



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

November 1, 2024

jordana.graveley@ct.gov

Re: Notice of Three Minor Air Quality Regulatory Amendments and Revision to State Implementation Plan

Dear Jordana Graveley,

The Council on Environmental Quality (Council) provides the following comments regarding the Department of Energy and Environmental Protection's (DEEP) proposed regulatory amendments and revision to the State Implementation Plan (SIP).

The Council supports the proposed changes to the air quality regulations that include:

- the addition of the 0.070 parts per million (ppm) ozone standard in section 22a-174-24 of the Regulations of Connecticut State Agencies (RCSA) that would maintain consistency between the Connecticut ambient air quality standards and the Environmental Protection's (EPA) National Ambient Air Quality Standards (NAAQS) for ozone;
- the removal of the "affirmative defense" provision from section 22a-174-33 of the RCSA; and
- the correction to section 22a-174-44 of the RCSA that clarifies the volatile organic compound (VOC) calculation methods available for adhesive and sealant products.

The Council recognizes that the reclassification of Greater Connecticut from "Moderate" to "Serious" nonattainment for the 2015 8-hour ozone NAAQS is due, in large part, to pollutants in the air that originate to the south and west of Connecticut and the Council understands that the ability of Connecticut to achieve attainment is prevented because of such pollutants. The Council also acknowledges that this interstate transport of pollutants is a national issue that should be effectively regulated by the EPA in order for Connecticut to achieve the ozone standards. The Council encourages DEEP to continue its efforts to reduce air pollution and the formation of ground-level ozone, which causes or exacerbates health problems that impact the quality of life for many of Connecticut's residents and leads to increased medical care costs and other economic impacts.

Thank you for your consideration of the Council's comments.

Sincerely,

Paul Aresta
Executive Director

C. Paul Farrell, DEEP - Director of Air Planning & Standards for the Bureau of Air Management