

HEARING REPORT

**Prepared Pursuant to
Code of Federal Regulations Part 40, Section 51.102**

**Regarding Revision to the
State Implementation Plan for Air Quality**

Hearing Officer: Merrily A. Gere

Date of Hearing: July 10, 2001

On June 1, 2001, the Commissioner of the Department of Environmental Protection (“Department”) signed a notice of intent to revise the State Implementation Plan (“SIP”) for air quality required by the Clean Air Act Amendments of 1990 (“CAA”). The revision to the SIP describes how Connecticut will achieve continued emissions reductions through 2007 in the Southwest Connecticut Severe Ozone Non-attainment Area and prepare a mid-course review by December 31, 2004. Pursuant to such notice, a public hearing was held on July 10, 2001. The public comment period for the proposed amendment closed on July 10, 2001.

I. Overview

This report describes the revision to the SIP as proposed for hearing; the final requirements of the revised SIP; a statement of the principal reasons in support of the Department’s revision; a statement of the principal considerations presented in oral and written comments in opposition to the Department’s revision; and a summary of all comments and responses thereto on the revision. Those who provided comments are identified in Attachment 1.

II. Summary and Text of the Revision as Proposed

This SIP revision (“Revision”) satisfies two outstanding requirements necessary for the U.S. Environmental Protection Agency (“EPA”) to approve Connecticut’s ozone attainment plans: (1) a plan for Connecticut to achieve attainment through continued emissions reductions through 2007 in the Southwest Connecticut Severe Ozone Non-attainment Area; and (2) a commitment to prepare mid-course review by December 31, 2004 to evaluate progress towards the goal of attaining the ozone national ambient air quality standard (“NAAQS”) statewide by 2007.

The Revision as proposed consists of four elements: (1) the Post-99 Rate of Progress Plan; (2) NO_x reductions at municipal waste combustion facilities; (3) additional potential control measures; and (4) a commitment to submit a mid-course review to EPA by December 31,

2004. Note that the final version of the Revision at Attachment 2 to this hearing report includes a commitment to pursue adoption of two of the potential control measures proposed.

The Revision as proposed is included in the package sent to Ms. Susan Studlien of EPA to notify EPA of the public hearing occurring on July 10, 2001. This submission does not include an additional copy of the proposed Revision, but rather cites to the proposed Revision included in that package.

III. Principal Considerations in Support of the Proposed Revision

The Revision demonstrates how Connecticut will come into compliance with the 1-hour ozone NAAQS, thereby satisfying the outstanding conditions necessary for EPA to approve Connecticut's ozone attainment plan as required by the CAA. EPA's conditions for approval are specified in the December 16, 1999 conditional approval of Connecticut's ozone attainment plans (64 FR 70332 and 64 FR 70348). Conditions for approval not addressed in this Revision were satisfied in the SIP revision "Addenda to the Ozone Attainment Demonstrations for the Southwest Connecticut Severe Ozone Nonattainment Area and Greater Connecticut Serious Ozone Nonattainment Area" dated February 8, 2000.

IV. Principal Considerations in Opposition to the Proposed Revision

EPA Region 1 suggested confirmation and investigation regarding certain portions of the emissions estimations included in the Revision. EPA's comments are described in detail in Section V.

V. Summary of Comments

The only comments were submitted by David B. Conroy, Chief of the Air Quality Planning Group at EPA Region 1.

Comments on the Post-1999 Rate of Progress Plan for Southwest Connecticut

Comment 1: Connecticut projected future year emissions based primarily on the State's 1996 periodic emission inventory. The State's post-1999 ROP plan documents that the 1996 on-road and off-road emission estimates were derived using the same updated methodology as the 1990 emissions used in the target calculations for these sectors. Connecticut also used the 1996 periodic emissions inventory to project future year emissions for area and point sources. Accordingly, Connecticut needs to ensure that the emission estimation methodologies used for point and area sources in the 1996 periodic inventory match those used to develop the 1990 emissions in the target level calculations for these sectors. Doing so will ensure that emission reductions are not shown in the ROP analysis simply due to changes in emission estimation methodologies. If Connecticut determines that area and point source emission estimation methodologies differ between the 1990 and 1996 inventories, it should revise its methodology to ensure that emission reduction credits are not shown in the ROP analysis simply due to differences in emission estimation procedures.

