# **Connecticut 2025 Annual Air Monitoring Network Plan**



# Connecticut Department of Energy and Environmental Protection Bureau of Air Management

July 2025

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## **Acronyms and Abbreviations**

AQI Air Quality Index AQS Air Quality System

BC Black carbon (aethalometer)

CAA Clean Air Act

CAMx Comprehensive Air Quality Model with Extensions

CBSA Core-based statistical area
CFR Code of Federal Regulations

CMAQ Community Multiscale Air Quality Modeling

CO Carbon monoxide

CSN Chemical Speciation Network

DEEP Connecticut Department of Energy and Environmental Protection

DAS Data acquisition system

EMP Enhanced monitoring plan for ozone EPA Environmental Protection Agency

FEM Federal equivalent method FRM Federal reference method

IMPROVE Interagency Monitoring of Protected Visual Environments

LOCal conditions of temperature and pressure
LISTOS Long Island Sound Tropospheric Ozone Study

MSA Metropolitan statistical area

NAAQS National Ambient Air Quality Standards
NCore National core monitoring stations

NO Nitric oxide NO<sub>2</sub> Nitrogen dioxide

NO<sub>X</sub> Nitrogen oxides (NO and NO<sub>2</sub>) NO<sub>Y</sub> Total Reactive oxides of nitrogen

NO<sub>z</sub> Reactive oxides of nitrogen other than NO and NO<sub>2</sub>

OAQPS Office of Air Quality Planning and Standards

OTR Ozone Transport Region

PAMS Photochemical assessment monitoring stations

 $\begin{array}{ll} PM_{2.5} & \text{Fine particulate matter (<2.5 microns)} \\ PM_{10} & \text{Respirable particulate matter (<10 microns)} \\ PM_{10\text{-}2.5} & \text{Coarse particulate matter (}PM_{10}-PM_{2.5}) \\ PWEI & \text{Population-weighted emission index} \end{array}$ 

QA Quality assurance

QA/QC Quality assurance/quality control SLAMS State and local monitoring stations

SO<sub>2</sub> Sulfur dioxide

SOP Standard operating procedure

STP Standard conditions of temperature and pressure (40 CFR 50.3: 25°C and 760 mm Hg)

UVC Ultra-violet carbon (aethalometer)

VOC Volatile organic compound

### Introduction

The Connecticut 2025 Air Monitoring Network Plan (Plan) is prepared by the Connecticut Department of Energy and Environmental Protection (DEEP) in accordance with 40 CFR 58.10. This plan meets the requirement to develop and submit to the Environmental Protection Agency (EPA) an annual air quality monitoring network plan to describe the air monitoring network and identify, for EPA's comment, any planned changes to air quality monitoring sites and monitored air pollutants to occur within 18 months following submittal. Principles of cooperative federalism require the states and EPA to work together to ensure the collection of uniform air quality data across the entire United States. As such, the Plan assumes the continuation of federal funding at current levels. Any recissions or reductions in federal funding will require DEEP to reassess the commitments set out in the plan.

DEEP posted the draft 2025 Plan for review and public comment on its website between May 19, 2025, and June 18, 2025, at <u>DEEP: Air Monitoring Network</u>. Notification of the draft Plan posting was made via announcement to Connecticut's State Implementation Plan Revision Advisory Committee (SIPRAC), DEEP's Bureau of Air Management's standing advisory committee on the state's implementation of the Clean Air Act (CAA). Comments received during the public comment period, along with DEEP's responses, are presented in Appendix B of this Plan.

### Background

EPA is the principal administrative body that enacts regulations to meet the requirements of the CAA and subsequent amendments thereto. One such requirement directed EPA to set primary and secondary air quality standards, known as the National Ambient Air Quality Standards (NAAQS) for the six "criteria pollutants" that Congress determined presented serious negative impacts to human health and welfare. For areas within Connecticut that do not meet a NAAQS, DEEP develops State Implementation Plans (SIPs) to detail the steps to be taken, in accordance with the CAA, to bring air quality into attainment. Ambient air quality monitoring is essential to track progress towards meeting clean air goals and demonstrate attainment.

While DEEP monitors ambient air quality in Connecticut primarily for comparison with the NAAQS, there are other important objectives to ambient air quality monitoring. This monitoring provides local air quality data to the public, supports air quality forecasting and the Air Quality Index (AQI), supports long-term health assessments and other scientific research, assists with air permitting, and helps identify long-term air quality trends to gauge effectiveness of air pollution control strategies, and serves as an accuracy check on computer-based air quality models, including photochemical air quality models (i.e., CMAQ and CAMx) used to predict future ozone levels in attainment demonstration SIPs. Additionally, emerging air monitoring technology such as small sensors and mobile monitoring platforms can be strategically deployed in historically overburdened communities or other sensitive areas of concern to determine localized air quality impacts too granular to be observed by the DEEP's static network.

### **Network Overview**

DEEP currently operates 14 stations in its air-monitoring network (Figure 1) as part of the national State and Local Air Monitoring Stations (SLAMS) network, established under the CAA. In October 2006, EPA instituted a network of core multi-pollutant sites. These sites are known as the National Core (NCore) network, the primary purpose of which is to consolidate monitoring of multiple pollutants at fewer sites for efficiency and cost savings. In addition, the NCore sites provide a comprehensive suite of high-resolution pollutant data for NAAQS compliance assessment, research studies and long-term trends analysis. There are two

NCore sites located in Connecticut: Criscuolo Park in New Haven, and Mohawk Mountain in Cornwall. The NCore network is part of the SLAMS network.

DEEP is in the process of replacing the shelter infrastructure at the New Haven Criscuolo Park NCore site as it has reached the end of its useful life. In anticipation of this infrastructure upgrade, DEEP created a portable, trailer-based, station outfitted with equivalent air monitoring analyzers and equipment to ensure continuous air sampling during this process. The temporary station will begin operating in 2025 and continue into 2026, or until the permanent replacement shed installation is completed and the associated air monitoring equipment is operational.



Figure 1: Connecticut DEEP Air Monitoring Network Map

### **Summary of Planned Network Changes**

While details of the planned monitoring network configuration are described in Table 1 below as well as in the Detailed Site Information section beginning on page 21, DEEP is proposing to implement the following changes:

 Transition from NO/NO<sub>Y</sub> to NO/NO<sub>X</sub> measurements at New Haven Criscuolo Park in 2025 based on data evaluations indicating NO<sub>Z</sub> constitutes an insignificant portion of total reactive nitrogen species. This proposed change is contingent upon receipt from EPA of a waiver for the NCore requirement to monitor NO/NOy.

- Addition of nitric oxide (NO) data collection to existing nitrogen dioxide (NO<sub>2</sub>) monitoring network through the deployment of Teledyne-API Model N500 cavity attenuated phase shift (CAPS) analyzers, which provide concurrent measurement of NO<sub>2</sub>-NO<sub>x</sub>-NO.
- Addition of wind speed and wind direction monitoring at Bridgeport Roosevelt School and Groton Fort Griswold sites.

# **Monitoring Site Information**

The ambient air monitoring sites currently operated by DEEP are listed in Table 1 below. Detailed information for each monitoring site is provided in a later section of this plan.

**Table 1: Monitoring Network Summary** 

Town	Site	PM2.5 (FRM)	PM2.5 (FRM, collocated)	PM2.5 (continuous FEM)	PM2.5 (continuous FEM, secondary)	PM10/PM10-2.5 (FRM)	PM10/PM10-2.5 (FRM, collocated)	PM10/PM-10.2.5 (continuous FEM)	PM10/PM10-2.5 (cont. FEM, secondary)	PM Speciation (CSN)	PM Speciation (IMPROVE)	PM2.5 Carbon (BC/UVC, continuous)	Ozone	502	00	NO <sub>2</sub>	NO/NO <sub>x</sub> *	NO/NOY	Total Column NO <sub>2</sub> /HCHO (Pandora program)	Traffic Count	Wind Speed	Wind Direction	Temperature	Dew Point / Rel. Humidity	Barometric Pressure	Solar Radiation	Mixing Height
Bridgeport	Roosevelt School		1/6	х				х						х							Р	Р	х				
Cornwall	Mohawk Mountain	1/3		х				χ†			1/3	х	х	х	х			х	х		х	х	х	Х	Х	Х	
Danbury	Western Connecticut State University	1/6		Х				χ†				Х	х								Х	х	Х		Х		
East Hartford	McAuliffe Park			х				Х				Х	х			х	Р				Х	х	х	Х	Х		
Greenwich	Point Park												х								Х	х	х				
Groton	Fort Griswold			х				χţ					х								Р	Р	Х				
Hartford	Huntley Place	1/6		Х				Х				Х			Х	х	Р			х	Х	х	Х		Х		
Madison	Hammonasset State Park												х						х		Х	х	х				
Middletown	Connecticut Valley Hospital												х								Х	х	х		Х		
New Haven	Criscuolo Park	1/3	1/6	х	х	1/3	1/6	χ†	X†	1/3		Х	х	х	х	х	Р	Т	х		Х	х	х	х	Х	Х	х
Stafford	Shenipsit State Forest												х								Х	х	Х				
Stratford	Stratford Lighthouse												х										Х				
Waterbury	Bank Street			Х				χ†													Х	х	х				
Westport	Sherwood Island State Park												х			х	Р		х		Х	х	Х		Х		х
X=Exis	sting P = Propo	sed f	for 20	25/20	026	•	Т	= Pr	оро	sed fo	r term	inatio	on in 2	2025/	/2026	,	† Inc	licate	s non	-regu	lator	y PM1	.0 (PN	/10 L	C only	/)	

<sup>\*</sup> NO/NO $_{\scriptscriptstyle X}$  data collection using Teledyne-API Model N500 CAPS NO $_{\scriptscriptstyle X}$  analyzer

## **National Ambient Air Quality Standards (NAAQS)**

EPA has set, and periodically updates, NAAQS for six principal pollutants, known as the criteria air pollutants. Table 2, reprinted here from EPA's website<sup>1</sup> (updated 12/16/2024), summarizes the current NAAQS compliance requirements for the criteria pollutants.

**Table 2: National Ambient Air Quality Standards** 

Pollutant [links to historical tab NAAQS reviews]	les of	Primary/ Secondary	Averaging Time	Level	Form
Carbon Monoxide (CC	<u>))</u>	primary	8 hours	9 ppm	Not to be exceeded more than once per
			1 hour	35 ppm	year
Lead (Pb)		primary and secondary	Rolling 3-month average	0.15 μg/m <sup>3 (a)</sup>	Not to be exceeded
Nitrogen Dioxide (NO	2)	primary	1 hour	100 ppb	98th percentile of 1-hour daily maximum concentrations, averaged over 3 years
		primary and secondary	1 year	53 ppb <sup>(b)</sup>	Annual Mean
Ozone (O <sub>3</sub> )		primary and secondary	8 hours	0.070 ppm <sup>(c)</sup>	Annual fourth-highest daily maximum 8- hour concentration, averaged over 3 years
Particle Pollution	PM <sub>2.5</sub>	primary	1 year	9.0 μg/m <sup>3</sup>	annual mean, averaged over 3 years
<u>(PM)</u>		secondary	1 year	15.0 μg/m <sup>3</sup>	annual mean, averaged over 3 years
		primary and secondary	24 hours	35 μg/m <sup>3</sup>	98th percentile, averaged over 3 years
	PM <sub>10</sub>	primary and secondary	24 hours	150 μg/m³	Not to be exceeded more than once per year on average over 3 years
Sulfur Dioxide (SO <sub>2</sub> )	•	primary	1 hour	75 ppb <sup>(d)</sup>	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years
		secondary	1 year	10 ppb	annual mean, averaged over 3 years

### Notes for Table 2:

<sup>&</sup>lt;sup>a</sup> In areas designated nonattainment for the Pb standards prior to the promulgation of the current (2008) standards, and for which implementation plans to attain or maintain the current (2008) standards have not been submitted and approved, the previous standards (1.5 μg/m3 as a calendar quarter average) also remain in effect.

<sup>&</sup>lt;sup>b</sup> The level of the annual NO<sub>2</sub> standard is 0.053 ppm. It is shown here in terms of ppb for the purposes of clearer comparison to the 1-hour standard level.

<sup>&</sup>lt;sup>c</sup> Final rule signed October 1, 2015, and effective December 28, 2015. The previous (2008) O3 standards additionally remain in effect in some areas. Revocation of the previous (2008) O3 standards and transitioning to the current (2015) standards will be addressed in the implementation rule for the current standards.

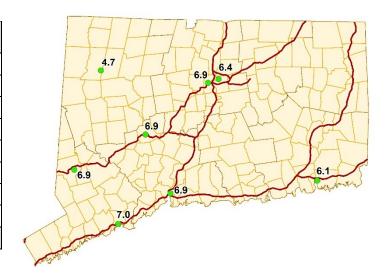
<sup>&</sup>lt;sup>d</sup> The previous SO<sub>2</sub> standards (0.14 ppm 24-hour and 0.03 ppm annual) will additionally remain in effect in certain areas: (1) any area for which it is not yet 1 year since the effective date of designation under the current (2010) standards, and (2) any area for which implementation plans providing for attainment of the current (2010) standard have not been submitted and approved and which is designated nonattainment under the previous SO<sub>2</sub> standards or is not meeting the requirements of a SIP call under the previous SO<sub>2</sub> standards (40 CFR 50.4(3)), A SIP call is an EPA action requiring a state to resubmit all or part of its State Implementation Plan to demonstrate attainment of the required NAAQS.

