

STATE OF CONNECTICUT

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Gina McCarthy Commissioner PHONE: 860-424-3001

July 10, 2008

Robert W. Varney Regional Administrator United States Environmental Protection Agency Region 1 1 Congress Street, Suite 1100 Boston, MA 02114-2023

Re: Connecticut 1997 Annual Fine Particulate Matter (PM_{2.5}) National Ambient Air Quality Standard Attainment Demonstration

Dear Administrator Varney:

In satisfaction of Section 172(b) and (c) of the Clean Air Act (CAA), I am pleased to submit the enclosed draft State Implementation Plan (SIP) revision demonstrating Connecticut's attainment of the 1997 annual PM_{2.5} national ambient air quality standard (NAAQS). This submission testifies to the historical hard work and commitment to air quality improvement of the U.S. Environmental Protection Agency (EPA), the Connecticut Department of Environmental Protection (CTDEP) and the other states in the multistate nonattainment area of which Connecticut is a part.

Only two counties in Connecticut, Fairfield and New Haven, are designated as nonattainment for the annual $PM_{2.5}$ NAAQS. These two counties, along with counties in downstate New York and northern New Jersey, are included by the EPA in a single multistate $PM_{2.5}$ nonattainment area based on measured violations in the New York and New Jersey portions of the area. All Connecticut monitors measure compliance with the annual $PM_{2.5}$ NAAQS, with monitored $PM_{2.5}$ levels in Connecticut exhibiting a general downward trend from 2001 through 2007 as a result of control program implementation.

The remainder of the nonattainment area is anticipated to soon monitor compliant $PM_{2.5}$ levels as well. Air quality modeling of emissions, grown and controlled to 2009, monitored data trends, plus other evidence of forthcoming emission reductions indicate that the previously non-attaining air quality levels in New York City and northern New Jersey will reach compliant levels by the April 2010 attainment date.

In reaching this conclusion, this demonstration includes the following components: a review of Connecticut's historical efforts to manage particulate matter; a summary of ambient air quality monitoring and inventory data trends for Connecticut and the nonattainment area; a catalogue of control measures implemented to reduce emissions of $PM_{2.5}$ and its precursors, including reasonably available control measures, as required by CAA Section 172(c)(1); a reaffirmation of Connecticut's actions with respect to transported emissions in satisfaction of CAA Section 110(a)(2)(D)(i); satisfaction of the contingency measures requirement; transportation conformity requirements to ensure that highway and transit project activities receiving federal funds do not cause or contribute to any new air quality violations or delay timely attainment; documentation of how Connecticut's SIP satisfies the program infrastructure requirements of CAA Section 110(a)(1) and (2) for $PM_{2.5}$; and a summary of all of Connecticut's $PM_{2.5}$ - related commitments to and requests of EPA.

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Despite reporting successful satisfaction of Connecticut's annual PM_{2.5} attainment requirements, this attainment demonstration highlights the ongoing air quality challenges facing Connecticut, the region and the country. Meeting such challenges successfully requires continued in-state efforts, cooperative planning with our sister states in the region and EPA's leadership in regional and national efforts. For example, an imminent challenge in particulate matter planning is attainment of the new revised 24-hour PM_{2.5} NAAQS, revised in 2006. We urge our partners at EPA to adopt additional national and regional emission control programs to ensure that equitable and cost-effective progress is made toward attainment. Such programs should include the most stringent possible non-road and on-road emission standards for all mobile source categories; more stringent national limitations on the sulfur content in fuels, including home heating oil; and effective programs to limit emissions from electric generation.

If you have any questions or comments regarding this enclosed state plan or if the Department may be of any assistance in this matter, please contact Anne Gobin at 860-424-3026.

Yours truly, Gina McCarthy

Commissioner

cc: David Conroy, EPA Region 1 Anne R. Gobin, CTDEP