Response: As explained below, I do not recommend that the Department revise its methodology as suggested in this comment in the final version of the Revision submitted to EPA.

EPA is correct in noting that emission estimation methodologies change over time. In fact, this was the primary motivation for the Department to consult with EPA to develop a simplified procedure prior to preparing this analysis. As stated in Section 2.2 of the Post-1999 ROP Plan, “The revised estimates of 1990 baseline emissions and 1996 and 1999 target levels (see Appendix B) are employed here only to serve as a consistent starting point for the establishment of target levels for 2002, 2005 and 2007 in the Post-1999 ROP Plan. The revised estimates are not intended to replace those included in the already approved 1990 baseline inventory, 15% RFP Plan, or 1999 ROP Plan.” Revised estimates were calculated for the on-road and non-road mobile source categories because mobile source emission estimation methods had changed significantly and combined emissions from these two categories accounted for 54% of volatile organic compounds (“VOC”) and 65% of nitrogen oxide (“NOx”) emissions in 1990.

Emission estimation procedures for most other source categories did not change between 1990 and 1996 (*e.g.*, point sources, which accounted for 33% of 1990 NOx emissions). For those categories for which procedures did change between 1990 and 1996, the Department judged that: 1) emissions from the affected categories were comparatively small; and/or 2) methodological changes do not result in changes to target emissions levels that significantly affect the ROP determination, given that overall emission reductions are projected to surpass ROP requirements by a wide margin. The Department determined that limited resources would be more effectively applied developing projected emissions for 2002, 2005 and 2007, rather than recalculating decade-old emission estimates for a group of relatively minor source categories with little resulting impact on the ROP demonstration.

Comment 2: Connecticut used VMT projections provided by the State's Department of Transportation to project on-road mobile emissions, gasoline storage and marketing emissions, and asphalt paving emissions. Use of VMT to predict emissions for gasoline storage and marketing emissions may not be effective due to the declining average fuel economy of the overall vehicle fleet caused by increased sport utility and light duty truck use. Connecticut should investigate use of a different surrogate to project emissions from gasoline storage and marketing activity.

Response: I recommend that the Department revise projected VOC emissions in the final Revision submitted to EPA in recognition that the use of VMT growth projections may underestimate emissions from gasoline storage/transport/marketing activities given the decline in average fleet fuel economy over the last decade or so. The decline in fuel economy is documented in EPA's December 2000 report "Light-Duty Automotive Technology and Fuel Economy Trends 1975 Through 2000," which indicates that light duty vehicle average fuel economy has declined from a peak of 25.9 miles/gallon for model year 1988 to 24.0 miles/gallon

for model year 2000.

In an effort to better project future emissions from gasoline storage and handling, the Department examined the trend in gasoline consumption by highway vehicles in Connecticut, as obtained from the Federal Highway Administration's Highway Statistics Series (*see* Tables MF-21 at <http://www.fhwa.dot.gov/ohim/ohimstat.htm>). Because a longer period of record was available, highway gasoline data were used instead of total gasoline consumption data, which include non-highway applications. As summarized in the following table, highway gasoline consumption in the state grew by 14.6% between 1990 and 1999. Gasoline consumption data during the 1990's reflects the increased fleet penetration of sport utility vehicles and small trucks as well as economic recession and expansion periods during the decade. Linear extrapolation of the 1990-1999 trend through 2007 yields fuel consumption growth estimates of 17.2%, 22.0%, and 25.0% for 2002, 2005, and 2007, relative to 1996. (These compare to VMT growth rates of 8.8%, 13.2%, and 16.1% for the same years, relative to 1996.)

Connecticut Highway Vehicle Gasoline Consumption

	Calendar Year	Gasoline Consumption (1000 gallons)	% Change vs 1990	% Change vs 1996
Actual	1990	1,301,715		
	1991	1,302,750	0.1%	
	1992	1,311,247	0.7%	
	1993	1,321,880	1.5%	
	1994	1,328,585	2.1%	
	1995	1,257,051	-3.4%	
	1996	1,326,218	1.9%	
	1997	1,330,775	2.2%	0.3%
	1998	1,373,280	5.5%	3.5%
	1999	1,491,660	14.6%	12.5%
Projected (1990-1999, extrapolated to 2002, 2005, & 2007)	2002	1,554,975	19.5%	17.2%
	2005	1,618,290	24.3%	22.0%
	2007	1,660,500	27.6%	25.2%

