Connecticut 2023 Annual Air Monitoring Network Plan



Connecticut Department of Energy and Environmental Protection Bureau of Air Management

June 2023

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Connecticut 2023 Annual Air Monitoring Network Plan

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Acronyms and Abbreviations

AQI Air Quality Index AQS Air Quality System

BC Black carbon (aethalometer)

CAA Clean Air Act

CBSA Core-based statistical area
CFR Code of Federal Regulations

CO Carbon monoxide

CSN Chemical Speciation Network

DEEP Connecticut Department of Energy and Environmental Protection

DAS Data acquisition system

EMP Enhanced monitoring plan for ozone EPA Environmental Protection Agency

FEM Federal Equivalent Method FRM Federal Reference Method

IMPROVE Interagency Monitoring of Protected Visual Environments

LISTOS Local conditions of temperature and pressure
LISTOS Long Island Sound Tropospheric Ozone Study

MSA Metropolitan statistical area

NAAQS National Ambient Air Quality Standards NCore National core monitoring stations

NOx Nitrogen oxides

NOy Reactive oxides of nitrogen

OAQPS Office of Air Quality Planning and Standards

OTR Ozone Transport Region

PAMS Photochemical assessment monitoring stations

 $\begin{array}{lll} PM_{2.5} & \text{Fine particulate matter (<2.5 microns)} \\ PM_{10} & \text{Respirable particulate matter (<10 microns)} \\ PM_{10\text{-}2.5} & \text{Coarse particulate matter (PM}_{10} - \text{PM}_{2.5}) \\ PWEI & \text{Population-weighted emission index} \end{array}$

QA Quality assurance

QA/QC Quality assurance/quality control SLAMS State and local monitoring stations

SO₂ Sulfur dioxide

SOP Standard operating procedure

STP Standard conditions of temperature and pressure (40 CFR 50.3: 25°C and 760 mm Hg)

UVC Ultra-violet carbon (aethalometer)

VOC Volatile organic compound

Introduction

The Connecticut 2023 Air Monitoring Network Plan (Plan) is prepared by the Connecticut Department of Energy and Environmental Protection (DEEP) in accordance with 40 CFR 58.10. This plan meets the requirement to develop and submit to the Environmental Protection Agency (EPA) an annual air quality monitoring network plan to describe the air monitoring network and propose any planned changes to air quality monitoring sites and monitored air pollutants to occur within 18 months following submittal.

The draft 2023 Network Plan was posted on DEEP's website at <u>DEEP: Air Monitoring Network</u>. Comments from stakeholders and the public were received between May 16, 2023 and June 15, 2023. Public comments and DEEP's responses are included in Appendix A of this Plan.

Background

The Clean Air Act of 1970 (CAA) established the EPA as the principal administrative body to enact regulations to meet the requirements of the CAA and subsequent amendments thereto. One such requirement directed EPA to set primary and secondary air quality standards, known as the National Ambient Air Quality Standards (NAAQS) for the six "criteria pollutants" that Congress determined presented serious negative impacts to human health and welfare. For areas within Connecticut that do not meet a NAAQS, DEEP develops State Implementation Plans (SIPs) to detail the steps to be taken to bring air quality into attainment. Ambient air quality monitoring is essential to track progress towards meeting clean air goals and demonstrate attainment.

While DEEP monitors ambient air quality in Connecticut primarily for comparison with the NAAQS, there are other important objectives to ambient air quality monitoring. This monitoring provides local air quality data to the public, supports air quality forecasting and the Air Quality Index (AQI), supports long-term health assessments and other scientific research, assists with air permitting and identifying long-term air quality trends to gauge effectiveness of air pollution control strategies and serves as an accuracy check on computer-based air quality models. Additionally, emerging air monitoring technology such as small sensors and mobile monitoring platforms can be strategically deployed in historically overburdened communities or other areas of concern to determine localized air quality impacts too granular to be observed by the DEEP's static network.

Network Overview

DEEP currently operates 14 stations in its air-monitoring network (Figure 1) as part of the national State and Local Air Monitoring Stations (SLAMS) network, established under the CAA. In October 2006, EPA instituted a network of core multi-pollutant sites. These sites are known as the National Core (NCore) network, the primary purpose of which is to consolidate monitoring of multiple pollutants at fewer sites for efficiency and cost savings. In addition, the NCore sites provide a comprehensive suite of high-resolution pollutant data for NAAQS compliance assessment, research studies and long-term trends analysis. There are two NCore sites located in Connecticut: Criscuolo Park in New Haven, and Mohawk Mountain in Cornwall. The NCore network is part of the SLAMS network.

Proposed Network Changes

Details of the proposed monitoring network configuration are described in the following site information pages. In addition to infrastructure maintenance and improvements, DEEP proposes the following additions to the monitoring network during the period 2023-2024:

- Assess continuous formaldehyde (HCHO) methods for potential future deployment to one or more coastal ozone sites.
- Support Long Island Sound coastal ozone studies proposed by EPA for 2023.
- Discontinue reporting of PM₁₀ at standard temperature and pressure (STP) from continuous federal equivalent method (FEM) monitors at five sites as of January 1, 2023. Reporting of PM₁₀ at local conditions (LC) and coarse PM (PM_{10-2.5}) will continue from these and all PM₁₀ FEM monitors in the network. Otherwise, no monitors are planned to be discontinued during 2023 2024.



Figure 1: Connecticut DEEP Air Monitoring Network

Monitoring Site Information

The ambient air monitoring sites currently operated by DEEP are listed in the Table 1 below. Detailed information for each monitoring site is provided in a later section of this plan.

Table 1: Monitoring Network Summary

Town	Site	PM2.5 (FRM)	PM2.5 (FRM, collocated)	PM2.5 (continuous FEM)	PM2.5 (continuous FEM, secondary)	PM10/PM10-2.5 (FRM)	PM10/PM10-2.5 (FRM, collocated)	PM10/PM-10.2.5 (continuous FEM)	PM10/PM10-2.5 (cont. FEM, secondary)	PM Speciation (CSN)	PM Speciation (IMPROVE)	PM2.5 Carbon (BC/UVC, continuous)	Ozone	502	03	NO ₂	NO/NOY	HCHO (continuous)	Total Column NO ₂ /HCHO	Traffic Count	Wind Speed	Wind Direction	Temperature	Dew Point / Rel. Humidity	Barometric Pressure	Solar Radiation	Mixing Height
Bridgeport	Roosevelt School		1/6	х				х						х									Х				
Cornwall	Mohawk Mountain	1/3		х				χ†			1/3	Х	Х	Х	х		Х		Х		Х	х	Х	х	Х	Х	
Danbury	Western Connecticut State University	1/6		х				χţ				Х	Х								Х	х	Х		Х		
East Hartford	McAuliffe Park			х				х				Х	х			х					Х	х	Х	Х	Х		
Greenwich	Point Park												х								Х	х	х				
Groton	Fort Griswold			х				χ†					Х										Х				
Hartford	Huntley Place	1/6		Х				Х				Х			Х	х				х	Х	х	Х		Х		
Madison	Hammonasset State Park												Х						Х		Х	х	Х				
Middletown	Connecticut Valley Hospital												Х								Х	х	Х		Х		
New Haven	Criscuolo Park	1/3	1/6	х	х	1/3	1/6	χ†	χ†	1/3		Х	х	х	Х	х	х		х		Х	х	х	х	Х	Х	х
Stafford	Shenipsit State Forest												х								х	х	Х				
Stratford	Stratford Lighthouse												х										Х				
Waterbury	Bank Street			Х				χ†													Х	Х	Х				
Westport	Sherwood Island State Park												х			х		P*	х		Х	х	Х		Х		х
X=Exi	X=Existing P = Planned in 2023/2024 T = Terminated in 2023/2024 † PM10 STP terminated January 1, 2023																										

^{*} Deployment during 2023 - 2024 contingent on availability of continuous HCHO method that meets acceptable QA/QC criteria; additionally, monitor may be located at an alternative site if warranted (e.g., LISTOS activities focused at alternative coastal site).

National Ambient Air Quality Standards (NAAQS)

The EPA's Office of Air Quality Planning and Standards (OAQPS) has set NAAQS for six principal pollutants, known as the criteria pollutants. Table 2, reprinted here from EPA's website, 1 summarizes the current NAAQS compliance requirements for the criteria pollutants.

Table 2: National Ambient Air Quality Standards

Pollutant [links to historical tables of NAAQS reviews]		Primary/ Secondary	Averaging Time	Level	Form		
Carbon Monoxide (CO	Carbon Monoxide (CO)		8 hours	9 ppm	Not to be exceeded more than once per		
			1 hour	35 ppm	year		
Lead (Pb)		primary	Rolling 3-month	$0.15 \mu g/m^{3 (a)}$	Not to be exceeded		
		and	average				
		secondary					
Nitrogen Dioxide (NO	<u>2</u>)	primary	1 hour	100 ppb	98th percentile of 1-hour daily maximum		
					concentrations, averaged over 3 years		
		primary	1 year	53 ppb ^(b)	Annual Mean		
		and					
		secondary					
Ozone (O ₃)		primary	8 hours	0.070 ppm ^(c)	Annual fourth-highest daily maximum 8-		
		and			hour concentration, averaged over 3		
	,	secondary			years		
Particle Pollution	PM _{2.5}	primary	1 year	12.0 μg/m ³	annual mean, averaged over 3 years		
<u>(PM)</u>		secondary	1 year	15.0 μg/m ³	annual mean, averaged over 3 years		
		primary	24 hours	35 μg/m³	98th percentile, averaged over 3 years		
		and					
		secondary					
	PM_{10}	primary	24 hours	150 μg/m³	Not to be exceeded more than once per		
					year on average over 3 years		
		secondary					
Sulfur Dioxide (SO ₂)		primary	1 hour	75 ppb ^(d)	99th percentile of 1-hour daily maximum		
					concentrations, averaged over 3 years		
		secondary	3 hours	0.5 ppm	Not to be exceeded more than once per year		

Notes for Table 2:

^a In areas designated nonattainment for the Pb standards prior to the promulgation of the current (2008) standards, and for which implementation plans to attain or maintain the current (2008) standards have not been submitted and approved, the previous standards (1.5 μg/m3 as a calendar quarter average) also remain in effect.

