



Gina McCarthy  
Commissioner

STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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November 18, 2008

Robert W. Varney  
Regional Administrator  
United States Environmental Protection Agency Region 1  
1 Congress Street, Suite 1100  
Boston, MA 02114-2023

Re: Connecticut Attainment Demonstration for the  
1997 Annual Fine Particulate Matter (PM<sub>2.5</sub>) National Ambient Air Quality Standard

Dear Administrator Varney:

Pursuant to Clean Air Act (CAA) Section 172(b) and (c), I am pleased to submit the enclosed State Implementation Plan revision demonstrating Connecticut's attainment of the 1997 annual PM<sub>2.5</sub> national ambient air quality standard (NAAQS). Connecticut's history of monitored compliance with the 1997 PM<sub>2.5</sub> NAAQS and the continuing emissions reductions from the control measures described in the demonstration attest to the Connecticut Department of Environmental Protection's (CTDEP's) successful implementation of air quality improvement strategies in the State and in coordination with other states in the nonattainment area and wider region. CTDEP looks forward to the approval of this submission, allowing us and our counterparts at U.S. Environmental Protection Agency (EPA) to devote our attention to the more complex air quality challenges of the future, such as complying with more stringent ozone and PM<sub>2.5</sub> NAAQS and developing more effective programs to limit emissions from electricity generation.

Although CTDEP recommended that all of the State of Connecticut be designated attainment for the 1997 PM<sub>2.5</sub> NAAQS, EPA combined two counties in Connecticut, Fairfield and New Haven, with counties in downstate New York and northern New Jersey in a single PM<sub>2.5</sub> nonattainment area based on measured violations in New York and New Jersey. Meanwhile, all Connecticut monitors continue to measure compliance with the annual PM<sub>2.5</sub> NAAQS. The enclosed demonstration describes the national, regional and local control measures that have been or will be implemented to further reduce emissions of PM<sub>2.5</sub> and its precursors as well as the modeling and other analyses required to demonstrate the likelihood of reaching attainment throughout the NY-NJ-CT nonattainment area by the mandated 2010 attainment date.

Achieving compliance with the 1997 annual PM<sub>2.5</sub> NAAQS throughout the nonattainment area is contingent on efforts in upwind states to comply with the NAAQS and the transport provisions of the CAA. Emissions in the NY-NJ-CT area are being reduced sufficiently to attain the annual PM<sub>2.5</sub> NAAQS, provided that upwind states comply with CAA Section 110(a)(2)(D) to reduce transported air pollution so as to no longer contribute significantly to nonattainment in

the NY-NJ-CT nonattainment area. EPA's technical support documents for the Clean Air Interstate Rule (CAIR) demonstrate that emissions from numerous upwind states make significant PM<sub>2.5</sub> contributions in the NY-NJ-CT area. EPA must ensure that these upwind states comply with the transport provisions of the CAA, regardless of the eventual fate of the CAIR program.

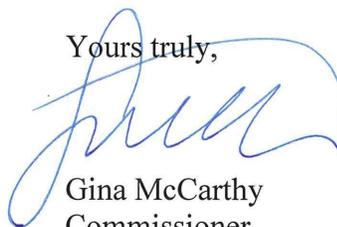
We look to EPA's leadership in the coming months to reach beyond the short-term planning horizons of the 1997 annual PM<sub>2.5</sub> and ozone NAAQS and the emissions reductions of the CAIR program. While important increments of progress are made in complying with those standards, additional long-term strategies to improve air quality are essential to ensure adequate protection of public health. Such long-term strategies should include the most stringent possible non-road and on-road emission standards for all mobile source categories; more stringent national limitations on the sulfur content in fuels, including home heating oil, and effective programs to limit emissions from electricity generation in a manner that also reduces demand. In striving to meet more stringent environmental goals, we will reap rewards in reduced public health costs, new technologies and new American jobs.

To satisfy the administrative requirements of 40 CFR 51, Appendix V and facilitate your review, this submission includes the following documents:

- Annual PM<sub>2.5</sub> Attainment Demonstration Technical Support Document;
- A hearing report including a summary of comments received and responses thereto; and
- An appendix of control measures in support of the demonstration.

If you have any questions or comments regarding the submission, or if CTDEP may be of any assistance in this matter, please contact Anne Gobin at 860-424-3026.

Yours truly,



Gina McCarthy  
Commissioner

cc: David Conroy, EPA Region 1  
Anne R. Gobin, CTDEP