

June 22, 2012

Mr. David Conroy, Chief of Air Programs Branch U.S. Environmental Protection Agency, Region 1 5 Post Office Square *Mail Code:* OEP05-2 Boston, MA 02109-3912

Re: Redesignation Request and Maintenance Plan for the 1997 Annual and 2006 24-hour  $PM_{2.5}$  National Ambient Air Quality Standards

Dear Mr. Conroy:

Pursuant to Clean Air Act (CAA) Sections 107(d)(3)(E) and 175A, I am pleased to submit the enclosed State Implementation Plan (SIP) revision. The SIP revision requests a redesignation to attainment status for Connecticut's portion of the New York-New-Jersey-Connecticut (NY-NJ-CT) nonattainment area for both the 1997 annual and 2006 24-hour fine particle (PM<sub>2.5</sub>) national ambient air quality standards (NAAQS). The revision also describes a maintenance plan designed to ensure continued compliance with those NAAQS through the year 2025.

The Connecticut Department of Energy and Environmental Protection (Department) has worked diligently, in partnership with EPA and the states of New York and New Jersey, to identify and implement cost effective emission control programs to comply with the NAAQS, and more importantly to provide clean air for our citizens. The air quality monitors throughout the area tell a compelling story – our air is getting cleaner with each passing year and the NY-NJ-CT area is now in full compliance with both  $PM_{2.5}$  NAAQS.

As described in the enclosures, the measured improvements in PM<sub>2.5</sub> air quality are due to a variety of permanent and enforceable control programs implemented to reduce emissions of PM<sub>2.5</sub> and its precursor pollutants. Connecticut was one of the first states to adopt annual limits for both nitrogen oxides and sulfur dioxide emissions from power plants and other large industrial sources. Connecticut has also adopted motor vehicle emission standards for new light and medium duty vehicles that are more stringent than the federal standards and continues to sponsor voluntary retrofit programs to reduce PM<sub>2.5</sub> emissions from the existing vehicle fleet.

Our efforts notwithstanding, the Department recognizes and values our partnership with EPA; many federal programs have also furthered our clean air goals such as low sulfur fuel standards for gasoline and diesel fuel, heavy duty diesel engine standards and regional power plant emission budgets. Even with our great progress, much work remains to be accomplished to fully protect public health as evidenced by the recent EPA proposal to adopt more stringent PM<sub>2.5</sub> NAAQS. Our cooperative efforts must continue to provide the additional reductions in locally generated emissions and interstate air pollution transport needed to assure healthier air for all of Connecticut's citizens.

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We look to EPA's leadership in the coming months to pursue additional long-term national strategies to further improve air quality and ensure adequate protection of public health. Such strategies should include the most stringent possible on-road and non-road emission standards, more stringent national limitations on the sulfur content in fuels, including home heating oil, and effective programs to limit emissions from electricity generation in a manner that also reduces demand. EPA must also ensure that states properly comply with the good neighbor provisions of CAA Section 110(a)(2)(D), allowing downwind states to achieve and maintain compliance with current and future NAAQS. In striving to meet more stringent environmental goals, we will reap rewards in reduced public health costs, new technologies and new American jobs.

To satisfy the administrative and public participation requirements of 40 CFR 51, Appendix V, Section 2.1, this submission includes the following documents:

- Enclosure 1: Public notice of the proposed SIP revision and opportunity for a hearing;
- Enclosure 2: Hearing Officer Delegation;
- Enclosure 3: Certification of the public review process;
- Enclosure 4: Response to Public Comments, including the Department's responses to comments received and revisions made to the proposed SIP revision; and
- Enclosure 5: Final SIP technical support document.

In the interest of conserving resources, we are enclosing a single paper copy and one identical electronic copy of this SIP revision. The SIP revision will also be available on the Department's website at: http://www.ct.gov/dep/cwp/view.asp?a=2684&q=322164&depNav GID=1619.

On February 8, 2011, the Department requested that EPA make a "Clean Data Determination", in accordance with 40 CFR 51.1004(c), for the NY-NJ-CT area for the 24-hour PM<sub>2.5</sub> NAAQS. It is important for EPA to issue final approval of that request and/or this SIP revision prior to December 14, 2012, the date when an attainment demonstration SIP would otherwise be due.

We look forward to working with EPA to complete the approval process for this SIP revision as soon as possible.

Yours truly,

Anne Gobin, Chief

Bureau of Air Management

Enclosures

cc: Daniel C. Esty, Commissioner

Department of Energy and Environmental Protection