^d The previous SO₂ standards (0.14 ppm 24-hour and 0.03 ppm annual) will additionally remain in effect in certain areas: (1) any area for which it is not yet 1 year since the effective date of designation under the current (2010) standards, and (2)any area for which implementation plans providing for attainment of the current (2010) standard have not been submitted and approved and which is designated nonattainment under the previous SO₂ standards or is not meeting the requirements of a SIP call under the previous SO₂ standards (40 CFR 50.4(3)), A SIP call is an EPA action requiring a state to resubmit all or part of its State Implementation Plan to demonstrate attainment of the required NAAQS.

^b The level of the annual NO₂ standard is 0.053 ppm. It is shown here in terms of ppb for the purposes of clearer comparison to the 1-hour standard level.

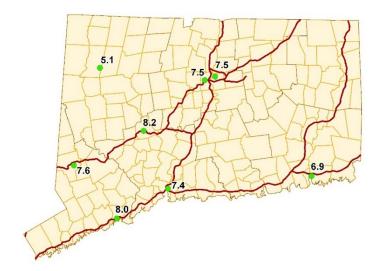
^c Final rule signed October 1, 2015, and effective December 28, 2015. The previous (2008) O3 standards additionally remain in effect in some areas. Revocation of the previous (2008) O3 standards and transitioning to the current (2015) standards will be addressed in the implementation rule for the current standards.

¹ https://www.epa.gov/criteria-air-pollutants/naaqs-table

PM_{2.5} Annual Design Values (2022)

The 2022 annual design values for PM_{2.5}, based on 2020 through 2022 data, are presented in the table and figure below. PM_{2.5} annual design values are calculated using the 3-year average of the respective annual weighted averages, based on daily average PM_{2.5} values.² The current annual PM_{2.5} NAAQS is 12.0 μ g/m³. All Connecticut monitors demonstrate compliance with the design value for the annual PM_{2.5} NAAQS. The design values presented below will be reconciled with EPA's reported 2022 design values in the final Plan.³

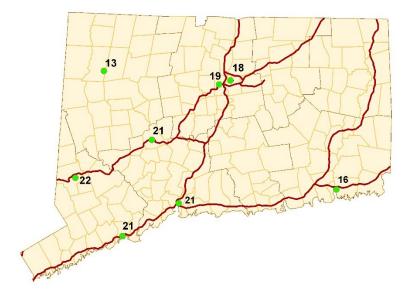
Site	Design Value (μg/m³)
Bridgeport	8.0
Cornwall	5.1
Danbury	7.6
East Hartford	7.5
Groton	6.9
Hartford	7.5
New Haven	7.4
Waterbury	8.2
NAAQS	12.0



PM_{2.5} Daily Design Values (2022)

Daily design values for PM_{2.5} using 2020 through 2022 data are given below. PM_{2.5} daily design values are calculated using the 3-year average of the annual 98th percentile of daily average values². The daily PM_{2.5} NAAQS is 35 μ g/m³. All Connecticut monitors demonstrate compliance with the design value for the 24-hour PM_{2.5} NAAQS. The design values presented below have been reconciled with EPA's reported design values³.

Site	Design Value (µg/m³)
Bridgeport	21
Cornwall	13
Danbury	22
East Hartford	18
Groton	16
Hartford	19
New Haven	21
Waterbury	21
NAAQS	35



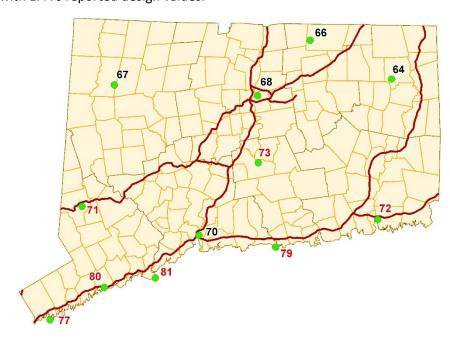
² 40 CFR 50.18 -- National primary ambient air quality standards for PM2.5.

³ Air Quality Design Values | US EPA

Ozone Design Values (2022)

The draft 2022 ozone 8-hour design values for the 2015 NAAQS are given in the table below. Ozone design values are derived by averaging three consecutive annual fourth highest daily maximum 8-hour ozone values.⁴ Based on both the 2008 ozone standard of 0.075 ppm (75 ppb) and the October 2015 revised ozone standard of 0.070 ppm (70 ppb), 8 out of 12 sites indicate nonattainment, shown in red font below. Connecticut's ozone monitoring season is March 1 through ending September 30. The design values presented below are reconciled with EPA's reported design values.

Site	Design Value (ppb)
Abington	64
Cornwall	67
Danbury	71
East Hartford	68
Greenwich	77
Groton	72
Madison	79
Middletown	73
New Haven	70
Stafford	66
Stratford	81
Westport	80
NAAQS	70



CO, SO₂, NO₂, and PM₁₀ NAAQS Comparisons (2022)

Comparisons of ambient levels of CO, SO₂, NO₂, and PM₁₀ to the primary NAAQS are provided in the tables below. The draft design values for each pollutant were derived in accordance with 40 CFR 50. The design values presented will be reconciled with EPA's reported design values before this plan is finalized.

CO NAAQS Comparison*

Site	1-Hr Design Value (ppm)	8-Hr Design Value (ppm)
Cornwall	2.8	0.7
Hartford	1.6	1.1
New Haven	1.6	1.2
NAAQS	35	9

^{*}Design values represent the higher of 2021 and 2022 2nd high values, rounded to the tenths place.

⁴ <u>40 CFR 50.15 -- National primary and secondary ambient air quality standards for ozone.</u>

NO₂ NAAQS Comparison

Site	1-Hr Design Value (ppb)	Annual Design Value (ppb)
East Hartford	38	8
Hartford	41	13
New Haven	45	12
Westport	39	8
NAAQS	100	53

SO₂ NAAQS Comparison

Site	1-Hr Design Value (ppb)
Bridgeport	3
Cornwall	2
New Haven	2
NAAQS	75

PM₁₀ NAAQS Comparison

Site	Daily "Design Value"* (μg/m³ STP)
Bridgeport	45
Cornwall	37
Danbury	47
East Hartford	44
Groton	49
Hartford	59
New Haven	32
Waterbury	67
NAAQS	150

^{*}Daily "design values" given are the fourth high daily concentrations over three years (2020-2022), presented here for comparison to the standard. The actual PM10 design value form is the expected number of exceedance days per year, averaged over three years, which should be less than or equal to one.

Overview of Network Operation

DEEP operates a network of 14 State and Local Air Monitoring Stations (SLAMS) sites throughout Connecticut used for monitoring air pollutants and meteorological parameters. This section contains information about monitoring methods and sampling frequencies, as well as monitoring network maps for each pollutant parameter. Network changes planned before the end of 2023 are discussed as are any anticipated network changes beyond that period.

PM_{2.5} Monitoring

The DEEP PM_{2.5} network consists of Thermo Partisol®-Plus 2025i sequential FRM air samplers with BGI VSCC (RFPS-0498-118/EQPM-020-145) and Teledyne API T640X continuous air samplers (EQPM-0516-238) for NAAQS compliance at eight air monitoring stations. The distribution of PM_{2.5} monitors in the network and their applicability to NAAQS attainment are shown in Table 3. All valid data from designated primary monitors is used in the derivation of NAAQS design values. Additionally, valid data from collocated and supplemental monitors is used to fill in any missing or invalidated

Cornwall Hartford East Hartford Order Danbury New Haven Bridgeport

scheduled or nonscheduled days for the primary monitor data used for computing the design values.

The filter-based FRM monitors operate at a 1-in-6 day frequency, except at the two NCore sites, New Haven and Cornwall, which run on 1-in-3 day schedules. As shown in Table 3, there are four primary PM_{2.5} FRM monitors, so the collocated monitor in New Haven meets the collocation requirement of 15 percent of the network.⁵ The FEM monitor in Bridgeport is designated as primary, collocated with FRM monitor, to meet collocation requirements for the FEM network⁶ and provide precision data. The FEM monitors at Bridgeport Roosevelt School, East Hartford McAuliffe Park, Groton Fort Griswold, and Waterbury Bank Street are designated as primary monitors. The two continuous FEM monitors in New Haven are used for unofficial collocated precision assessment of the Teledyne T640X analyzers.

There are no changes planned for the PM_{2.5} monitoring network during 2023-2024.

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⁵ 40 CFR 58 Appendix A 3.2.3

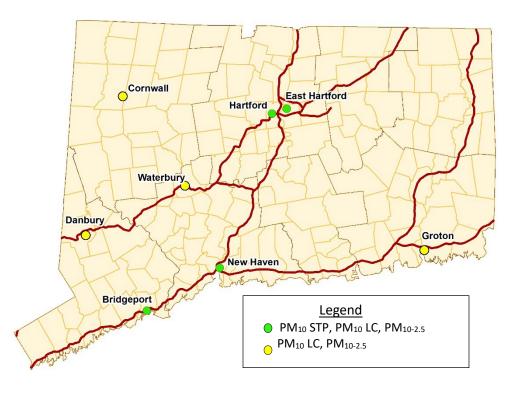
⁶ Ibid.

Table 3: DEEP PM_{2.5} FRM/FEM Network Summary

Site	Primary	Collocated	Supplemental
Bridgeport-Roosevelt Sch.	Continuous FEM	1-in-6 FRM	
Cornwall-Mohawk Mt.	1-in-3 FRM		Continuous FEM
Danbury-WCSU	1-in-6 FRM		Continuous FEM
East Hartford-McAuliffe Pk.	Continuous FEM		
Groton-Ft. Griswold	Continuous FEM		
Hartford-Huntley Pl.	1-in-6 FRM		Continuous FEM
New Haven-Criscuolo Pk.	1-in-3 FRM	1-in-6 FRM	2 Continuous FEMs
Waterbury-Bank St.	Continuous FEM		

PM₁₀/PM_{10-2.5} Monitoring

DEEP operates PM₁₀ monitors for NAAQS regulatory compliance at four sites in its air monitoring network, which include New Haven, Bridgeport, Hartford and East Hartford. Of these, only the New Haven site uses federal reference method (FRM) Thermo Partisol®-Plus 2025i sequential air samplers (RFPS-1298-127) for its primary (1in-3 day schedule) and collocated (1-in-6 day schedule) monitors. The paired PM_{2.5} and PM₁₀ FRM collocated



monitors provide collocated FRM PM $_{10-2.5}$, as requested by EPA as part of a national network of FRM PM $_{10-2.5}$ collocated sites for data quality assessment.