<sup>&</sup>lt;sup>1</sup> https://www.epa.gov/criteria-air-pollutants/naaqs-table

### PM<sub>2.5</sub> Annual Design Values (2024)

The 2024 annual design values for PM<sub>2.5</sub>, based on 2022 through 2024 data, are presented in the table and figure below. PM<sub>2.5</sub> annual design values were calculated using the 3-year average of the respective annual weighted averages, based on daily average PM<sub>2.5</sub> values, and they have been reconciled with EPA's reported 2024 design values.<sup>2</sup> The annual PM<sub>2.5</sub> NAAQS is 9.0  $\mu$ g/m<sup>3</sup>. All Connecticut monitors demonstrate compliance with the design value for the annual PM<sub>2.5</sub> NAAQS.<sup>3</sup>

Site	Design Value (μg/m³)
Bridgeport	7.0
Cornwall	4.7
Danbury	6.9
East Hartford	6.4
Groton	6.1
Hartford	6.9
New Haven	6.9
Waterbury	6.9
NAAQS	9.0



PM<sub>2.5</sub> Daily Design Values (2024)

Daily design values for PM<sub>2.5</sub> using 2022 through 2024 data are given below. PM<sub>2.5</sub> daily design values were calculated using the 3-year average of the annual 98th percentile of daily average values and have been reconciled with EPA's reported 2024 design values.<sup>2</sup> The daily PM<sub>2.5</sub> NAAQS is 35  $\mu$ g/m³. All Connecticut monitors demonstrate compliance with the design value for the 24-hour PM<sub>2.5</sub> NAAQS.<sup>3</sup>

Site	Design Value (μg/m³)
Bridgeport	19
Cornwall	15
Danbury	20
East Hartford	18
Groton	17
Hartford	19
New Haven	18
Waterbury	18
NAAQS	35



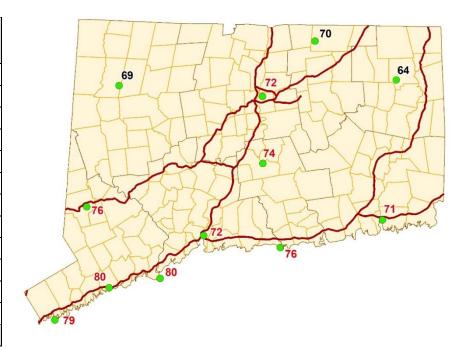
<sup>&</sup>lt;sup>2</sup> 40 CFR 50.18 -- National primary ambient air quality standards for PM2.5.

<sup>&</sup>lt;sup>3</sup> <u>Air Quality Design Values | US EPA;</u> PM<sub>2.5</sub> design values shown are based on data that includes corrected data from DEEP's continuous federal equivalent method analyzers as discussed in the PM<sub>2.5</sub> Network Description section below.

# Ozone Design Values (2024)

2024 ozone 8-hour design values for the 2015 NAAQS are given in the table below. Ozone design values were derived by averaging three consecutive annual fourth highest daily maximum 8-hour ozone values and have been reconciled with EPA's reported 2024 design values.<sup>4</sup> Nine out of twelve sites indicate nonattainment, shown in red font below, with either the 2008 ozone standard of 0.075 ppm (75 ppb) or the more stringent 2015 ozone standard of 0.070 ppm (70 ppb). Connecticut's ozone monitoring season is March 1 through ending September 30, but ozone is monitored annually at three sites.

Site	Design Value (ppb)
Abington	64
Cornwall	69
Danbury	76
East Hartford	72
Greenwich	79
Groton	71
Madison	76
Middletown	74
New Haven	72
Stafford	70
Stratford	80
Westport	80
NAAQS	70



<sup>&</sup>lt;sup>4</sup> <u>40 CFR 50.15 -- National primary and secondary ambient air quality standards for ozone.</u>

# CO, SO<sub>2</sub>, NO<sub>2</sub>, and PM<sub>10</sub> NAAQS Comparisons (2024)

Comparisons of ambient levels of CO,  $SO_2$ ,  $NO_2$ , and  $PM_{10}$  to the primary NAAQS are provided in the tables below. The design values for each pollutant were derived in accordance with 40 CFR 50 and have been reconciled with EPA's reported 2024 design values.

# CO NAAQS Comparison\*

Cito	1-Hr Design	8-Hr Design
Site	Value (ppm)	Value (ppm)
Cornwall	3.2	0.8
Hartford	2.7	1.1
New Haven	2.2	1.3
NAAQS	35	9

<sup>\*</sup>Design values represent the higher of 2023 and 2024 2<sup>nd</sup> high values, rounded to the tenths place.

# SO<sub>2</sub> NAAQS Comparison

Site	1-Hr Design Value (ppb)	Annual Design Value* (ppb)
Bridgeport	4	0
Cornwall	2	0
New Haven	2	0
NAAQS	75	10

<sup>\*</sup>Secondary standard

# NO<sub>2</sub> NAAQS Comparison

Site	1-Hr Design Value (ppb)	Annual Design Value (ppb)
East Hartford	36	7
Hartford	43	13
New Haven	46	11
Westport	42	9
NAAQS	100	53

## PM<sub>10</sub> NAAQS Comparison

Site	3-Yr 4 <sup>th</sup> High Daily Value <sup>*</sup> (μg/m³ STP)	Design Value (Estim. No. of Annual Exceedances)
Bridgeport	91	0.3
East Hartford	63	0
Hartford	65	0
New Haven	29	0
NAAQS	150	1.0

<sup>\*</sup>Three-year fourth high daily concentrations over three years (2022-2024), presented here for comparison to the standard. The actual PM10 design value form is the expected number of exceedance days per year, averaged over three years, which should be less than or equal to 1.0.

### **Overview of Network Operation**

DEEP operates a network of 14 State and Local Air Monitoring Stations (SLAMS) sites throughout Connecticut used for monitoring air pollutants and meteorological parameters. This section contains information about monitoring methods and sampling frequencies, as well as monitoring network maps for each pollutant parameter. Network changes planned before the end of 2025 are discussed as are any anticipated network changes beyond that period.

PM<sub>2.5</sub> Monitoring

# The DEEP PM<sub>2.5</sub> network consists of Thermo Partisol®-Plus 2025i sequential FRM air samplers with BGI VSCC (RFPS-0498-118/EQPM-020-145) and Teledyne-API T640X continuous air samplers (EQPM-0516-238) for NAAQS compliance at eight air monitoring stations. The distribution of PM<sub>2.5</sub> monitors in the network and their applicability to NAAQS attainment are shown in Table 3. All valid data from designated primary monitors is used in the derivation of NAAQS design values. Additionally, valid data from collocated and supplemental monitors is used to

fill in any missing or invalidated

# Cornwall Hartford Hartford Danbury New Haven Bridgeport

scheduled or nonscheduled days for the primary monitor data used for computing the design values.

The filter-based FRM monitors operate at a 1-in-6 day frequency, except at the two NCore sites, New Haven and Cornwall, which run on 1-in-3 day schedules. As shown in Table 3, there are four primary PM<sub>2.5</sub> FRM monitors, so the collocated monitor in New Haven meets the collocation requirement of 15 percent of the network.<sup>5</sup> The FEM monitor in Bridgeport is designated as primary, collocated with FRM monitor, to meet collocation requirements for the FEM network<sup>6</sup> and provide precision data. The FEM monitors at Bridgeport Roosevelt School, East Hartford McAuliffe Park, Groton Fort Griswold, and Waterbury Bank Street are designated as primary monitors. The two continuous FEM monitors in New Haven are used for unofficial collocated precision assessment of the Teledyne T640X analyzers. There are no changes planned for the PM<sub>2.5</sub> monitoring network during 2025-2026.

During 2023, Teledyne API made available a firmware update for the T640/T640X analyzers, which was developed in conjunction with EPA, to provide data with closer alignment with data from reference grade (FRM) samplers. DEEP installed and enabled the data alignment firmware during July-August 2023. For T640X data collected prior to the data alignment implementation, EPA developed and applied a data

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<sup>&</sup>lt;sup>5</sup> 40 CFR 58 Appendix A 3.2.3

<sup>&</sup>lt;sup>6</sup> Ibid.

correction algorithm to address a consistent bias between FEM and FRM data.<sup>7</sup> In accordance with EPA policy, and with DEEP concurrence, the corrected data was used to compute the preliminary PM<sub>2.5</sub> design values shown in this Plan. Unadjusted continuous data from DEEP Teledyne T640x are available in AQS delineated by method code 238.

On March 6, 2024, EPA promulgated a revised NAAQS for particulate matter, in which the annual standard for fine particulate (PM<sub>2.5</sub>) was lowered from 12.0 to 9.0 micrograms per cubic meter.<sup>8</sup> Because the PM<sub>2.5</sub> levels in the Worcester, MA-CT core-based statistical area (CBSA), which includes Windham County, CT, area are within 15 percent of the new annual standard, this area is required to deploy an additional PM<sub>2.5</sub> monitor<sup>9</sup>. The Massachusetts Department of Environmental Protection has agreed to deploy and operate the additional PM<sub>2.5</sub> monitor, which will be located at their existing monitoring site in Uxbridge, MA<sup>10</sup>.

Table 3: DEEP PM<sub>2.5</sub> FRM/FEM Network Summary

Site	Primary	Collocated	Supplemental
Bridgeport-Roosevelt Sch.	Continuous FEM	1-in-6 FRM	
Cornwall-Mohawk Mt.	1-in-3 FRM		Continuous FEM
Danbury-WCSU	1-in-6 FRM		Continuous FEM
East Hartford-McAuliffe Pk.	Continuous FEM		
Groton-Ft. Griswold	Continuous FEM		
Hartford-Huntley Pl.	1-in-6 FRM		Continuous FEM
New Haven-Criscuolo Pk.	1-in-3 FRM	1-in-6 FRM	2 Continuous FEMs
Waterbury-Bank St.	Continuous FEM		

<sup>&</sup>lt;sup>7</sup> 89 FR 42874

<sup>8 89</sup> FR 16202

<sup>&</sup>lt;sup>9</sup> 40 CFR 58 Appendix D 4.7

<sup>&</sup>lt;sup>10</sup> <u>Draft Massachusetts 2025 Air Monitoring Network Plan (pg 13)</u>

# PM<sub>10</sub>/PM<sub>10-2.5</sub> Monitoring

DEEP operates PM<sub>10</sub> monitors for NAAQS regulatory compliance at four sites in its air monitoring network, which include New Haven, Bridgeport, Hartford and East Hartford. Of these, only the New Haven site uses federal reference method (FRM) Thermo Partisol®-Plus 2025i sequential air samplers (RFPS-1298-127) for its primary (1in-3 day schedule) and collocated (1-in-6 day schedule) monitors. The paired PM<sub>2.5</sub> and PM<sub>10</sub> FRM collocated



monitors provide collocated FRM PM $_{10-2.5}$ , as requested by EPA as part of a national network of FRM PM $_{10-2.5}$  collocated sites for data quality assessment.

In addition to the FRM  $PM_{10}$  monitors at New Haven, DEEP employs federal equivalent method (FEM) Teledyne API T640X  $PM_{10}$  continuous PM mass monitors (EQPM-0516-239) at the three remaining NAAQS regulatory compliance sites. The T640X analyzers produce 1-minute and 60-minute average  $PM_{2.5}$ ,  $PM_{10}$  (at local conditions (LC) and standard temperature and pressure (STP) conditions) and  $PM_{10-2.5}$  (coarse PM). Coarse PM is defined as thoracic PM having particle aerodynamic diameters between 2.5 and 10 microns, operationally defined as the difference  $PM_{10}$  minus  $PM_{2.5}$ .

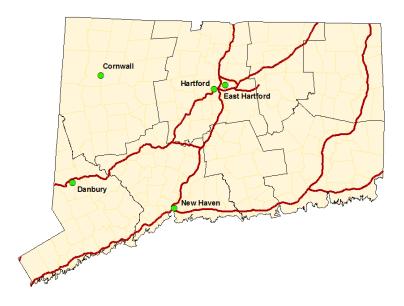
DEEP received approval to discontinue reporting of  $PM_{10}$  at STP for all monitors not utilized to meet minimum network design criteria for  $PM_{10}$  as delineated in 40 CFR 58 Appendix D (§4.6), which sites are indicated by yellow symbols in the above network map. The sites that have retained regulatory  $PM_{10}$  STP reporting include New Haven Criscuolo Park (FRM, primary and collocated), Bridgeport Roosevelt School (FEM), Hartford Huntley Place (FEM) and East Hartford McAuliffe Park (FEM). DEEP will continue reporting  $PM_{10}$  at LC and  $PM_{10-2.5}$  for all current T640X FEM PM monitors in the network.

No changes are planned for the  $PM_{10}/PM_{10-2.5}$  monitoring network during 2025-2026.

### **PM Speciation Monitoring**

PM<sub>2.5</sub> chemical speciation measurements are obtained at five sites in the DEEP air monitoring network. These include filter-based daily composite 1-in-3 day samples at the 2 NCore sites, and continuous hourly black carbon at five sites.

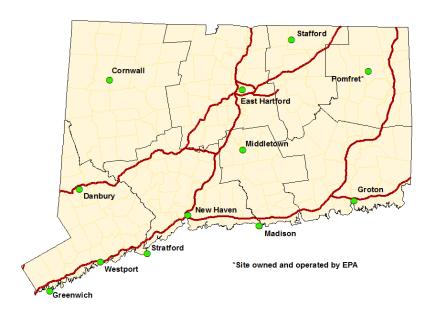
The Interagency Monitoring of Protected Visual Environments (IMPROVE) monitor is located at the Cornwall site and the Chemical Speciation Network (CSN) monitor is at the New Haven Criscuolo Park site. Both sites are operated on the standard EPA 1-in-3 day PM sample schedule and provide 24-hour integrated filter-base measurements.



Black carbon (BC) and ultra-violet channel carbon (UVC), a wood smoke PM surrogate, are monitored at the Criscuolo Park, Cornwall, Hartford, East Hartford McAuliffe Park and Danbury WCSU sites using 7-channel TAPI Model 633 aethalometers. No changes are proposed to the PM speciation network during 2025-2026.

### **Ozone Monitoring**

DEEP operates eleven ozone sites in its air monitoring network for NAAQS compliance. The ozone analyzers at the Cornwall Mohawk Mountain, East Hartford McAuliffe Park and New Haven Criscuolo Park sites are operated year-round, while the remaining sites are operated during the EPA-defined ozone season, which for Connecticut is from March 1 to September 30. In addition to the DEEP's ozone monitoring network, EPA operates an ozone monitor in Abington (Pomfret) during the ozone season as part of its Clean Air Status and Trends (CASTNET) network.