When the revised growth factors are applied to the gasoline storage and handling categories, (*i.e.*, gasoline/crude oil storage, volatile organic liquid (VOL) storage, VOL ship/barge transfer, barge/tanker cleaning, bulk gas terminals, gasoline bulk plants, tank truck unloading, vehicle fueling, underground tank breathing, and gasoline trucks in transit) projected VOC emissions for 2002, 2005 and 2007 increase by 0.18 tons/day, 0.19 tons/day and 0.20 tons/day, respectively, compared to the projections included in the draft Post-1999 ROP Plan. I recommend that the Department incorporate these minor changes into the appropriate tables and text in the final 1999 ROP Plan submitted to EPA.

Comment 3: Connecticut did not predict any increase in emissions from municipal waste combustors in the State because these facilities are currently operating at close to maximum capacity. Given this, Connecticut may want to review its municipal waste management plan to see if there may be increased use of landfills in the State in the coming decade, and if so revise its

projected emissions from landfills accordingly.

Response: In the final version of the Revision submitted to EPA, I recommend the Department make no change to the proposed Revision in response to this comment. The Department's current municipal waste management plan, "Proposed Solid Waste Management Plan: Minimizing Disposal in the 21st Century" (December 1999), does *not* indicate a potential increase in the use landfills. The Management Plan describes the Department's strategies to best manage Connecticut's municipal solid waste ("MSW") over the next two decades, with particular focus on the years 2000-2005. As stated in the Management Plan, "One of the most important solid waste objectives for the next decade is to maximize the amount of waste source reduced, recycled, and composted -- both for the increased preservation of natural resources and in order to avoid the need for additional MSW disposal capacity as the state's population grows." The Department has established a goal to increase source reduction and recycling practices so as to reduce the MSW disposal rate from the current level of 0.73 tons/capita/year to 0.61 tons/capita/year by the year 2020. This goal is consistent with the solid waste management hierarchy established by Connecticut General Statutes ("CGS") Section 22a-228(b), which reserves landfill disposal for only those wastes that are not suitable for source reduction, recycling, composting or incineration at the state's existing permitted municipal waste combustor facilities.

As stated in the Management Plan, analysis of available data indicates that there is sufficient source reduction and recycling potential to make it unnecessary to permit additional MSW disposal capacity prior to at least 2005, when the next scheduled reassessment of disposal needs and capacity occurs. At that time, if the need for additional future MSW disposal capacity is projected, preference will be given to expansion of existing recovery/disposal facilities, consistent with the hierarchy established by CGS Section 22a-228(b). Given these policies and that the three remaining MSW landfills accepting waste in Connecticut are *not* located in the Southwest Connecticut nonattainment area, it is highly unlikely that there will be increased landfill disposal of MSW in Southwest Connecticut prior to the required 2007 attainment date. Similarly, any potential expansion of existing municipal waste combustor facilities in Southwest Connecticut is unlikely prior to 2007, given the 2005 reassessment date and permitting timelines. It should be noted that the Post-1999 ROP Plan conservatively assumes MSW landfill emissions in Southwest Connecticut will increase with statewide population levels through 2007, even though no landfills in that area are accepting new waste.

Comment 4: Connecticut should document the assumption used to calculate emissions reductions from use of Phase II reform in stationary point and area sources.

Response: In addition to mobile source VOC and NO_x reductions resulting from year 2000 implementation of the second phase of reformulated gasoline ("RFG Phase II"), the Post-1999 ROP Plan takes credit for evaporative VOC reductions from gasoline storage/transport/marketing activities included in the stationary source sector of the inventory. As indicated in Appendix C of the Post-1999 ROP Plan, stationary source evaporative VOC reductions were assumed to be proportional to the relative change in MOBILE5b uncontrolled refueling emissions determined for the Reid vapor pressures ("RVP") associated with RFG Phase I and Phase II (*i.e.*, 3.97 g/gall

at 7.9 RVP & 3.44 g/gall at 6.8 RVP, respectively). The resulting 13.3% reduction was applied to 1996 VOC emission estimates, along with appropriate growth factors (as revised in response to Comment 2 above), to project VOC emissions in 2002, 2005 and 2007. I recommend the Department revise the final version of the Post-1999 ROP Plan submitted to EPA to include additional text narrative in Section 3.3.1 and MOBILE5b input files in Appendix D to document these reductions.