In addition to the FRM PM_{10} monitors at New Haven, DEEP employs federal equivalent method (FEM) Teledyne API T640X PM_{10} continuous PM mass monitors (EQPM-0516-239) at the three remaining NAAQS regulatory compliance sites. The T640X analyzers produce 1-minute and 60-minute average $PM_{2.5}$, PM_{10} (at local (LC) and standard (STP) conditions of temperature and pressure) and $PM_{10-2.5}$ (coarse PM). Coarse PM is defined as thoracic PM having particle aerodynamic diameters between 2.5 and 10 microns, operationally defined as the difference PM_{10} minus $PM_{2.5}$.

DEEP received tentative approval to discontinue reporting of PM_{10} at standard conditions (STP) (parameter code 81102) for all monitors not utilized to meet minimum network design criteria for PM_{10} as delineated in 40 CFR 58 Appendix D (§4.6), which sites are indicated by yellow symbols in the above network map. DEEP will continue reporting PM_{10} at local conditions (LC) (85101) and $PM_{10-2.5}$ (86101) for all current PM_{10} monitors in the network. The monitors that were discontinued for PM_{10} STP reporting as of January 1, 2023, are the continuous FEM monitors at the following sites, with associated EPA Air Quality System (AQS) IDs:

Cornwall Mohawk Mountain 09-005-0005
Danbury WCSU 09-001-1123
Groton Fort Griswold St Park 09-011-0124
New Haven Criscuolo Park 09-009-0027
Waterbury Bank Street 09-006-2123

The sites that will retain PM_{10} STP (81102) reporting include: New Haven Criscuolo Park (FRM, primary and collocated), Bridgeport Roosevelt School (FEM), Hartford Huntley Place (FEM) and East Hartford McAuliffe Park (FEM). Table 4 summarizes the State and Local Air Monitoring Stations (SLAMS) PM_{10} network design criteria and Connecticut's compliance with those requirements. Note that all monitor are classified as having "low concentrations" per Table D-4 of Appendix D to Part 58 (i.e.: levels below 80 percent of NAAQS).

Table 4: Summary of PM₁₀ Monitoring Requirements Criteria for Connecticut

CBSA Code	CBSA Name	Counties included in CBSA	Population (2021 estimates)	Max Value (ug/m³ STP)	Min No. of Monitors	Proposed No. of Monitors
14860	Bridgeport-Stamford- Norwalk	Fairfield	959,768	68	1-2	1
25540	Hartford- East Hartford- Middletown	Hartford, Middlesex, Tolland	1,211,906	63	2-4	2
35300	New Haven-Milford	New Haven	863,700	75	1-2	1
35980	Norwich-New London	New London	265,206	50	0-1	0
49340	Worcester	Worcester, MA; Windham, CT	978,447	52	1-2	1*
45860	Torrington (micropolitan statistical area)	Litchfield	185,000	71	0	0

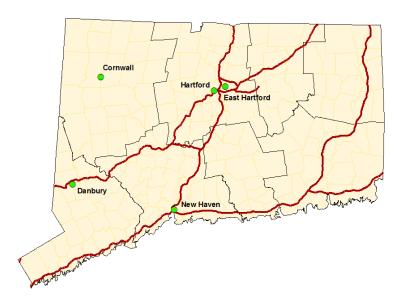
^{*}Current Worcester CBSA monitor operated by Massachusetts DEP

Other than the abovementioned reduction of PM_{10} STP reporting, no changes are planned for the $PM_{10}/PM_{10-2.5}$ monitoring network during 2023-2024

PM Speciation Monitoring

PM_{2.5} chemical speciation measurements are obtained at five sites in the DEEP air monitoring network. These include filter-based daily composite 1-in-3 day samples at the 2 NCore sites, and continuous hourly black carbon at five sites.

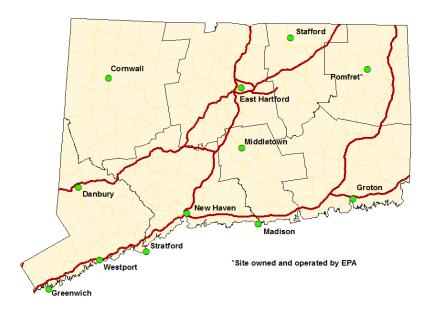
The Interagency Monitoring of Protected Visual Environments (IMPROVE) monitor is located at the Cornwall site and the Chemical Speciation Network (CSN) monitor is at the New Haven Criscuolo Park site. Both sites are operated on the standard EPA 1-in-3 day PM sample schedule and provide 24-hour integrated filter-base measurements.



Black carbon (BC) and ultra-violet channel carbon (UVC), a wood smoke PM surrogate, are monitored at the Criscuolo Park, Cornwall, Hartford, East Hartford McAuliffe Park and Danbury WCSU sites using 7-channel TAPI Model 633 aethalometers. No changes are proposed to the PM speciation network during 2023-2024.

Ozone Monitoring

DEEP operates eleven ozone sites in its air monitoring network for NAAQS compliance. The ozone analyzers at the Cornwall Mohawk Mountain, East Hartford McAuliffe Park and New Haven Criscuolo Park sites are operated year-round, while the remaining sites are operated during the EPA-defined ozone season, which for Connecticut is from March 1 to September 30. In addition to the DEEP's ozone monitoring network, EPA operates an ozone monitor in Abington (Pomfret) during the ozone season as part of its Clean Air Status and Trends (CASTNET) network.



NAAQS compliance ozone monitoring

in the DEEP network is conducted using Teledyne-API Model T400 UV photometric ozone analyzers (method EQOA-992-087). Ozone measurements are sent to the EPA AirNow website for AQI purposes on an hourly basis. DEEP is planning to replace the current network of ozone monitors with new monitors

within the next year or two, as the current units have been in service for approximately ten years. Additionally, DEEP plans to purchase addition new calibrators to comply with EPA's proposed directive that ozone transfer standards must have internal photometers to improve and/or ensure data quality control.

Ozone Enhanced Monitoring Plan

This section consists of the Enhanced Monitoring Plan (EMP) for Connecticut pursuant to 40 CFR sections 58.10 (a) (11) and 58 App D 5(h). These federal regulations, revised under the 2015 National Ambient Air Quality Standards (NAAQS) for ozone, require that any state with any area designated moderate nonattainment or above, or any state within the Ozone Transport Region (OTR), submit an Enhanced Monitoring Plan for ozone (EMP) to the regional office of the Environmental Protection Agency (EPA) no later than October 1, 2019.

Background

Recent ozone (O₃) levels in Connecticut are generally the highest in the eastern U.S, placing some regions of the state in severe nonattainment for the 2008 ozone National Ambient Air Quality Standards (NAAQS). For the 2015 NAAQS, the entire state is designated as moderate nonattainment. These levels largely result from transport of ozone and ozone precursors into Connecticut from the south-west direction along the northeast urban corridor. Modeling and other analyses have shown significant contributions to ozone levels in Connecticut from sources both inside and outside of the greater New York and greater Connecticut nonattainment areas.⁸

DEEP has documented through numerous public comment submissions, communications and even litigation, that EPA9 must fully implement in a timely manner the Clean Air Act "good neighbor" provisions designed to address interstate air pollution transport before Connecticut can reasonably expect to attain either the 2008 or 2015 ozone NAAQS in the Connecticut portion of the Northern New Jersey – New York – Connecticut nonattainment area. DEEP will continue to develop and implement monitoring activities under this EMP to increase the scientific knowledge and understanding of the fate and transport mechanisms of ozone and related ozone precursor pollutants in this region, with specific attention to impacts of the waterland boundary. DEEP expects the data from these enhanced monitoring activities will further clarify the critical role that interstate air pollution transport plays in the Northern New Jersey-New York-Connecticut and Greater Connecticut nonattainment areas and further inform the development and implementation of meaningful national programs that will protect public health and the environment.

The 2015 O_3 NAAQS amended monitoring requirements for the Photochemical Air Monitoring Stations (PAMS) network. Previously, Connecticut operated PAMS volatile organic compounds (VOC) monitors at three sites: East Hartford McAuliffe Park, New Haven Criscuolo Park and Westport Sherwood Island State Park. The revised rule now requires VOC monitoring at all National Core (NCore) monitoring sites in Core-Based Statistical Areas (CBSAs) having populations greater than 1 million. In addition, areas with moderate or higher levels of O_3 nonattainment, as well as all areas within the Ozone Transport Region (OTR), are

⁷ FR 80 65292, October 26, 2015

⁸ FR 82 1733, January 6, 2017

⁹ Greater CT Ozone Attainment Demonstration for the 2008 NAAQS

required to develop Enhanced Monitoring Plans (EMPs). EMPs are required to provide for any additional monitoring beyond the minimum requirements for State and Local Air Monitoring Stations (SLAMS) that would be beneficial in identifying pollutant levels, sources, transport and progress towards attainment. The EMP mandate is intended to provide state and local environmental agencies an opportunity to implement additional monitoring beyond SLAMS that addresses the particular needs of nonattainment areas not explicitly covered under the revised PAMS network.

Strategic Approach and Objectives

State and local environmental agencies have conducted considerable surface monitoring of O_3 , O_3 precursors [e.g.: nitrogen oxides (NO, NO₂, NO_X, NO_Y), volatile organic compounds (VOCs)] and meteorological parameters for many years as part SLAMS and PAMS networks. Current strategies for analyzing O_3 production and transport are typically based on computer modeling with source emissions and meteorological inputs, where high resolution speciated VOC data have limited usefulness in model development or validation.

