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Karl J. Wagener
Executive Director

DATE: July 31, 2008

TO: Bureau of Air Management
Department of Environmental Protection
ATTN: Michele Totten

FROM: Karl Wagener
Executive Director

RE: SIP Revision, Connecticut PM2.5 NAAQS Attainment Demonstration

The Council on Environmental Quality offers the following comments on the PM2.5 Attainment Demonstration SIP Revision.

It is understood that the current revision addresses anticipated attainment of the 1997 standard, and that no additional control measures are required. However, the hearing notice states that "The emission control strategies described within this SIP not only serve the purpose of demonstrating attainment for the 1997 annual PM2.5 NAAQS but also position Connecticut to achieve goals for greenhouse gases, daily PM2.5 levels, ozone precursors, air toxics, improved visibility and support for environmental justice initiatives." With that in mind, the Council recommends that the Department evaluate an additional control measure, specifically the restriction of traffic-halting highway construction and maintenance work on high-pollution days. Because high levels of PM2.5 are often coincident in the summer months with Ozone Action Days, perhaps the latter could be used as the trigger for restricting road work.

The Council offers this recommendation for two reasons:

- 1) When traffic actually stops (not just slows) for road work, particulate emissions surely increase along with ozone precursors.
- 2) When traffic is backed up – as it was for several miles on I-84 on a recent Ozone Action Day, according to a citizen complaint received by the Council – there is a negative public relations effect that counteracts the Department's efforts to obtain cooperation from individual citizens. Can the Department

expect a person to put off painting his or her house with oil-based paints, or take an inconvenient bus, when one can see cars and trucks backed up for miles on the interstate creating visible emissions and ozone precursors? Except in emergencies, these traffic jams are *unnecessary* contributors to high PM2.5 and ozone levels, given the range of available alternatives.

The Council notes that most of the control technologies in the subject document are aimed at constant, rather than episodic, improvements in emissions. Some, such as the restriction on certain asphalts in summer months, are seasonal. However, several metropolitan areas in the country have implemented restrictions on road construction and maintenance on Ozone Action Days.¹

It should be possible to expand this policy to state contractors and successfully account for anticipated contractual issues that might arise between the contracting agency and the contractors. The Council recommends that such a control measure be evaluated for

1. its potential effect on PM2.5 levels, and
2. its effect on securing voluntary cooperation with the types of actions the Department seeks in its Ozone Action Day fact sheet. Included in this analysis should be an evaluation of the negative effect on such voluntary cooperation of *not* implementing such a control measure.

If the control measure has the potential for positive effects, the Council recommends that it be included and implemented.

Thank you for your consideration of these comments.

¹ The Missouri Department of Transportation, as part of the St. Louis Regional Clean Air Partnership, reduces maintenance operations that may cause traffic congestion on forecasted “red” ozone days. Contractors to the state are urged to voluntarily do the same. In the Georgia counties that comprise metropolitan Atlanta, contractors are encouraged to refrain from paving operations and using heavy equipment on “ozone action days”. In Prince Georges County, Maryland, the Director of Highway Maintenance is directed to reduce the use of heavy equipment on “air quality Action days”. Other examples exist throughout the country of restrictions on painting, spraying, paving and use of heavy equipment by state highway agencies when ozone concentrations are highest.