



August 5, 2013

Air Emissions Reporting Requirements Rule  
Docket No. EPA-HQ-OAR-2004-0489  
Environmental Protection Agency  
Mail Code: 2822T  
1200 Pennsylvania Avenue, NW.  
Washington D.C. 20460  
[a-and-r-Docket@epa.gov](mailto:a-and-r-Docket@epa.gov)

**Re: *Connecticut Department of Energy and Environmental Protection's Comments on the Proposed Air Emissions Reporting Requirements Rule Revisions***

Dear Docket Administrator,

The Connecticut Department of Energy and Environmental Protection (DEEP) respectfully submits the following comment on the proposed revisions to the Air Emissions Reporting Requirements (AERR) rule: *Revisions to the Air Emissions Reporting Requirements: Revisions to Lead (Pb) Reporting Thresholds and Clarifications to Technical Reporting Details* (78 FR 37164, June 20, 2013). DEEP's only concern is that the current daily and seasonal emissions reporting requirements relevant to ozone be retained.

DEEP supports the Environmental Protection Agency's (EPA's) goal of reducing the reporting burden on state and local agencies. However, the requirement to submit daily and seasonal emissions values and the related definitions should be retained in the AERR rule. Deleting the daily and seasonal emissions reporting requirement from the AERR rule, or including those elements only as a state-optional element, is not consistent with the inventory requirements of the proposed ozone implementation rule (*Implementation of the 2008 National Ambient Air Quality Standards for Ozone: State Implementation Plan Requirements*, 78 FR 34178, June 6, 2013). Section 51.1115 of the ozone implementation rule proposal requires states to satisfy their inventory obligations using the ozone-relevant data elements defined in the AERR rule. This requirement may not be adequately satisfied if seasonal and summer day emissions reporting requirements and related definitions are deleted from, or considered only optional, in the AERR.

Maintaining daily and seasonal emissions values will also assist the states in addressing high electricity demand days (HEDD), particularly if EPA chooses to update the modeling guidance with respect to the HEDD phenomenon.

If you have any questions regarding this letter, please contact Merrily Gere of my staff at 860-424-3416.

Sincerely,

Richard A. Pirolli, Director  
Planning & Standards Division  
Bureau of Air Management

cc: David Conroy, EPA, Region 1