PAMS monitoring programs also include, in addition to VOCs, three carbonyls that are more typically abundant: formaldehyde, acetaldehyde and acetone. The most significant of these, formaldehyde (HCHO), has been used extensively as a proxy for VOC free radical formation in research and analyses on tropospheric ozone. 10 Given the understanding that O_3 formation may be sensitive to changes in either VOCs (VOC limited regime) or NO_X (NO_X limited regime), as demonstrated with photochemical numeric computer models, the ratio of HCHO to NO_2 from ambient air monitoring during high O_3 events can be key in the validation of computer modeling approaches.

In addition to monitoring strategies aimed at understanding aspects of the regional O_3 chemistry, collecting data that clearly show the spatial variability of surface O_3 concentrations is critical to developing approaches to address non-attainment in Connecticut. DEEP maintains an extensive network of O_3 monitoring sites, particularly along its prevailing upwind (south-southwestern) border to effectively track ozone plumes transported into the state, and these sites consistently show the highest ozone concentrations in Connecticut.

Enhanced Monitoring Activities

DEEP proposed the following activities and resource commitments to meet the objectives for enhanced monitoring under this EMP. DEEP believes these proposed actions meet the requirements of the EMP and will assist DEEP's ongoing efforts toward assessing and understanding ozone nonattainment issues in Connecticut:

- Continued operation of two additional O₃ monitors beyond those minimally required for the State and Local Air Monitoring Station (SLAMS) in the Bridgeport-Stamford-Norwalk Core-Based Statistical Area (CBSA).
- Continued operation of one additional ozone monitor beyond those minimally required in the Hartford-West Hartford-East Hartford CBSA.
- Continued operation of one additional NO₂ monitor, located at the Westport Sherwood Island State Park site.

¹⁰ Jin, X et. al, 2017, Evaluating a Space-Based Indicator of Surface Ozone-NOx-VOC Sensitivity Over Midlatitude Source Regions and Application to Decadal Trends, J. of Geophysical Research, 122 (19) 10,439-10,461

- Assessment of continuous HCHO methods. Contingent upon the availability of an instrument that is capable of operation within demonstrable acceptable quality assurance criteria, DEEP would procure and potentially deploy to a coastal ozone site.
- Continued operation of two ceilometers, at Westport and New Haven, for atmospheric mixing height (boundary layer depth).
- Provision of site access and on-site technical support for EPA's Pandora spectrophotometers, which
 continuously monitor total column NO₂ and HCHO, at four sites (Westport Sherwood Island, New
 Haven Criscuolo Park, Cornwall Mohawk Mountain and Madison Hammonasset State Park).
- Provision of field and data support as needed for EPA's proposed study of ozone fate and transport in the Long Island Sound/coastal Connecticut region proposed for 2023.
- Targeted deployment of a portable O₃ monitor on a public transport ferry operating on Long Island Sound between Bridgeport, CT and Port Jefferson, NY during the 2023 O₃ monitoring season.

DEEP has participated as a joint effort with multiple state and federal agencies, academic researchers, non-governmental organizations and private businesses in the development, planning and implementation of these activities. Figure 2 shows the proposed DEEP monitoring network with EMP activities included.

SLAMS Ozone Monitoring

The ozone monitoring requirements in 40 CFR 58 for state and local air monitoring stations (SLAMS) set minimum numbers of monitors based on ozone NAAQS design values and population for each core-based statistical area (CBSA). In addition, the months of the ozone season are determined for each location, which for Connecticut is March through September. Ozone monitors at National Core (NCore) multipollutant sites operate year-round, using Teledyne API 400E analyzers (reference method ID EQOA-0992-087).

Minimum SLAMS ozone monitoring requirements are provided in Table D-2 of Appendix D, 40 CFR 58. An assessment for the Connecticut network, shown in Table 5 below, gives populations and design values for each CBSA. For both the Bridgeport-Stamford-Norwalk and Hartford-West Hartford-East Hartford CBSAs, a minimum of 2 monitors are required, while there are 4 and 3 monitors in each CBSA, respectively. DEEP proposes to consider these 3 additional monitors as part of this EMP.

Table 5: Summary of Connecticut Ozone Monitoring Network Design Compliance

CBSA	2019 Population	Maximum 2020	No. of required	Current no. of
	(estimated)	design value	SLAMS monitors	SLAMS monitors
Bridgeport-	943,332	82	2	4
Stamford-Norwalk,				
СТ				
Hartford-West	1,204,877	74	2	3
Hartford-East				
Hartford, CT				
New Haven-Milford,	854,757	80	2	2
СТ				
Norwich-New	265,206	73	1	1
London, CT				
Worcester, MA-CT	947,404	69	2	3
Torrington, CT	180,333	65	1	1



Figure 2: Map of EMP-Related Monitoring Locations

SLAMS NO₂ Monitoring

Connecticut meets its regulatory NO₂ monitoring requirements for near road and area-wide monitors with two monitors in the Hartford CBSA. An additional NO₂ monitor required by the Regional Administrators for the protection of sensitive and vulnerable populations is located at the New Haven NCore site. A fourth monitor, located in Westport as part of the enhanced monitoring plan, is intended to provide further data to assist in understanding ozone precursor transport into Connecticut. All NO₂ monitors are Teledyne API T500U cavity attenuated phase shift spectroscopy (CAPS) (reference method ID EQNA-0514-212).

Formaldehyde Monitoring

DEEP intends to continue to assess automated formaldehyde (HCHO) methods for potential procurement and deployment to one or more coastal ozone sites. HCHO measurements would be a complement to NO_2 measurements, as the ratio is an important indicator to assess whether the ozone production regime is VOC

or NO_X limited. Acquisition of a continuous HCHO monitor is contingent on the determination of reliable and practical quality assurance and control methodology.

Upper Air Measurements

The planetary boundary layer (PBL) is the near-surface portion of the troposphere that is generally considered to be well mixed, such that pollutants emitted or created are more or less mixed but confined within the PBL. As such, lower boundary layer heights are associated with higher pollutant concentrations. The different radiative and absorptive capacities of land and water can affect the PBL height, also known as the mixing height (MH). Thus, coastal areas downwind of large water bodies may have higher concentrations than inland levels where the mixing heights are increased. DEEP is operating two ceilometers, at New Haven and Westport, for automated mixing height measurements. The ceilometers are model CL51, manufactured by Vaisala, Oyj, that operate based on optical backscattering by fine particulate aerosols that tend to concentrate just below the mixing height. The New Haven ceilometer has been in operation since November 2015, and the Westport ceilometer was installed in May 2021. DEEP's ceilometer data is available on the University of Maryland Baltimore County's Unified Ceilometer Network (UMBC UCN) at Unified Ceilometer Network.

Long Island Sound Tropospheric Ozone Study

Starting in 2017, and continuing through 2018, DEEP partnered with EPA, the National Aeronautics and Space Administration (NASA), the Northeast States for Coordinated Air Use Management (NESCAUM), other states and academic institutions to conduct field studies of O_3 atmospheric chemistry and transport in the greater New York – Long Island Sound – Connecticut area, with a particular focus on the mechanisms that result in the high O_3 levels observed along the Connecticut coastline. This study, named the Long Island Tropospheric Ozone Study (LISTOS),¹¹ has utilized, in addition to the enhanced monitoring conducted by DEEP as described above (fixed site and ferry O_3 , NO_2 HCHO, MH), ground-based upper air monitoring, investigations into coastal meteorology, intensive upper air chemical and meteorological monitoring during high O_3 events, aircraft-based high resolution remote sensing of trace gases for source identification during high O_3 events, and ground-based episode monitoring of trace NO_2 and VOCs using a mobile laboratory. EPA is planning a follow-up study of coastal Connecticut and Long Island ozone to take place during the summer of 2023, for which DEEP would provide support as personnel resources allow. Additionally, During the summer of 2023, DEEP will operate an O_3 monitor on a ferry that makes several trips each day crossing Long Island Sound between Bridgeport, CT and Port Jefferson, NY.

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¹¹ http://www.nescaum.org/documents/listos/

NO₂ and NO/NO_Y Monitoring

DEEP monitors nitrogen dioxide (NO₂) at four sites in the monitoring network using Teledyne-API Model T500U (EQNA-0514-212), which are capable of directly measuring NO₂ using cavity attenuated phase shift (CAPS) spectroscopy methodology. The NO₂ monitors are maintained at Hartford Huntley Place, East Hartford McAuliffe Park, New Haven Criscuolo Park and Westport Sherwood Island State Park for regulatory compliance.

DEEP also operates two nitrogen oxide/total reactive oxides of nitrogen (NO/NO_Y) TAPI model

Cornwall
NO/NOy
Hartford
NO2
NO2
NO2
NO2
NO2
Westport
NO2, NO/NOy

T200U/501 monitors, at Cornwall Mohawk Mountain and New Haven Criscuolo Park, to comply with NCore requirements. NO_Y is defined as $NO+NO_Z+NO_Z$, where NO_Z represents higher oxides of nitrogen. The major components of NO_Z include nitrous acids [nitric acid (HNO_3), and nitrous acid ($HONO_3$), organic nitrates [peroxyl acetyl nitrate (PAN), methyl peroxyl acetyl nitrate (MPAN), and peroxyl propionyl nitrate, (PPN)], and particulate nitrates.

The NO_2 and NO/NO_Y networks fulfill requirements for NCore and SLAMS monitoring of these parameters. These requirements include: near road and area wide NO_2 monitoring in a core-based statistical area (CBSA) with a population greater than 1,000,000 (Hartford and East Hartford sites, respectively); nationwide NO_2 monitoring for susceptible and vulnerable populations at site selected by EPA (New Haven) and NCore NO/NO_Y monitoring (Cornwall and New Haven). The Westport NO_Z monitor is operated in fulfillment of Connecticut's enhanced monitoring plan.

CO Monitoring

DEEP operates three carbon monoxide (CO) sites in the air monitoring network, as shown on the map at right. All CO samplers are operated year-round and employ TEI 48iQ-TL analyzers (RFCA-0981-054). Of the 3 sites, New Haven and Cornwall satisfy the requirement for CO monitoring at NCore sites and Hartford fulfills requirements for co-location with an NO2 near road monitor in a CBSA having a population greater than 1 million.12 The EPA Regional Administrator has not indicated any locations in the state for additional CO monitoring aimed at susceptible and vulnerable populations.