### NAAQS compliance ozone monitoring

in the DEEP network is conducted using Teledyne-API Model N400 UV photometric ozone analyzers (method EQOA-0992-087). In 2024 DEEP replaced the aging network of Teledyne-API Model T400 UV photometric ozone analyzers with Teledyne-API Model N400 UV photometric ozone analyzers. Additionally, all ozone analyzers are paired with Teledyne-API Model T700U trace-level dilution calibrators at multiple gaseous pollutant sites or Teledyne-API Model T703 photometric ozone calibrators at sites where ozone is

the only gas measured. These calibrators utilize internal photometers to ensure data quality control and to comply with the current EPA ozone transfer standard directive<sup>11</sup>. Additionally, for 2025 DEEP will commence conducting field calibrations using Teledyne-API Model T753U portable trace-level ozone calibrators with internal photometer feedback in alignment with the technical directive. DEEP has conducted ozone annual performance evaluations with photometer-equipped T753U calibrators since 2023.

### **Ozone Enhanced Monitoring**

This section details Connecticut's Enhanced Monitoring Plan (EMP) for ozone pursuant to 40 CFR sections 58.10 (a) (11) and 58 App D 5(h). These federal regulations, revised under the 2015 National Ambient Air Quality Standards (NAAQS) for ozone, <sup>12</sup> require that any state with any area designated moderate nonattainment or above, or any state within the Ozone Transport Region (OTR), submit an EMP for ozone to the regional office of the Environmental Protection Agency (EPA) no later than October 1, 2019. DEEP submitted its plan in July 2018. Subsequently, the EMP has been incorporated into the annual air monitoring network plan.

### Background

Recent ozone (O<sub>3</sub>) levels in Connecticut are generally the highest in the eastern U.S, placing three of Connecticut's eight counties in severe nonattainment for the 2008 ozone National Ambient Air Quality Standards (NAAQS). For the 2015 NAAQS, the entire state is designated as serious nonattainment. These levels largely result from transport of ozone and ozone precursors into Connecticut from the south-west direction along the northeast urban corridor. Modeling and other analyses have shown significant contributions to ozone levels in Connecticut from sources outside of the greater New York and greater Connecticut nonattainment areas.<sup>13</sup>

DEEP has documented through numerous public comment submissions, communications and even litigation, that EPA<sup>14</sup> must fully implement in a timely manner the Clean Air Act "good neighbor" provisions designed to address interstate air pollution transport before Connecticut can reasonably expect to attain either the 2008 or 2015 ozone NAAQS in the Connecticut portion of the Northern New Jersey – New York – Connecticut nonattainment area. DEEP will continue to develop and implement monitoring activities under this EMP to increase the scientific knowledge and understanding of the fate and transport mechanisms of ozone and related ozone precursor pollutants in this region, with specific attention to impacts of the waterland boundary. DEEP expects the data from these enhanced monitoring activities will further clarify the critical role that interstate air pollution transport plays in the Northern New Jersey-New York-Connecticut and Greater Connecticut nonattainment areas and further inform the development and implementation of meaningful national programs, including especially national mobile source control programs, that will protect public health and the environment.

<sup>&</sup>lt;sup>11</sup> Transfer Standards for Calibration of Air Monitoring Analyzers for Ozone-Technical Assistance Document

<sup>&</sup>lt;sup>12</sup> FR 80 65292, October 26, 2015

<sup>&</sup>lt;sup>13</sup> FR 82 1733, January 6, 2017

<sup>&</sup>lt;sup>14</sup> Greater CT Ozone Attainment Demonstration for the 2008 NAAQS

In addition to the impacts of interstate air pollution transport, the mobile source sector, including both onroad and non-road sources, combine to contribute most of the air pollution emitted within Connecticut. EPA must also address the impact of these 'federal sources' that are beyond Connecticut's regulatory authority.

The 2015 O<sub>3</sub> NAAQS amended monitoring requirements for the Photochemical Air Monitoring Stations (PAMS) network. Previously, Connecticut operated PAMS volatile organic compounds (VOC) monitors at three sites: East Hartford McAuliffe Park, New Haven Criscuolo Park and Westport Sherwood Island State Park. The revised rule now requires VOC monitoring at all National Core (NCore) monitoring sites in Core-Based Statistical Areas (CBSAs) having populations greater than 1 million. In addition, areas with moderate or higher levels of O<sub>3</sub> nonattainment, as well as all areas within the Ozone Transport Region (OTR), are required to develop EMPs. EMPs are required to provide for any additional monitoring beyond the minimum requirements for State and Local Air Monitoring Stations (SLAMS) that would be beneficial in identifying pollutant levels, sources, transport and progress towards attainment. The EMP mandate is intended to provide state and local environmental agencies an opportunity to implement additional monitoring beyond SLAMS that addresses the needs of nonattainment areas not explicitly covered under the revised PAMS network.

# **Strategic Approach and Objectives**

State and local environmental agencies have conducted considerable surface monitoring of  $O_3$ ,  $O_3$  precursors [e.g.: nitrogen oxides (NO, NO<sub>2</sub>, NO<sub>X</sub>, NO<sub>Y</sub>), volatile organic compounds (VOCs)] and meteorological parameters for many years as part SLAMS and PAMS networks. Current strategies for analyzing  $O_3$  production and transport are typically based on computer modeling with source emissions and meteorological inputs, where high resolution speciated VOC data have limited usefulness in model development or validation.

PAMS monitoring programs also include, in addition to VOCs, three carbonyls that are more typically abundant: formaldehyde, acetaldehyde and acetone. The most significant of these, formaldehyde (HCHO), has been used extensively as a proxy for VOC free radical formation in research and analyses on tropospheric ozone. <sup>15</sup> Given the understanding that  $O_3$  formation may be sensitive to changes in either VOCs (VOC limited regime) or  $NO_X$  ( $NO_X$  limited regime), as demonstrated with photochemical numeric computer models, the ratio of HCHO to  $NO_2$  from ambient air monitoring during high  $O_3$  events can be key in the validation of computer modeling approaches.

In addition to monitoring strategies aimed at understanding aspects of the regional  $O_3$  chemistry, collecting data that clearly show the spatial variability of surface  $O_3$  concentrations is critical to developing approaches to address non-attainment in Connecticut. DEEP maintains an extensive network of  $O_3$  monitoring sites, particularly along its prevailing upwind (south-southwestern) border to effectively track ozone plumes transported into the state, and these sites consistently show the highest ozone concentrations in Connecticut.

# **Enhanced Monitoring Activities**

Contingent on the availability of federal funding, DEEP plans the following activities and resource commitments to meet the objectives for this EMP:

<sup>&</sup>lt;sup>15</sup> Jin, X et. al, 2017, Evaluating a Space-Based Indicator of Surface Ozone-NOx-VOC Sensitivity Over Midlatitude Source Regions and Application to Decadal Trends, J. of Geophysical Research, 122 (19) 10,439-10,461

- Continued operation of two additional O₃ monitors beyond those minimally required for the State and Local Air Monitoring Station (SLAMS) in the Bridgeport-Stamford-Norwalk Core-Based Statistical Area (CBSA).
- Continued operation of one additional ozone monitor beyond those minimally required in the Hartford-West Hartford-East Hartford CBSA.
- Continued operation of one additional NO<sub>2</sub> monitor, located at the Westport Sherwood Island State Park site.
- Assessment of continuous HCHO methods. Contingent upon the availability of an instrument that is capable of operation within acceptable and demonstrable quality assurance criteria, DEEP would procure and potentially deploy to a coastal ozone site.
- Continued operation of two ceilometers, at Westport and New Haven, for atmospheric mixing height (boundary layer depth).
- Provision of site access and on-site technical support for EPA's Pandora spectrophotometers, which continuously monitor total column NO₂ and HCHO, at four sites (Westport Sherwood Island, New Haven Criscuolo Park, Cornwall Mohawk Mountain and Madison Hammonasset State Park).

In addition to meeting the requirements of the 40 CFR 58, DEEP believes these actions will also assist ongoing efforts toward assessing and understanding ozone nonattainment in Connecticut.

Figure 2 shows the DEEP monitoring network with EMP activities included.

# **SLAMS Ozone Monitoring**

The ozone monitoring requirements in 40 CFR 58 for state and local air monitoring stations (SLAMS) set minimum numbers of monitors based on ozone NAAQS design values and population for each core-based statistical area (CBSA). In addition, the months of the ozone season are determined for each location, which for Connecticut is March through September. Ozone monitors at National Core (NCore) multipollutant sites operate year-round.

Minimum SLAMS ozone monitoring requirements are provided in Table D-2 of Appendix D, 40 CFR 58. For both the Bridgeport-Stamford-Norwalk and Hartford-West Hartford-East Hartford CBSAs, a minimum of 2 monitors are required, while there are 4 and 3 monitors in each CBSA, respectively. DEEP proposes to continue these 3 additional monitors as part of this EMP.

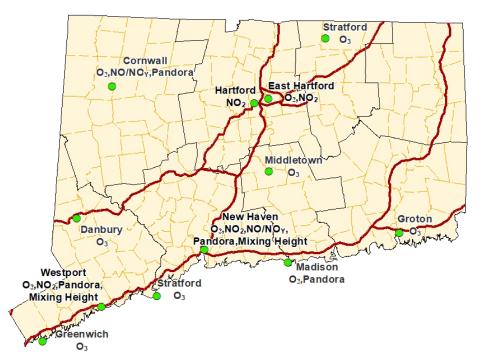


Figure 2: Map of EMP-Related Monitoring Locations

### SLAMS NO<sub>2</sub> Monitoring

Connecticut meets its regulatory  $NO_2$  monitoring requirements for near road and area-wide monitors with two monitors in the Hartford CBSA. An additional  $NO_2$  monitor required by the Regional Administrators for the protection of sensitive and vulnerable populations is located at the New Haven NCore site. A fourth monitor, located in Westport as part of the enhanced monitoring plan, is intended to provide further data to assist in understanding ozone precursor transport into Connecticut.

## Formaldehyde Monitoring

DEEP is continuing to assess automated continuous formaldehyde (HCHO) methods for potential procurement and deployment to one or more coastal ozone sites. HCHO measurements would be a complement to  $NO_2$  measurements, as the ratio is an important indicator to assess whether the ozone production regime is VOC or  $NO_X$  limited. Acquisition of a continuous HCHO monitor is contingent on the determination of reliable and practical quality assurance and control methodology.

### **Upper Air Measurements**

The planetary boundary layer (PBL) is the near-surface portion of the troposphere that is generally considered to be well mixed, such that pollutants emitted or created are more or less mixed but confined within the PBL. As such, lower boundary layer heights are associated with higher pollutant concentrations. The different radiative and absorptive capacities of land and water can affect the PBL height, also known as the mixing height (MH). Thus, coastal areas downwind of large water bodies may have higher concentrations than inland levels where the mixing heights are increased. DEEP is operating two ceilometers, at New Haven and Westport, for automated mixing height measurements. The ceilometers are model CL51, manufactured by Vaisala, Oyj, that operate based on optical backscattering by fine particulate

aerosols that tend to concentrate just below the mixing height. The New Haven ceilometer has been in operation since November 2015, and the Westport ceilometer was installed in May 2021. DEEP has been working to register the two ceilometers with the <u>Unified Ceilometer Network</u> (UCN), which will have both current and archived data available for download.

### NO/NO<sub>2</sub> and NO/NO<sub>Y</sub> Monitoring

DEEP monitors nitrogen dioxide (NO<sub>2</sub>) at four sites in the monitoring network using Teledyne-API Model N500 (EQNA-0320-256), which are capable of directly measuring NO<sub>2</sub>-NO<sub>x</sub>-NO using cavity attenuated phase shift (CAPS) spectroscopy methodology. The NO<sub>2</sub> monitors are maintained at Hartford Huntley Place, East Hartford McAuliffe Park, New Haven Criscuolo Park and Westport Sherwood Island State Park for regulatory compliance. In 2024 DEEP began replacing Teledyne-API Model T500U CAPS monitors (EQNA-0514-212) that had been approaching ten years



of service with Teledyne-API Model N500 CAPS instruments measuring NO $_2$ -NO $_x$ -NO. Westport Sherwood Island was updated on 7/20/2024, Hartford Huntley Place was updated 8/1/2024, and New Haven Criscuolo Park on 2/5/2025. East Hartford McAuliffe Park is scheduled for update in Spring 2025. With each N500 installation, DEEP initiated concurrent collection of ambient NO and NO $_x$  data alongside direct NO $_2$  measurements.

DEEP also operates two nitrogen oxide/total reactive oxides of nitrogen (NO/NO $_{\rm Y}$ ) TAPI model T200U/501Y monitors, at Cornwall Mohawk Mountain and New Haven Criscuolo Park, to comply with NCore requirements. NO $_{\rm Y}$  is defined as NO+NO $_{\rm Z}$ +NO $_{\rm Z}$ , where NO $_{\rm Z}$  represents higher oxides of nitrogen. The major components of NO $_{\rm Z}$  include nitrous acids [nitric acid (HNO $_{\rm 3}$ ), and nitrous acid (HONO)], organic nitrates [peroxyl acetyl nitrate (PAN), methyl peroxyl acetyl nitrate (MPAN), and peroxyl propionyl nitrate, (PPN)], and particulate nitrates.

At New Haven Criscuolo Park, DEEP proposes a transition from  $NO_Y$  to  $NO_X$  monitoring beginning in 2025, coinciding with the replacement of the existing monitoring shed and use of a temporary monitoring station. This proposed change is contingent on EPA's issuance of a waiver for the NCore  $NO_Y$  requirement. Longterm data evaluations indicate a minimal contribution of  $NO_Z$  at the location, which suggests a large majority of measured  $NO_Y$  is comprised of  $NO_X$  and  $NO_Z$  with limited formation or transport of secondary nitrogen compounds. However, monitoring  $NO_Y$  to account for this small fraction of reactive nitrogen oxides involves significant additional resources (equipment/parts, labor) as compared to  $NO_X$  monitoring, which does not involve operating a remote, tower-mounted converter with interconnected conditioned sample and calibration lines. With these considerations and given that the trace levels of  $NO_Z$  detected at this urban site are not expected to be a considerable factor in Connecticut's ozone implementation planning, DEEP proposes transitioning to  $NO_X$  monitoring from  $NO_Y$  during summer 2025 when the New

Haven Criscuolo Park shed is being replaced. DEEP plans to continue monitoring  $NO_2$  directly during this time to continue to meet regulatory requirements for  $NO_2$  under the NAAQS. This proposed change would begin in the summer of 2025 when the  $NO_Y$  tower will be dismantled during a planned site upgrade that includes monitoring shelter replacement. See Appendix A for a review and analysis of the  $NO_Y$  data.

