
Enclosure A: Adequacy Determination of the Connecticut State Implementation Plan for Clean Air Act Section 110(a) Infrastructure Elements

2012 National Ambient Air Quality Standards for Fine Particles



December 14, 2015
CONNECTICUT DEEP
79 Elm St, Hartford, CT 06106-5127

Introduction

Airborne particles pose a significant risk to human health at certain concentrations. Small airborne particles (Fine Particles or PM_{2.5}) pose the greatest risk because they can penetrate deep into lung tissue, and may even pass into an individual's blood stream.¹ Together, the Environmental Protection Agency (EPA) and the States work to improve or maintain air quality at levels safe for the public. To do so the EPA, with input from public health experts, the States and other stakeholders, works to ensure that the National Ambient Air Quality Standards (NAAQS) are set at levels sufficient to protect public health with an adequate margin of safety. Once EPA sets a NAAQS, States and EPA initiate a planning process to assess the level of pollution in the air, designate each area based on monitored levels and work together to plan and adopt appropriate air pollution controls if necessary to ensure air quality meets the applicable standard.

The Clean Air Act (CAA) requires a periodic review of the science upon which the NAAQS are based and the NAAQS themselves. On December 14, 2012, the EPA revised the PM_{2.5} NAAQS.² The EPA revised the annual standard from 15.0 micrograms per cubic meter (µg/m³) to 12.0 µg/m³ and retained the 24-hr standard at 35 µg/m³, which had been previously revised by EPA on September 21, 2006. On December 18, 2014, the EPA promulgated initial designations³ for the 2012 annual PM_{2.5} NAAQS, designating all of Connecticut as "unclassifiable/attainment" based on air quality monitoring data generated by the Connecticut Department of Energy and Environmental Protection (Department) showing all PM_{2.5} monitoring sites in the state comply with the NAAQS. Previously, on September 11, 2013, EPA approved⁴ a maintenance plan for the Connecticut portion of the New York-New Jersey-Connecticut area for the 1997 annual and 2006 24-hour PM_{2.5} NAAQS. As a result, all of Connecticut is currently designated as attainment for all PM_{2.5} NAAQS. In addition, recent monitoring data shows a continued decline of ambient PM_{2.5} levels and verifies ongoing compliance with the 2012 PM_{2.5} NAAQS (see Figures 1 and 2).

CAA sections 110(a)(1) and 110(a)(2) require all states to submit any necessary revisions to their State Implementation Plan (SIP) to ensure the state possesses adequate authority to implement, maintain and enforce any revised or new NAAQS. This requirement is known as the Infrastructure SIP or I-SIP. The Department previously submitted I-SIP revisions to EPA for the 1997 PM_{2.5} NAAQS on September 4, 2008 and for the 2006 PM_{2.5} NAAQS on September 18, 2009 (with further updates submitted on January 7, 2011, August 19, 2011, June 15, 2012, and July 11, 2012). EPA maintains a webpage documenting the agency's most recent actions on these and other I-SIP submissions.⁵

The CAA requires I-SIPs be submitted three years after the promulgation of a revised or new NAAQS. Therefore, the I-SIP for the 2012 PM_{2.5} NAAQS is due to EPA by December 14, 2015.

¹ <http://www3.epa.gov/airnow/particle/pm-color.pdf>

² [78 FR 3086 \(January 15, 2013\)](#)

³ [80 FR 2206 \(January 15, 2015\)](#)

⁴ [78 FR 58467 \(September 24, 2013\)](#)

⁵ http://www.epa.gov/airquality/urbanair/sipstatus/reports/ct_infrabypoll.html

Figure 1. Connecticut's PM_{2.5} Annual Design Value Trends.

