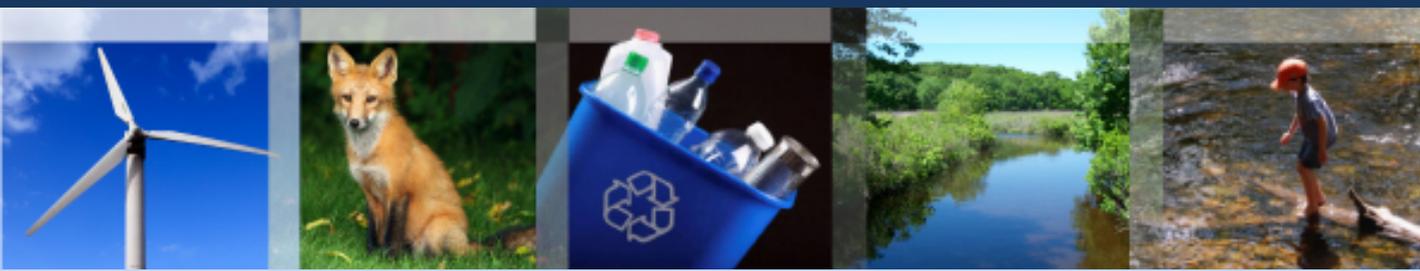




Connecticut Department of Energy and Environmental Protection



1997 Ozone NAAQS: EPA Proposed SIP Call for NY-NJ-CT Area

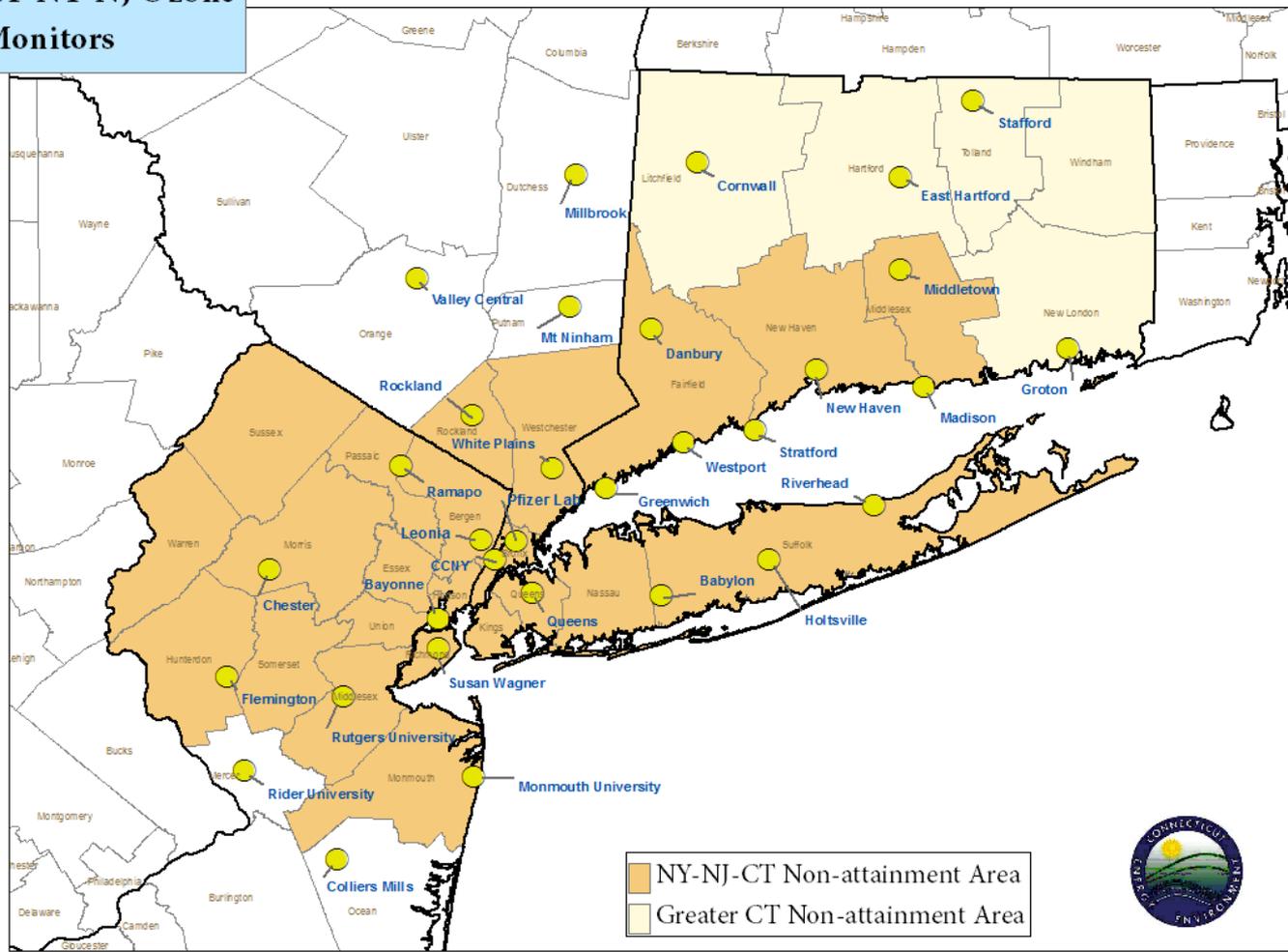
Paul Bodner