The  $NO_2$  and  $NO/NO_Y$  networks fulfill network design requirements for NCore and SLAMS monitoring of these parameters. These requirements include near road and area wide  $NO_2$  monitoring in a core-based statistical area (CBSA) with a population greater than 1,000,000 (Hartford and East Hartford sites, respectively); nationwide  $NO_2$  monitoring for susceptible and vulnerable populations at site selected by EPA (New Haven) and NCore  $NO/NO_Y$  monitoring (Cornwall and New Haven). The Westport  $NO_2$  monitor is operated in fulfillment of Connecticut's enhanced monitoring plan.

DEEP previously conducted daily quality control (QC) checks, which included points at zero, span and midpoint, for the NO<sub>2</sub> monitors. The span and midpoint checks used gaseous NO<sub>2</sub> (in N<sub>2</sub>) cylinder standards, which were designated as non-protocol standards by EPA in February 2021. As such, all checks since that time are considered by EPA as non-valid for meeting EPA quality assurance data quality objectives. <sup>16</sup> Since January 1, 2024, DEEP has conducted bi-weekly manual gas-phase titration (GPT) QC checks, while simultaneously working to configure automated checks at all NO<sub>2</sub> sites using NO/NOx protocol standards with gas-phase titration (GPT) to produce NO<sub>2</sub> target points. For 2025-2026 DEEP plans to continue to test and implement daily, automated GPT QC checks all NO<sub>2</sub> sites. DEEP will continue overlapping bi-weekly manual GPT QC checks until significant and repeatable confidence in automated GPT QC procedures is demonstrated.

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<sup>&</sup>lt;sup>16</sup> 40 CFR Part 58 Appendix A

## **CO Monitoring**

DEEP operates three carbon monoxide (CO) sites in the air monitoring network, as shown on the map at right. All CO samplers are operated year-round and employ Teledyne-API Model T300U analyzers (RFCA-1093-093. DEEP was previously utilizing TEI 48iQ-TL analyzers (RFCA-0981-054), which were replaced at Hartford and Cornwall sites in 2024, and in New Haven early in 2025 due to issues in performance. Of the 3 sites, New Haven and Cornwall satisfy the requirement for CO monitoring at NCore sites and Hartford fulfills requirements for co-location with



an  $NO_2$  near road monitor in a CBSA having a population greater than 1 million.<sup>17</sup> The EPA Regional Administrator has not indicated any locations in the state for additional CO monitoring aimed at susceptible and vulnerable populations.

## **SO2 Monitoring**

DEEP currently operates three sulfur dioxide (SO<sub>2</sub>) sites in the air monitoring network.

All samplers are TEI 43iQ-TL  $SO_2$  analyzers (EQSA-0486-060) and are operated year-round. Both 1-hour average and 5-minute block average  $SO_2$  data are validated and reported to EPA.

The network requirements for SO<sub>2</sub> monitoring include NCore, population-weighted emissions index (PWEI) and Regional Administrator-



<sup>&</sup>lt;sup>17</sup> 76 FR 54294; August 31, 2011

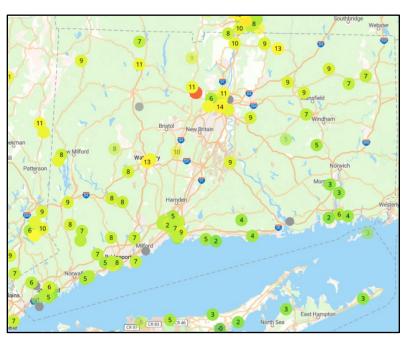
required monitoring.  $^{18}$  The Cornwall and New Haven sites satisfy the NCore  $SO_2$  requirement. Although not covered by PWEI requirements, DEEP intends to continue  $SO_2$  monitoring at Bridgeport Roosevelt School at this time, given that it is located in an area of relatively higher concentrations with vulnerable and sensitive populations.

<sup>&</sup>lt;sup>18</sup> 75 FR 35520; June 22, 2010

### **Community-Based Monitoring and Community Outreach Efforts**

DEEP is continuing to develop a program to support community-based air monitoring efforts and create a framework to advise and assist existing and prospective community-led air monitoring projects. This includes providing technical assistance on air quality sensor siting, operation, data management, and interpretation, along with community grant support and project development aid. DEEP also seeks to build a greater understanding of air quality information at more spatially refined scales, with a focus on capacity building in local communities. Additionally, DEEP is evaluating low-cost sensors relative to the performance of reference-grade monitors, conducting workshops, and building materials to benefit continued community air quality education and outreach efforts.

Towards these goals, DEEP is operating an air sensor loan program to provide low-cost air quality sensors and technical assistance to community groups, educators, and public entities to aid community-based air monitoring initiatives. At this time, approximately 60 DEEP-owned PurpleAir sensors have been loaned to program partners to deploy at schools and neighborhoods in support of their project goals. In addition to loaned sensors, DEEP has deployed PurpleAir sensors at each monitoring station with the goal of advancing knowledge of low-cost sensors and contributing more real-time data to public interfaces, including the AirNow Fire and Smoke Map. Saturating the state network with PurpleAir sensors contextualizes the performance of individual sensors, while also characterizing air quality in many different regions of the state. Additionally, DEEP



Above: PurpleAir Live Map displaying public sensors across Connecticut

deployed PurpleAir sensors in the proximity of the Hawthorne fire located in Berlin, CT, in Fall of 2024 to provide real-time air quality information to firefighters, emergency responders and nearby residents.

In addition to PurpleAir sensors, which only measure fine particulate matter, DEEP has procured low-cost sensors from other emerging manufacturers to explore both gaseous and particulate criteria air pollutant monitoring capabilities. These air sensors are part of a collocation study at the East Hartford McAuliffe Park monitoring station to evaluate sensor performance relative to regulatory monitors. Goals of this effort are to gain technical experience and assess data quality from a range of low-cost sensors for potential utilization in future community-based monitoring projects. Preliminary sensor reports are available for use and for comment by air monitoring agencies and the public on the DEEP Air Monitoring GitHub Page (CT-DEEP-Air-Monitoring repositories · GitHub). DEEP hopes the findings from these collocation studies help contribute to collective understanding of air sensor performance and limitations and will continue engagement with other state air agencies and community groups for project feedback.

DEEP is a partner on two projects in Connecticut funded by American Rescue Plan (ARP) grants. The Connecticut Department of Public Health received an ARP grant to establish a network of low-cost air sensors to provide real-time measurements of PM<sub>2.5</sub> in distressed communities in Ansonia and Derby, Connecticut. DEEP will continue to offer technical guidance and support and make regulatory monitors

available for sensor collocation. Project outcomes entail the establishment of a centralized web-based dashboard for real-time air sensor data, actionable health-supportive information, and guidance towards existing community health programs. The project will also produce training modules as part of an education and outreach campaign for community-centered air pollution awareness, and long-term assistance for community-led air monitoring. This project is in the initial phases, with efforts expected to increase later in 2025.



Above: PurpleAir sensor installed at East Hartford monitoring site

Additionally, DEEP continues to be partnered with the City of Stamford Health Department on an ARP-funded project to monitor for criteria air pollutants in the South End and West Side neighborhoods of Stamford, CT. These neighborhoods rank high on the EPA's EJSCREEN Tool, meet the Justice40 Initiative's definition of disadvantaged neighborhoods, and are in close proximity to environmental hazards. Project outcomes will include an online data portal, community education, sensor deployment, and data collection with the intent to inform future pollution reduction efforts. Ongoing DEEP contributions to this project include Quality Assurance Project Plan (QAPP) development, technical assistance, and data-related support. In 2024, DEEP staff participated in a public event to inform community members of the project and solicit feedback on sensor locations. Three Aeroqual AQY-

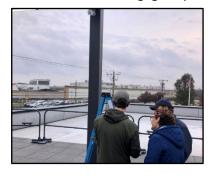
R sensors were received by the City of Stamford, with plans to install the sensors and continue public outreach into 2025.

DEEP continues participation in the Air Quality Monitoring Workgroup of Northeast and Mid-Atlantic states & DC. This workgroup is facilitated by the Georgetown Climate Center and includes TD Environmental and The Metropolitan Group as primary consultants. This workgroup's goal is to support participating states and community partners in establishing hyperlocal air quality monitoring projects. Workgroup goals include strategies on how to obtain federal funding, utilize data from air monitoring projects to enable actionable change to reduce emissions, and build relationships with community groups overburdened by air pollution. DEEP views this work as a critical



component of meeting commitments to environmental equity and environmental justice.

DEEP continues to engage in professional development efforts to help meet these goals, including



participation in EPA-hosted conferences and workshops facilitated by the Georgetown Climate Center. Additionally, DEEP staff have expanded community-focused education and outreach, relationship building, and technical support efforts. Staff have led several workshops on the topic of understanding air quality for teachers and community members plus opportunities to enroll in the EPA Air Quality Flag Program and the DEEP air sensor loan program. In alignment with continued and expanding commitment to Environmental Justice, and the ultimate goal of clean air for all, the above Community Monitoring initiatives are planned to broaden in 2025 and onward.

Above Left: PurpleAir loan program community partner touchpoint and sensor installation

Above Right: Installation of low-cost air sensor used in collocation studies at East Hartford monitoring site

### **Detailed Site Information**

The following section presents detailed information for each monitoring site, such as identification code, location, history, monitored parameters, monitoring objectives, history and descriptive information.

Town – Site: Pomfret – Abington

 County:
 Windham
 Latitude:
 41.840501°

 Address:
 80 Ayers Road
 Longitude:
 -72.010404°

 AQS Site ID:
 09-015-9991
 Elevation:
 209 m (686 ft)

Spatial Scale: Regional Year Established: 1993

Combined Statistical Area: Boston-Worcester-Providence https://goo.gl/maps/u9FJezp64t855AbAA







	PM2.5 (FRM)
	PM2.5 (FRM, Collocated)
	PM2.5 (Continuous - FEM)
	PM10/PM-Coarse (FRM)
	PM10/PM-Coarse (FRM, Collocated)
	PM10/PM-Coarse (Continuous)
	Lead-PM10
	Lead-PM10 (Collocated)
	PM Speciation (CSN)
	PM Speciation (IMPROVE)
	PM2.5 Carbon (BC/UVC, Continuous)
Х	Ozone
	203
	00
	Direct NO <sub>2</sub>
	NO/NO <sub>2</sub> /NOx
	NO/NOY
	Traffic Count
	Wind Speed
	Wind Direction
	Temperature
	Dew Point / Rel. Humidity
	Barometric Pressure
	Solar Radiation
ı	

**Site Description:** The Abington site is a regional-scale site located in a rural/agricultural area in northeast Connecticut in the town of Pomfret. This site is operated by the National Park Service under the direction of EPA as part of their Clean Air Status and Trends Network (CASTNET). It is located on a hilltop approximately 2.3 km south of State Route (SR) 44 and 0.6 km east of SR 97.

**Monitoring Objectives:** The Abington monitoring site objective is to collect ozone measurements to assess long-terms trends as part of the national CASTNET network. The site will also be used to determine compliance with the ozone NAAQS in Windham County.

**Planned changes for 2025-2026:** This site is not under the operational control or purview of DEEP and is included in this Network Plan for informational purposes only.

Town – Site: **Bridgeport – Roosevelt School** 

**Fairfield** Latitude: 41.170875° County: Address: 680 Park Avenue Longitude: -73.194759° AQS Site ID: 09-001-0010 Elevation: 7 m (23 ft) Spatial Scale: Neighborhood Year Established: 1982

Combined Statistical Area: New York-Newark <a href="https://goo.gl/maps/u9FJezp64t855AbAA">https://goo.gl/maps/u9FJezp64t855AbAA</a>







1/6   x	PM2.5 (FRM)	PM2.5 (FRM, Collocated)	PM2.5 (Continuous - FEM)	PM10/PM-Coarse (FRM)	PM10/PM-Coarse (FRM, Collocated)	PM10/PM-Coarse (FEM, Continuous)	Lead-PM10	Lead-PM10 (Collocated)	PM Speciation (CSN)	PM Speciation (IMPROVE)	PM2.5 Carbon (BC/UVC, Continuous)	Ozone	502	00	Direct NO <sub>2</sub>	NO/NO <sub>2</sub> /NOx	NO/NOV	Traffic Count	Wind Speed	Wind Direction	Temperature	Dew Point / Rel. Humidity	Barometric Pressure	Solar Radiation
		1/6	Χ			Х							Χ						Р	Р	Х			

**Site Description:** The Roosevelt School site is a neighborhood-scale site located in southwestern Connecticut in the city of Bridgeport. This site is located 50 m to the north of I-95 and 200 m to the west of the I-95 and Route 8 interchange. This coastal site is located in a schoolyard and residential neighborhoods are present in every direction of the site. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region I.

**Monitoring Objectives:** The Bridgeport Roosevelt School monitoring site objectives include monitoring of PM<sub>2.5</sub>, PM<sub>10</sub>, PM<sub>10-25</sub>, and SO<sub>2</sub> for assessment of population exposure to these pollutants. The PM<sub>2.5</sub> FEM analyzer serves as the primary monitor for collocation with a PM<sub>2.5</sub> FEM sampler. The Bridgeport site records some of the highest levels of SO<sub>2</sub> and PM<sub>2.5</sub> in the CT DEEP network.