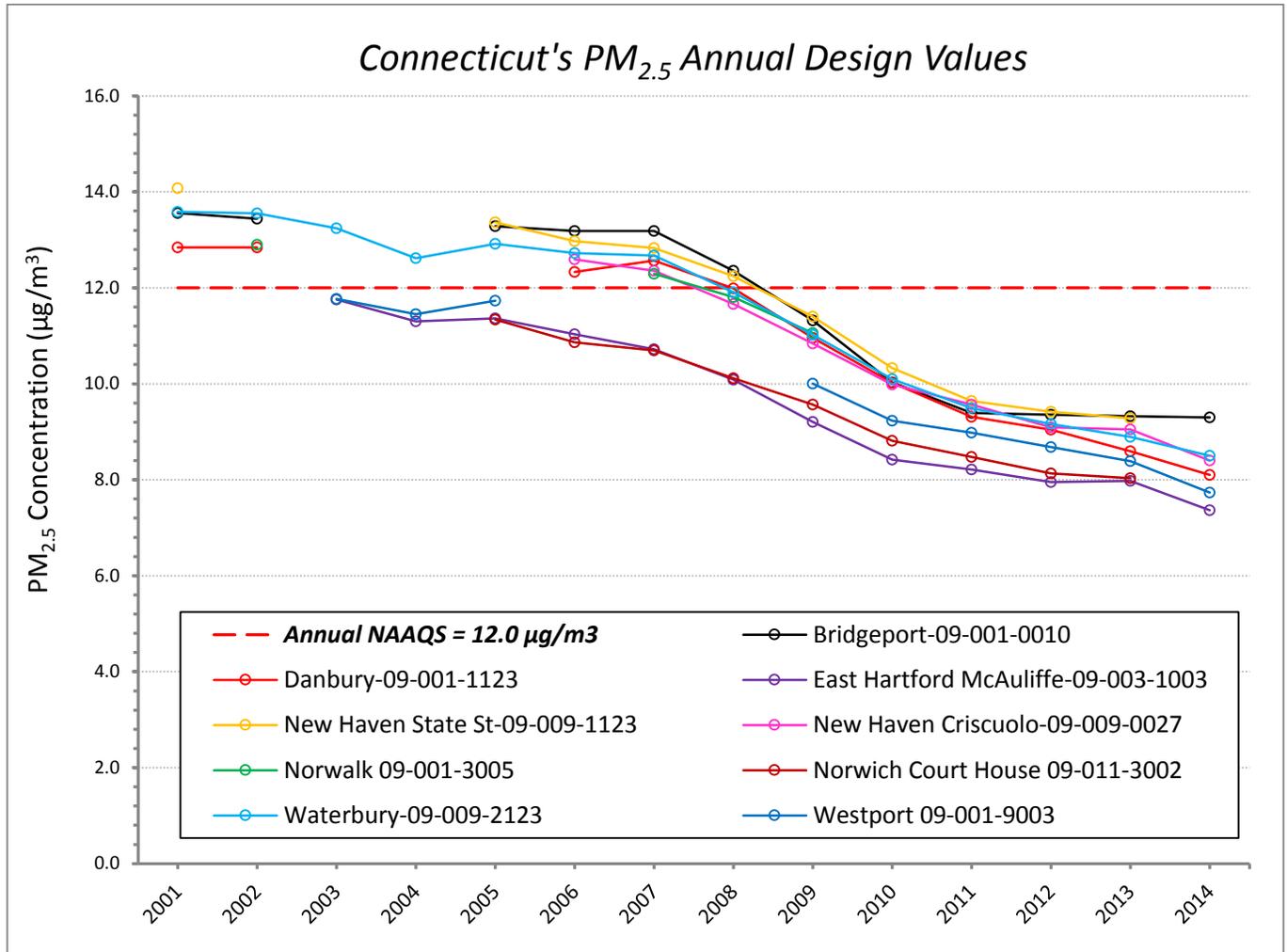
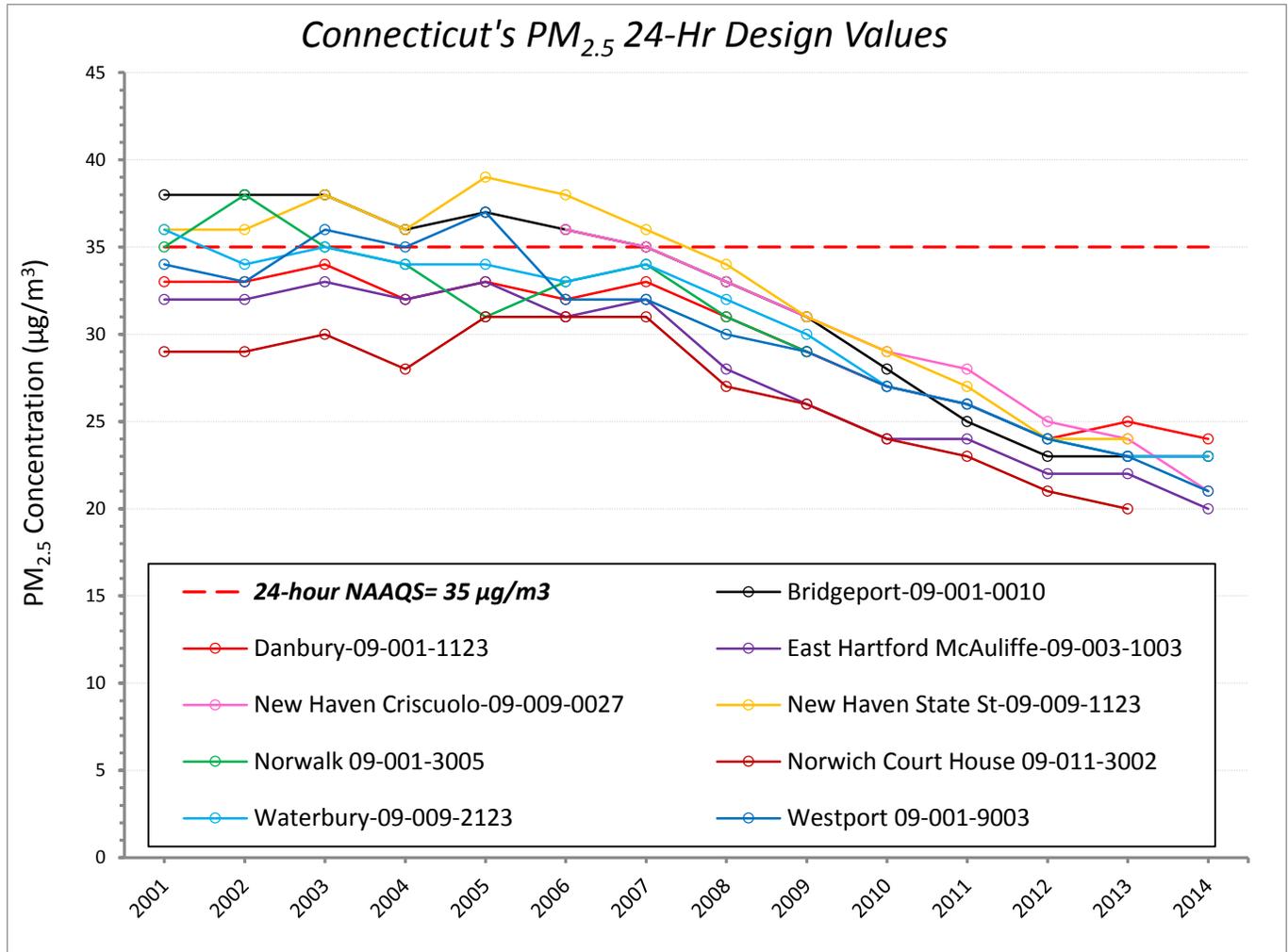


