

11.0 Commitments and Requests for EPA Actions

As Connecticut has no violating monitors for the annual PM_{2.5} NAAQS, and as attainment in the NY-NJ-CT nonattainment area is anticipated by April 2010, CTDEP's commitments largely focus on existing state and federal control measures, which are identified in detail in Sections 4 and 5. CTDEP acting alone, however, has limited authority and ability to effect changes in air quality, even within our own state borders. The ultimate success of this attainment demonstration, and of Connecticut's broader efforts to address ozone and daily PM_{2.5} levels, eliminate Connecticut's contributions to regional haze in Class I areas and reduce air toxic emissions will depend upon actions in other states and EPA to adopt, implement and enforce a wide array of PM_{2.5} and PM_{2.5}-precursor control measures and to comply with relevant CAA requirements. To that end, CTDEP makes the following commitments to and requests of EPA:

11.1 Full Implementation and Enforcement of Modeled Control Measures

Connecticut has already adopted and implemented pre- and post-2002 control strategies that will reduce emissions and allow for attainment of the annual PM_{2.5} NAAQS in the NY-NJ-CT nonattainment area. Connecticut commits to maintaining, as necessary and appropriate, the implementation and enforcement of those State programs and control measures identified in Tables 4-1 and 4-3, for as long as the underlying enforceable mechanism is valid.

11.2 Completion of the Adoption of Certain Control Measures

In Connecticut's 8-Hour Ozone Attainment Demonstration (February 1, 2008), CTDEP committed to the adoption of a number of control measures intended to reduce ozone precursor emissions in the state. While most of those control measures have been successfully adopted (e.g., architectural and industrial maintenance coating VOC reductions, VOC reductions from consumer products, a CAIR NOx ozone season trading program), CTDEP continues to work to achieve emission reductions consistent with the 8-Hour Ozone Attainment Demonstration.

11.3 Maintenance of Monitoring Network

CTDEP maintains an extensive network for monitoring ambient PM_{2.5} concentrations. As depicted previously in Figure 3-1, CTDEP operated 12 PM_{2.5} monitors in 2007. A full description of Connecticut's air monitoring program is included in the current version of the CTDEP's annual monitoring plan.¹ Connecticut commits to maintaining an adequate PM_{2.5} network, subject to a joint annual review process by CTDEP and EPA.

11.4 Implementation of New Source Review in a PM_{2.5} Nonattainment Area

On May 16, 2008 EPA published the final rule for implementation of the new source review (NSR) program for the annual PM_{2.5} NAAQS. As required by the May 16, 2008 implementation rule, as of July 15, 2008, Connecticut commits to implement the provisions of 40 CFR 51 Appendix S for PM_{2.5} in Fairfield and New Haven counties. CTDEP will also: address condensable emissions during the transition period before EPA finalizes Method 202, as provided in the implementation rule; implement the major source thresholds, significant emission rate thresholds and offset ratios as required in the implementation rule; and seek to prepare and submit a revised PSD and non-attainment area NSR SIP, which takes into account PM_{2.5} within Connecticut's air quality regulations, by May 16, 2011.

¹ A draft of CTDEP's 2007 monitoring plan, "Connecticut 2007 Annual Monitoring Network Plan" is available at: <http://www.ct.gov/dep/lib/dep/air/siprac/2007/2007networkplan.pdf>.

11.5 Address Transport

Connecticut's recently submitted Section 110(a)(2)(D) SIP revision² includes a discussion of EPA's CAIR modeling analysis,³ which identifies eight upwind states that contribute significantly to 8-hour ozone NAAQS nonattainment in Connecticut (i.e., New York, Pennsylvania, New Jersey, Ohio, Virginia, Maryland, West Virginia, Massachusetts, District of Columbia). The analysis showed that Connecticut is the only state subject to transport exceeding 90% of projected 2010 ozone levels, illustrating the unique and overwhelming influence upwind emissions have on Connecticut's prospects for achieving timely attainment. EPA's modeling also predicts that CAIR will provide minimal relief to Connecticut, reducing by less than one percent the ozone transport affecting the state on high ozone days.

EPA's CAIR modeling highlights the importance of securing sufficient upwind reductions to enable Connecticut to ensure attainment and maintenance of the 8-hour ozone NAAQS in a timely manner. Most, if not all of the same transport mechanisms would also apply in the case of PM_{2.5}. As described in Section 8, the modeling used in this attainment demonstration is based on the OTC's "beyond-on-the-way" suite of control measures. CTDEP is pursuing adoption of these measures; achievement of the anticipated emissions reductions in Connecticut and the region is dependent on upwind states doing the same.

Although the weight-of-evidence analyses included in Section 8 support CTDEP's conclusion that PM_{2.5} attainment has already occurred throughout Connecticut and may credibly be achieved in all of the nonattainment area by 2010, the probability of attainment will be enhanced if additional non-modeled upwind reductions are secured. CTDEP requests that EPA, when reviewing PM_{2.5} attainment demonstrations and other related SIP revisions, ensures that adequate emission controls are adopted and implemented by upwind states such that no other state continues to make significant contributions to PM_{2.5} nonattainment in New York, New Jersey or Connecticut.

11.6 Adopt New Federal Programs

CTDEP also requests that EPA adopt additional, national and regional emission control programs to ensure that equitable and cost-effective progress is made to achieve the 2006 24-hour PM_{2.5} NAAQS. At a minimum, EPA should move forward with the adoption of the most stringent possible non-road and on-road emission standards for all mobile source categories. Also, consistent with EPA's reductions in the sulfur content of mobile source fuels, national fuel sulfur content limits for home heating oil would go far to reduce PM_{2.5} levels, particularly in the Northeast.⁴ We also urge EPA to work with states to address emissions from electric generation on high electric demand days, as such emissions typically occur on the hottest summer days and exacerbate ozone air quality problems.

² "Revision to Connecticut's State Implementation Plan: Meeting the Interstate Air Pollution Transport Requirements of Clean Air Act Section 110(a)(2)(D)(i)"; Submitted to EPA on March 13, 2007; See: http://www.ct.gov/dep/lib/dep/air/regulations/proposed_and_reports/revsipsec110appendix.pdf.

³ "Technical Support Document for the Final Clean Air Interstate Rule: Air Quality Modeling"; US EPA OAQPS; March 2005; See: <http://www.epa.gov/cleanairinterstaterule/pdfs/finaltech02.pdf>.

⁴ CGS section 16a-21a allows for Connecticut to limit the sulfur content of home heating oil to as low as 500 ppm, but only if the surrounding states of New York, Massachusetts and Rhode Island first adopt such a requirement. Regional or federal regulation of the sulfur content of home heating oil would facilitate actions necessary to trigger CGS section 16a-21a.