**Planned changes for 2025-2026:** Addition of wind speed and wind direction monitoring at Bridgeport Roosevelt School if feasible

Town – Site: Cornwall – Mohawk Mountain

 County:
 Litchfield
 Latitude:
 41.821417°

 Address:
 Mohawk Mountain Rd
 Longitude:
 -73.297333°

 AQS Site ID:
 09-005-0005
 Elevation:
 505 m (1656 ft)

Spatial Scale: Regional Year Established: 1988

Combined Statistical Area: New York-Newark https://goo.gl/maps/pWXdPsYZTvUt9kjQ8







1/3     X       X   X   X   X   X   X   X	PM2.5 (FRM)	PM2.5 (FRM, Collocated)	PM2.5 (Continuous - FEM)	PM10/PM-Coarse (FRM)	PM10/PM-Coarse (FRM, Collocated)	PM10/PM-Coarse (FEM, Continuous)	Lead-PM10	Lead-PM10 (Collocated)	PM Speciation (CSN)	PM Speciation (IMPROVE)	PM2.5 Carbon (BC/UVC, Continuous)	Ozone	502	CO	Direct NO <sub>2</sub>	NO/NO <sub>2</sub> /NOx	NO/NOV	Total Column NO2/HCHO	Wind Speed	Wind Direction	Temperature	Dew Point / Rel. Humidity	Barometric Pressure	Solar Radiation
	1/3		Х			Х				1/3	Х	Х	Х	Χ			Х	Х	Х	Х	Х	Х	Х	Х

**Site Description:** The Mohawk Mountain site is a rural regional-scale site located in northwestern Connecticut in the town of Cornwall. The site is located at the summit of Mohawk Mountain with an elevation of 505 m (1656 ft), and is approximately 17 km to the east of the New York border and 25 km to the south of the Massachusetts border. This site meets all siting requirements and criteria and has been approved by EPA as an NCore site.

**Monitoring Objectives:** The primary monitoring objectives are to meet NCore requirements for  $O_3$ , CO,  $SO_2$ , NO, NOy,  $PM_{2.5}$  FRM,  $PM_{10}$  FRM,  $PM_{10-2.5}$  FRM,  $PM_{2.5}$  speciation, continuous  $PM_{2.5}$  and surface meteorology.  $PM_{2.5}$  chemical speciation measurements are collected through the IMPROVE network as 1-in-3 day 24-hour samples and by continuous analyzers for fine particulate carbon parameters (BC/UVC). EPA operates a Pandora analyzer for total column  $NO_2$  and HCHO.

Planned changes for 2025-2026: None.

Town – Site: Danbury – Western Connecticut State University
County: Fairfield Latitude: 41.39914°

Address: White Street Langitude: 73.44205°

Address: White Street Longitude: -73.44306°
AQS Site ID: 09-001-1123 Elevation: 116 m (380 ft)
Spatial Scale: Neighborhood Year Established: 1974

Combined Statistical Area: New York-Newark https://goo.gl/maps/Db7KMS3nDs1tBBV58







**Site Description:** The Western Connecticut State University (WCSU) site is a neighborhood-scale site for PM<sub>2.5</sub> and an urban-scale site for O<sub>3</sub>, located in western Connecticut in the city of Danbury. This site is located on the top level of a parking garage on the WCSU campus. This site is located approximately 140 m to the southeast of I-84 on White Street. Residential neighborhoods are located in all directions of the site. This site meets all siting requirements and criteria and has been approved by EPA Region I. The downtown area of Danbury has a generally bowl-shaped topography and therefore is subject to occasional high PM<sub>2.5</sub> events during the winter.

**Monitoring Objectives:** The Danbury WCSU monitoring site objectives include collecting  $PM_{2.5}$  and  $PM_{10}/PM_{10-2.5}$  measurements for NAAQS compliance and for AQI forecasting purposes. Ozone is measured at the Danbury site for compliance assessment and AQI forecast reporting. Black carbon (BC/UVC) aethalometer monitoring is included to track the wood smoke contribution to PM pollution.

Planned changes for 2025-2026: None

Town – Site: East Hartford – McAuliffe Park

Hartford County: Latitude: 41.784705° Address: McAuliffe Park Longitude: -72.631518° AQS Site ID: 09-003-1003 Elevation: 15 m (50 ft) Spatial Scale: Neighborhood Year Established: 1981

Combined Statistical Area: Hartford-East Hartford <a href="https://goo.gl/maps/1JZNXcdmVkrMDy2cA">https://goo.gl/maps/1JZNXcdmVkrMDy2cA</a>







PM2.5 (FRM)	PM2.5 (FRM, Collocated)	< PM2.5 (Continuous - FEM)	PM10/PM-Coarse (FRM)	PM10/PM-Coarse (FRM, Collocated)	< PM10/PM-Coarse (FEM, Continuous)	Lead-PM10	Lead-PM10 (Collocated)	PM Speciation (CSN)	PM Speciation (IMPROVE)	< PM2.5 Carbon (BC/UVC, Continuous)	< Ozone	502	00	< Direct NO <sub>2</sub>	NO/NOx	NO/NOY	Traffic Count	< Wind Speed	< Wind Direction	< Temperature	< Dew Point / Rel. Humidity		barometric Fressure
		Х			Х					Х	Х			Х	Р			Х	Х	Х	Х	>	K
	X=Exi	isting	Р	= Plar	ned in 2	025/20	026	Т	=	Propos	ed to	termir	nate ii	n 2025	/2026								

**Site Description:** The McAuliffe Park site is neighborhood-scale site located in central Connecticut in the town of East Hartford. The site is located approximately 120 m to the east of Route 5, 2.0 km to the east of I-91 and 2.5 km to the south of I-291. This site is located 3.7 km to the northeast of the city of Hartford. Residential neighborhoods are located in all directions of this site. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region I.

**Monitoring Objectives:** The East Hartford McAuliffe Park monitoring site objectives include collecting  $PM_{2.5}$  and  $PM_{10}/PM_{10-2.5}$  measurements for NAAQS compliance and AQI forecasting purposes using continuous FEM samplers. Ozone is measured at the McAuliffe Park site for compliance assessment and AQI and forecast reporting. The  $NO_2$  monitor meets the requirement for area-wide monitoring in the Hartford-West Hartford-East Hartford CBSA.

Planned changes for 2025-2026: None.

Greenwich – Point Park

Town - Site: **Fairfield** County: Latitude: 41.004673° Address: **Tod's Driftway** Longitude: -73.585136° 09-001-0017 AQS Site ID: Elevation: 3 m (10 ft) Urban Year Established: 1978 Spatial Scale:

Combined Statistical Area: New York-Newark <a href="https://goo.gl/maps/i8UZ5dMPad6Ao9wm6">https://goo.gl/maps/i8UZ5dMPad6Ao9wm6</a>







PM2.5 (FRM)	PM2.5 (FRM, Collocated)	PM2.5 (Continuous - FEM)	PM10/PM-Coarse (FRM)	PM10/PM-Coarse (FRM, Collocated)	PM10/PM-Coarse (Continuous)	Lead-PM10	Lead-PM10 (Collocated)	PM Speciation (CSN)	PM Speciation (IMPROVE)	PM2.5 Carbon (BC/UVC, Continuous)	× Ozone	802	00	Direct NO <sub>2</sub>	NO/NO <sub>2</sub> /NO <sub>X</sub>	NO/NOy	Traffic Count	× Wind Speed	× Wind Direction	× Temperature	Dew Point / Rel. Humidity	Barometric Pressure	Solar Radiation
X	(=Existin	ng l	P =	= Planned	l in 2025	5/2026	т	= P	ronosed	to term	ninate	in 202	5/202	26									

**Site Description:** The Greenwich Point Park site is an urban-scale site located is southwestern Connecticut on the Long Island Sound in the town of Greenwich. This is a coastal site located approximately 3.0 km to the southeast and 5.0 km to the northeast of the New York border. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region I.

**Monitoring Objectives:** The Greenwich Point Park monitoring site objectives include collecting ozone measurements for compliance assessment and AQI and forecast reporting.

Planned changes for 2025-2026: None.

Town – Site: Groton – Fort Griswold

Latitude: County: **New London** 41.35348° Address: 141 Smith Street Longitude: -72.07886° AQS Site ID: 09-011-0124 Elevation: 37 m (120 ft) Spatial Scale: Neighborhood Year Established: 2007

Combined Statistical Area: Hartford-East Hartford <a href="https://goo.gl/maps/6JqNN2troZpz8pQS7">https://goo.gl/maps/6JqNN2troZpz8pQS7</a>







PM2.5 (FRM) PM2.5 (FRM, Collocated)	PM10/PM-Coarse (FEM,	Lead-PM10	Lead-PM10 (C	PM Speciatio	PM Speciation	PM2.5 Carbo	Ozone	802	8	Direct NO <sub>2</sub>	NO/NO2/NC	NO/NOy	Traffic Count	Wind Speed		Temperature	Dew Point / Rel.
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					х	x	x	x	x x	x x	x x x	x x x	x x x	x x x	x	X	X
					PM2.5 SO2 CO CO Direct I Direct I NO/NC Traffic Wind 5 Tempe Dew Pe	SO2 CO CO Direct NO2/NO2/N NO/NO2/N Traffic Cou Wind Spee	SO2 CO Direct NO2/N NO/NO2/N Traffic Cou Wind Spee	Direct NO <sub>2</sub> /N NO/NO <sub>2</sub> /N NO/NOy Traffic Cou Wind Spee Wind Direc	Direct NO <sub>2</sub> /N NO/NO <sub>2</sub> /N NO/NO <sub>2</sub> /N Traffic Cou Wind Spee Wind Direct Temperatu Dew Point	NO/NO <sub>2</sub> /N NO/NOy Traffic Cou Wind Spee Wind Direct Temperatu	NO/NOy Traffic Cou Wind Spee Wind Direct Temperat. Dew Point	Traffic Cou Wind Spee Wind Direc Temperati	Wind Spee Wind Direc Temperatu Dew Point	Wind Direc	Temperatu Dew Point	Dew Point / R	
					Direct I  NO/NC  NO/NC  Traffic  Wind 5  Wind 6  Barom											Dew Point / R	Barometric Pr

X=Existing

= Planned in 2025/2020

Proposed to terminate in 2025/2026

**Site Description:** The Fort Griswold site is a neighborhood-scale site located in southeastern Connecticut in the town of Groton. This site is located approximately 1.1 km to the south of I-95 and 0.5 km to the east of the New London Harbor. Residential neighborhoods are located in all directions of this site. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region I.

**Monitoring Objectives:** The Groton Fort Griswold monitoring site objectives include monitoring of the two key pollutants, ozone and PM<sub>2.5</sub>, for the southeastern part of Connecticut. Ozone and PM<sub>2.5</sub> are measured at the Fort Griswold site for compliance assessment and AQI and forecast reporting.

Planned changes for 2025-2026: Addition of wind speed and wind direction if feasible.

Town – Site: Hartford – Huntley Place

Hartford County: Latitude: 41.771475° Address: 10 Huntley Place Longitude: -72.679914° AQS Site ID: 09-003-0025 Elevation: 14 m (46 ft) **Near Road** Year Established: 2013 Spatial Scale:

Combined Statistical Area: Hartford-East Hartford <a href="https://goo.gl/maps/MS2HTok92Bx2Y8xV6">https://goo.gl/maps/MS2HTok92Bx2Y8xV6</a>







1/6   X     X     X   X   X   X   X   X	PM2.5 (FRM)	PM2.5 (FRM, Collocated)	PM2.5 (Continuous - FEM)	PM10/PM-Coarse (FRM)	PM10/PM-Coarse (FRM, Collocated)	PM10/PM-Coarse (Continuous)	Lead-PM10	Lead-PM10 (Collocated)	PM Speciation (CSN)	PM Speciation (IMPROVE)	PM2.5 Carbon (BC/UVC, Continuous)	Ozone	502	со	Direct NO <sub>2</sub>	NO/NO×	NO/NOy	Traffic Count	Wind Speed	Wind Direction	Temperature	Dew Point / Rel. Humidity	Barometric Pressure	Solar Radiation
	1/6		Х			Х					Х			Χ	Х	Р		Х	Х	Х	Х		Х	

**Site Description:** The Huntley Place site is a near-road site located in north central Hartford. The site, located on the northwest side of US I-84, is approximately 0.25 km to the west of the US I-91 corridor and the Founders and Bulkeley Bridges over the Connecticut River. Residential neighborhoods are located to the north, east and west of the site. This site meets siting requirements for a near-road NO<sub>2</sub> site and has been approved by EPA.

**Monitoring Objectives:** The primary monitoring objectives for the site are to capture NO<sub>2</sub> concentrations near heavily trafficked roads, to assess area-wide NO<sub>2</sub> concentrations, and to assess NO<sub>2</sub> concentrations for vulnerable and susceptible populations in adjacent neighborhoods. The data will also be used to help determine compliance with the 1-hour NO<sub>2</sub> NAAQS as established by EPA in 2010. This site also collects CO, FRM PM<sub>2.5</sub>, continuous FEM PM<sub>2.5</sub> & PM<sub>10</sub>, BC/UVC and traffic counts.

Planned changes for 2025-2026: Addition of NO/NOx.

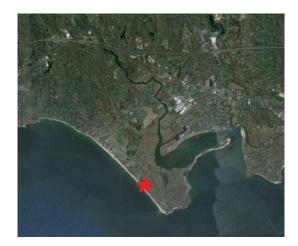
Town – Site: Madison – Hammonasset State Park

Latitude: County: **New Haven** 41.256803° Water Way, Address: Longitude: -72.553266° **Hammonasset SP** AQS Site ID: 09-009-9002 Elevation: 3 m (10 ft) Spatial Scale: Regional Year Established: 1981

Combined Statistical Area: New York-Newark <a href="https://goo.gl/maps/FCelNH5T51dnU4jb6">https://goo.gl/maps/FCelNH5T51dnU4jb6</a>







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Dew Point / Rel. Humidity	

**Site Description:** The Hammonasset State Park site is a regional-scale site located in central coastal Connecticut in the town of Madison. This site is located approximately 1.5 km to the south of Route 1 and 3.0 km to the south of I-95 on the Long Island Sound. Residential neighborhoods are located primarily to the northeast, north and northwest of the site. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region I.