Figure 2. Connecticut's PM_{2.5} 24-Hr Design Value Trends



I-SIP Requirements

This I-SIP demonstrates that Connecticut meets all the requirements of CAA section 110(a)(1) and section 110(a)(2) for the 2012 PM_{2.5} NAAQS. This I-SIP was prepared in accordance with EPA’s most recent guidance⁶, issued on September 13, 2013. Each of the CAA section 110(a)(2) requirements are detailed in the following sections of this document which provide the detail to how Connecticut meets each requirement. The Department hereby incorporates by reference all statutory and regulatory sections submitted with previous infrastructure SIP submissions and includes references and revised statutes and regulatory requirements, as appropriate.

⁶ [“Guidance on Infrastructure State Implementation Plan \(SIP\) Elements Under Clean Air Act Sections 110\(a\)\(1\) and 110\(a\)\(2\)”](#)

Adequacy of Connecticut's Programs Under CAA section 110(a)(2)(A)

The Department has listed below the 30 program elements which ensure the limitation and control of fine particle emissions and precursors, as required by CAA section 110(a)(2)(A). Table 1 describes those elements and any revisions or new elements since the last I-SIP submission. Not Applicable (N/A) indicates there have been no revisions since the last I-SIP submission.

Table 1. Section 110(a)(2)(A) Emissions Limits and Other Control Measures

Corresponding Connecticut Program Element Citation	Description	Description if revision or new submission
Connecticut General Statutes (CGS) Section 22a-6(a)(1)	Authorizes the commissioner to "[a]dopt, amend or repeal ... such environmental standards, criteria and regulations ... as are necessary and proper to carry out his functions, powers and duties." It is under this general grant of authority that the Commissioner has adopted emissions standards and control measures for a variety of sources and pollutants.	N/A
CGS Section 22a-174	Establishes the commissioner's general authority to adopt regulations and issue permits to control air pollution.	N/A
CGS Section 22a-174(f)	Limitations on open burning. ⁷	N/A
CGS Section 22a-174e	Decommissioning of Stage II vapor recovery systems. Pressure decay test of stage I vapor recovery systems.	Revisions to CGS Section 22a-174e became effective June 18, 2013, requiring decommissioning of stage II vapor recovery systems. Connecticut subsequently repealed Regulations of Connecticut State Agencies (RCSA) section 22a-174-30, effective July 8, 2015, in accordance with the EPA rule making published in the May 16, 2012 Federal register (77 FR 28772). The Department submitted the SIP revision to the EPA on September 15, 2015. ⁸
CGS Section 22a-174g	California motor vehicle emission standards, including exhaust emissions standards for both PM precursors and direct PM	N/A
CGS Section 22a-174k	Restrictions on operation of outdoor wood-burning furnaces.	Revisions to CSG Section 22a-174k effective June 6, 2014. Restricted the burning of any material other than non-chemically treated wood.
CGS Section 16a-21a	Limits the sulfur content of home heating oil and off-road diesel fuel.	In July 2014, statute revised to remove the dependence on the surrounding state regulations to limit the sulfur

⁷Including limitations on days forecasted to have an air pollution episode.

⁸http://www.ct.gov/deep/lib/deep/air/regulations/sip/SIP-FinalSubmittal_GDF-VaporRecovery.pdf