New Haven

DEEP currently operates three sulfur dioxide (SO₂) sites in the air monitoring network

All samplers are TEI 43iQ-TL SO_2 analyzers (EQSA-0486-060) and are operated year-round. Both 1-hour average and 5-minute block average SO_2 data are validated and reported to EPA.

The network requirements for SO₂ monitoring include NCore, population-weighted emissions index (PWEI) and Regional Administrator-required monitoring.¹³ The Cornwall and New Haven sites satisfy the NCore SO₂ requirement.

SO2 Monitoring



¹² 76 FR 54294; August 31, 2011

¹³ 75 FR 35520; June 22, 2010

Table 6 shows the PWEI values for CBSAs that are within or intersecting Connecticut, based on the 2017 National Emissions Inventory and US Census Bureau 2019 county population estimates. The SO₂ NAAQS monitoring requirements based on PWEI values state that a monitor is required in areas having PWEI values greater than or equal to 5,000 MMperson-tons/yr. Therefore, no PWEI SO₂ monitors are currently required in the state. In addition, the EPA has not indicated a requirement for any additional SO₂ monitors in areas having the potential to violate the NAAQS, areas where vulnerable or sensitive populations may be impacted, or near large sources not conducive to modeling. We also note that the SO₂ primary design values, as provided in an earlier section of this Network Plan, range from 2 to 4 ppb, and are well below the 1-hour NAAQS of 75 ppb.

Although not covered by PWEI requirements, DEEP intends to continue SO_2 monitoring at Bridgeport Roosevelt School at this time, given that it is located in an area of relatively higher concentrations and vulnerable and sensitive populations.

Table 6: Population Weighted Emissions Index (PWEI) Values for Connecticut CBSAs

Core-Based Statistical Area (CBSA)	SO ₂ (tons/yr)	Population (2019 estim.)	PWEI (MMperson- tons/yr)
Bridgeport-Stamford-Norwalk	359	943332	339
Hartford-East Hartford-Middletown	284	1204877	342
Torrington	1	180333	0
New Haven-Milford	90	854757	77
Norwich-New London	109	265206	29
Worcester	273	947404	259

Community-Based Monitoring and Community Outreach Efforts

DEEP is investing resources to support community-based air monitoring efforts and is developing a framework to advise and assist existing and prospective community-led air monitoring projects. This includes providing technical assistance on air quality sensor operation, data management, and interpretation, with plans to assist with grant procurement and project development. DEEP will also build a greater understanding of air quality information at more spatially refined scales, with a focus on environmental justice and overburdened front-line communities. Additionally, DEEP is evaluating low-cost sensors relative to the performance of reference-grade monitors and educating students and the public about air quality issues.

DEEP has installed low-cost PurpleAir sensors at each monitoring station with the goal of advancing our knowledge of the operation and performance of low-cost sensors. DEEP has also developed a pilot sensor loan program to provide air quality sensors plus related technical assistance to community groups, educators, and individuals to help build community-based air monitoring programs. At this time, approximately 15 DEEP-owned PurpleAir sensors have been loaned to schools and community group partners to deploy at schools and neighborhoods in support of their project goals. Saturating the state network with PurpleAir sensors contextualizes the performance of individual sensors, while also characterizing air quality in many different regions of the state.

In addition to PurpleAir sensors, which only measure PM, DEEP is procuring low-cost sensors that monitor both gaseous and particulate criteria air pollutants. The goal of this effort is to evaluate sensor performance relative to regulatory monitors and gain experience with a range of low-cost sensors that may be used to provide technical assistance and support for future community-based monitoring projects.

To achieve these goals, DEEP is participating in the Air Quality Monitoring Workgroup of Northeast and Mid-Atlantic states & DC. This workgroup is facilitated by the Georgetown Climate Center and includes TD Environmental and The Metropolitan Group as primary consultants. This workgroup's goal is to support participating states and community partners in establishing hyperlocal air quality monitoring projects. Workgroup outcomes will include strategies on how to obtain federal funding, utilize data from air monitoring projects to enable actionable change to reduce emissions, and build relationships with community groups overburdened by air pollution. DEEP views this work as a critical component of meeting commitments to environmental equity and environmental justice.

The CT Department of Public Health received an American Rescue Plan (ARP) grant to establish a network of low-cost air sensors to provide real-time measurements of pollutants of concern (PM_{2.5} and ozone) in the distressed communities of Ansonia and Derby, CT. DEEP is a partner on this project and is planning on contributing 10 PurpleAir sensors in addition to technical guidance and support. A goal of the project is to establish a web-based dashboard that will provide information about the effects of poor air quality days on health and link to existing programs to support community health. The project will produce training modules and an education and outreach campaign for community members to raise awareness of air pollutants and assist with long-term, community-led air monitoring. This project is in the initial phases, with efforts expected to increase later in 2023.

DEEP staff continue to engage in professional development efforts to help meet these goals, including EPA-hosted conferences and workshops facilitated by the Georgetown Climate Center on air quality and environmental justice fundamentals. Additionally, DEEP staff have led several workshops on the topic of understanding air quality for teachers and community members with opportunities for Air Quality Flag Program and Sensor Loan Program enrollment. DEEP plans to continue to expand this effort.

Detailed Site Information

The following section presents detailed information for each monitoring site, such as: identification code, location, history, monitored parameters, monitoring objectives, history and descriptive information.

Town – Site: Pomfret – Abington

 County:
 Windham
 Latitude:
 41.840501°

 Address:
 80 Ayers Road
 Longitude:
 -72.010404°

 AQS Site ID:
 09-015-9991
 Elevation:
 209 m (686 ft)

Spatial Scale: Regional Year Established: 1993

Combined Statistical Area: Boston-Worcester-Providence https://goo.gl/maps/u9FJezp64t855AbAA







	PM2.5 (FRM, Collocated)
	PM2.5 (Continuous - FEM)
	PM10/PM-Coarse (FRM)
	PM10/PM-Coarse (FRM, Collocated)
	PM10/PM-Coarse (Continuous)
	Lead-PM10
	Lead-PM10 (Collocated)
	PM Speciation (CSN)
	PM Speciation (IMPROVE)
	PM2.5 Carbon (BC/UVC, Continuous)
Х	Ozone
	502
	00
	Direct NO ₂
	NO/NO ₂ /NOx
	NO/NOy
	VOCs (PAMS)
	Traffic Count
	Wind Speed
	Wind Direction
	Temperature
	Dew Point / Rel. Humidity
	Barometric Pressure
	Solar Radiation

X=Existing



= Planned in 2023/24



= Proposed to terminate in 2023/2024

Site Description: The Abington site is a regional-scale site located in a rural/agricultural area in northeast Connecticut in the town of Pomfret. This site is operated by the National Park Service under the direction of EPA as part of their Clean Air Status and Trends Network (CASTNET). It is located on a hilltop approximately 2.3 km south of State Route (SR) 44 and 0.6 km east of SR 97.

Monitoring Objectives: The Abington monitoring site objective is to collect ozone measurements to assess long-terms trends as part of the national CASTNET network. The site will also be used to determine compliance with the ozone NAAQS in Windham County.

Planned changes for 2023-2024: This site is not under the operational control or purview of DEEP and is included in this Network Plan for informational purposes only.

Town – Site: **Bridgeport – Roosevelt School**

County: **Fairfield** Latitude: 41.170875° Address: 680 Park Avenue Longitude: -73.194759° AQS Site ID: 09-001-0010 Elevation: 7 m (23 ft) Spatial Scale: Neighborhood Year Established: 1982

Combined Statistical Area: New York-Newark https://goo.gl/maps/u9FJezp64t855AbAA







X=Existing P

P = Planned in 2023/24

= Proposed to terminate in 2023/2024

Site Description: The Roosevelt School site is a neighborhood-scale site located in southwestern Connecticut in the city of Bridgeport. This site is located 50 m to the north of I-95 and 200 m to the west of the I-95 and Route 8 interchange. This coastal site is located in a schoolyard and residential neighborhoods are present in every direction of the site. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region I.

Monitoring Objectives: The Bridgeport Roosevelt School monitoring site objectives include collecting continuous FEM PM_{2.5} measurements for compliance purposes and for AQI and forecasting purposes. The PM_{2.5} FEM is designated as the primary sampler to for NAAQS.

Town – Site: Cornwall – Mohawk Mountain

County:LitchfieldLatitude:41.821417°Address:Mohawk MountainLongitude:-73.297333°AQS Site ID:09-005-0005Elevation:505 m (1656 ft)

Spatial Scale: Regional Year Established: 1988

Combined Statistical Area: New York-Newark https://goo.gl/maps/pWXdPsYZTvUt9kjQ8







X=Existing P = Planned in 2023/24 T = Proposed to terminate in 2023/2024

† PM10 STP proposed to terminate January 1, 2023

Site Description: The Mohawk Mountain site is a rural regional-scale site located in northwestern Connecticut in the town of Cornwall. The site is located at the summit of Mohawk Mountain with an elevation of 505 m (1656 ft), and is approximately 17 km to the east of the New York border and 25 km to the south of the Massachusetts border. This site meets all siting requirements and criteria and has been approved by EPA as an NCore site.

Monitoring Objectives: The primary monitoring objectives are to meet NCore requirements for O_3 , CO, SO_2 , NO, NOy, $PM_{2.5}$ FRM, PM_{10} FRM, $PM_{10-2.5}$ FRM, $PM_{2.5}$ speciation, continuous $PM_{2.5}$ and surface meteorology. $PM_{2.5}$ chemical speciation measurements are collected through the IMPROVE network as 1-in-3 day 24-hour samples and by continuous analyzers for fine particulate carbon parameters (BC/UVC). EPA operates a Pandora analyzer for total column NO_2 and HCHO.

Planned changes for 2023-2024: Discontinue continuous (FEM) PM₁₀ STP on January 1, 2023.