**Monitoring Objectives:** The Madison Hammonasset State Park monitoring site objective is to collect ozone measurements for compliance assessment and AQI forecast reporting. A second objective is to collect data in support of the Enhanced Monitoring Plan (page 12 of this Plan) for research on regional ozone transport.

Planned changes for 2025-2026: None.

Middletown – Connecticut Valley Hospital

Town – Site: County: Latitude: 41.549863° Address: **CVH-near Battell Hall** Longitude: -72.625971° 09-007-9007 AQS Site ID: Elevation: 58 m (190 ft) Year Established: Spatial Scale: Neighborhood 1980

Combined Statistical Area: Hartford-East Hartford <a href="https://goo.gl/maps/FCeLNH5T51dnU4jb6">https://goo.gl/maps/FCeLNH5T51dnU4jb6</a>







	(FRM)
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	PM2.5 (Continuous - FEM) PM10/PM-Coarse (FRM)
	PM10/PM-Coarse (FRM, Collocated)
	PM10/PM-Coarse (Continuous)
	Lead-PM10
	Lead-PM10 (Collocated)
	PM Speciation (CSN)
	PM Speciation (IMPROVE)
	PM2.5 Carbon (BC/UVC, Continuous)
Х	Ozone
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	Direct NO <sub>2</sub>
	NO/NO <sub>2</sub> /NO <sub>x</sub>
	∕on/on
	Traffic Count
х	Wind Speed
Х	Wind Direction
Х	Temperature
	Dew Point / Rel. Humidity
Х	Barometric Pressure
	Solar Radiation
l	

X=Existing

= Planned in 2025/2026

= Proposed to terminate in 2025/2026

**Site Description:** The Middletown Connecticut Valley Hospital (CVH) site is an urban-scale ozone site located in central Connecticut. This site is located approximately 0.2 km to the east of Route 9. Residential neighborhoods are located to the west, north and south of this site. This site meets all siting requirements. DEEP relocated the site within the CVH campus to a shed near Battelle Hall in 2017.

**Monitoring Objectives:** The CVH monitoring site objective is to collect ozone measurements for compliance assessment and AQI forecast reporting.

Planned changes for 2025-2026: None.

Town – Site: New Haven – Criscuolo Park

Latitude: County: **New Haven** 41.30117° Address: 1 James Street Longitude: -72.902880° AQS Site ID: 09-009-0027 Elevation: 3 m (10 ft) Spatial Scale: Neighborhood Year Established: 2004

Combined Statistical Area: New York-Newark <a href="https://goo.gl/maps/T2MUeqoVrqC9Virj7">https://goo.gl/maps/T2MUeqoVrqC9Virj7</a>







1/3 1/6 X 1/3 1/6 X X X X 1/3 X X X X X X X X X X X X X X X X X X X	PM2.5 (FRM)	PM2.5 (FRM, Collocated)	PM2.5 (Continuous - FEM)	PM10/PM-Coarse (FRM)	PM10/PM-Coarse (FRM, Collocated)	PM10/PM-Coarse (FEM, Continuous)†	PM2.5 (Cont. FEM, secondary)	PM10/PM-Coarse (Cont. FEM, secondary)	PM Speciation (CSN)	PM Speciation (IMPROVE)	PM2.5 Carbon (BC/UVC, Continuous)	Ozone	502	00	Direct NO <sub>2</sub>	NO/NO <sub>x</sub>	NO/NOy	Total Column NO <sub>2</sub> /HCOC	Wind Speed	Wind Direction	Temperature	Dew Point / Rel. Humidity	Barometric Pressure	Solar Radiation	Mixing Height
	1/3	1/6	Χ	1/3	1/6	Х	Χ	Χ	1/3		Х	Х	Χ	Χ	Χ	Р	Т	Χ	Х	Х	Χ	Х	Χ	Χ	Χ

**Site Description:** The Criscuolo Park site is a neighborhood-scale site located on the western side of the city of New Haven. The site is approximately 0.25 km to the north of the I-95 Quinnipiac River Bridge. The site is approximately 1.0 km to the east of the I-91 and I-95 interchange. Bulk petroleum transfer stations are located 0.3 to 2.0 km to the south of the site. Residential neighborhoods are located to the west, north and east of the site.

**Monitoring Objectives:** The primary monitoring objectives are to meet NCore requirements for O<sub>3</sub>, CO, SO<sub>2</sub>, PM<sub>2.5</sub>, PM<sub>10</sub>, PM<sub>10-2.5</sub>, PM<sub>2.5</sub> speciation, NO/NO<sub>Y</sub> and surface meteorology. NO<sub>2</sub> monitoring is conducted in fulfillment of the requirement for NO<sub>2</sub> monitoring of vulnerable and sensitive populations at 40 nationwide sites selected by the Regional Administrators. PM<sub>2.5</sub> chemical speciation measurements are collected through the Chemical Speciation Network (CSN) as 1-in-3 day 24-hour samples and by continuous analyzers for fine particulate carbon parameters (BC/UVC).

Planned changes for 2025-2026: The existing station monitoring shed will be replaced 2025 into 2026. A temporary monitoring station will be deployed early in 2025 to ensure continuous sampling. DEEP proposes a change from  $NO_{\gamma}$  to  $NO_{\chi}$  monitoring coinciding with station upgrades.

Town – Site: Stafford – Shenipsit State Forest

 County:
 Tolland
 Latitude:
 41.97569°

 Address:
 172 Chestnut Hill
 Longitude:
 -72.386741°

 AQS Site ID:
 09-013-1001
 Elevation:
 265 m (869 ft)

Spatial Scale: Regional Year Established: 1980

Combined Statistical Area: Hartford-East Hartford <a href="https://goo.gl/maps/Nq6NJTnexh3N54FJ8">https://goo.gl/maps/Nq6NJTnexh3N54FJ8</a>







PM2.5 (FRM, Collocated) PM2.5 (Continuous - FEM) PM10/PM-Coarse (FRM, Colloc PM10/PM-Coarse (FRM, Colloc PM10/PM-Coarse (Continuous) Lead-PM10 Lead-PM10 Lead-PM10 Lead-PM10 Lead-PM10 Lead-PM10 Collocated) PM Speciation (IMPROVE) PM Speciation (IMPROVE) PM Speciation (IMPROVE) PM Speciation (LOND) PM2.5 Carbon (BC/UVC, Contin X Ozone SO2 CO Direct NO2 NO/NO3/NOX NO/NO3/NOX Traffic Count X Wind Speed X Wind Speed Dew Point / Rel. Humidity Barometric Pressure Solar Radiation			PM2.5 (FRM)
PM2.5 (Continuous - FEN PM10/PM-Coarse (FRM) PM10/PM-Coarse (FRM) PM10/PM-Coarse (FRM) Lead-PM10 Lead-PM10 Lead-PM10 Lead-PM10 Lead-PM10 Conti Lead-PM10 PM Speciation (IMPROVI PM Speciation (IMPROVI PM2.5 Carbon (BC/UVC, Ozone SO2 CO Direct NO; NO/NOy Traffic Count Wind Speed Wind Speed Wind Speed Solar Radiation Solar Radiation	- 1		IL AND THE PROPERTY OF CAMP
PM2.5 (Continuous - FER PM10/PM-Coarse (FRM) PM10/PM-Coarse (FRM) PM10/PM-Coarse (FRM) PM10/PM-Coarse (FRM) PM Speciation (GSN) PM Speciation (GSN) PM Speciation (GSN) PM Speciation (GNPROV) Ozone SO2 CO Direct NO2 NO/NO3 NO/NO4 Traffic Count Wind Speed Wind Speed Wind Speed Solar Radiation Solar Radiation			PM2.5 (FRM, Collocated)
PM10/PM-Coarse (FRM, PM10/PM-Coarse (FRM, PM10/PM-Coarse (FRM, Lead-PM10 Lead-PM10 Lead-PM10 Lead-PM10 Lead-PM10 Collocated) PM Speciation (IMPROVI PM Speciation (IMPROVI PM Speciation (IMPROVI OZONE SO2 CO Direct NO; NO/NO2/NOX NO/NO4 Traffic Count Wind Speed Wind Speed Wind Speed Wind Speed Solar Radiation Solar Radiation			(Continuous -
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Lead-PM10  Lead-PM10 (Collocated)  PM Speciation (IMPROVI PM2.5 Carbon (BC/UVC, Ozone SO2 CO Direct NO2, NO/NO3/NOX NO/NOY Traffic Count Wind Speed Wind Speed Wind Speed Wind Speed Solar Rediation Solar Radiation			PM10/PM-Coarse (Continuous)
Lead-PM10 (Collocated) PM Speciation (IMPROVI PMS.5 Carbon (BC/UVC, Ozone SO2 CO Direct NO; NO/NOy Traffic Count Wind Speed Wind Direction Temperature Dew Point / Rel. Humidil Barometric Pressure Solar Radiation			Lead-PM10
PM Speciation (IMPROVI) PMS Speciation (IMPROVI) PM2.5 Carbon (BC/UVC, Ozone SO2 CO Direct NO2 NO/NO2/NOX NO/NOY Traffic Count Wind Speed Wind Direction Temperature Dew Point / Rel. Humiditi Barometric Pressure Solar Radiation		·	Lead-PM10 (Collocated)
PM Speciation (IMPROV) PM2.5 Carbon (BC/UVC, Ozone SO2 CO Direct NO; NO/NO2/NOX NO/NO9 Traffic Count Wind Speed Wind Direction Temperature Dew Point / Rel. Humidit Barometric Pressure Solar Radiation			PM Speciation (CSN)
PM2.5 Carbon (BC/UVC, Ozone SO2 CO Direct NO; NO/NO2/NOX NO/NOy Traffic Count Wind Speed Wind Direction Temperature Dew Point / Rel. Humidii Barometric Pressure Solar Radiation			PM Speciation (IMPROVE)
			PM2.5 Carbon (BC/UVC, Continuous)
		Х	Ozone
			502
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			Direct NO <sub>2</sub>
			NO/NO <sub>2</sub> /NO <sub>X</sub>
			NO/NOV
			Traffic Count
		Х	Wind Speed
		Х	Wind Direction
Dew Point / Rel. Humidity  Barometric Pressure  Solar Radiation		Х	Temperature
Barometric Pressure Solar Radiation			Dew Point / Rel. Humidity
Solar Radiation			Barometric Pressure
			Solar Radiation

**Site Description:** The Shenipsit State Forest site is a regional-scale site that is located in northern Connecticut in the town of Stafford. The site is approximately 100 m to the south of Route 190, 17 km to the east of I-91 and 12 km to the northwest of I-84. This site is located 34 km to the northeast of the city of Hartford. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region I.

= Proposed to terminate in 2025/2026

**Monitoring Objectives:** The Stafford Shenipsit State Forest monitoring site objective is to collect ozone measurements for compliance assessment and AQI forecasting purposes.

Planned changes for 2025-2026: None.

= Planned in 2025/2026

X=Existing

Town – Site: Stratford – Lighthouse

**Fairfield** County: Latitude: 41.151906° Address: **End of Prospect Drive** Longitude: -73.103375° AQS Site ID: 09-001-3007 Elevation: 3 m (10 ft) Spatial Scale: Regional Year Established: 1980

Combined Statistical Area: New York-Newark <a href="https://goo.gl/maps/vsTck3vFZm7GmV457">https://goo.gl/maps/vsTck3vFZm7GmV457</a>







	PMZ.5 (FRM)  PMZ.5 (Continuous - FEM)  PMJ0/PM-Coarse (FRM)  PMJ0/PM-Coarse (FRM)  PMJ0/PM-Coarse (FRM)  Lead-PMJ0  Lead-PMJ0  Lead-PMJ0  Lead-PMJ0  PM Speciation (IMPROVE)  NO/NO2, NOX  NO/NO2, NOX  NO/NO4  Traffic Count  Wind Speed  Wind Direction  Dew Point / Rel. Humidity
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**Site Description:** The Stratford Lighthouse site is a regional-scale site located in southwestern Connecticut in the town of Stratford and is owned by the federal government. This is a coastal site that is located 4.5 km to the southeast of I-95 and is directly on the Long Island Sound. This site is approximately 45 km to the northeast of the New York State border. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region I.

**Monitoring Objectives:** The Stratford Lighthouse monitoring site objective is to collect ozone measurements for compliance assessment and AQI forecasting purposes.

Planned changes for 2025-2026: No planned changes; however, this property is currently for sale, therefore DEEP is monitoring the situation and pending the sale, will assess whether the monitoring site can remain at this location or potentially explore establishing a new monitoring site at an alternative location.

Town – Site: Waterbury – Bank Street

County: **New Haven** Latitude: 41.550465° Address: 440 Bank Street Longitude: -73.043650° 09-009-2123 AQS Site ID: Elevation: 80 m (269 ft) Spatial Scale: Year Established: Neighborhood 1975

Combined Statistical Area: New York-Newark <a href="https://goo.gl/maps/GVEjvCjQBviEVBA88">https://goo.gl/maps/GVEjvCjQBviEVBA88</a>







**Site Description:** The Waterbury site is a neighborhood-scale site located in western Connecticut at Meadow Street and Bank Street in the Naugatuck River Valley. This site is approximately 170 m to the south of I-84, 300 m to the east of Route 8 and 0.75 km to the east of the I-84 and Route 8 interchange. Residential neighborhoods are located in all directions of the site. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region 1.

**Monitoring Objectives:** The Waterbury Bank Street site monitoring objectives include collecting PM<sub>2.5</sub>/PM<sub>10</sub> FEM measurements for compliance purposes and AQI forecast reporting.