Corresponding Connecticut Program Element Citation	Description	Description if revision or new submission
		content in the fuel. In July 2015 statute revised to clarify that the enforcement of it's provisions in this statute are to be implemented by the Commissioner of Energy and Environmental Protection The full statute is attached in Attachment A.
RCSA Section 22a-174-1(19) and (62)	Defines "brush" for purposes of CSG Section 22a-174(f) and "Major source baseline date" for purposes of RCSA Section 22a-174-3a.	RCSA Section 22a-174-1(62) was previously approved (80 FR 43960). RCSA Section 22a-174-1(19) is included in Attachment B.
RCSA Section 22a-174-3a(i)	Ambient air quality analysis.	The Department updated RCSA Section 22a-174-3a(i), effective April 2014. The EPA published a direct final rule approving said changes in the July 24, 2015 FR (80 FR 43960).
RCSA Section 22a-174-3a(j)	Best Available Control Technology (BACT).	N/A
RCSA Section 22a-174-3a(k)	Prevention of Significant Deterioration (PSD).	The Department updated RCSA Section 22a-174-3a(k), effective April 2014. The EPA published a direct final rule approving said changes in the July 24, 2015 FR (80 FR 43960).
RCSA Section 22a-174-3a(l)	Non-attainment areas, New Source Review (NSR).	N/A
RCSA Section 22a-174-18	Control of particulate matter and visible emissions	N/A
RCSA Section 22a-174-19	Control of sulfur compound emissions.	Submitted on April 22, 2014 with subsequent revision June 18, 2015.
RCSA Section 22a-174-19a	Control of sulfur dioxide emissions from power plants and other large stationary sources.	Submitted on April 22, 2014 with subsequent revision June 18, 2015.
RCSA Section 22a-174-19b	Fuel sulfur content limitations for stationary sources.	Submitted on April 22, 2014 with subsequent revision September 28, 2015.
RCSA Section 22a-174-20	Control of organic compound emissions.	Revisions as approved in June 9, 2014 FR (79 FR 32873)
RCSA Section 22a-174-22	Control of nitrogen oxide (NOx) emissions.	Revisions as approved in July 10, 2014 FR (79 FR 39322)
RCSA Section 22a-174-22c	CAIR NOx Trading Program	N/A ⁹
RCSA Section 22a-174-24	Ambient Air Quality Standards	Revisions as approved in June 24, 2015 FR (80 FR 36242)
RCSA Section 22a-174-27	Periodic motor vehicle inspections & maintenance.	Revisions as approved in March 17, 2015 FR (80 FR 13768)
RCSA Section 22a-74-30a	Stage I Vapor Recovery	Revisions to the vapor recovery program were effective July 8, 2015. The Department has submitted SIP revision on September 15, 2015 for the EPA's approval.
RCSA Section 22a-174-32	Reasonably Available Control Technology for organic compounds	N/A
RCSA Section 22a-174-36	Low Emission Vehicle (LEV) program	N/A
RCSA Section 22a-174-36b	LEV II program	Revisions as approved in March 17, 2015 FR (80 FR 13768)
RCSA Section 22a-174-36c	LEV III program	SIP submission RSCA 22a-174-36c included as Attachment C, a copy of the full regulation and associated administrative record for SIP approval.

⁹ DEEP is currently evaluating options to preserve the NOx reductions achieved through CAIR. Any revisions to this section will be addressed in a separate SIP revision when the revisions are final.

Corresponding Connecticut Program Element Citation	Description	Description if revision or new submission
RCSA Section 22a-174-38	Limits for Municipal Waste Combustors	N/A ¹⁰
RCSA Section 22a-174-40	Consumer Products	N/A ¹¹
RCSA Section 22a-174-41	Architectural and Industrial Maintenance (AIM) coatings	N/A ⁹
RCSA Section 22a-174-44	Adhesives and Sealants	N/A

¹⁰ DEEP is currently assessing and drafting lower NOx limits for RCSA 22a-174-38. Any revisions to this section will be addressed in its own process should the final revisions deem it necessary.

¹¹ DEEP is currently drafting revisions that will achieve additional VOC reductions, as committed to in DEEP's 2014 RACT submission for the 2008 ozone standard. This will have the co-benefit of reducing pollutants which can be precursors of PM2.5.

Adequacy of Connecticut's Programs Under 110(a)(2)(B)

The Department has three program elements that govern monitoring, collecting and analyzing of ambient air quality with respect to fine particles and precursors. Table 2 describes those elements and any revisions that have occurred since the last I-SIP submission. Not Applicable (N/A) indicates there have been no revisions since the last I-SIP submission. The Department operates and maintains a continuous and manual PM_{2.5} ambient air monitoring network operated in accordance with 40 CFR 53. In addition, the Department also operates and maintains a monitoring network to measure ambient concentrations of PM_{2.5} precursors. The Department has committed to maintaining this network in the 2015 Network Plan, as described and linked in Table 2.

Table 2. Section 110(a)(2)(B) Ambient Air Quality Monitoring Program Elements

Corresponding Connecticut Program Element Citation	Description	Description if re-submission or new submission
CGS Section 22a-174(d)	Provides the commissioner with all incidental powers necessary to control air pollution.	N/A
Annual Air Monitoring Network Plan as required by 40 CFR 53 and 58.	The Annual Air Monitoring Network Plan , assures that all requirements set forth in 40 CFR 53 and 58 are fulfilled in accordance with the methods set forth in these sections.	2015 Plan approved by EPA on July 10, 2015.
Five-Year Network Assessment as required by 40 CFR 58.	The Five-Year Network Assessment , assures the monitoring network meets the goals of appendix D 40 CFR 58 and determines if the existing network has any gaps or redundancies that require attention.	The Department submitted the 2015 Network Assessment on August 24, 2015.

