



Gina McCarthy
Commissioner

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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PHONE: 860-424-3001

February 1, 2008



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

Re: ***State Implementation Plan Revision Regarding Attainment of the
8-Hour Ozone Standard in Connecticut***

Dear Administrator Varney:

In satisfaction of Sections 172(b) and 182(b) of the Clean Air Act (CAA), I am pleased to submit the enclosed State Implementation Plan (SIP) revision describing Connecticut's efforts to attain the federal 8-hour National Ambient Air Quality Standard (NAAQS) for ground-level ozone. Also enclosed is documentation of Connecticut's 2002 baseline inventory, developed as required by CAA Sections 172(c)(3) and 182(a)(3). Successful achievement of attainment under the plan is predicated on actions made in concert with our sister states in the Ozone Transport Commission (OTC) region, continued reductions in ozone precursor emissions in upwind states and EPA's leadership in these state, regional and national efforts.

The plan makes use of air quality modeling and other quantitative and qualitative analyses of air quality, emissions and meteorological data to demonstrate attainment of the 8-hour ozone NAAQS by the June 2010 deadline. While the draft plan recognizes and attempts to adjust for uncertainties in its predictions, particularly in the Southwest Connecticut portion of the greater New York City nonattainment area, one thing is clear: because ozone levels in Connecticut are dominated by transport from upwind areas, attainment can be assured in 2010 by securing additional emission reductions from upwind states that make significant contributions to nonattainment in Connecticut. While Connecticut has worked through the OTC to encourage upwind reductions, additional national rules promulgated by EPA are necessary to reduce significant transport of ozone and ozone precursors from states upwind of Connecticut to areas of nonattainment in our State.

In reviewing the plan, you will note that Connecticut has not only met all requirements mandated by the CAA for moderate 8-hour ozone nonattainment areas as well as the previously adopted programs for serious and severe 1-hour ozone nonattainment areas -- including reasonably available control technology, VOC reductions from nontraditional sources such as consumer products, mobile source and fuel requirements -- but has exceeded mandated moderate nonattainment area actions. CTDEP, in conjunction with other states in the region and EPA regional offices, is even looking beyond simple, traditional seasonal and annual controls for stationary sources to create a program to address the significant, but previously unacknowledged,

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emissions that occur on peak electric demand days in the summer months. We are committed to continuing a process to achieve real, measurable air quality and public health benefits for Connecticut residents, but we recognize that we cannot meet this goal acting alone. Valuable improvements in Connecticut's air quality now rely on actions outside of the state. To that end, we are pleased that EPA will be considering a tighter ozone air quality standard and welcome the corresponding addition of national and regional controls over the coming years.

The enclosed SIP revision package includes the public hearing report, which address the comments provided by your staff, as well as the final technical support documents, which include the modifications noted in the hearing report. The final version of the plan, including all appendices, is available on the CTDEP web site at:
http://www.ct.gov/dep/cwp/view.asp?a=2684&q=322158&depNav_GID=1744.

I would like to thank you and your staff for your assistance in processing this SIP revision toward approval. The finalization of this plan will allow both of our agencies to refocus our efforts on constructive and creative approaches to reduce ozone precursor emissions as we plan for tighter federal ozone requirements in the future. Please call Anne Gobin at (860) 424-3026 if the Department can be of any assistance in your review of this plan.

Yours truly,



Gina. McCarthy
Commissioner

Enclosures

cc: Amey Marrella, Deputy Commissioner
Anne Gobin, Chief, Bureau of Air Management
David Conroy, EPA Region 1

Administrative Materials

All required state and federal procedures for public participation were followed as evidenced in the attachments listed below. Such attachments are included in satisfaction of the requirements of 40 CFR 51, Appendix V, Section 2. The Hearing Report addresses all the comments received, though not all comments resulted in changes to the Technical Support Document. The public notice and certification of public hearing demonstrate that the Department held a public hearing in accordance with the public notice and that the Department followed appropriate state and federal procedures for public participation. A group of new regulations, referred to in the attainment demonstration, are attached for inclusion in the State Implementation Plan. The submitted attachments include the following:

Binder 1

Attachment A: Hearing report.

Attachment B: Notice of public hearing.

Attachment C: Certification of public hearing.

Attachment D: 8-Hour Ozone Attainment Demonstration: Technical Support Document (TSD)

Attachment E: Regulations

1. 8-Hour Ozone Package
 - a. Amendment of Section 22a-174-20(*l*), Metal Cleaning;
 - b. Adoption of Section 22a-174-40, Consumer Products; and
 - c. Adoption of 22a-174-41, Architectural and Industrial Maintenance Products.
2. Amendment of Section 22a-174-43, Portable Fuel Container Spillage
3. Amendment of Section 22a-174-24(*i*), 8-Hour Ozone Standard

Binder 2

Attachment F: 8-Hour Ozone Attainment Demonstration: TSD Appendices

Binder 3

Attachment G: 2002 Periodic Ozone and Carbon Monoxide Emissions Inventory