

February 15, 2018

Via Electronic Submission
To the Federal eRulemaking Portal
<http://www.regulations.gov>

U.S. Environmental Protection Agency
Docket ID No. EPA-HQ-OAR-2017-0548

RE: EPA Responses to Certain State Designation Recommendations for the 2015 Ozone National Ambient Air Quality Standards

Dear Administrator Pruitt:

The Department of Energy and Environmental Protection (DEEP) welcomes the opportunity to comment on the United States Environmental Protection Agency's (EPA's) nonattainment designations for the 2015 National Ambient Air Quality Standards (NAAQS) for Ozone published in the Federal Register [[83 FR 651](#)] on January 5, 2018.

We are especially concerned with transport of ozone and its precursors into Connecticut as transport is the overwhelming cause of nonattainment in Connecticut. The unhealthy air quality measured in Connecticut needs to be addressed for public health and economic reasons that unfairly impact Connecticut.

As you know, in its October 1, 2016 designation recommendation [letter](#) to EPA, Connecticut provided suggestions for an expanded nonattainment area to better account for transport. Just as it did in response to our 176A petition for an expanded nonattainment area, EPA repeatedly concludes that there are other tools available to address transport. Unfortunately, none of the tools have adequately addressed transport and enable Connecticut citizens to breathe clean air. This leaves Connecticut totally reliant on upwind states to provide a full and timely transport remedy through their implementation plans.

Connecticut is concerned that EPA's decision resulted in maintenance of the status quo. As such, EPA is setting off on the same path that failed to account for transport within the timeframes required by the CAA for the 2008 standards. EPA explains in its [Technical Support Document](#) (TSD) regarding the designations that, in addition to there being other available tools, it did not use the expanded boundaries recommended by Connecticut because States did not submit consistent approaches to an expanded nonattainment area. It is EPA's role to step in and set the multistate nonattainment area boundaries to effectively address transport when states do not fulfill their obligations or make decisions. EPA should reconsider its analyses and rely on its authority to designate areas which best account for transport rather than looking to

inconsistencies amongst the various state submittals as justification for the status quo. The status quo designations and classification method will not put us on the path to the transformational changes needed to attain the 2015 ozone NAAQS.

We look forward to working with you to achieve success in timely attainment of the standards. Please contact Mr. Richard Pirolli, Director of Air Planning and Standards Division, at (860) 424-3450 with any questions regarding these comments.

Sincerely,



Anne R. Gobin, Chief
Bureau of Air Management

cc: David Conroy