Dear Administrator Johnson:

This comment letter is being sent by the Connecticut Department of Environmental Protection (Department) in response to the U.S. Environmental Protection Agency’s (EPA’s) proposals, published on January 17, 2006 in the Federal Register, entitled National Ambient Air Quality Standards for Particulate Matter (71 FR 2620) and Revisions to Ambient Air Monitoring Regulations (71 FR 2710). The Department supports comments on these proposals provided by the Northeast States for Coordinated Air Use Management’s (NESCAUM) Executive Director Arthur N. Marin in his April 11, 2006 letters to EPA. Rather than reiterate those comments here, our major concerns are highlighted below.

The Department works closely with EPA in our shared mission to protect the public health and environment. With respect to EPA’s proposed NAAQS (Docket No. EPA-HQ-OAR-2001-0017), we find the proposed revisions to the NAAQS do not adequately meet our shared objectives. Specifically:

- EPA’s proposed primary and secondary fine particulate matter (PM$_{2.5}$) national ambient air quality standards (NAAQS) do not adequately protect public health or welfare. Regarding the primary NAAQS, numerous studies document the significant health threat posed by PM$_{2.5}$, resulting in recommendations by both the Clean Air Scientific Advisory Committee (CASAC) and EPA’s own staff to revise the primary PM$_{2.5}$ NAAQS to levels more stringent than in the current proposal. Regarding the secondary NAAQS, CASAC, EPA staff and NESCAUM all recommend a sub-daily standard that will serve to provide improved visibility during daylight hours and help areas make reasonable progress toward regional haze goals. Pursuant to Section 109(b) of the Clean Air Act, the Administrator is required to establish primary standards requisite to protect the public health, providing an adequate margin of safety, and secondary standards requisite to protect the public welfare. Consequently, the final PM$_{2.5}$ NAAQS should be set consistent with the Act.

- Similarly, in setting a NAAQS for coarse particulate matter, such standard should be established that ensures nationwide public health protection, with no source-based exemptions, and that includes an adequate monitoring network to provide data to address any uncertainties about source contributions and urban/rural exposures. As recommended by NESCAUM, EPA should at a minimum retain the PM$_{10}$ NAAQS until
As we work toward our shared responsibility to assure all citizens have clean air, it is incumbent upon both our agencies to establish standards that protect the health and environment, have the monitoring tools to evaluate the ambient air quality and the success of our control efforts, as well as to maintain adequate funding commitments to this high priority effort. We trust you will work with us to assure the regulatory framework is sound, meets our shared needs, and the federal contribution of funding to these efforts are not compromised.

Yours truly,

Anne Gobin, Chief
Bureau of Air Management