Town – Site:Danbury – Western Connecticut State UniversityCounty:FairfieldLatitude:41.39914°Address:White StreetLongitude:-73.44306°AQS Site ID:09-001-1123Elevation:116 m (380 ft)

Spatial Scale: Neighborhood Year Established: 1974

Combined Statistical Area: New York-Newark https://goo.gl/maps/Db7KMS3nDs1tBBV58







77	9/1 PM2.5 (FRM)	PM2.5 (FRM, Collocated)	× PM2.5 (Continuous - FEM)	PM10/PM-Coarse (FRM)	PM10/PM-Coarse (FRM, Collocated)	× PM10/PM-Coarse (FEM, Continuous) [†]	Lead-PM10	Lead-PM10 (Collocated)	PM Speciation (CSN)	PM Speciation (IMPROVE)	× PM2.5 Carbon (BC/UVC, Continuous)	× Ozone	502	00	Direct NO ₂	NO/NO ₂ /NOx	NO/NOy	VOCs (PAMS)	Traffic Count	× Wind Speed	× Wind Direction	× Temperature	Dew Point / Rel. Humidity	× Barometric Pressure	Solar Radiation
	1/6		Х			Х					Х	Х								Х	Х	Х		Х	

Site Description: The Western Connecticut State University (WCSU) site is a neighborhood-scale site for PM_{2.5} and an urban-scale site for O₃, located in western Connecticut in the city of Danbury. This site is located on the top level of a parking garage on the WCSU campus. This site is located approximately 140 m to the southeast of I-84 on White Street. Residential neighborhoods are located in all directions of the site. This site meets all siting requirements and criteria and has been approved by EPA Region I. The downtown area of Danbury has a generally bowl-shaped topography, and therefore is subject to occasional high PM_{2.5} events during the winter.

Monitoring Objectives: The Danbury WCSU monitoring site objectives include collecting $PM_{2.5}$ and $PM_{10}/PM_{10-2.5}$ measurements for NAAQS compliance and for AQI forecasting purposes. Ozone is measured at the Danbury site for compliance assessment and AQI forecast reporting. Black carbon (BC/UVC) aethalometer monitoring is included to track the wood smoke contribution to PM pollution.

Planned changes for 2023-2024: Discontinue continuous (FEM) PM_{10} STP on January 1, 2023.

Town – Site: East Hartford – McAuliffe Park

County: Hartford Latitude: 41.784705° Address: McAuliffe Park Longitude: -72.631518° AQS Site ID: 09-003-1003 Elevation: 15 m (50 ft) Spatial Scale: Neighborhood Year Established: 1981

Combined Statistical Area: Hartford-East Hartford https://goo.gl/maps/1JZNXcdmVkrMDy2cA







Site Description: The McAuliffe Park site is neighborhood-scale site located in central Connecticut in the town of East Hartford. The site is located approximately 120 m to the east of Route 5, 2.0 km to the east of I-91 and 2.5 km to the south of I-291. This site is located 3.7 km to the northeast of the city of Hartford. Residential neighborhoods are located in all directions of this site. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region I.

Monitoring Objectives: The East Hartford McAuliffe Park monitoring site objectives include collecting $PM_{2.5}$ and $PM_{10}/PM_{10\cdot2.5}$ measurements for NAAQS compliance and AQI forecasting purposes using continuous FEM samplers. Ozone is measured at the McAuliffe Park site for compliance assessment and AQI and forecast reporting. The NO_2 monitor meets the requirement for area-wide monitoring in the Hartford-West Hartford-East Hartford CBSA.

Greenwich – Point Park

Town - Site: County: **Fairfield** Latitude: 41.004673° Address: **Tod's Driftway** Longitude: -73.585136° 09-001-0017 AQS Site ID: Elevation: 3 m (10 ft) Urban Year Established: 1978 Spatial Scale:

Combined Statistical Area: New York-Newark https://goo.gl/maps/i8UZ5dMPad6Ao9wm6







PM2.5 (FRM)	PM2.5 (FRM, Collocated)	PM2.5 (Continuous - FEM)	PM10/PM-Coarse (FRM)	PM10/PM-Coarse (FRM, Collocated)	PM10/PM-Coarse (Continuous)	Lead-PM10	Lead-PM10 (Collocated)	PM Speciation (CSN)	PM Speciation (IMPROVE)	PM2.5 Carbon (BC/UVC, Continuous)	× Ozone	502	00	Direct NO ₂	NO/NO ₂ /NO _X	NO/NOy	VOCs (PAMS)	Traffic Count	× Wind Speed	× Wind Direction	× Temperature	Dew Point / Rel. Humidity	Barometric Pressure	Solar Radiation
	=Existin		Р	= Planne				ļ		to term									Α	Α	X			

Site Description: The Greenwich Point Park site is an urban-scale site located is southwestern Connecticut on the Long Island Sound in the town of Greenwich. This is a coastal site located approximately 3.0 km to the southeast and 5.0 km to the northeast of the New York border. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region I.

Monitoring Objectives: The Greenwich Point Park monitoring site objectives include collecting ozone measurements for compliance assessment and AQI and forecast reporting.

Town – Site: Groton – Fort Griswold

Latitude: County: **New London** 41.35348° Address: 141 Smith Street Longitude: -72.07886° AQS Site ID: 09-011-0124 Elevation: 37 m (120 ft) Spatial Scale: Neighborhood Year Established: 2007

Combined Statistical Area: Hartford-East Hartford https://goo.gl/maps/6JqNN2troZpz8pQS7







PM2.5 (FRM)	PM2.5 (FRM, Collocated)	PM2.5 (Continuous - FEM)	PM10/PM-Coarse (FRM)	PM10/PM-Coarse (FRM, Collocated)	PM10/PM-Coarse (FEM, Continuous)†	Lead-PM10	Lead-PM10 (Collocated)	PM Speciation (CSN)	PM Speciation (IMPROVE)	PM2.5 Carbon (BC/UVC, Continuous)	Ozone	502	00	Direct NO ₂	NO/NO ₂ /NOx	NO/NOy	VOCs (PAMS)	Traffic Count	Wind Speed	Wind Direction	Temperature	Dew Point / Rel. Humidity	Barometric Pressure	Solar Radiation
		Χ			Х						Χ										Х			

Site Description: The Fort Griswold site is a neighborhood-scale site located in southeastern Connecticut in the town of Groton. This site is located approximately 1.1 km to the south of I-95 and 0.5 km to the east of the New London Harbor. Residential neighborhoods are located in all directions of this site. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region I.

Monitoring Objectives: The Groton Fort Griswold monitoring site objectives include monitoring of the two key pollutants, ozone and PM_{2.5}, for the southeastern part of Connecticut. Ozone and PM_{2.5} are measured at the Fort Griswold site for compliance assessment and AQI and forecast reporting.

Planned changes for 2023-2024: Discontinue continuous (FEM) PM₁₀ STP on January 1, 2023.

Town – Site: Hartford – Huntley Place

 County:
 Hartford
 Latitude:
 41.771475°

 Address:
 10 Huntley Place
 Longitude:
 -72.679914°

 AQS Site ID:
 09-003-0025
 Elevation:
 57.2 m (187.7 ft)

Spatial Scale: Near Road Year Established: 2013

Combined Statistical Area: Hartford-East Hartford https://goo.gl/maps/MS2HTok92Bx2Y8xV6







PM2.5 (FRM) PM2.5 (FRM, Collocated) PM2.5 (Continuous - FEN PM10/PM-Coarse (FRM) PM10/PM-Coarse (FRM) Lead-PM10 Lead-PM10 PM Speciation (CSN)
1/6 X X X X X X X X X X X X X X X X X X X

Site Description: The Huntley Place site is a near-road site located in north central Hartford. The site, located on the north west side of US I-84, is approximately 0.25 km to the west of the US I-91 corridor and the Founders and Bulkeley Bridges over the Connecticut River. Residential neighborhoods are located to the north, east and west of the site. This site meets siting requirements for a near-road NO₂ site, and has been approved by EPA.

Monitoring Objectives: The primary monitoring objectives for the site are to capture NO₂ concentrations near heavily trafficked roads, to assess area-wide NO₂ concentrations, and to assess NO₂ concentrations for vulnerable and susceptible populations in adjacent neighborhoods. The data will also be used to help determine compliance with the 1-hour NO₂ NAAQS as established by EPA in 2010. This site also collects CO, FRM PM_{2.5}, continuous FEM PM_{2.5} & PM₁₀, BC/UVC and traffic counts.

Town – Site: Madison – Hammonasset State Park

Latitude: County: **New Haven** 41.256803° Water Way, Address: Longitude: -72.553266° **Hammonasset SP** AQS Site ID: 09-009-9002 Elevation: 3 m (10 ft) Spatial Scale: Regional Year Established: 1981

Combined Statistical Area: New York-Newark https://goo.gl/maps/FCeLNH5T51dnU4jb6







|--|

Site Description: The Hammonasset State Park site is a regional-scale site located in central coastal Connecticut in the town of Madison. This site is located approximately 1.5 km to the south of Route 1 and 3.0 km to the south of I-95 on the Long Island Sound. Residential neighborhoods are located primarily to the northeast, north and northwest of the site. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region I.

Monitoring Objectives: The Madison Hammonasset State Park monitoring site objective is to collect ozone measurements for compliance assessment and AQI forecast reporting. A second objective is to collect data in support of the Enhanced Monitoring Plan (page 12 of this Plan) for research on regional ozone transport.

Middletown – Connecticut Valley Hospital

Town - Site: County: Latitude: 41.549863° Address: **CVH-near Battell Hall** Longitude: -72.625971° 09-007-9007 AQS Site ID: Elevation: 58 m (190 ft) Neighborhood Year Established: Spatial Scale: 1980

Combined Statistical Area: Hartford-East Hartford https://goo.gl/maps/FCeLNH5T51dnU4jb6







	PM2.5 (FRM)
	PM2.5 (FRM, Collocated)
	PM2.5 (Continuous - FEM)
	PM10/PM-Coarse (FRM)
	PM10/PM-Coarse (FRM, Collocated)
	PM10/PM-Coarse (Continuous)
	Lead-PM10
	Lead-PM10 (Collocated)
	PM Speciation (CSN)
	PM Speciation (IMPROVE)
	PM2.5 Carbon (BC/UVC, Continuous)
Х	Ozone
	502
	со
	Direct NO ₂
	NO/NO ₂ /NOx
	NO/NOy
	VOCs (PAMS)
	Traffic Count
Х	Wind Speed
Х	Wind Direction
Х	Temperature
	Dew Point / Rel. Humidity
Х	Barometric Pressure
	Solar Radiation

X=Existing

Р

= Planned in 2023/24

= Proposed to terminate in 2023/2024

Site Description: The Middletown Connecticut Valley Hospital (CVH) site is an urban-scale ozone site located in central Connecticut. This site is located approximately 0.2 km to the east of Route 9. Residential neighborhoods are located to the west, north and south of this site. This site meets all siting requirements. DEEP relocated the site within the CVH campus to a shed near Battelle Hall in 2017.

