



M. Jodi Rell

GOVERNOR

STATE OF CONNECTICUT

March 12, 2009

Ira W. Leighton, Acting Regional Administrator
U. S. Environmental Protection Agency Region 1
One Congress Street, Suite 1100
Boston, MA 02114-2023

***Re: 2008 8- Hour Ozone National Ambient Air Quality Standard:
Recommended Attainment Area Designations for Connecticut***

Dear Acting Administrator Leighton:

I write in response to Robert Varney's letter of December 30, 2008 requesting that I provide attainment designations for the State of Connecticut under the 2008 national ambient air quality standard (NAAQS) for 8-hour ozone, as required by Section 107(d) of the Clean Air Act (CAA). Consistent with CAA Section 107(d) and U.S. Environmental Protection Agency (EPA) guidance, the entire State of Connecticut should be designated as nonattainment for the 2008 8-hour ozone NAAQS.

Based on an analysis of air quality, emissions, meteorology, population, traffic and other data relevant under EPA guidance, the state should be divided into two nonattainment areas, with the same boundaries established for the 1997 ozone NAAQS, as follows:

- The **Southwest Connecticut** nonattainment area, comprised of Fairfield, New Haven and Middlesex Counties, as part of a larger multi-state New York City metropolitan nonattainment area; and
- The **Greater Connecticut** nonattainment area, comprised of Litchfield, Hartford, Tolland, Windham and New London Counties.

The recommended areas are delineated in the map attached to this letter, and a nine-factor analysis supporting the recommended area boundaries is set out in the enclosed technical support document.

Despite our best efforts to reduce in-state ozone precursor emissions, Connecticut has not yet attained the less stringent 1997 ozone NAAQS and will likely be hindered in attaining the 2008 ozone NAAQS because of the overwhelming influence of transported pollution from upwind states. Connecticut will do its fair share to reduce Connecticut's contribution to unhealthy ozone levels, within our borders and downwind. Pursuant to CAA Section 110(a)(2)(D), we expect EPA to ensure that every state fully addresses its contribution to any other state's ozone nonattainment.

Ira W. Leighton
DATE
Page 2

Staff at the Connecticut Department of Environmental Protection are eager to work with you and other states in the region to develop new emission reduction measures and innovative approaches that will eliminate the unhealthy ozone levels in the state and the region, allowing all of us to breathe easier. Please get in touch with Anne R. Gobin, Chief of the Connecticut Department of Environmental Protection's Bureau of Air Management at (860) 424-3026 with any questions regarding these recommendations or the supporting documentation.

Sincerely,



M. Jodi Rell
Governor

Attachment (Figure)
Enclosure (Technical Support Document)

cc: D. Conroy (EPA Region I)
G. McCarthy (CTDEP)
A. Gobin (CTDEP)

**Map of Connecticut's Recommended 2008 8-Hour
Ozone NAAQS Nonattainment Area Boundaries**