Adequacy of Connecticut's Programs Under 110(a)(2)(C)

The Department has 14 program elements for ensuring the enforcement of control measures. Table 3 describes those elements and any revisions that have occurred since the last I-SIP submission. Not Applicable (N/A) indicates there have been no revisions since the last I-SIP submission.

Table 3. Section 110(a)(2)(C) Enforcement Program Elements

Corresponding Connecticut Program Element Citation	Description	Description if re-submission or new submission
CGS Section 22a-6(a)(5)	"The commissioner may ... in accordance with constitutional limitations, enter at all reasonable times, without liability, upon any public or private property, except a private residence, for the purpose of inspection and investigation to ascertain possible violations of any statute, regulation, order or permit administered, adopted or issued by him and the owner, managing agent or occupant of any such property shall permit such entry . . ."	N/A
CGS Section 22a-6b	Imposition of civil penalties by the commissioner	N/A
CGS Section 22a-7(d)	Civil actions.	N/A
CGS Section 22a-171	"The commissioner shall . . . (4) adopt, amend, repeal and enforce regulations . . . and do any other act necessary to enforce the provisions of [Chapter 446c, entitled "Air Pollution Control," which encompasses CGS Sections 22a-170 through 22a-206]."	N/A
CGS Section 22a-174	Powers of the commissioner. Regulations. Fees. Exemptions. General permits. Appeal of commissioner's action re permit applications	N/A
CGS Section 22a-175	Penalties for violations	N/A
CGS Section 22a-176	Consideration in making regulations and issuing orders.	N/A
CGS Section 22a-177	Enforcement of regulations. Complaints.	N/A
CGS Section 22a-178	Orders to Correct Violations	N/A
CGS Section 22a-180	Penalty for violations of orders. Injunctions	N/A
RCSA Section 22a-3a-6(c)	Orders, rulings and decisions – procedures in contested cases	N/A
RCSA Section 22a-174-2a	Specifies procedural requirements for the new source review (NSR) program, including notification concerning major sources permits and modifications.	The Department adopted revisions in 2012 to require the notification of surrounding states and affected Federal Land Managers (FLMs) of certain administrative actions relative to air pollution permits. The EPA published a direct final rule approving said changes in the July 24, 2015 FR (80 FR 43960)
RCSA Section 22a-174-3a	Permit to construct and operate stationary sources. This section provides a permit program for enforceable emission limits and control measures.	The Department updated RCSA Section 22a-174-3a(k) and 3a(i) effective April 2014. The EPA published a direct final

Corresponding Connecticut Program Element Citation	Description	Description if re-submission or new submission
		rule approving said changes in the July 24, 2015 FR (80 FR 43960). ¹²
RCSA Section 22a-174-12	Violations and enforcement of the Regulations of Connecticut State Agencies. This section provides that “The Commissioner shall designate employees of the Department to be known as enforcement personnel, who shall, acting with or without complaints, conduct investigations and ascertain whether the Commissioner's regulations are being complied with.”	N/A

¹² The definitions of the PSD program were also revised to include a major source baseline for PM2.5. This revision to RCSA Section 22a-174-1 was also approved in July 24, 2015 FR (80 FR 43960).

Adequacy of Connecticut's Programs Under 110(a)(2)(D)

The Department's air pollution control programs ensure that Connecticut meets all of the interstate and international obligations mandated by CAA section 110(a)(2)(D) for the PM_{2.5} NAAQS. In addition to the various authorities and emission programs described elsewhere in this document, the three elements summarized in Table 4 require appropriate notification of permit activities to nearby states and ensure sources do not adversely impact air quality or visibility in nearby states. The Department also certifies that there are no sources in Connecticut subject to an active finding under CAA section 126 or 115 (relating to interstate or international pollution abatement). The discussion in Attachment D provides additional evidence that Connecticut meets the requirements of CAA section 110(a)(2)(D)(i) regarding interstate transport and visibility protection.

Table 4. Section 110(a)(2)(D) Interstate Transport

Corresponding Connecticut Program Element Citation¹³	Description	Description if re-submission or new submission
RCSA Section 22a-174-2a	Specifies procedural requirements for the new source review (NSR) program, including notification to nearby states concerning major sources permits and modifications.	The Department adopted revisions in 2012 to require the notification of surrounding states and affected Federal Land Managers (FLMs) of certain administrative actions relative to air pollution permits. The EPA published a direct final rule approving said changes in the July 24, 2015 FR (80 FR 43960)
RCSA Section 22a-174-3a	Prevention of significant deterioration and nonattainment new source review requirements, which include modeling requirements that ensure new/modified sources to not cause/contribute to PSD or NAAQS issues in nearby states.	The Department updated RCSA Section 22a-174-3a(k) and 3a(i) effective April 2014. The EPA published a direct final rule approving said changes in the July 24, 2015 FR (80 FR 43960). ¹⁴
Regional Haze SIP as required by 40 CFR 51.308	The State must address regional haze in each mandatory Class I Federal area located within the State and in each mandatory Class I Federal area located outside the State which may be affected by emissions from within the State.	EPA approved the existing Regional Haze SIP for the current ten-year planning period in the July 10, 2014 FR (79 FR 39322) On July 13, 2015 the Department submitted the five-year look back SIP demonstrating sufficient progress in visibility of the surrounding Class I areas and Connecticut's implementation of the strategies committed to in the SIP. The Department will continue to be involved for the next regional haze planning session through the regional planning organization, MANE-VU .

