
Resulting Reduction = 14%

<table>
<thead>
<tr>
<th>Contributor</th>
<th>Westport</th>
<th>Greenwich</th>
<th>Danbury</th>
<th>Stratford</th>
<th>Middletown</th>
<th>Madison</th>
<th>New Haven</th>
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<tr>
<td>NY</td>
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<td>17.46</td>
<td>12.50</td>
<td>15.52</td>
<td>13.93</td>
<td>15.87</td>
<td>14.57</td>
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<td>8.71</td>
<td>8.22</td>
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<td>PA</td>
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<td>7.22</td>
<td>8.05</td>
<td>8.09</td>
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<td>6.52</td>
<td>3.33</td>
<td>5.56</td>
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<td>2.10</td>
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<tr>
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<td>24.58</td>
<td>22.44</td>
<td>23.46</td>
<td>24.64</td>
<td>25.12</td>
<td>24.37</td>
<td>23.22</td>
</tr>
</tbody>
</table>

**Resulting DV**

|         | 75 | 73 | 72 | 74 | 73 | 70 | 70 |

**Notes:**
1) If a state's contribution is “NA”, it is not significant for that monitor and its contributions are included in the <0.75 ppb category.
2) “Other” includes Initial/Boundary Conditions, Biogenics, Off-shore Marine, Canada/Mexico, and Fires.
Conclusion

1997 NAAQS
• We are demonstrating we are meeting the SIP Call requirements for the 1997 Standard with this SIP submittal.
• We are demonstrating monitored attainment beginning in 2015 (if Exceptional Event is accepted) and by 2017 with modeling.

2008 NAAQS
• We have implemented the necessary strategies and reductions to meet RFP and the associated MVEBs.
• We have the required modeling, inventories etc.
• Attainment is only possible with a full remedy for the 110(a)(2)(D) aka “Good Neighbor Provisions” . Therefore, we ask EPA to deliver these overdue and necessary reductions.
Notice for Comments and Hearing

Coming soon! To be posted at the link below:


Comments will be sent to:
Mail to: Kate Knight
Air Bureau 5th Floor
79 Elm St Hartford, CT 06106-4064

Email to: Kathleen.Knight@ct.gov