Comment 5: The emission trend for AIM coatings should be reviewed. The 1990 estimate for the severe area was 13,430 lbs/day based on an EF of 4.6 lbs per capita from the old "Volume I" inventory guidance. The 1996 Periodic Inventory estimate is 10,676 lbs/day based on an EF of 3.63 lbs per capita. The text of the 1996 Periodic Inventory explains that the 3.63 per capita EF is from the EIIP guidance document, but the EIIP guidance document indicates on page 5-7 that the EF should still be 4.6 lbs per capita (the sum of the two EFs shown in Table 5-2: $0.74 + 3.87 = 4.61$). In the draft Post-1999 ROP Plan, the lower estimate of 10,676 lbs/day is projected with growth factors, then lowered by 20% to account for the Federal AIM rule. What is the source of the 3.63 lbs per capita EF used to determine 1996 emissions?

Response: The Department has re-examined the EIIP guidance and has confirmed that the 3.63 lbs/capita emission factor it used to develop AIM emission estimates for the 1996 periodic inventory (as well as to project future year ROP emissions) is correct. Therefore, in response to this comment, in the final version of the Revision submitted to EPA, I recommend the Department make no change to the Revision as proposed. The EIIP Table 5-2 values of 0.74 and 3.87 to which EPA refers represent VOC contents (in pounds of VOC per gallon of paint) for water- and solvent-based coatings, respectively, *not* emission factors. When combined with per capita usage values from page 5-2 of the EIIP document (*i.e.*, 1.82 gallons/capita for water-based coatings and 0.59 gallons/capita for solvent-based coatings), the 3.63 lbs/capita emission factor results. In light of this, no change is necessary to the AIM calculations in the Post-1999 ROP Plan.

Comment 7 (sic): Documentation should be provided explaining how a typical summer day NOx estimate was determined for point sources. The 2007 daily point source NOx emissions in the draft submittal are reported as 19.1 tons per summer day (tpsd) for the severe area, and 57 tpsd for the serious area for a statewide total of 76.1 tpsd. The 2007 NOx point source budget for the State is 9,534 tons over 5 months, which divided by 150 days yields 63.6 tpsd.

Response: As documented in Section 3 of the Post-1999 ROP Plan, typical summer day NOx emissions for point sources were determined as follows:

- (a) Emission estimates from the Department's 1996 Periodic Inventory were grown to 2002, 2005 and 2007 (*see* Appendix C of the Plan) using the employment-based growth factors documented in Appendix F. Emissions growth for electric generating units was not included due to the decreasing emissions cap imposed by Connecticut's NOx Budget Program. No growth was assumed for municipal waste combustion ("MWC") units, as discussed in the response to Comment 3; and

(b) Emission projections for 2002, 2005 and 2007 were then adjusted to account for reductions calculated for each facility affected by either Connecticut's NOx Budget Program or recently adopted MWC emission limits. Emission reduction calculations for each of those programs are documented in Appendices G and H to the Plan.

The Department is not familiar with the specific details of how EPA developed emission inventory projections in support of the NOx SIP Call rulemaking; therefore, no attempt was made to explain any differences that may exist between the Department and EPA projections. For these reasons, in the final version of the Revision submitted to EPA, I recommend the Department make no change to the Revision as proposed at hearing.

Comments on the NOx Reductions from Municipal Waste Combustion Facilities

Comment 8: Connecticut's February 8, 2000 SIP revision concerning addenda to the ozone attainment demonstration identified commitments for addressing the remaining shortfall for the Southwest CT severe nonattainment area. The commitments included submitting additional NOx limits applicable to municipal waste combustors (MWC) and a determination as to the appropriateness of substituting NOx reductions expected to be achieved in the Greater CT serious area for NOx reductions required in the Southwest CT severe area. The additional MWC NOx limits are expected to achieve 1.62 tpsd NOx reductions statewide as indicated in the June 4, 2001 proposed SIP revision. However, the June 4, 2001 proposed submittal does not provide specific justification for using the 1.62 tpsd statewide NOx reductions to meet the specific NOx shortfall in the severe ozone nonattainment area. Connecticut should provide such justification in its final revisions to the ozone SIP.

Response: In the final version of the Revision submitted to EPA, I recommend that the Department incorporate the following justification for using statewide emission reductions to meet the EPA-identified shortfall.

