



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



April 11, 2006

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

Attention: Revisions to Ambient Air Monitoring Regulations  
Docket No. EPA-HQ-OAR-2001-0017 and EPA-HQ-OAR-2004-0018

RE: Comments on National Ambient Air Quality Standards for Particulate Matter, and  
Revisions to Ambient Air Monitoring Regulations

Dear Administrator Johnson:

This comment letter is being sent by the Connecticut Department of Environmental Protection (Department) in response to the U.S. Environmental Protection Agency's (EPA's) proposals, published on January 17, 2006 in the Federal Register, entitled *National Ambient Air Quality Standards for Particulate Matter* (71 FR 2620) and *Revisions to Ambient Air Monitoring Regulations* (71FR 2710). The Department supports comments on these proposals provided by the Northeast States for Coordinated Air Use Management's (NESCAUM) Executive Director Arthur N. Marin in his April 11, 2006 letters to EPA. Rather than reiterate those comments here, our major concerns are highlighted below.

The Department works closely with EPA in our shared mission to protect the public health and environment. With respect to EPA's proposed NAAQS (Docket No. EPA-HQ-OAR-2001-0017), we find the proposed revisions to the NAAQS do not adequately meet our shared objectives. Specifically:

- EPA's proposed primary and secondary fine particulate matter (PM<sub>2.5</sub>) national ambient air quality standards (NAAQS) do not adequately protect public health or welfare. Regarding the primary NAAQS, numerous studies document the significant health threat posed by PM<sub>2.5</sub>, resulting in recommendations by both the Clean Air Scientific Advisory Committee (CASAC) and EPA's own staff to revise the primary PM<sub>2.5</sub> NAAQS to levels more stringent than in the current proposal. Regarding the secondary NAAQS, CASAC, EPA staff and NESCAUM all recommend a sub-daily standard that will serve to provide improved visibility during daylight hours and help areas make reasonable progress toward regional haze goals. Pursuant to Section 109(b) of the Clean Air Act, the Administrator is required to establish primary standards requisite to protect the public health, providing an adequate margin of safety, and secondary standards requisite to protect the public welfare. Consequently, the final PM<sub>2.5</sub> NAAQS should be set consistent with the Act.
- Similarly, in setting a NAAQS for coarse particulate matter, such standard should be established that ensures nationwide public health protection, with no source-based exemptions, and that includes an adequate monitoring network to provide data to address any uncertainties about source contributions and urban/rural exposures. As recommended by NESCAUM, EPA should at a minimum retain the PM<sub>10</sub> NAAQS until

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these issues are resolved. Revocation of the PM<sub>10</sub> NAAQS should not occur until a nationally applicable PM coarse standard is promulgated and areas designations are made.

As the environmental partner charged with performing ambient monitoring, the Department has the following issues with respect to EPA's proposed monitoring requirements (Docket No. EPA-HQ-OAR-2004-0018):

- Inadequate funding is provided to support the costs of Connecticut's ambient air monitoring program despite the fact that significant effort has already been made to realign our monitoring efforts with the critical programmatic needs. With the FY07 budget proposal, further funding cuts are likely. EPA's proposed funding levels will compromise the ability of the Department to adequately maintain the critical monitoring activities necessary to fulfill federal mandates, evaluate trends, and determine the effectiveness of our control strategies.
- The Department does not support EPA's proposed reduction in the number of ozone and PM<sub>2.5</sub> sites in areas substantially above or near the proposed standard because so few sites will be inadequate to demonstrate actual ambient conditions and compromise the ability to issue accurate PM<sub>2.5</sub> and ozone forecasts and timely health warnings to the public.
- The Department does not support every day sampling for PM-coarse because it is an unnecessary use of limited resources. One-in-three day sampling has been shown to provide information that adequately characterizes air quality.
- The Department does not support EPA's proposed PM-coarse monitoring exemptions for non-urban areas, which would result in no PM-coarse or PM<sub>10</sub> standards in non-urban areas that are just as deserving of public health protection as urban areas. Such a proposal undermines the intent of the Clean Air Act that mandates protection of public health.
- The Department does not support the relaxation of the Federal Equivalent Method (FEM) requirement, because the quality of the data would be lessened. This relaxation would compromise the ability to adequately characterize air quality which would be less protective of public health.

As we work toward our shared responsibility to assure all citizens have clean air, it is incumbent upon both our agencies to establish standards that protect the health and environment, have the monitoring tools to value the ambient air quality and the success of our control efforts, as well as to maintain adequate funding commitments to this high priority effort. We trust you will work with us to assure the regulatory framework is sound, meets our shared needs, and the federal contribution of funding to these efforts are not compromised.

Yours truly,



Anne Gobin, Chief  
Bureau of Air Management

AG/em