Monitoring Objectives: The CVH monitoring site objective is to collect ozone measurements for compliance assessment and AQI forecast reporting.

Town – Site: New Haven – Criscuolo Park

County: **New Haven** Latitude: 41.30171° Address: 1 James Street Longitude: -72.902880° AQS Site ID: 09-009-0027 Elevation: 3 m (10 ft) Year Established: 2004 Spatial Scale: Neighborhood

Combined Statistical Area: New York-Newark https://goo.gl/maps/T2MUeqoVrqC9Virj7







1/3 PM2.5 (FRM)		× PM2.5 (Continuous - FEM)	PM10/PM-Coarse (FRM)	9/1 PM10/PM-Coarse (FRM, Collocated)	× PM10/PM-Coarse (FEM, Continuous) [†]	× PM2.5 (Cont. FEM, secondary)	× PM10/PM-Coarse (Cont. FEM, secondary)†	1/3	PM Speciation (IMPROVE)	× PM2.5 Carbon (BC/UVC, Continuous)	× Ozone	× 802	8 ×	× Direct NO ₂	× NO/NOy	VOCs (PAMS)	× Total Column NO ₂ /HCOC	× Wind Speed	× Wind Direction	× Temperature	× Dew Point / Rel. Humidity	× Barometric Pressure	× Solar Radiation	X Mixing Height
	χ:	=Fyisting	Р	_	Planned	l in 202	3/2/	Т	- D	ronoseo	to to	minat	o in 20	122/20	24	+ DM	10 STE	nrone	sod to	torm	inata I	วกมวก	/1 202	,

Site Description: The Criscuolo Park site is a neighborhood-scale site located on the western side of the city of New Haven. The site is approximately 0.25 km to the north of the I-95 Quinnipiac River Bridge. The site is approximately 1.0 km to the east of the I-91 and I-95 interchange. Bulk petroleum transfer stations are located 0.3 to 2.0 km to the south of the site. Residential neighborhoods are located to the west, north and east of the site.

Monitoring Objectives: The primary monitoring objectives are to meet NCore requirements for O_3 , CO, SO_2 , $PM_{2.5}$, PM_{10} , $PM_{10-2.5}$, $PM_{10-2.5}$, $PM_{2.5}$ speciation, NO/NO_Y and surface meteorology. NO_2 monitoring is conducted in fulfillment of the requirement for NO_2 monitoring of vulnerable and sensitive populations at 40 nationwide sites selected by the Regional Administrators. $PM_{2.5}$ chemical speciation measurements are collected through the Chemical Speciation Network (CSN) as 1-in-3 day 24-hour samples and by continuous analyzers for fine particulate carbon parameters (BC/UVC).

Planned changes for 2023-2024: Discontinue continuous (FEM) PM₁₀ STP on January 1, 2023.

Town – Site: Stafford – Shenipsit State Forest

 County:
 Tolland
 Latitude:
 41.97569°

 Address:
 172 Chestnut Hill
 Longitude:
 -72.386741°

 AQS Site ID:
 09-013-1001
 Elevation:
 265 m (869 ft)

Spatial Scale: Regional Year Established: 1980

Combined Statistical Area: Hartford-East Hartford https://goo.gl/maps/Nq6NJTnexh3N54FJ8







PM2.5 (FRM) PM2.5 (FRM, Collocated) PM2.5 (Continuous - FEM) PM10/PM-Coarse (FRM, C PM10/PM

Site Description: The Shenipsit State Forest site is a regional-scale site that is located in northern Connecticut in the town of Stafford. The site is approximately 100 m to the south of Route 190, 17 km to the east of I-91 and 12 km to the northwest of I-84. This site is located 34 km to the northeast of the city of Hartford. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region I.

Monitoring Objectives: The Stafford Shenipsit State Forest monitoring site objective is to collect ozone measurements for compliance assessment and AQI forecasting purposes.

Town – Site: Stratford – Lighthouse

Fairfield County: Latitude: 41.151906° **End of Prospect Drive** Address: Longitude: -73.103375° AQS Site ID: 09-001-3007 Elevation: 3 m (10 ft) Spatial Scale: Regional Year Established: 1980

Combined Statistical Area: New York-Newark https://goo.gl/maps/vsTck3vFZm7GmV457







PM2.5 (FRM, Collocated) PM2.5 (Continuous - FEM) PM10/PM-Coarse (FRM) PM10/PM-Coarse (FRM) PM10/PM-Coarse (FRM) Lead-PM10 Lead-PM10 Lead-PM10 Lead-PM10 Lead-PM10 Lead-PM10 Lead-PM10 Lead-PM10 PM Speciation (IMPROVE) NO/NO2/NOX NO/NO2/NOX NO/NO2/NOX NO/NOy VOCs (PAMS) Traffic Count Wind Speed Wind Direction X Temperature Dew Point / Rel. Humidity Barometric Pressure Solar Radiation		PM2.5 (FRM)
PM2.5 (Continuous - FEN PM10/PM-Coarse (FRM) PM10/PM-Coarse (FRM) PM10/PM-Coarse (FRM) PM10/PM-Coarse (FRM) PM3 Speciation (GSN) PM Speciation (GN) PM Speciation (GN		PM2.5 (FRM, Collocated)
PM10/PM-Coarse (FRM, PM10/PM-Coarse (FRM, PM10/PM-Coarse (Conti Lead-PM10 Lead-PM10 Lead-PM10 Lead-PM10 Collocated) PM Speciation (IMPROV PM2.5 Carbon (BC/UVC, CO CO Direct NO2 NO/NO2/NOX NO/NO2/NOX NO/NO3/NOY VOCs (PAMS) Traffic Count Wind Speed Wind Direction X Temperature Dew Point / Rel. Humidi Barometric Pressure Solar Radiation		
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Lead-PM10 Lead-PM10 Lead-PM10 Lead-PM10 (Collocated) PM Speciation (GN) PM Speciation (IMPROV X Ozone SO2 CO Direct NO2 NO/NO2/NOX NO/NO3/NOX NO/NO4 VOCS (PAMS) Traffic Count Wind Direction X Temperature Dew Point / Rel. Humidin Barometric Pressure Solar Radiation		(FRM,
Lead-PM10 Lead-PM10 (Collocated) PM Speciation (IMPROV) PMS.5 Carbon (BC/UVC, CO Direct NO2 NO/NO2/NOX NO/NOY VOCs (PAMS) Traffic Count Wind Speed Wind Direction X Temperature Dew Point / Rel. Humidil Barometric Pressure Solar Radiation		PM10/PM-Coarse (Continuous)
Lead-PM10 (Collocated) PM Speciation (IMPROV) PM2.5 Carbon (BC/UVC, CO Direct NO2 NO/NO2/NOX NO/NOY VOCs (PAMS) Traffic Count Wind Speed Wind Direction Wind Speed Wind Barometric Pressure Solar Radiation		Lead-PM10
PM Speciation (CSN) PM Speciation (IMPROV) PM2.5 Carbon (BC/UVC, CO CO Direct NO2 NO/NO2/NOX NO/NOY VOCS (PAMS) Traffic Count Wind Direction Wind Direction Traffic Count Wind Direction Solar Radiation Solar Radiation		Lead-PM10 (Collocated)
PM Speciation (IMPROVY PM2.5 Carbon (BC/UVC, SO2 CO Direct NO2 NO/NO2/NOX NO/NO9 VOCS (PAMS) Traffic Count Wind Speed Wind Direction X Temperature Dew Point / Rel. Humidil Barometric Pressure Solar Radiation		PM Speciation (CSN)
NOZONE SO2 CO Direct NO2 NO/NO2/NOX NO/NO3/NOX NO/NO4 VOCs (PAMS) Traffic Count Wind Speed Wind Direction X Temperature Dew Point / Rel. Humidif Barometric Pressure Solar Radiation		PM Speciation (IMPROVE)
x x		Carbon (BC/UVC,
X X		Ozone
X		502
X X		ОО
X		Direct NO ₂
		NO/NO ₂ /NOx
		NO/NOY
		VOCs (PAMS)
		Traffic Count
		Wind Speed
		Wind Direction
Dew Point / Rel. Humidity Barometric Pressure Solar Radiation	Х	Temperature
Barometric Pressure Solar Radiation		Dew Point / Rel. Humidity
Solar Radiation		Barometric Pressure
		Solar Radiation

X=Existing

= Planned in 2023/24

= Proposed to terminate in 2023/2024

Site Description: The Stratford Lighthouse site is a regional-scale site located in southwestern Connecticut in the town of Stratford. This is a coastal site that is located 4.5 km to the southeast of I-95 and is directly on the Long Island Sound. This site is approximately 45 km to the northeast of the New York State border. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region I.

Monitoring Objectives: The Stratford Lighthouse monitoring site objective is to collect ozone measurements for compliance assessment and AQI forecasting purposes.

Town – Site: Waterbury – Bank Street

County: **New Haven** Latitude: 41.550465° Address: 440 Bank Street Longitude: -73.043650° 09-009-2123 AQS Site ID: Elevation: 80 m (269 ft) Spatial Scale: Year Established: Neighborhood 1975

Combined Statistical Area: New York-Newark https://goo.gl/maps/GVEjvCjQBviEVBA88







PM2.5 (FRM)	PM2.5 (FRM, Collocated)	PM2.5 (Continuous - FEM)	PM10/PM-Coarse (FRM)	PM10/PM-Coarse (FRM, Collocated)	PM10/PM-Coarse (FEM, Continuous)†	Lead-PM10	Lead-PM10 (Collocated)	PM Speciation (CSN)	PM Speciation (IMPROVE)	PM2.5 Carbon (BC/UVC, Continuous)	Ozone	802	00	Direct NO ₂	NO/NO ₂ /NO _x	NO/NOy	VOCs (PAMS)	Traffic Count	Wind Speed	Wind Direction	Temperature	Dew Point / Rel. Humidity	Barometric Pressure	Solar Radiation
		Χ			Х														Х	X	Х			
	X=Existing P = Planned in 2023/24					Т	= Prop	osed to	termir	nate in	2023	/2024	† P	M10 S	TP pro	posed	to tern	ninate	Januar	y 1, 20	23			

Site Description: The Waterbury site is a neighborhood-scale site located in western Connecticut at Meadow Street and Bank Street in the Naugatuck River Valley. This site is approximately 170 m to the south of I-84, 300 m to the east of Route 8 and 0.75 km to the east of the I-84 and Route 8 interchange. Residential neighborhoods are located in all directions of the site. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region 1.