Planned changes for 2025-2026: None

Town – Site: Westport – Sherwood Island State Park

**Fairfield** Latitude: 41.118240° County: Address: **Sherwood Island Lane** Longitude: -73.336751° 09-001-9003 AQS Site ID: Elevation: 3 m (10 ft) Spatial Scale: Regional Year Established: 1996

Combined Statistical Area: New York-Newark <a href="https://goo.gl/maps/9Ux2WXExzNssLSJT9">https://goo.gl/maps/9Ux2WXExzNssLSJT9</a>





PM2.5 (FRM)	PM2.5 (FRM, Collocated)	PM2.5 (Continuous - FEM)	PM10/PM-Coarse (FRM)	PM10/PM-Coarse (FRM, Collocated)	PM10/PM-Coarse (Continuous)	Lead-PM10	Lead-PM10 (Collocated)	PM Speciation (CSN)	PM Speciation (IMPROVE)	PM2.5 Carbon (BC/UVC, Continuous)	Ozone	502	СО	NO <sub>2</sub>	NO/NO <sub>x</sub>	NO/NOy	Total Column NO <sub>2</sub> /HCOC	Wind Speed	Wind Direction	Temperature	Dew Point / Rel. Humidity	Barometric Pressure	Solar Radiation	Mixing Height
							Х			Χ	Р		Χ	Χ	Х	Χ				Х				
	X=Existing			= Plar	ned in 2	025/2	026	Т	= Pr	oposed	to ter	minat	e in 2	025/2	026									

**Site Description:** The Westport Sherwood Island State Park site is a regional-scale site located in southwestern Connecticut. This is a coastal site that is approximately 0.5 km to the south of I-95 on the Long Island Sound. This site meets all siting requirements and criteria and has been approved internally by DEEP and independently by EPA Region 1.

Monitoring Objectives: Ozone is measured at the Westport site for compliance assessment and AQI forecast reporting. Surface level  $NO_2$  will be monitored as part of the Enhanced Monitoring Plan. A total column  $NO_2$  (and potentially other trace gas) Pandora analyzer, operated by EPA, was installed in May 2018 to support studies of ozone fate and transport in the Long Island Sound/Coastal Connecticut region.

Planned changes for 2025-2026: Addition of NO/NOx.

#### Appendix A: Analysis of Total Reactive Oxides of Nitrogen (NOY) at New Haven Criscuolo Park

## Review and Analysis of NO<sub>Z</sub> Component of NO<sub>Y</sub> at Criscuolo Park, New Haven

DEEP reviewed and analyzed data collected from DEEP's  $NO/NO_y$  monitor located at the Criscuolo Park, New Haven, monitoring site (AQS ID 09-009-0027). The objective was to characterize and evaluate the significance of the  $NO_z$  data relative to the major components of  $NO_y$ , which are  $NO_z$  and  $NO_z$ . DEEP is proposing replacing the  $NO_y$  monitor at the site with an  $NO/NO_z/NO_x$  monitor and is therefore requesting a waiver to allow this replacement.

#### Background

CFR monitoring requirements for National Core multipollutant (NCore) sites include nitric oxide (NO) and total reactive oxides of nitrogen  $(NO_Y)^{19}$ . Additionally, 40 CFR 58 Appendix D 3.(b)(1) provides for the possibility of a waiver granted by the EPA regional administrator for substitution of monitoring of NO/NO<sub>Y</sub> with NO/NO<sub>X</sub>. NO<sub>X</sub> is defined as NO + NO<sub>2</sub>, while NO<sub>Y</sub> is defined as NO + NO<sub>2</sub> + NO<sub>Z</sub>, where NO<sub>Z</sub> represents oxides of nitrogen other than NO and NO<sub>2</sub>. These may include nitrous acids, organic nitrates, and particulate nitrates. These NO<sub>Z</sub> compounds are generally highly reactive and short-lived. For NO/NO<sub>Y</sub> monitoring, DEEP employs Teledyne API (TAPI) T200U/501Y NO/NO<sub>Y</sub> analyzers, which operate on the analytical principle of chemiluminescence to determine concentrations of NO gas. The analyzers utilize a thermal converter to reduce NO<sub>2</sub> and NO<sub>Z</sub> species to NO so that the NO<sub>Y</sub> concentration can be determined. A switching valve alternates the sample path between passing through the converter and bypassing the converter to assess concentrations of both NO and NO<sub>Y</sub> simultaneously. As the NO<sub>Z</sub> species of NO<sub>Y</sub> are known to readily react with or be adsorbed by surfaces, the converter is mounted on a 10 meter tower, with a short inlet probe to minimize loss of NO<sub>Z</sub>.

#### **Approach**

In addition to the NO/NO $_{\rm Y}$  monitor at New Haven, DEEP operates a direct NO $_{\rm Z}$  monitor, which has been a TAPI model T500U, recently replaced by a TAPI N500. Both of these models employ the cavity attenuated phase shift (CAPS) method that can measure NO $_{\rm Z}$  without interference of other oxides of nitrogen. The N500 model is also able to determine NO $_{\rm X}$ , in addition to NO $_{\rm Z}$ , and therefore NO as well, by oxidizing NO to NO $_{\rm Z}$  using an internal ozone source. Given the availability of the NO/NO $_{\rm Y}$  and true NO $_{\rm Z}$  data, NO $_{\rm Z}$  concentrations were determined by subtracting NO $_{\rm X}$  from NO $_{\rm Y}$ . A 3-year period of relatively complete data, 2022 – 2024, was analyzed to characterize monitored concentration levels and potential correlations with other monitored parameters.

#### Results

Summary statistics of the estimated NO values for the period 1/1/2022 through 12/31/2024, based on  $NO_Y - (NO_2 + NO)$ , is given in Table 1. Concentrations of  $NO_Z$  ranged between -10 ppb to 43 ppb, with an average value of 0.77 ppb and a median value of 0.4 ppb. The standard deviation is 1.84 ppb, showing that the  $NO_Z$  values are generally fairly tightly distributed slightly above zero, although there are a small number of high positive and negative outliers. Given that a significant fraction of the values (30 percent) is negative, it seems likely that the combined error of the two methods (T500U for  $NO_Z$ , N200U/501Y for  $NO/NO_Y$ ) is considerable relative to the magnitude of the  $NO_Z$  values.

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<sup>&</sup>lt;sup>19</sup> EPA: Fact Sheet for NOy Monitoring

Table 4: Summary Statistics for NOz, 2022-2024

Count	18,197
Data Completeness	69%
Average (ppb)	0.78
Median (ppb)	0.4
Maximum (ppb)	43.4
Minimum (ppb)	-10.6
Standard Deviation (ppb)	1.84
5 <sup>th</sup> Percentile (ppb)	-1.2
95 <sup>th</sup> Percentile (ppb)	4

A frequency histogram of  $NO_z$  concentrations over this period is shown in Figure 3. As indicated by the 5<sup>th</sup> and 95<sup>th</sup> percentiles, 90 percent of the  $NO_z$  values are between -1.2 ppb and 4 ppb.

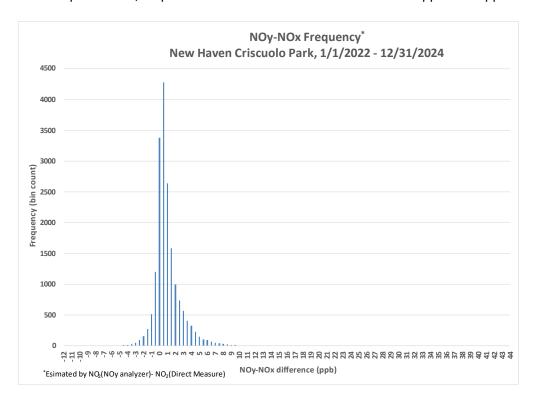


Figure 3: Frequency Histogram of NOZ Data, 2022 – 2024

An analysis of binned  $NO_Z$  concentration value frequencies over 8-point wind direction sectors does not show a consistent pattern over the range of values (Figure 4). Values between 0 and 5 ppb were favored for the north and south directions, while values in the 5 to 10 ppb range had higher frequencies in the south, northeast and southwest directions. For the 10 to 20 ppb range, wind directions to the southeast, south and southwest had the highest frequency, which is the general direction of bulk petroleum storage, commercial marine activity at New Haven harbor, and Interstate 95.

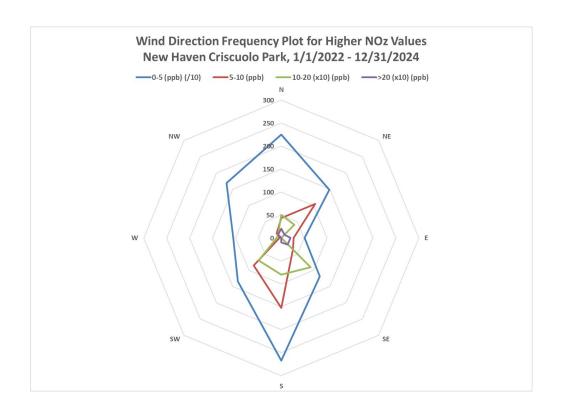


Figure 4: NO<sub>z</sub> Wind Rose Plot, 2022-2024

Hourly  $NO_Z$  data was used to evaluate correlations with several other parameters also monitored at Criscuolo Park (temperature, ozone, carbon monoxide, sulfur dioxide, fine particulate, aethalometer UVC). None of the comparisons showed significant correlations, the highest being UVC, with a Pearson correlation coefficient ( $R^2$ ) of 0.12. A summary of the correlation data is given in Table 2. In addition to the correlations of hourly data described above, a comparison of daily maximum 8-hour

ozone with daily maximum 1-hour  $NO_Z$  was done to investigate the possible connection of higher levels of  $NO_Z$  with potential  $O_3$  production. To focus on higher ozone event days, data for days where the temperature did not exceed 27 °C (about 80 °F) were not included. The results indicated a slightly positive, but weak correlation (Table A-2 and Figure 5).

**Table 5: Summary of Linear Regression Correlation Equations** 

Parameters (units)	Slope	Intercept	R <sup>2</sup>
CO (ppm) vs. NO <sub>z</sub> (ppb)	3.7468	-0.3085	0.0914
Temp (deg. C) vs. NO <sub>z</sub> (ppb)	0.0159	0.5738	0.0052
O <sub>3</sub> (ppb) vs. NO <sub>z</sub> (ppb)	0.0058	0.9311	0.002
SO <sub>2</sub> (ppb) vs. NO <sub>z</sub> (ppb)	-0.1028	0.7841	0.0002
$PM_{2.5}$ (ug/m <sup>3</sup> ) vs. $NO_Z$ (ppb)	0.0675	0.2652	0.0826
Aethalometer UVC (ug/m³) vs. NO <sub>z</sub> (ppb)	0.6601	0.2138	0.1214
Daily max 8-hr O <sub>3</sub> (ppb) vs. daily max 1-hr NO <sub>2</sub> (ppb)	0.1937	14.976	0.0452

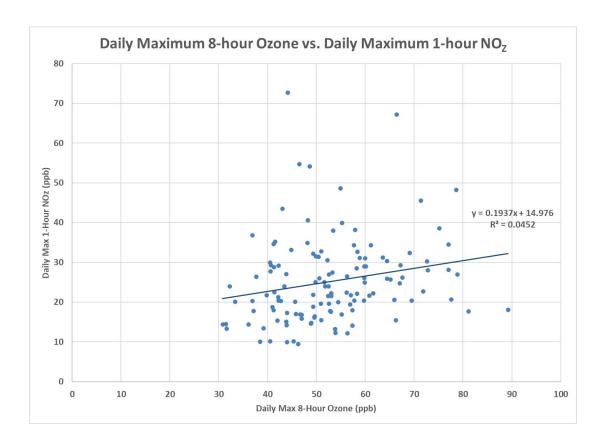


Figure 5: Correlation Plot of Daily Maximum 8-Hour O<sub>3</sub> vs Daily Maximum 1-hour NO<sub>2</sub>

# **Summary**

A review of New Haven, Criscuolo Park monitoring station  $NO_Z$  data for the period January 1, 2022, through December 31, 2024, indicates that values are generally low, with an average 0.78 ppb, and with 95 percent of values below 4 ppb. No significant relationships with other monitored pollutants were identified, nor were the presence of any large sources in the vicinity indicated. Higher values of  $NO_Z$  were observed on warmer days (>27 °C) when ozone tended to be higher. Given that: (1) minimal useful information is collected beyond what is obtained by  $NO/NO_Z/NO_X$  monitoring (2)  $NO/NO_Y$  monitoring is more complicated and labor intensive and has substantial maintenance costs (requiring frequent converter replacements); and that (3)  $NO/NO_Y$  monitoring has lower data quality and completeness compared to more conventional analyzers, DEEP is requesting that  $NO/NO_Z/NO_X$  monitoring be utilized going forward to replace  $NO/NO_Y$  monitoring at the New Haven Criscuolo Park site.

<sup>\*</sup>Data filtered to include only days were the 1-hour maximum temperature exceeded 27 ºC.

#### B Appendix B: Network Plan Public Comments and Responses

Public comments on the Plan and DEEP's responses (in italic font) are provided in this section.

## Comments Received from EPA New England

1. In the first paragraph on page 2, DEEP discusses the use of a temporary shelter at New Haven. Will DEEP continue to measure all other pollutants and parameters currently measured at that site except NOY?

DEEP response: DEEP will continue monitoring all pollutant parameters, with the exception of NOy, during the period that the temporary shelter is deployed, roughly July through November 2025. Most meteorological parameters will also continue during this time, including ambient temperature, relative humidity, dew point, barometric pressure, and solar radiation. However, NO<sub>Y</sub>, resultant wind speed and direction, mixing height, and the additional T640X PM (POC 4) special purpose monitor (SPM) will be suspended during the transition period.

2. We acknowledge the following overall proposed changes to your network, on page 2:

#### **Proposed Network Changes:**

Details of the proposed monitoring network configuration are described in the following site information pages. DEEP is proposing to implement the following changes:

- Transition from NO/NOY to NO/NOX measurements at New Haven Criscuolo Park in 2025 based on data evaluations indicating NOZ constitutes an insignificant portion of total reactive nitrogen species.
- Addition of nitric oxide (NO) data collection to existing nitrogen dioxide (NO2) monitoring network through the deployment of Teledyne-API Model N500 cavity attenuated phase shift (CAPS) analyzers, which provide concurrent measurement of NO2-NOX-NO.
- Addition of wind speed and wind direction monitoring at Bridgeport Roosevelt School and Groton Fort Griswold sites.

