



STATE OF CONNECTICUT
EXECUTIVE CHAMBERS

M. JODI RELL
GOVERNOR

August 30, 2004

The Honorable Michael O. Leavitt
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460

Re: Connecticut Designations under the PM_{2.5} National Ambient Air Quality Standard

Dear Administrator Leavitt:

I am writing to you today as a follow-up to our ongoing discussions with the U. S. Environmental Protection Agency (EPA) regarding EPA's assignment later this year of air quality designations for the health-based fine particulate matter standard in Connecticut. Governor Rowland wrote to you on February 20, 2004, recommending that the entire State of Connecticut be designated attainment for fine particulate matter (also known as particulate matter less than 2.5 microns, or PM_{2.5}). Regional Administrator Robert W. Varney's June 29, 2004 response to Governor Rowland indicated EPA's intent to modify some of our recommendations, but he also indicated that additional information would be considered in the process if we could provide that to you by September 1, 2004. This letter transmits that additional information.

Having reviewed all the available information, I am even more convinced that a statewide attainment designation for PM_{2.5} is appropriate for Connecticut. The available information is based on two actions undertaken by our Department of Environmental Protection (DEP), an expansion of the ambient monitoring network for PM_{2.5} in and around New Haven and a thorough analysis of existing and expected air quality levels in Connecticut and the New York City area. Two main points emerge from these actions, as summarized below:

1. The recently acquired monitoring data demonstrate unequivocally that the community in New Haven is not being exposed to PM_{2.5} concentrations above the level of the National Ambient Air Quality Standards. Thus, the City of New Haven should be designated attainment for PM_{2.5}.
2. Atmospheric transport and dispersion modeling conducted by EPA and DEP confirm that emissions from Connecticut are not contributing significantly to measured PM_{2.5} nonattainment in New York City and northern New Jersey. In

fact, EPA's proposed Clean Air Interstate Rule (CAIR) specifically and uniquely excludes Connecticut from the emission reduction program designed to reduce PM2.5 because EPA concluded that Connecticut's emissions do not significantly contribute to the PM2.5 nonattainment measured in New York and New Jersey. Therefore, there is no technical justification for including the Connecticut portion of the New York Combined Statistical Area (CSA) as part of a multi-state PM2.5 nonattainment area having the same CSA boundaries.

Given the above, I urge you to promulgate final PM2.5 designations as attainment for the entire State of Connecticut later this year as scheduled. Technical material resulting in the above conclusions is being transmitted in the two attachments to this letter. It is also available on our Web site at <http://www.dep.state.ct.us/air2/pm25/pm25designation.htm>.

I am also going to suggest an alternative to the approach Regional Administrator Varney suggested in his June 29 letter. That is, if you do not feel the requisite data are currently available to support a PM2.5 attainment designation for the entire State at this time, I respectfully request that you consider the option of an unclassifiable designation for some portion of southwest Connecticut, as provided for under Section 107(d)(1)(A)(iii) of the Clean Air Act. As an alternative to a technically unsupportable nonattainment designation, the unclassifiable determination would allow EPA and DEP to focus resources appropriately, encouraging economic growth while still protecting public health. The reality for Connecticut is that a nonattainment designation will impose significant administrative burdens on the State without achieving any measurable public health benefit.

I will be looking forward to EPA's affirmative response to Connecticut's recommendations. If you would like to discuss these matters further, please contact Arthur J. Rocque, Jr. (DEP Commissioner) or Jane K. Stahl (DEP Deputy Commissioner) at 1-860-424-3001. Thank you.

Sincerely,



M. JODI RELL
Governor

MJR/DJW/djw
Enclosure

cc: R. Varney (EPA Region I)
A. Rocque (CT DEP)
J. Stahl (CT DEP)