¹³ In addition to these program elements, the Department notes that no sources in Connecticut are subject to any active finding under CAA sections 115 or 126 with respect to PM_{2.5} or its precursor pollutants.

¹⁴ The definitions of the PSD program were also revised to include a major source baseline date for PM_{2.5}. This revision to RCSA Section 22a-174-1 was also approved in July 24, 2015, see [80 FR 43960](#).

Adequacy of Connecticut’s Programs Under 110(a)(2)(E)

The Department has three program elements to ensure Connecticut’s programs have adequate resources and meet conflict of interest requirements. Table 5 describes those elements and any recent revisions since the last I-SIP submission. Not Applicable (N/A) indicates there have been no revisions since the last I-SIP and the citation is included as previously submission.

Table 5. Section 110(a)(2)(E) Program Elements to Ensure Adequate Resources

Corresponding Connecticut Program Element Citation	Description	Description if re-submission or new submission
CGS Section 22a-171	Duties of the Commissioner of Energy and Environmental Protection “shall (1) initiate and supervise programs for the purposes of determining the causes, effect and hazards of air pollution; (2) initiate and supervise state-wide programs of air pollution control education; (3) cooperate with and receive money from the federal government and, with the approval of the Governor, from any other public or private source; (4) adopt, amend, repeal and enforce regulations as provided in section 22a-174 and do any other act necessary to enforce the provisions of this chapter and section 14-164c; (5) advise and consult with agencies of the United States, agencies of the state, political subdivisions and industries and any other affected groups in furtherance of the purposes of this chapter.”	N/A The State of Connecticut is the sole authority implementing the SIP and does not rely on local or regional governments or agencies to carry out this responsibility.
Performance Partnership Agreement Process	In an annually updated agreement, EPA Region 1 and DEEP identify a joint agenda for environmental progress and expectations for the state/federal partnership. The agreement specifies resource commitments for each year and represents an evolving, collaborative approach that establishes priorities among competing demands for limited resources.	N/A
CGS section 1-85	Interest in conflict with discharge of duties.	CGS section 1-85 was submitted for EPA approval on December 28, 2012 along with the Ozone Infrastructure SIP.

Adequacy of Connecticut's Programs Under 110(a)(2)(F)

The Department has six program elements to ensure stationary source monitoring is conducted in accordance with the CAA requirements. Table 6 describes those elements and any recent revisions since the last I-SIP submission. Not Applicable (N/A) indicates there have been no revisions since the last I-SIP submission.

Table 6. Section 110(a)(2)(F) Stationary Source Monitoring System Program Elements

Corresponding Connecticut Program Element Citation	Description	Description if re-submission or new submission
CGS Section 22a-6(a)(5)	"The commissioner may, in accordance with constitutional limitations, enter at all reasonable times, without liability, upon any public or private property, except a private residence, for the purpose of inspection and investigation to ascertain possible violations of any statute, regulation, order or permit administered, adopted or issued by him and the owner, managing agent or occupant of any such property shall permit such entry ..."	N/A
CGS Section 22a-174(c)	Various powers of the commissioner related to permitting, inspections, and recordkeeping.	N/A
RCSA section 22a-174-4	Source monitoring, record keeping and reporting. Paragraph (d)(1) states: "The commissioner may, by written notice, require the owner or operator of any source to create, maintain and submit data, records or reports of monitoring data and other information deemed necessary by the commissioner to evaluate compliance with chapter 446c of the Connecticut General Statutes and regulations promulgated thereunder. Such information shall be recorded, compiled and submitted on forms furnished or prescribed by the commissioner. The written notice shall provide the date by which such data, records or reports shall be submitted to the commissioner."	Revisions approved by EPA in the July 16, 2014 FR (79 FR 41427)
RCSA section 22a-174-5	Methods for sampling, emission testing, sample analysis, and reporting. Subsection (e)(1) states: "The owner or operator of a stationary source of air pollution with maximum uncontrolled emissions of any particular air pollutant greater than one hundred (100) tons per year shall be required to carry out emission tests as prescribed by the commissioner. Such test or tests shall be conducted at such intervals as the	The Department updated RCSA section 22a-174-5 to include an additional test methods for sulfur in fuels in conjunction with the adoption of low sulfur fuel requirements in RCSA 22a-174-19b. The full text the RSCA 22a-174-5 is included in Attachment E.

Corresponding Connecticut Program Element Citation	Description	Description if re-submission or new submission
	<p>commissioner may specify for an individual stationary source.”</p> <p>Subsection (e)(2) states: “In addition to the emission tests required in subdivision 22a-174-5(e)(1), the commissioner may require the owner or operator of any stationary source to conduct emission tests of emissions.”</p>	
RCSA section 22a-174-10	Public availability of information. Subsection (a) states: “Any records, reports or other information obtained by the Commissioner or on file with the department shall, pursuant to the provisions of sections 1-7 through 20 of the General Statutes, as amended, be made available to the public.”	N/A
RCSA section 22a-174-19b(g)	Record keeping and reporting for fuel users and merchants.	Submitted on April 22, 2014 with subsequent revision September 28, 2015.

