

January 21, 2021

Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127
Attention: Kiernan Wholean

Mr. Wholean,

Environmental Review, Inc. has reviewed the Connecticut Regional Haze State Implementation Plan Revision and respectfully submits the following comments:

1.

Page 11. Section 2.3. Visibility Trends.

The document “Mid-Atlantic/Northeast U.S. Visibility Data 2004-2017 Report and Plots” is the SIP’s source for the decision to only consider sulfate, nitrate and their precursors as major contributors to haze. However, this work also shows that organic carbon mass remains as much a contributor (15-24%) as nitrate but was not discussed in the SIP. NOx/nitrate can be correlated with formation of secondary organic particulate matter, however, the transport of gases which form secondary organic particles and/or the transport of secondary particles should not be ignored. Connecticut’s potential contribution pollutants that can contribute to organic particle formation (O3, VOC, etc.) should be evaluated.

2.

Page 40. Section 3.6. Ammonia (NH3).

Figure 3-16 shows the emission reduction of NH3 from sources in Connecticut occurred from 2002-2008 and there has been no significant change from 2008-2017. NH3 is a precursor to particle formation and the SIP does not mention plans to reduce NH3 emissions. An analysis which evaluates the transport of NH3 from CT to class I areas is necessary to determine that CT is “not reasonably anticipated to contribute to visibility impairment in and Class I area.”, develop a meaningful long-term strategy, and monitoring plan for regional haze.

3.

Page 50. Section 5.2 Element 3. Ultra-low Sulfur Fuel Oil Standards.

“RCSA 22a-174-19b further limits sulfur content of fuel oil sold in Connecticut for use in stationary sources to 15 ppm for distillate and 3000 ppm (0.3%S) for aviation and residual fuels.” Low sulfur fuel is currently used by most facilities thus the impact of requiring lower sulfur content may be minimal. The effect of this regulation should be shown and quantified to demonstrate the claim that “Connecticut’s low sulfur fuel program already meets element 3 of the Ask.” and there are effective measures in place to reduce future visibility impairment.

4.

Page 71. Section 8. Additional Elements of Connecticut's Long-Term Strategy.

Section 8 details elements of Connecticut's Long-Term Strategy such as ongoing air pollution programs, construction activities, source retirement and replacement, and smoke management practices. However, Section 8 does not describe or mention tracking and reporting on additional reductions in emissions from such plans. It would be to Connecticut's advantage to track the progress and report on emission reductions, which are not mandated by the State Implementation Plan, but may contribute to Connecticut meeting or exceeding 2028 visibility emission goals.

5.

Page 7. Section 2. Monitoring and Visibility Assessment

Connecticut does have an extensive network for monitoring NO_x, SO₂ and Ozone, whose trends should be readily available. The IMPROVE monitoring program (and specifically Connecticut's site at Mohawk Mountain) mentioned in the SIP, does monitor visibility related particulate bound pollutants, including mass, elements, sulfates and nitrates and carbon, at a location which is minimally impacted by local urban emissions. Ambient air quality data, from the statewide network in addition to that from the Mohawk Mountain site, should have considered including some of the trends from those data to support their past reductions and projections into the future.

6.

Page 71. Section 8. Additional Elements of Connecticut's Long-Term Strategy

The plan might mention some variables which would affect Connecticut and the MANEVU's visibility goals for 2028, such as more recent and regular western wildfires and possible emission changes driven by changes in economic conditions. For instance, an uptick in PM concentrations/emissions between 2008 and 2011 were partially the result of the more extensive use of wood fuel, when the oil prices were volatile during that time period.

Please direct all responses to these comments to this address: thommac62@gmail.com

Thank you,

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