

David B. Conroy, Chief
Air Programs Branch
United States Environmental Protection Agency – Region 1
5 Post Office Square – Suite 100
Boston, MA 02109-3912

Re: State Implementation Plan Revision – 8-Hour Ozone Attainment Demonstration for the Connecticut Portion of the New York-Northern New Jersey-Long Island (NY-NJ-CT) Nonattainment Area.

Dear Mr. Conroy:

In accordance with 40 CFR 51 Appendix V, the enclosed revision to Connecticut's State Implementation Plan (SIP) for air quality is submitted for your approval. The plan includes the attainment demonstration for the 1997 national ambient air quality standard for ozone and quantification of the overwhelming transport that prevents Connecticut from attaining the 2008 standard regardless of our significant efforts toward that goal.

Notice of the proposed SIP revision was published on June 20, 2017. Comments were accepted through July 25th, 2017, the date of public hearing. The included documents for this SIP revision are as follows:

- Enclosure A: Technical Support Document for the 8-Hour Ozone Attainment Demonstration for the Greater Connecticut Area (including statewide MVEBs);
- Enclosure B: Public Notice as published on DEEP's website;
- Enclosure C: Certification of Public Review Process;
- Enclosure D: Hearing Report.

The enclosed Hearing Report details the comments received along with the Department's responses. Comments were received only from EPA. EPA suggests that Connecticut voluntarily seek a reclassification to serious nonattainment. As you appreciate, the ozone NAAQS is a health based standard and the people of Connecticut deserve the same clean air benefits as those living in attainment areas. The magnitude of the transport problem requires timely and decisive action by EPA, not further delays with the commensurate deleterious effects on the health of Connecticut's citizens.

EPA should not rely on CAA reclassification mechanisms without having first fulfilled CAA attainment provisions related to transport and the "good neighbor" provisions under CAA section 110. To do otherwise is to negate the purpose of CAA section 110 and leads to the unduly burdensome and unfair result of requiring an area subject to transport to solve a problem the solution to which lies outside its authority to control. EPA must fulfill its duty and take immediate action to enforce the "good neighbor" provisions of the CAA.

We would like to thank Anne Arnold, Bob McConnell, Ariel Garcia, Rich Burkhart and Donald Dahl of your staff for their assistance in finalizing Connecticut's ozone SIP revisions. Electronic duplicates of this SIP revision have been emailed to those staff and can be found on DEEP's [ozone planning webpage](#).

Sincerely,



Anne R. Gobin
Chief, Bureau of Air Management