The use of additional statewide NOx and VOC reductions to meet the EPA-identified emission reduction shortfalls in Southwest Connecticut is appropriate and consistent with both EPA guidance and air quality data. EPA addresses the geographic substitution issue in a December 23, 1997 memorandum entitled "Guidance for Implementation of the One-Hour Ozone and Pre-existing PM-10 NAAQS." The guidance indicates that, for one-hour nonattainment areas, states are allowed to take credit for emissions reductions obtained from sources outside the designated nonattainment area as long as the reductions occur no further than 100 km (for VOC sources) or 200 km (for NOx sources) away from the nonattainment area. When applied to the New York-New Jersey-Connecticut (NY-NJ-CT) nonattainment area, these substitution distances encompass all of Connecticut (*see* Figure IV-2 of the OTC Model Rule Report, included as Enclosure C of the original hearing package). Although this guidance was initially intended to address geographic substitution for use in post-1996 rate of progress plans, EPA has implied that it can also be applied for attainment planning purposes given the regional nature of the ozone problem. For example, EPA control strategies, such as the NOx Budget Program, reflect this same principle and thus use regional emission reductions to attain the ozone standard.

Note also that, historically, many of the highest ozone levels measured in Connecticut occur outside of the Southwest Connecticut portion of the NY-NJ-CT severe nonattainment area. For example, the highest design values in the state for each of the years from 1998 through 2000 were measured either in Middletown or Madison, towns located downwind of the NY-NJ-CT severe nonattainment area, although significantly influenced by transport from that area. In recognition of this, ozone control strategy SIP's in the NY-NJ-CT severe area have been developed with the objective of achieving ozone attainment throughout *all* portions of Connecticut, not just the Southwest Connecticut portion of the NY-NJ-CT nonattainment area. With that objective in mind, the Department intends to implement all selected shortfall measures statewide to address Connecticut's contribution to nonattainment areas both within the state and further downwind.

EPA guidance materials (*e.g.*, EPA's August 5, 1994 memorandum entitled "Clarification of Policy for Nitrogen Oxides (NO_x) Substitution") also address the conditions under which NO_x reductions can be substituted for VOC reductions. Requirements to qualify for NO_x substitution include: 1) submittal of photochemical grid modeling showing that NO_x reductions are an effective means to reduce ozone concentrations; and 2) submittal of reasonably available control technology ("RACT") regulations for NO_x point sources. As documented in Section 2.1 of the Post-1999 ROP Plan, SIP modeling analyses submitted by the Department identify regional NO_x emissions as a prime contributor to ozone formation in Connecticut and throughout the Northeast, supporting the need for large-scale NO_x reductions to achieve compliance with the one-hour ozone standard in Connecticut. The Department has also submitted the required NO_x RACT regulations, along with the recently adopted MWC regulations and NO_x Budget Program. Together, these control strategies will provide significant NO_x reductions from stationary sources within the state.

Comment 9: Subdivision (1) of subsection 22a-174-38(c) refers to compliance with the emission limits in Table 38-1a. However, Table 38-1a is struck-out as it contains mercury standards which Connecticut does not want incorporated into the SIP. Therefore, the reference to Table 38-1a in subdivision (1) should also be struck-out for consistency. Similarly, subdivision (2) of this subsection has a reference to Table 38-2a that contains struck-out mercury standards and, therefore, the reference to the table should also be struck-out.

Response: I recommend that in the final version of Section 22a-174-38 submitted to EPA in the Revision the Department include the references in subdivisions (c)(1) and (c)(2) of Section 22a-174-38 to mercury limits more stringent than required by EPA's municipal waste combustor guidelines and NSPS in strikeout form. In addition, I recommend the Department include all emissions limits and related provisions for pollutants other than NO_x in strikeout form as the SIP applies only to the ozone NAAQS.

Comment 10: *Retracted.*

Comment on Additional Potential Control Measures

Comment 11: In EPA's December 16, 1999 proposed conditional approval ozone attainment demonstration, EPA said it did not believe the attainment analysis for New York-Northern New

Jersey-Long Island area proves attainment by the year 2007. An analysis EPA did to further determine how much additional reduction was needed in order for EPA to approve a revised and re-submitted attainment demonstration showed that an additional 3.8% VOC and 0.3% NO_x reduction from base year 1990 inventories would be necessary to approve a revised and re-submitted attainment demonstration for this area.

