



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



July 7, 2006

Stephen L. Johnson, Administrator  
Environmental Protection Agency  
Mail Code 6102T  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Attention: Docket No. EPA-HQ-OAR-2005-0175

Re: Comments on EPA's Proposed Transition to New or Revised Particulate Matter National Ambient Air Quality Standards

Dear Administrator Johnson:

This comment letter is being sent by the Connecticut Department of Environmental Protection (CTDEP) in response to the U.S. Environmental Protection Agency's (EPA's) advanced notice of proposed rulemaking (ANPR), published on February 9, 2006 in the Federal Register, entitled *Transition to New or Revised Particulate Matter National Ambient Air Quality Standards* (71FR 6718). The CTDEP supports comments submitted into this docket by the Northeast States for Coordinated Air Use Management (NESCAUM) Executive Director Arthur N. Marin. We will not reiterate those comments here, but will highlight some of our major concerns. In addition, our comments do not reflect our previously stated position that EPA's proposed revisions to the particulate matter standards do not provide adequate protection of public health or the environment (see my comment letter of April 11, 2006).

As described below, CTDEP is concerned that EPA's proposed transition plan neither implements the new standards soon enough, nor ensures that continued progress is made during the interim period before the new standards become effective.

With regard to the PM<sub>2.5</sub> standards:

- If EPA finalizes its proposal to retain the annual standard at 15  $\mu\text{g}/\text{m}^3$ , CTDEP supports Option 1, whereby the 1997 standard would not be revoked and areas would continue to implement their existing State Implementation Plans (SIPs) with existing attainment dates. As EPA states, this continues the momentum in the PM<sub>2.5</sub> SIP program and is the most straightforward – no anti-backsliding rule for the annual standard would be required.
- If EPA decides to adopt more stringent annual and/or 24-hour standards, CTDEP recommends that revocation of the relevant 1997 standard(s) take effect when control measure SIPs for the new standards are approved, not one year after designations are finalized (as proposed by EPA). In addition, anti-backsliding provisions should be included to ensure emission reductions that would have occurred through 2009 under the

1997 standards are realized and that no area is allowed to eliminate any control measure that has an impact on downwind areas.

- EPA's proposed timeline for implementing revised PM<sub>2.5</sub> designations provides one year after revised standards are promulgated for states to make recommendations and two additional years for EPA to evaluate those recommendations and sign final designations. The Clean Air Act (CAA) requires EPA to designate areas within two years after revised standards are promulgated, with up to one additional year if the Administrator has insufficient information. With a well established PM<sub>2.5</sub> monitoring network already in place, an additional year for EPA's designation decision is not necessary. CTDEP recommends that EPA tighten the timeline such that designations for revised standards become effective no later than April 2009, with attainment plans due by April 2012, and attainment required no later than April 2014.

With regard to the PM<sub>10-2.5</sub> (PM-coarse) standards:

- The CAA mandates that EPA issue final designations within three years from promulgation of an air quality standard. (The third year can be justified in this case due to insufficient PM-coarse monitoring data.) CTDEP supports EPA's alternative proposal to designate all areas "unclassifiable" for PM-coarse by no later than December 2009 and subsequently redesignate areas to attainment or nonattainment when more complete data sets are available. State recommendations under CAA Section 107(d)(3)(D) could then be encouraged in a timeframe that allows EPA to make resulting designations effective by the July 2013 date in EPA's proposed timeline.
- Consistent with my letter of April 11, 2006, revocation of the PM<sub>10</sub> NAAQS should not occur until a nationally applicable PM-coarse standard is fully implemented through approved attainment SIPs. Assuming EPA revokes the PM standard prior to that time, a strong anti-backsliding rule must be in place prior to the revocation. The anti-backsliding rule should apply to any area that currently has controls on PM<sub>10</sub> emissions, not just areas where EPA proposes to retain the PM<sub>10</sub> standard after promulgation of the coarse PM NAAQS.

With regard to New Source Review (NSR) and Prevention of Significant Deterioration (PSD):

- CTDEP agrees with EPA's proposal (Option 1) that PM<sub>10</sub> should continue to be a regulated NSR pollutant for the PSD program. Therefore, PM<sub>10</sub> would be regarded as a regulated NSR pollutant in all areas of the country, even in those areas where EPA proposes to revoke the 24-hour PM<sub>10</sub> NAAQS.

Mr. Stephen L. Johnson, Administrator  
Page 3 of 3  
July 7, 2006

- CTDEP recommends that new PM<sub>2.5</sub> and PM-coarse PSD increments and Significant Impact Levels (SILS) be promulgated in a timely fashion. These PSD increments and SILS should be set at levels proportional to current PM<sub>10</sub> values, based on their respective NAAQS.
- EPA should develop appropriate PM<sub>2.5</sub> and PM-coarse emission factors for use in inventory development and dispersion modeling. When appropriate PM<sub>2.5</sub> (or PM-coarse) emission estimates are not available, PM<sub>10</sub> should be used as a surrogate in dispersion modeling analyses and the predicted impact compared against the PM<sub>2.5</sub> (or PM-coarse) NAAQS. The idea of using PM<sub>10</sub> emissions in dispersion modeling and comparing these predicted PM<sub>10</sub> impacts to the former PM<sub>10</sub> NAAQS should not be an option for PM<sub>2.5</sub> compliance demonstrations.

CTDEP shares EPA's commitment to establish and implement, in a timely fashion, ambient PM standards that will provide adequate protection of public health and the environment. To this end, CTDEP is concerned that EPA's proposed FY2007 monitoring budget includes significant national program cuts for PM<sub>2.5</sub> monitoring at a time when more stringent standards are being adopted. EPA must ensure that additional funding is provided to states to establish and operate sufficient PM<sub>2.5</sub> and PM-coarse monitoring networks, while ensuring adequate funding is maintained for core programs. Finally, CTDEP urges EPA to work with stakeholders to develop consistently reliable continuous PM measurement techniques that produce results equivalent to the currently applicable Federal Reference Methods, while reducing labor and operational costs.

CTDEP urges you to carefully consider all of our comments, including those provided in my April 11, 2006 letter concerning EPA's proposed revisions to the PM standards.

Thank you for your attention to this matter.

Yours truly,



Anne Gobin, Chief  
Bureau of Air Management

AG/pb