

Notice of Proposed State Implementation Plan for Air Quality

The Commissioner of the Department of Energy and Environmental Protection (DEEP) hereby gives notice of intent to revise the State Implementation Plan (SIP) to comply with the Environmental Protection Agency's guidance for fulfilling requirements under section 110(A)(2)(D)(i)(I) of the Clean Air Act (CAA), also known as the Good Neighbor Provision, for the 2015 National Ambient Air Quality Standards for Ozone.

The authority to adopt this SIP revision is granted by section 22a-174 of the Connecticut General Statutes (CGS). This notice is required pursuant to 40 Code of the Federal Regulations 51.102.

A copy of the proposed SIP revision is available for public inspection during normal business hours at DEEP's Bureau of Air Management, Planning and Standards Division 5th Floor, 79 Elm Street, Hartford, CT and may be reviewed by contacting Kathleen Knight at 860-424-3823. The SIP Revision is also available at the link below.

All interested persons are invited to comment on the proposed SIP revision. Comments should be submitted via electronic mail to kathleen.knight@ct.gov or via postal carrier to Kathleen Knight at the DEEP, Bureau of Air Management, 5th Floor, 79 Elm Street, Hartford, CT 06106-4064. All comments should be received by 4:30 PM on October 18, 2018.

In accordance with 40 CFR 51.102, DEEP will hold a hearing at the time and location set out below **only if a request for such a hearing is made on or before October 12, 2018 at 4:30 PM.**

PUBLIC HEARING
October 18, 2018 at 9:00 AM
Department of Energy and Environmental Protection, Holcombe Room, 5th Floor
79 Elm Street
Hartford, CT 06106

A request to hold the hearing identified above may be made by any person by electronic mail to kathleen.knight@ct.gov or by telephone (860-424-3823). Such a request must be made by 4:30 PM on October 12, 2018. If no request for a hearing is received on or before that date, the hearing will be cancelled. Information on the status of the hearing will be posted on DEEP's website at http://www.ct.gov/deep/cwp/browse.asp?a=2586&deepNav_GID=1511 as of October 15, 2018. Questions concerning the public hearing may be directed to kathleen.knight@ct.gov or (860-424-3823).

The Connecticut Department of Energy and Environmental Protection is an Affirmative Action and Equal Opportunity Employer that is committed to complying with the Americans with Disabilities Act. To request an accommodation contact us at (860) 418-5910 or deep.accommodations@ct.gov

[Proposed Connecticut Good Neighbor State Implementation Plan for the 2015 Ozone NAAQS](#)

Date

September 14, 2018


Robert Kaliszewski
Deputy Commissioner



Delegation of Hearing Officer

In accordance with the provisions of section 22a-2 of the Connecticut General Statutes, Kathleen Knight of the Bureau of Air Management is hereby appointed as hearing officer. The purpose of this delegation is to allow said officer to conduct a public hearing on Thursday, October 18, 2018 and to render a decision regarding a proposal to amend the State Implementation Plan for the Good Neighbor Provisions regarding the 2015 ozone NAAQS.

Sept. 14, 2018

Date

A handwritten signature in blue ink, appearing to read "Robert Kaliszewski", is written over a horizontal line.

Robert Kaliszewski
Deputy Commissioner

CONNECTICUT GOOD NEIGHBOR SIP FOR THE 2015 OZONE NAAQS



Connecticut Department of

**ENERGY &
ENVIRONMENTAL
P R O T E C T I O N**

DRAFT FOR HEARING

September 2018

Introduction

On October 1, 2015, the Environmental Protection Agency (EPA) revised the primary and secondary National Ambient Air Quality Standards for ozone (NAAQS). Pursuant to Clean Air Act (CAA) section 110(a)(1) and (2), all states are required to submit any necessary revisions to their State Implementation Plans (SIPs) to provide for the implementation, maintenance and enforcement of any revised or new NAAQS. These implementation plans are known as infrastructure SIPs and include the requirement, under CAA section 110(a)(2)(D)(i), to prohibit emissions from within the state from interfering with the attainment or maintenance of a NAAQS in any other state. This requirement under CAA section 110(a)(2)(D)(i) is known individually as the “good neighbor” SIP. Due to its complexity the good neighbor SIP is often addressed separately from other portions of the infrastructure SIP.

The Connecticut Department of Energy and Environmental Protection (DEEP) made public notice of proposed revisions to its infrastructure SIP on June 29, 2018. In the proposal, DEEP stated that it would address the good neighbor SIP revision for the 2015 ozone NAAQS separately, and does so in this document. These SIP revisions are due to EPA by October 1, 2018

On March 27, 2018, EPA released a memo and supplemental information to assist states in the development of good neighbor SIPs.¹ DEEP shows that, following the guidance contained in EPA’s memo, Connecticut satisfies the good neighbor provision.²

Evaluation of Significant Contribution following EPA Guidance

EPA’s March 27, 2018 guidance established a four step process for evaluating if a state significantly contributes to nonattainment in a downwind state. This four step process is as follows:

- (1) identify downwind air quality problems;
- (2) identify the upwind states that “contribute enough” to those problems;
- (3) identify emission reductions necessary (if any), considering cost and air quality factors, to prevent the state from contributing significantly to another state’s air quality problems; and
- (4) adopt permanent and enforceable measures needed to achieve those reductions.