Monitoring Objectives: The Waterbury Bank Street site monitoring objectives include collecting PM_{2.5}/PM₁₀ FEM measurements for compliance purposes and AQI forecast reporting.

Planned changes for 2023-2024: Discontinue continuous (FEM) PM₁₀ STP on January 1, 2023.

Town – Site: Westport – Sherwood Island State Park

Fairfield Latitude: County: 41.118240° Address: **Sherwood Island Lane** Longitude: -73.336751° 09-001-9003 AQS Site ID: Elevation: 3 m (10 ft) Spatial Scale: Regional Year Established: 1996

Combined Statistical Area: New York-Newark https://goo.gl/maps/9Ux2WXExzNssLSJT9





PM2.5 (FRM)	PM2.5 (FRM, Collocated)	PM2.5 (Continuous - FEM)	PM10/PM-Coarse (FRM)	PM10/PM-Coarse (FRM, Collocated)	PM10/PM-Coarse (Continuous)	Lead-PM10	Lead-PM10 (Collocated)	PM Speciation (CSN)	PM Speciation (IMPROVE)	PM2.5 Carbon (BC/UVC, Continuous)	X Ozone	502	00	× NO ₂	NO/NOy	ج HCHO (Continuous)	× Total Column NO ₂ /HCOC	× Wind Speed	× Wind Direction	× Temperature	Dew Point / Rel. Humidity	Barometric Pressure	Solar Radiation	× Mixing Height
	X=Exi		Р		inned in	2022 "	24	Т		Propos				. 2022	/2024									

^{*} Deployment of HCHO in 2023 contingent on availability of continuous HCHO method that meets acceptable QA/QC criteria; additionally, monitor may be located at an alternative site if warranted (e.g., LISTOS activities focused at alternative coastal site).

Site Description: The Westport Sherwood Island State Park site is a regional-scale site located in southwestern Connecticut. This is a coastal site that is approximately 0.5 km to the south of I-95 on the Long Island Sound. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region 1.

Monitoring Objectives: Ozone is measured at the Westport site for compliance assessment and AQI forecast reporting. Surface level and total column NO₂ and HCHO will be monitored as part of the Enhanced Monitoring Plan. A total column NO₂ (and other trace gas) Pandora analyzer, operated by EPA, was installed in May 2018 to support studies of ozone fate and transport in the Long Island Sound/Coastal Connecticut region.

Appendix A: Network Plan Public Comments and Responses

The following comments were provided by Anne K. McWilliams, Connecticut Air Monitoring Coordinator, EPA New England. No additional comments were received during the public review period. DEEP responses, where appropriate, are given in blue font.

1. Page iii. EPA recommends CT DEEP revisits the list Acronyms and Abbreviations to ensure they are still applicable to the document.

DEEP response: The list has been revised to remove unused items.

2. We acknowledge the following overall proposed changes to your network, on page 2:

Proposed Network Changes:

In addition to infrastructure maintenance and improvements, DEEP proposes the following additions to the monitoring network during the period 2023-2024:

- Assess continuous formaldehyde (HCHO) methods for potential future deployment to one or more coastal ozone sites*.
- Support Long Island Sound coastal ozone studies proposed by EPA for 2023*.
- Discontinue reporting of PM_{10} at standard temperature and pressure (STP) from continuous federal equivalent method (FEM) monitors at five sites as of January 1, 2023. Reporting of PM_{10} at local conditions (LC) and coarse PM ($PM_{10-2.5}$) will continue from these and all PM_{10} FEM monitors in the network.
- * Note: These two proposed changes were initially included in the 2018 Network Plan as part of the Enhanced Monitoring Plan, which was submitted one year in advance as requested by EPA.
 - 3. Pages 5-7. EPA released design values for all criteria pollutants in May 2023 which includes 2022 data for the entire country. All design values represented here are generally consistent with those values. (We also note that for PM₁₀ the standard is based on exceedances.) https://www.epa.gov/air-trends/air-quality-design-values#report As discussed in the narrative, the design values in final plan will be updated as appropriate.

DEEP response: DEEP has verified the 2022 design values with those reported by EPA at the above link.

4. Pages 8. The third paragraph states "The FEM monitors in East Hartford McAuliffe Park, Groton Fort Griswold, Hartford Huntley Place, and Waterbury Bank Street are designated as primary monitors." However, Table 3: DEEP PM_{2.5} FRM/FEM Network Summary lists the 1-in-6 FRM as Primary and the Continuous FEM as Supplemental.

DEEP response: The text on page 8, as quoted above, contains an error in that it should not have listed Hartford Huntley Place FEM PM_{2.5} monitor as primary, as DEEP has designated the 1-in-6 FRM as primary in Table 3 and in the Air Quality System (AQS) site configuration. The text has been corrected to indicate that there are four primary FRM PM_{2.5} monitors, and that Bridgeport, East Hartford, Groton and Waterbury FEM PM_{2.5} monitors are designated as primary monitors.

- 5. Page 11-12. We note and support plans to replace your aging ozone monitors currently used in the network.
- 6. On pages 13-14. We note, acknowledge, and support implementation of CT's EMP as approved by EPA on October 25, 2018, as described below:

Enhanced Monitoring Activities

DEEP proposed the following activities and resource commitments to meet the objectives for enhanced monitoring under this EMP. DEEP believes these proposed actions meet the requirements of the EMP and will assist DEEP's ongoing efforts toward assessing and understanding ozone nonattainment issues in Connecticut:

- Continued operation of two additional O₃ monitors beyond those minimally required for the State and Local Air Monitoring Station (SLAMS) in the Bridgeport-Stamford-Norwalk Core-Based Statistical Area (CBSA).
- Continued operation of one additional ozone monitor beyond those minimally required in the Hartford-West Hartford-East Hartford CBSA.
- Continued operation of one additional NO₂ monitor, located at the Westport Sherwood Island State Park site.
- Targeted deployment of a compact O₃ monitor on one of the Bridgeport, CT Port Jefferson, NY ferries crossing the Long Island Sound to assist scientific research of ozone fate and transport mechanisms in the greater New York-Long Island Sound region. (Note this language is slightly revised from CT DEEP's approved EMP)
- Installation of one HCHO continuous monitor at the Westport site.
- Continued operation of two ceilometers, at Westport and New Haven, for atmospheric mixing height (boundary layer depth).
- Provision of site access and on-site technical support for EPA's Pandora spectrophotometers, which continuously monitor total column NO₂ and HCHO, at four sites (Westport Sherwood Island, New Haven Criscuolo Park, Cornwall Mohawk Mountain and Madison Hammonasset State Park).

DEEP has participated as a joint effort with multiple state and federal agencies, academic researchers, non-governmental organizations and private businesses in the development, planning and implementation of these activities.

We note that the draft 2023 ANP does not include the installation of one HCHO continuous monitor at the Westport site. We suggest the installation of one HCHO continuous monitor at the Westport site as described in the EMP begin in 2023. We also note that the draft 2023 ANP does not discuss the targeted deployment of a compact O_3 monitor on one of the Bridgeport, CT – Port Jefferson, NY ferries crossing Long Island Sound.

DEEP response: DEEP will continue to evaluate the feasibility of commercially available HCHO continuous analyzers, and will reach out to EPA, other state agencies and vendors as part of the process. DEEP's current understanding is that available gaseous standards, which are not EPA-certified protocol standards, have been providing recovery levels around 70 percent against factory calibrated analyzers, which will not allow for reasonably adequate data quality. DEEP welcomes any information and guidance EPA can provide on commercially-available continuous HCHO analyzers that can be properly calibrated in order to produce quality data.

Regarding the Bridgeport, CT – Port Jefferson, NY portable O_3 monitoring, the EMP section has been updated to reflect the targeted deployment of this monitoring during the 2023 monitoring season, which coincides with planned activities this year that extend the LISTOS study efforts.

- 7. Page 22. The site description and monitoring objectives should be revised to detail the Bridgeport Roosevelt School site description and monitoring objectives.
 - DEEP response: The Bridgeport site description and monitoring objectives section, which was inadvertently switched to the text for Cornwall in the draft, has been corrected.
- 8. Page 30. The monitoring objective for The Madison Hammonasset State Park states "A second objective is to collect data in support of the Enhanced Monitoring Plan (Appendix B of this Network Plan)." The draft 2023 ANP does not include an Appendix B.

DEEP response: The reference to the Enhanced Monitoring Plan in the Madison monitoring objectives section has been corrected.

Additional EPA Comment: As you are aware, EPA New England has developed a tool called the Valley Identification Tool that can be helpful to identify valley locations that may be impacted by wood smoke. Given the recent changes to your network and associated resource savings, we think there might be additional opportunities to conduct PM_{2.5} monitoring in CT. We urge you to consider the results of the Valley Identification Tool as they relate to some areas in Connecticut that may be impacted by wood smoke.

DEEP response: DEEP has conducted an analysis of valley locations with the potential for wood smoke impact as part of the 2020 Network Assessment.¹⁴ DEEP plans to revisit the valley analysis and look to partner with individuals or entities for deployment of low-cost sensors in areas with the potential for higher wood smoke levels during the upcoming heating season. Areas indicating recurring high PM levels may be candidates for establishment of fixed-base regulatory PM_{2.5} monitoring sites in the DEEP network. Additionally, DEEP has deployed over 40 PurpleAir sensors throughout the state to include at all air monitoring sites and other state facilities, as well as part of the air sensor loan program to provide additional coverage throughout the state to include valley locations.

¹⁴ Connecticut 2020 Ambient Air Monitoring 5-Year Network Assessment