Adequacy of Connecticut’s Programs Under 110(a)(2)(G)

The Department has two program elements to provide authority comparable to that in CAA section 303 and adequate contingency plans to implement such authority. Table 7 describes relevant program element and any recent revisions since the last I-SIP submittal. Not Applicable (N/A) indicates there have been no revisions since the last I-SIP submission Note that Connecticut is a Priority III area as defined by [40 CFR 51.150](#) and therefore is not required to prepare a contingency plan.

Table 7. Section 110(a)(2)(G) Emergency Powers Program Elements

Corresponding Connecticut Program Element Citation	Description	Description if re-submission or new submission
CGS Section 22a-181	Emergency action to protect public health or safety	N/A
RCSA section 22a-174-6	Air pollution emergency episode procedures. This section describes the existing emergency episode procedures in place, which are consistent with the significant harm levels as indicated in 40 CFR Part 51.151. However, for PM Connecticut is classified as priority III and therefore not required to have a contingency plan.	N/A

Adequacy of Connecticut’s Programs Under 110(a)(2)(H)

The Department has two program elements that authorize SIP revisions if and when needed. Table 8 describes in detail those elements and any recent revisions since the last I-SIP submittal. Not Applicable (N/A) indicates there have been no revisions since the last I-SIP submission.

Table 8. Section 110(a)(2)(H) Program Elements Governing Future SIP Revisions

Corresponding Connecticut Program Element Citation	Description	Description if re-submission or new submission
CGS section 22a-174(d)	The commissioner is authorized with all incidental powers necessary to control and prohibit air pollution.	N/A
Air Quality Implementation Plan, Chapter 13, (March 3, 1972)	<p>“This implementation plan is intended to be dynamic, not static. To this end, it will be revised when necessary.”</p> <p>The Department has revised the SIP on numerous occasions over the last 43 years. Most recently submitted and proposed SIP revisions can be found here: http://www.ct.gov/deep/cwp/view.asp?a=2684&q=331234&deepNav_GID=1619</p>	N/A

Adequacy of Connecticut's Programs Under 110(a)(2)(I)

The requirements of CAA section 110(a)(2)(I) state ..." in the case of a plan or plan revision for an area designated as a nonattainment area, meet the applicable requirements of part D of this subchapter (relating to non-attainment areas)." This section is not applicable to Connecticut as EPA has designated Connecticut as attainment/unclassifiable. On [December 18, 2014 EPA signed](#) the initial designations; Connecticut was designated as attainment/unclassifiable.

Adequacy of Connecticut's Programs Under 110(a)(2)(J)

The Department has eight program elements to ensure compliance with CAA section 121 consultation requirements, CAA section 127 public notification requirements and Part C PSD and visibility protection requirements. Table 9 describes those elements and any recent revisions since the last I-SIP submittal. Not Applicable (N/A) indicates there have been no revisions since the last I-SIP submission.

Table 9. Section 110(a)(2)(J) Program Elements Governing Consultation, Public Notification, PSD and Visibility Protection

Corresponding Connecticut Program Element Citation	Description	Description if re-submission or new submission
CGS Section 22a-171	Duties of commissioner of Energy and Environmental Protection. ... “(2) Initiate and supervise state-wide programs of air pollution control education;” “(5) advise and consult with agencies of the United States, agencies of the state, political subdivisions and industries and any other affected groups in furtherance of the purposes of this chapter.”	N/A
CGS Section 22a-174(d)	“The commissioner shall have all incidental powers to carry out the purposes of [Chapter 446c, entitled “Air Pollution Control,” which encompasses Conn. Gen. Stat. Sections 22a-170 through 22a- 206] . . .	N/A
CGS Chapter 54	Uniform Administrative Procedures Act.	In 2014, CGS section 4-168 was revised; Connecticut regulations are now required to be submitted through the states e-regulations system; making an additional avenue for the public to access any regulation related changes. The revised statute is included as Attachment F.
RCSA section 22a-174-2a	This regulation specifies procedural requirements for new source review and Title V permitting, including signatory responsibilities, public notice/comment/hearing requirements, as well as requirements related to permit and registration changes.	The Department adopted revisions in 2012 to require the notification of surrounding states and affected Federal Land Managers (FLMs) of certain administrative actions relative to air pollution permits. The EPA published a direct final rule approving said changes in the July 24, 2015 FR (80 FR 43960)

