

10.0 Adequacy Determination for CAA Section 110(a)(1) and (2) Program Infrastructure

Pursuant to CAA Section 110(a)(1) and (2), all States are required to submit plans to implement, maintain and enforce the 1997 PM_{2.5}, including such basic SIP requirements as emissions inventories, monitoring and modeling to assure attainment and maintenance of the standards. On August 15, 2006, the EPA issued guidance to States about compliance with CAA Section 110(a)(2)(D)(i). CTDEP addressed the interstate transport requirements of CAA Section 110(a)(2)(D)(i) for the PM_{2.5} NAAQS.¹ On October 2, 2007, EPA issued guidance on compliance with the remaining non-transport-related requirements of CAA Section 110(a)(2). This explanation addresses such non-transport-related requirements for the PM_{2.5} NAAQS.

CTDEP submitted a PM_{2.5} NAAQS infrastructure adequacy determination to EPA on September 4, 2008². That determination states that Connecticut's SIP will fully satisfy the infrastructure requirements of CAA section 110(a)(1) and (2) for the PM_{2.5} NAAQS with the submission of this final PM_{2.5} attainment demonstration SIP and a required May 2011 SIP revision pertaining to elements of the new source review (NSR) and Prevention of Significant Deterioration (PSD) programs. EPA approved the September 4, 2008 submission as complete on October 22, 2008.³

On July 11, 2008, the U.S. Court of Appeals (D.C. Circuit) vacated the Clean Air Interstate Rule (CAIR). The D.C. Circuit is currently considering requests for rehearing of that decision, making the future of the CAIR program and the anticipated emissions reductions uncertain. CTDEP was subject to CAIR only for the ozone season nitrogen oxides program, and the vacatur is unlikely to have an impact on CTDEP's satisfaction of its interstate transport requirements for PM_{2.5}.⁴ However, should the vacatur stand, CTDEP notes that upwind states will need to evaluate reductions in sulfur dioxide and nitrogen oxide emissions to be certain that those states satisfy their interstate transport obligations.

¹ See 73 FR 25516 (May 7, 2008).

² See http://www.ct.gov/dep/cwp/view.asp?a=2684&q=331234&depNav_GID=1619.

³ See 73 FR 62902.

⁴ EPA's CAIR modeling determined that Connecticut emissions do not exceed the 0.2 microgram per cubic meter average annual threshold by which EPA established a significant PM_{2.5} impact on another state in the projection year 2010. From this, EPA determined that Connecticut emissions do not contribute significantly to downwind nonattainment of the 1997 PM_{2.5} NAAQS. In addition, air quality modeling conducted by CTDEP also concluded that emissions of PM_{2.5} do not significantly contribute to downwind PM_{2.5} nonattainment. See 72 FR 62420 (November 5, 2007).