In Connecticut's proposed post-1999 ROP plan submitted on June 4, 2001, the 1990 emission estimates for both VOC and NO_x were recalculated using EPA's MOBILE 5b model and EPA's draft NONROAD model. The revised 1990 emission estimates are 144.0 tpsd of VOC and 132.7 tpsd of NO_x. Using these 1990 emission inventory values, Connecticut's shortfalls are predicted to be 5.5 tpsd of VOC and 0.4 tpsd of NO_x. In its final revisions to its ozone SIP, Connecticut should commit to submit control measures to cover these shortfall amounts and identify the specific measures it intends to adopt and submit to EPA for approval.

Response: In the final submission to EPA, I recommend the Department commit to pursue adoption of additional control measures to cover EPA's revised shortfall estimate, as requested by EPA in Comment 11. As explained below, it would be difficult for the Department to produce accurate emission reduction shortfall estimates as suggested in this comment.

In February 2000, the Department submitted addenda to the ozone attainment demonstration committing to address the EPA-identified emission reduction shortfalls of 0.4 tpsd NO_x and 4.9 tpsd VOC. EPA's shortfall calculations were based, in part, on Connecticut's 1990 emission inventory, which has received final EPA approval into the SIP. In the Post-1999 ROP Plan, revised estimates of 1990 emissions (as well as 1996 and 1999 ROP emission target levels) were determined based on more recent emission estimation methods for mobile sources. However, as stated in Section 2.2 of the Post-1999 ROP Plan, the revised estimates were not intended to replace the 1990 baseline emission inventory (or the target levels) already approved by EPA, but rather were limited to serving "as a consistent starting point for the establishment of target levels for 2002, 2005, and 2007 in the Post-1999 ROP Plan."

EPA's suggested revisions to the previously approved 1990 baseline emission inventory would marginally alter the calculated shortfall values as indicated in their comment above, but could also bring into question the need to revisit previous SIP submissions such as the 15% RFP Plan, the 1999 ROP Plan and the attainment modeling.

It would be difficult for the Department to incorporate the 1990 emission revisions into the shortfall calculations, especially given the great degree of uncertainty built into EPA's shortfall procedures. This is consistent with EPA's current practice to not require updates to previously submitted emission inventories, modeling, ROP calculations and attainment demonstrations whenever new emission or dispersion modeling methods are made available.

Notwithstanding the above discussion, the additional control strategies the Department is committing to pursue will be sufficient to satisfy the revised EPA-identified attainment shortfall. The Department is committing at this time to pursue two of the potential control measures

included in the Revision as proposed at public hearing. Having analyzed the potential emission reductions from the proposed additional control measures, the Department has chosen (1) additional restrictions on VOC emissions from mobile equipment refinishing operations and (2) requirements to reduce VOC emissions for certain consumer products, both as based on model rules included at Enclosure D of “Updates to the Ozone Attainment Plans for the Southwest Connecticut and Greater Connecticut Ozone Nonattainment Areas.” Together with the already adopted MWC NO_x requirements, these measures will achieve reductions that satisfy the EPA-identified attainment shortfall for Southwestern Connecticut and allow attainment of the 1-hour ozone NAAQS. In Section 4 of the final version of the Revision (included as Attachment 2 of this report), I recommend that the Department commit to pursue adoption of these two additional control measures and demonstrate that they provide sufficient emission reductions.

VI. Final Text of Proposed Revision

See Attachment 2 to this report for the final text of the Revision, “Updates to the Ozone Attainment Plans for the Southwest Connecticut and Greater Connecticut Ozone Nonattainment Areas” with its accompanying enclosures.

VII. Conclusion

Based upon the comments submitted by interested parties and addressed in this Hearing Report, I recommend the final revision, as contained herein in Attachment 2, be submitted by the Commissioner of Environmental Protection for approval to the U.S. Environmental Protection Agency as a revision to the Connecticut State Implementation Plan for Air Quality.

Merrily A. Gere
Hearing Officer

Date

Attachment 1

Commentor

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Attachment 2
Final Text of Revision,
Revised in Response to
Comment

Attachment 3
Notice of Public Hearing

Attachment 4
Certification of Public
Hearing

**Revision to State Plan for
Large MWCs,
R.C.S.A. Section 22a-174-38
to Replace the Version
Submitted November 28, 2000**

**Connecticut Department of Environmental Protection
Bureau of Air Management**

September 2001