Corresponding Connecticut Program Element Citation	Description	Description if re-submission or new submission
RCSA section 22a-174-3a(k)	Permit Requirements for Attainment Areas: Prevention of Significant Deterioration of Air Quality (PSD) Program. This section addresses the prevention of significant deterioration of air quality and visibility protection.	The Department updated RCSA Section 22a-174-3a(k), effective April 2014. The EPA published a direct final rule approving said changes in the July 24, 2015 FR (80 FR 43960).
AQI Forecasting and Reporting	Pursuant to 40 CFR 58.50, DEEP provides daily air quality forecasts to the public via EPA's AirNow and Enviroflash programs, as well as via DEEP's website and air quality information telephone line.	The Department has updated its procedures in accordance with the updated EPA guidance released December, 2013.
Regional Haze SIP as required by 40 CFR 51.308	The State must address regional haze (or visibility) in each mandatory Class I Federal area located within the State and in each mandatory Class I Federal area located outside the State which may be affected by emissions from within the State.	<p>EPA approved the existing Regional Haze SIP for the current ten-year planning period in the July 10, 2014 FR (79 FR 39322)</p> <p>On July 13, 2015 the Department submitted the five-year look back SIP evaluating the progress in visibility of the surrounding Class I areas and Connecticut's implementation of the strategies committed to in the SIP.</p> <p>The Department will continue to be involved for the next regional haze planning session through the regional planning organization, MANE-VU.</p>
State Implementation Plan Revision Advisory Committee (SIPRAC)	SIPRAC is a forum which enables face-face communications with the public and other stakeholders for air quality related topics. Established in 1972 and generally meets each month.	Routinely updated. Relevant information can be found on the SIPRAC website .

Adequacy of Connecticut’s Programs Under 110(a)(2)(K)

The Department has two program elements to ensure Connecticut is able to provide for air quality modeling to assess the ambient air quality impact of air pollutant emissions. Table 10 describes those elements and any recent revisions since the last I-SIP submittal. Not Applicable (N/A) indicates there have been no revisions since the last I-SIP submission.

Table 10. Section 110(a)(2)(K) Program Elements Governing Air Quality Modeling

Corresponding Connecticut Program Element Citation	Description	Description if re-submission or new submission
CGS section 22a-5	“The commissioner shall carry out the environmental policies of the state and shall have all powers necessary and convenient to faithfully discharge this duty. In addition to, and consistent with the environment policy of the state, the commissioner shall (a) promote and coordinate management of water, land and air resources to assure their protection, enhancement and proper allocation and utilization; ... (e) provide for the prevention and abatement of all water, land and air pollution including, but not limited to, that related to particulates, gases, dust, vapors, noise, radiation, odors, nutrients and cooled or heated liquids, gases and solids; ...”	N/A
RCSA section 22a-174-3a(i)	Ambient Air Quality Analysis: “The commissioner may request any owner or operator to submit an ambient air quality impact analysis using applicable air quality models and modeling protocols approved by the commissioner.”	The Department updated RCSA Section 22a-174-3a(i), effective April 2014. The EPA published a direct final rule approving said changes in the July 24, 2015 FR (80 FR 43960).

Adequacy of Connecticut’s Programs Under 110(a)(2)(L)

The Department has five program elements to ensure Connecticut has an adequate fee structure and program for permitted sources. Table 11 describes those program elements and any recent revisions since the last I-SIP submittal. Not Applicable (N/A) indicates there have been no revisions since the last I-SIP submission.

Table 11. Section 110(a)(2)(L) Program Elements Governing Permitting Fees

Corresponding Connecticut Program Element Citation	Description	Description if re-submission or new submission
CGS Section 22a-6(a)(10)	“The commissioner may . . . by regulations adopted in accordance with the provisions of chapter 54 require the payment of a fee sufficient to cover . . . the reasonable cost of reviewing and acting upon an application for and monitoring compliance with the terms and conditions of any	N/A

Corresponding Connecticut Program Element Citation	Description	Description if re-submission or new submission
	state or federal permit, license, registration, order, certificate or approval required . . .”	
CGS Section 22a-6f	Fees	N/A
CGS Section 22a-174(g)	“The commissioner shall require, by regulations adopted in accordance with the provisions of chapter 54, the payment of a permit application fee sufficient to cover the reasonable costs of reviewing and acting upon an application for, and monitoring compliance with the terms and conditions of, any state or federal permit, license, order, certificate or approval required pursuant to this section. . . .”	N/A
RCSA section 22a-174-26(c)(1)	“Each person to whom the commissioner issues a permit, or a modification or renewal thereto, under section 22a-174-3a, section 22a- 174-2a and section 22a-174-19 of the Regulations of Connecticut State Agencies shall pay a permit fee as prescribed in the fee schedule in subdivision (2) of this subsection.” The fee schedule is set forth in Table 26-1 of subsection 2.	N/A
RCSA section 22a-174-33(j)(1)(Z)	Requires Title V source to pay all fees due under RCSA section 22a-174-26.	N/A

Adequacy of Connecticut’s Programs Under 110(a)(2)(M)

The Department has two program elements to ensure Connecticut has an adequate process for local political subdivisions to participate in SIP revisions. Table 12 describes those program elements and any recent revisions since the last I-SIP submission. Not Applicable (N/A) indicates there have been no revisions since the last I-SIP submission.

Table 12. Section 110(a)(2)(L) Adequate Process for Local Political Subdivisions to Participate in SIP Revisions.

Corresponding Connecticut Program Element Citation	Description	Description if re-submission or new submission
CGS Section 4-168	Notice prior to action on regulations	N/A
State Implementation Plan Revision Advisory Committee (SIPRAC)	SIPRAC is a forum which enables face-face communications with the public and other stakeholders for air quality related topics. Established in 1972 and generally meets each month.	Routinely updated. Relevant information can be found on the SIPRAC website .