EPA recommends using modeled projected ozone contributions for the year 2023. EPA provides results of this modeling showing each state’s contribution to nonattainment receptors.³ EPA has generally considered that a state “contributes enough” or is linked to another state’s nonattainment if its contribution to the nonattainment receptor is greater than one percent of the standard, in this case 0.70 ozone parts per billion. Table 1 below shows EPA’s 2023 model results for receptors where Connecticut’s contribution was projected to meet or exceed the one percent level.⁴ Those values highlighted in green are the projected design values which do not exceed the standard. If the average projected design value exceeds the standard it is considered nonattainment. If the maximum design value exceeds the standard it is considered a “maintenance” receptor in danger of exceeding the standard. The results indicate that Connecticut contributes to only one nonattainment receptor – Suffolk, New York.

¹ [Memo from Peter Tsigotis / EPA dated March 27, 2018, “Information on the Interstate Transport State Implementation Plan Submissions for the 2015 Ozone National Ambient Air Quality Standards under Clean Air Act Section 110\(a\)\(2\)\(D\)\(i\)\(I\)”](#).

² DEEP has expressed its concerns – most recently in [comments on the CSAPR Close-out Rule](#) -- that the procedures on which this guidance are based are insufficient to remedy transport. Connecticut nevertheless uses this guidance for lack of adequate alternate guidance.

³ <https://www.epa.gov/airmarkets/march-2018-memo-and-supplemental-information-regarding-interstate-transport-sips-2015-0>

⁴ In guidance released August 31, 2018, EPA considers a 1 ppb threshold (rather than 1 percent) acceptable for determining if a state contributes enough to be linked to a downwind state’s nonattainment receptor. As Connecticut contributes less than 1 ppb to the nonattainment and maintenance receptors in EPA’s 2023 modeling, we could here conclude that Connecticut satisfies its good neighbor requirements.

Table 1. Modeled receptor locations where Connecticut contributes greater than one percent of the standard to the average or maximum projected 2023 design value. Also shown are the contribution due to the State in which the receptor is located.

State	County	2023 Average DV (ozone ppb)	2023 Maximum DV (ozone ppb)	In-State Contribution (ozone ppb)	CT Contribution (ozone ppb)
Rhode Island	Kent	60.4	60.7	0.65	5.83
Massachusetts	Hampden	59.3	59.5	2.74	5.06
Rhode Island	Providence	59.5	61.1	2.93	4.3
Rhode Island	Washington	62.6	64.0	11.8	3.94
New York	Suffolk	65.2	66.9	16.44	3.04
Massachusetts	Bristol	61.2	61.2	1.48	2.98
Massachusetts	Dukes	64.1	66.6	10.54	2.46
New York	Putnam	58.4	59.2	13.86	1.91
New York	Dutchess	58.6	60.2	13.3	1.9
New York	Westchester	63.8	64.4	14.79	1.82
Massachusetts	Essex	58.4	58.4	9.87	1.75
Massachusetts	Essex	56.2	56.8	8.73	1.65
Massachusetts	Suffolk	50.1	50.4	8.65	1.57
New York	Suffolk	67.6	68.7	16.75	1.51
Massachusetts	Barnstable	60.5	62.2	20.5	1.44
New York	Rockland	62.0	62.8	9.6	1.29
Massachusetts	Essex	57.2	57.2	10.8	1.18
New Jersey	Passaic	61.3	62.7	11.62	1.18
Maine	York	59.6	60.7	1.08	1.06
New York	Orange	55.3	56.9	11.46	1.05
Massachusetts	Suffolk	55.5	56.9	19.11	0.98
New York	Suffolk	74.0	75.5	18.11	0.83

The next step in EPA’s process (step 3) is to evaluate the necessary reductions. In this step, EPA considers feasible only reductions that are available at a cost of less than of \$1,400 per ton of emissions reduced. Connecticut’s emitters are currently required to adopt control measures at costs exceeding \$13,000 per ton.⁵ Due to Connecticut’s long history of reducing ozone precursor emissions, it has exhausted lower cost emission reduction measures.⁶

Conclusion

Having shown that emission reduction costs in Connecticut currently exceed the maximum acceptable threshold for emissions reductions by EPA, Connecticut has shown that, at step 3, Connecticut satisfies EPA requirements for a satisfactory good neighbor SIP for the 2015 ozone NAAQS. Any outstanding good neighbor requirements for the less stringent 2008 ozone NAAQS are therefore equally satisfied.

⁵ Regulations of Connecticut State Agencies section 22a-174-22e(h).

⁶ These control measures are documented in Connecticut’s most recent [ozone attainment plan technical support documents](#) for the 2008 standard submitted to EPA in 2017.