

STATE OF CONNECTICUT  
EXECUTIVE CHAMBERS

JOHN G. ROWLAND  
GOVERNOR

February 10, 2004

The Honorable Michael O. Leavitt  
Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building, 1101A  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

RE: PM2.5 National Ambient Air Quality Standard Recommended Designations for  
Connecticut

Dear Governor Leavitt:

I am writing to provide you with Connecticut's recommendation for attainment designations and geographic boundaries for the fine particulate matter national ambient air quality standards (NAAQS) pursuant to section 107(d)(1) of the Clean Air Act (CAA). Although I believe Connecticut can demonstrate on both scientific and legal bases that it is in attainment statewide for fine particulate matter and should be so designated, I understand that EPA views air quality data measured at the Stiles Street monitoring station in New Haven, Connecticut as the basis for a nonattainment designation. If that is the case, then I believe that at a minimum our documentation demonstrates that there is no justification to propose a large nonattainment area aligning New Haven with the metropolitan statistical area defined as northern New Jersey and southern New York.

In the attached technical document, you will find a demonstration that the Stiles Street monitor is anomalous. Readings from other pertinent monitoring stations are below the new NAAQS; in some instances they are well below the standard. Therefore, combining New Haven with northern New Jersey and southern New York as one nonattainment area is neither technically justified nor necessary or sufficient to effectuate attainment in those areas. In fact, New Haven is meteorologically distinct in terms of influencing air quality in the New York City metropolitan area.

I firmly believe that our data shows that air quality measured at Stiles Street truly is an anomaly, not representative of the air people breathe, and should not be used as the sole basis for a nonattainment designation. It was originally and remains a poor location for a monitoring site, one more influenced by cold diesel engines from trucks entering Interstate 95 from a nearby marine terminal than indicative of ambient air quality. It clearly meets the EPA definition for a "micro scale" site from which your guidance precludes data being used for annual attainment demonstrations. Accordingly, I recommend that the entire State of Connecticut be designated attainment for fine particulate matter. However, if you do not find the technical data and legal

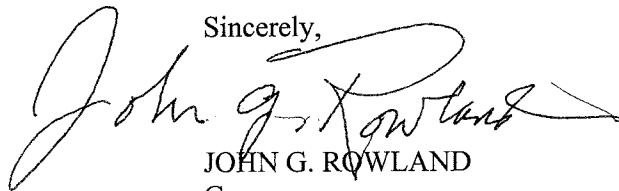
parameters allow for an attainment designation, I recommend a nonattainment designation of a more limited political/geographic subdivision like the City of New Haven itself or, at worse, New Haven County, Connecticut.

Due to planned reconstruction of the I-95 interchange, the monitor at Stiles Street will be eliminated in the next year. Working with EPA Region I staff, a new proximate monitoring site has been developed and is currently operational. While both monitors will be run for as long as possible, a whole new monitoring system will have to be used to demonstrate attainment. Therefore, should you opt to designate a portion of Connecticut nonattainment based on the Stiles Street data, I request the opportunity for expeditious redesignation with new data and further refinement of our technical documentation before final attainment plans are due.

I trust you will find the enclosed technical documentation compelling and hope you reach the same conclusion that science and the law merit attainment classification for the entire State of Connecticut. I must confess that my years with the NGA suggest that were this same scenario to occur in a western state, it would not even be a question for disagreement. Should your conclusion result in a recommendation of nonattainment designation for fine particulate matter, however, I would like to reemphasize my request for an opportunity for expeditious redesignation based upon refined technical demonstrations of attainment as data is produced by the newly approved additional monitoring site in New Haven.

If we can be of assistance as you review this matter, please contact Arthur J. Rocque, Jr., Commissioner of the Department of Environmental Protection at (860) 424-3001. Thank you for your consideration in this important matter.

Sincerely,



JOHN G. ROWLAND  
Governor

JGR/AJR/djw/lmt  
Enclosure (Support Document)

cc: R. Varney (EPA Region I)  
D. Conroy (EPA Region I)  
A. Rocque (CT DEP)  
J. Stahl (CT DEP)  
A. Gobin (CTDEP)