



**REGION 1**

BOSTON, MA 02109

May 10, 2024

Tracy Babbidge  
Chief, Bureau of Air Management  
Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127  
Tracy.Babbidge@ct.gov

Re: Proposed Exceptional Event Demonstration for 2023 Ozone Air Monitoring Data

Dear Ms. Babbidge:

On April 9, 2024, the Connecticut Department of Energy and Environmental Protection (CT DEEP) provided the opportunity for public comment on a proposed exceptional events demonstration for ozone for the exclusion of 8-hr ozone monitoring data in the Greater Connecticut nonattainment area. The proposed demonstration requests data exclusion for April 13–14, June 30–July 1, and July 12, 2023. The public comment period ends on May 10, 2024.

EPA has reviewed CT DEEP's proposed demonstration and is providing comments in the enclosure, in addition to the comments EPA previously provided on the draft demonstration on March 26, 2024. We look forward to the receipt of your final demonstration submittal. Thank you for the opportunity to review and comment on your proposed exceptional event demonstration. Please do not hesitate to contact Michele Kosin at (617) 918-1175 with any questions or concerns.

Sincerely,

Lynne A. Hamjian, Director  
Air and Radiation Division

cc: Pete Babich, CT DEEP  
Paul Farrell, CT DEEP  
Kiernan Wholean, CT DEEP

Enclosure: Comments on Proposed Exceptional Event Demonstration for 2023 Ozone Air Monitoring Data

## Comments on Proposed Exceptional Event Demonstration for 2023 Ozone Air Monitoring Data

1. The final demonstration prepared by CT DEEP should contain supporting information to sufficiently demonstrate a clear causal relationship between the wildfire and prescribed fire events and proposed monitor exceedances on April 13–14 and July 12 dates. CT DEEP should ensure the demonstration provides a weight of evidence approach to support the claim that fire emissions identified from the events caused the exceedances of the ozone NAAQS at the monitoring locations. EPA is offering comments below to further assist CT DEEP in the development of the final demonstration.
2. Ozone formation in CT is a complex problem that is affected by several factors such as interstate transport of ozone and precursors from upwind states, elevated temperatures and solar insolation, and Long Island Sound meteorology. The demonstration should discuss the influence of such compounding factors when assessing the impact of wildfire smoke on the air monitoring locations for selected dates. These factors should be considered and discussed throughout the demonstration for each of the requested monitors and dates. Including supporting information before and after the exceedance days, in the context of the requested day, could also help illustrate the potential impact of smoke during the requested dates.
3. Although 40 CFR part 58, Appendix D defines the ozone monitoring season as beginning March 1, CT DEEP defines the ozone season as beginning on May 1 in the RCSA Section 22a-174-22e as discussed in footnote 1. EPA notes that the May 1 start date in RCSA Section 22a-174-22e results from the NOx Control Program that requires large sources of NOx emissions to utilize controls to reduce emissions during the May 1 – September 30 timeframe to reduce ozone pollution. Since the April 13–14 event is outside of this period for the NOx Control Program, the demonstration could benefit from an explanation of how the proposed April 13–14 event was not impacted by upwind NOx emissions.
4. For the April 13–14, 2023, proposed event, the proposed demonstration discusses prescribed burning at Flint Hills; two major fires on April 6 and 7 in Riley County Kansas (agricultural burn); burn scars showing additional prescribed fires burning out of control; wildfires burning in PA (contained started April 12 and April 18), NY, and NJ; and a map of 8,000 other fires. The demonstration should describe how the agricultural burning and other fires in April of 2023 compared to a similar timeframe in other years.
5. The proposed demonstration contains several figures used to illustrate the potential impact of smoke on the air monitoring locations for the requested dates. CT DEEP should ensure the trends identified for each figure in the proposed demonstration are clearly explained and discuss how each figure supports the requested exclusion dates in the demonstration.