Regarding the second bullet, EPA is still reviewing DEEP's demonstration to support the conclusion that NOZ constitutes an insignificant portion of total reactive nitrogen species at New Haven. DEEP should not transition from NO/NOY to NO/NOX measurement at New Haven until EPA approves the request.

DEEP response: DEEP acknowledges that EPA's decision regarding a waiver for NO/NOy monitoring at New Haven is pending. The following language was added to the first bullet under Proposed Network Changes on page 2: "This proposed change is contingent upon receipt from EPA of a waiver for the NCore requirement to monitor NO/NOy."

3. On page 3, Table 1 indicates that monitoring for  $NO/NO_Y$  is already terminated at New Haven. Language should indicate DEEP is proposing termination of  $NO/NO_Y$  at New Haven.

DEEP response: Language for the P (planned) and T (terminated) symbols descriptions in the footer for Table 1 has been updated to indicate proposed changes, i.e., "proposed to be terminated in 2025-2026."

4. On page 3, Table 1 indicates that the Cornwall  $PM_{10}/PM_{10-2.5}$  (continuous Federal Equivalent Method, or FEM) monitor is non-regulatory for  $PM_{10}$  ( $PM_{10}$  at local conditions, or LC). Cornwall is an NCore site, required to report  $PM_{10-2.5}$  mass. Therefore,  $PM_{10}/PM_{10-2.5}$  should be reported in standard temperature and pressure (STP).

DEEP response: The minimum monitoring standards for NCore sites (40 CFR 58 Appendix D 3.(b)) require monitoring for  $PM_{10-2.5}$ , but not specifically regulatory  $PM_{10}$ .  $PM_{10C}$ , which is  $PM_{10}$  at local conditions of temperature and pressure (LC), must have units compatible with  $PM_{2.5}$ , such that the difference  $PM_{10C} - PM_{2.5}$  can be computed to obtain  $PM_{10-2.5}$ . Standard units for  $PM_{10-2.5}$  are given in EPA's "Sampling Methods for All Parameters" code list (<a href="https://aqs.epa.gov/aqsweb/documents/codetables/methods\_all.html">https://aqs.epa.gov/aqsweb/documents/codetables/methods\_all.html</a>) as Micrograms/cubic meter (LC). NCore monitoring requirements, specified in 40 CFR 58 Appendix D, do not include criteria pollutant  $PM_{10}$ , which would require conversion of ambient LC concentrations to units of micrograms/cubic meter at 1 atmosphere pressure and 25 °C temperature (STP).

The only reference DEEP found in the monitoring regulations related to  $PM_{10-2.5}$  and  $PM_{10}$  STP is Part 50, Appendix O 1.9, indicating that  $PM_{10C}$  obtained from a reference method could be submitted as regulatory  $PM_{10}$  only if the data is converted to STP units, and if the  $PM_{10C}$  is distinctly identified (parameter code 85101) from the  $PM_{10}$  STP data (parameter code 81102).

5. On page 9, footnote 8 should be revised to 89 FR 16202.

DEEP response: Footnote 8 on page 9 has been changed to 89 FR 16202 to reference the updated PM NAAQS rule.

6. On page 10, Cornwall should be listed in the text for regulatory compliance with  $PM_{10}$  monitoring. In the accompanying figure, DEEP should clarify the legend to indicate which sites are needed for compliance. Sites needed for regulatory compliance should not be reporting  $PM_{10}$  in local conditions (LC).

DEEP response: DEEP's understanding is that only  $PM_{10}$  and  $PM_{2.5}$ , both measured at local conditions, are used to derive  $PM_{10-2.5}$ , and that  $PM_{10}$  STP is not needed. Additionally, DEEP understands that minimum monitoring requirements either for NCore sites, or general  $PM_{10}$  requirements applicable for the Litchfield, CT, micropolitan statistical area, which includes the Cornwall Mohawk Mt site, do not include regulatory  $PM_{10}$  ( $PM_{10}$  STP) monitoring due to low population and low  $PM_{10}$  concentration in this micropolitan statistical area. Sites designated for regulatory  $PM_{10}$  monitoring requirements are indicated by green markers on the  $PM_{10}$  network figure on page 10.

7. On page 10, DEEP states "DEEP will continue reporting  $PM_{10}$  at LC and  $PM_{10-2.5}$  for all current  $PM_{10}$  monitors in the network." Reporting  $PM_{10}$  at LC for all monitors in the network is not consistent with 40 CFR Part 58 requirements. For clarity, EPA recommends switching this paragraph with the following paragraph which makes it clear that regulatory  $PM_{10}$  will be reported in STP as required. DEEP can then discuss LC reporting for the non-regulatory  $PM_{10}$  monitors.

DEEP response: The above recommended changes have been made on page 10.

8. On page 14, we note, acknowledge, and support implementation of CT's enhanced monitoring plan (EMP) as described below:

## **Enhanced Monitoring Activities**

DEEP proposed the following activities and resource commitments to meet the objectives for enhanced monitoring under this EMP. DEEP believes these proposed actions meet the requirements of the EMP and will assist DEEP's ongoing efforts toward assessing and understanding ozone nonattainment issues in Connecticut:

- Continued operation of two additional O<sub>3</sub> monitors beyond those minimally required for the State and Local Air Monitoring Station (SLAMS) in the Bridgeport-Stamford-Norwalk Core-Based Statistical Area (CBSA).
- Continued operation of one additional ozone monitor beyond those minimally required in the Hartford-West Hartford-East Hartford CBSA.

- Continued operation of one additional NO<sub>2</sub> monitor, located at the Westport Sherwood Island State Park site.
- Assessment of continuous HCHO [formaldehyde] methods. Contingent upon availability of an instrument that is capable of operation within demonstratable acceptable quality assurance criteria, DEEP would procure and potentially deploy to a coastal ozone site.
- Continued operation of two ceilometers, at Westport and New Haven, for atmospheric mixing height (boundary layer depth).
- Provision of site access and on-site technical support for EPA's Pandora spectrophotometers, which continuously monitor total column NO<sub>2</sub> and HCHO, at four sites (Westport Sherwood Island, New Haven Criscuolo Park, Cornwall Mohawk Mountain and Madison Hammonasset State Park).
- 9. On page 17, EPA acknowledges CT DEEP's current challenge implementing bi-weekly manual gas-phase titration (GPT) quality control checks for NO<sub>2</sub>. We support CT DEEP's work to transition to automated GPT quality control (QC) checks as soon as possible.
- 10. On pages 20-21, EPA acknowledges your efforts described under "Community-Based Monitoring and Community Outreach Efforts." CT DEEP highlights the work being done to support community air monitoring through the expansion of its sensor loan program, assessment of sensor performance, and assistance with two American Rescue Plan community air monitoring grants.
- 11. On page 23, the monitoring objectives for Bridgeport Roosevelt School should include sulfur dioxide (SO2) monitoring.

DEEP response: The Bridgeport Roosevelt School monitoring objectives description on page 23 has been revised to indicate that population exposure and highest concentration levels are monitoring objectives for both PM and SO<sub>2</sub> monitors.

### Comments Received from Debora Roe, People's Action for Clean Energy (PACE)

PACE requested the following be added to the plan:

- 1. Install a fixed air monitoring stations in Granby, CT (in the Floydville Road area) and in other highly impacted communities, equipped with:
  - o PM2.5 (FEM)
  - Ultrafine particles (UFP) / Black Carbon (Aethalometer)
  - o NO₂ and VOC sensors
  - Meteorological sensors (wind direction, speed, mixing height)

DEEP response: DEEP appreciates the comments from PACE on the draft Plan and acknowledges there are concerns regarding local air pollution impacts from airport operations. The purpose of the draft Plan, however, is to ensure compliance with federal ambient air monitoring requirements necessary to demonstrate compliance with NAAQS. Neither the Plan, nor the monitoring network, is designed to assess the impacts from a single source.

Airport related emissions are taken into account as part of DEEP's air quality management program. In an effort to explore further the impact of BDL on emissions in Connecticut, DEEP reviewed its 2017 periodic emissions inventory.

The percentage of statewide emissions from BDL as calculated from the published 2017 Periodic Emissions Inventory document are as follows:

voc	NO <sub>X</sub>	СО	PM <sub>10</sub> -PRI	PM <sub>2.5</sub> -PRI	SO <sub>2</sub>	Lead
0.09%	0.68%	0.24%	0.03%	0.07%	1.72%	0.04%

Depending on the pollutant, the larger airports referenced in the comment, such as LAX or BOS (Logan), have significantly higher emissions than BDL. For example, NOx emissions are five to thirteen times higher at BOS and LAX, respectively, than at BDL using the same 2017 data.

While the comment did not specify lead (Pb), DEEP notes that EPA has studied the impact of Pb emissions from small airports where leaded fuel used for piston-engine aircraft was predominant (<u>Airport Lead Monitoring</u>). While airports in Connecticut were too small to be included in the study, lead monitoring conducted at the New Haven Criscuolo Park monitoring site from 2010 to 2016 indicated levels far below the health-based regulatory limit of  $0.15 \,\mu g/m^3$ .

Please see the additional information about DEEP's sensor loan program noted in response to comment 4, below.

2. Launch a short-term mobile monitoring campaign in towns beneath the flight path (Granby, East Granby, Suffield, Windsor Locks) using DEEP's existing portable equipment or partner with EPA's Region 1 mobile air lab.

DEEP response: The Geospatial Measurement of Air Pollution (GMAP) vehicle is a resource operated by DEEP that has the capacity to monitor air toxics, criteria air pollutants and precursors, greenhouse gases, simultaneous meteorological information, and GPS coordinates. The GMAP vehicle is used for inspection targeting and complaint response purposes throughout the state. The GMAP takes instantaneous measurements of certain air pollutants and meteorological parameters; when unusual readings are observed, additional investigation is conducted, using traditional source inspection techniques, to determine

the source of such readings. DEEP has a very small staff supporting the GMAP program who use a defined protocol to prioritize locations for deploying the vehicle. Information relating to GMAP activities will be made available on this webpage: <a href="https://portal.ct.gov/deep/air/compliance-assurance/geospatial-measurement-of-air-pollution---qmap">https://portal.ct.gov/deep/air/compliance-assurance/geospatial-measurement-of-air-pollution---qmap</a>

The GMAP is not used for the type of comprehensive, scientifically rigorous monitoring that has been requested given its mobile nature and the high incidence of spectral, meteorological, and other inferences in the air pollutant concentration measurements it takes. GMAP is a screening tool that the DEEP has incorporated into the Air program's compliance assurance efforts to prioritize and address sources of air pollution that would not be subject to on-site inspections or that might otherwise be detected. The goal of the GMAP program is to reduce emissions from these sources and enhance compliance.

3. Add Bradley International Airport to the list of priority sources under the Enhanced Monitoring Plan (EMP), given its regional impact and the population density of affected downwind communities.

DEEP response: States located in the Ozone Transport Region (OTR), as well as states with ozone nonattainment areas classified moderate and above, are required to develop and implement an Enhanced Monitoring Plan (EMP) for surface level ozone. The EMP is intended to provide additional monitoring to increase scientific understanding of the causes of ozone nonattainment, such that control measures may be implemented to achieve attainment. EMPs are not intended to study the impact of specific sources or their contribution to a regional air quality problem.

Given that Connecticut's ozone nonattainment problem is largely driven by interstate air pollution transport, the Connecticut EMP is focused on identifying factors that contribute to high ozone levels in coastal Connecticut, such as in Madison, Stratford, Westport, and Greenwich. Emissions from Bradley International Airport do not impact ozone levels at these sites.

4. Include Bradley-area sensor deployments in DEEP's PurpleAir loan program and collocation evaluations, and publicly share real-time data via the AirNow Fire and Smoke Map or a CT-specific dashboard.

DEEP response: DEEP currently has PurpleAir sensors deployed in Windsor Locks and on Barndoor Hills Road in Granby. DEEP welcomes applications for monitoring projects surrounding this and any other areas of community concern. Program details and an online application form can be found at the following link: CT DEEP Sensor Loan Program.

Data from DEEP air sensors, including those operated through the air sensor loan program, are publicly available and can be viewed alongside regulatory monitors on the AirNow Fire and Smoke Map (<a href="https://fire.airnow.gov/">https://fire.airnow.gov/</a>) as well as via the PurpleAir Real-Time Map (<a href="https://map.purpleair.com/">https://map.purpleair.com/</a>).

5. Coordinate with MassDEP and EPA Region 1 to replicate regional-scale studies that link aviation activity with spikes in PM2.5 and UFP concentrations.

DEEP response: Given the relative size of Bradley airport compared to other airports identified by the commenter and that DEEP is preempted from regulating airport-related emissions, DEEP should rely on studies from larger airports and utilize such data, if warranted, to advocate for additional federal control programs to reduce airport related emissions. The approach utilized by a New Haven environmental group to conduct air quality monitoring near Tweed-New Haven airport may be one approach to consider as an approach for Bradley Airport. For that project, the environmental group secured local grant funding to

deploy sensors and a mobile lab as part of a grassroot effort to generate an independent set of monitoring

data.

## Comment received from Sharon G. Huttner, Branford Clean Energy Committee member

There is a major lapse in the annual air monitoring network plan, and that is the omission of monitoring air pollution of aviation. High quality air monitoring should be conducted on an ongoing basis at Bradley International Airport and Tweed Airport. Please add this to the updated plan.

DEEP response: DEEP appreciates this comment and acknowledges there are concerns regarding local air pollution impacts from airport operations. The purpose of the draft Plan, however, is to ensure compliance with federal ambient air monitoring requirements necessary to demonstrate compliance with NAAQS. Neither the Plan, nor the monitoring network, is designed to assess the impacts from a single source, such as Bradley International Airport in Windsor Locks. Specific details of DEEP's ambient air monitoring network and compliance with federal air monitoring regulations can be found in the Five Year Network Assessment (available at this link: Air Monitoring in Connecticut). For additional information, please see DEEP's responses to PACE, above.