



STATE OF CONNECTICUT

DEPARTMENT OF ENVIRONMENTAL PROTECTION



November 23, 2010

EPA Docket Center
EPA West (Air Docket)
Attn: Docket ID No. EPA-HQ-OAR-2009-0491
U.S. Environmental Protection Agency
Mail Code: 2822T
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460

Re: *Notice of Data Availability Supporting Federal Implementation Plans To Reduce Interstate Transport of Fine Particulate Matter and Ozone: Revisions to Emission Inventories. Docket ID: EPA-HQ-OAR-2009-0491*

Dear Docket Administrator:

The Connecticut Department of Environmental Protection (CTDEP) appreciates the opportunity to comment on the "Notice of Data Availability Supporting Federal Implementation Plans to Reduce Interstate Transport of Fine Particulate Matter and Ozone: Revisions to Emission Inventories" (75 FR 66055, October 27, 2010), hereafter referred to as the "2nd NODA". CTDEP recognizes the Environmental Protection Agency's (EPA) efforts to act swiftly to address interstate transport and make the rulemaking process more transparent than at any other time in the recent past. CTDEP has one general comment and one Connecticut-specific comment on the 2nd NODA.

General Comment

Boiler Maximum Achievable Control Technology (MACT)

At FR 66057, the EPA "...seeks comment on whether or not to revise projected non-electric generating unit (EGU) emissions inventories for 2014 to reflect sulfur dioxide (SO₂) and PM_{2.5} reductions from the proposed National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (75 FR 32006)..." (Boiler MACT). EPA goes on to say that if the projected reductions associated with the final Boiler MACT differed from the proposed projected Boiler MACT reductions, EPA would use the final rule projections if they become available in time for use in EPA's modeling for the final Transport Rule.

CTDEP recommends that EPA not include the projected reductions from the Boiler MACT in the final Transport Rule modeling. There is too much uncertainty regarding the finalization of the Boiler MACT, both in terms of level of reductions and timing. If the final Boiler MACT differs significantly from the proposed Boiler MACT, and if EPA is not able to use the final rule projections due to timing, modeling results could be inaccurate and EPA's revisions to the Transport Rule could be ill-advised. Overwhelming transport issues for downwind states could be exacerbated in such a circumstance. Modeling assumptions should be based on final rules with a certain outcome (i.e., that are not challenged in district court) for accurate emissions estimates.

Connecticut-specific comment

Controls required by the Connecticut State Implementation Plan (SIP)

EPA requests comment on their inclusion of revised 2012 and 2014 non-EGU point and nonpoint projected emissions to reflect controls required by the New York SIP. CTDEP notes that similar controls are required by Connecticut's SIP, yet they have not been included in the 2nd NODA. CTDEP recommends that control levels required by Connecticut's consumer products, architectural and industrial maintenance coatings, portable fuel containers, mobile equipment repair and refinishing, solvent metal cleaning, adhesives and sealants, and asphalt paving rules (see Attachment A) be included in the 2012 and 2014 non-EGU point and nonpoint projected emissions in the 2nd NODA.

In closing, CTDEP urges EPA to include the recommendations set out in this letter in order to finalize a Transport Rule as quickly as possible in order to further protect public health and the environment while ensuring such rule is based on the most accurate modeling assumptions available. If you have any questions regarding this letter, please do not hesitate to contact Wendy Jacobs of my staff at 860-424-3457.

Very truly yours,



Gary S. Rose, Director
Engineering & Enforcement
Bureau of Air Management

Attachment A: MARAMA spreadsheet with Connecticut control measures to include in modeling

Attachment A

MARAMA spreadsheet with Connecticut control
measures to include in modeling