SIPRAC
June 5, 2014



Connecticut Department of Energy and Environmental Protection

NY-NJ-CT Ozone Nonattainment Area

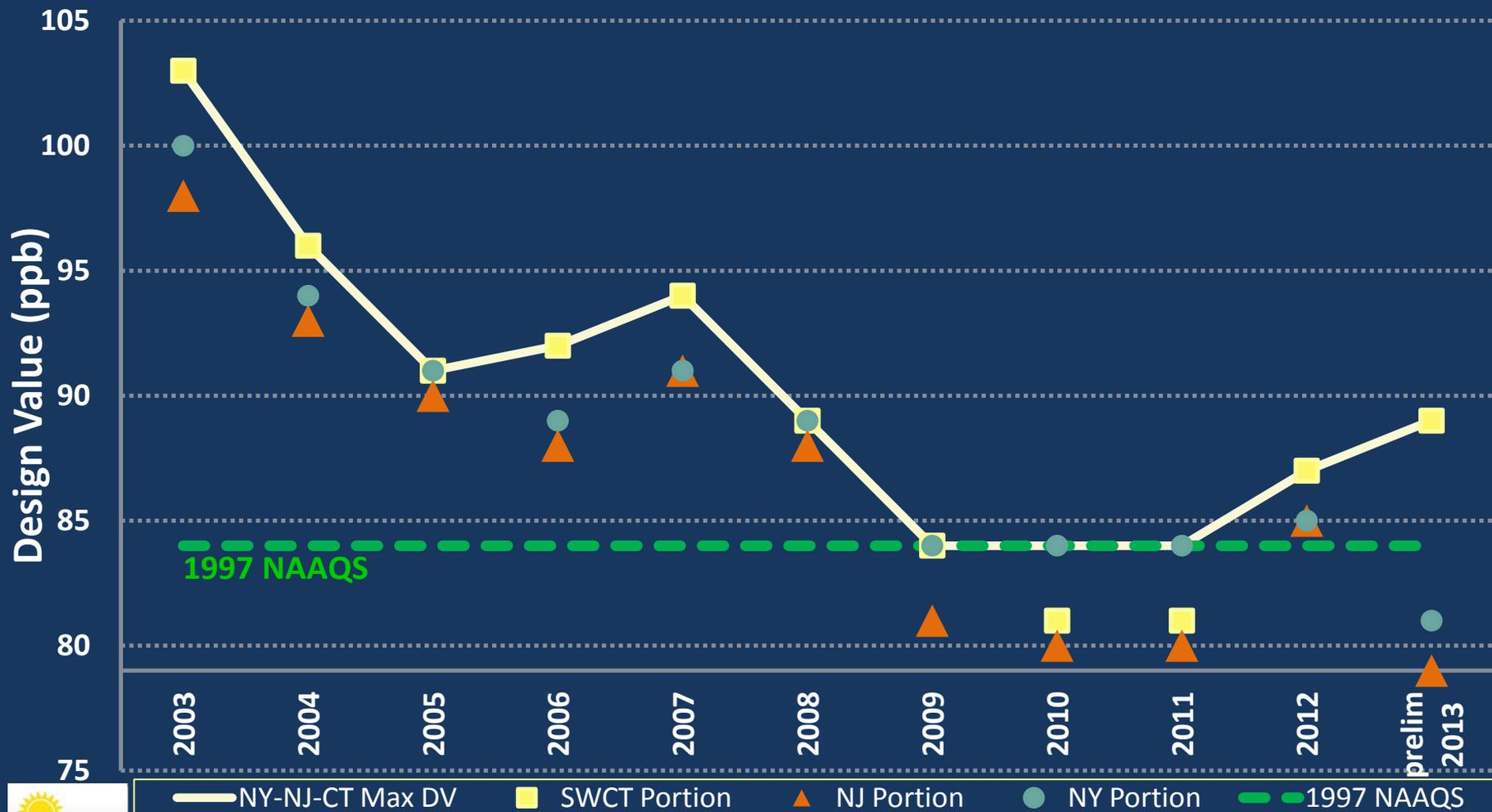
CT-NY-NJ Ozone Monitors



Revised January 23, 2014

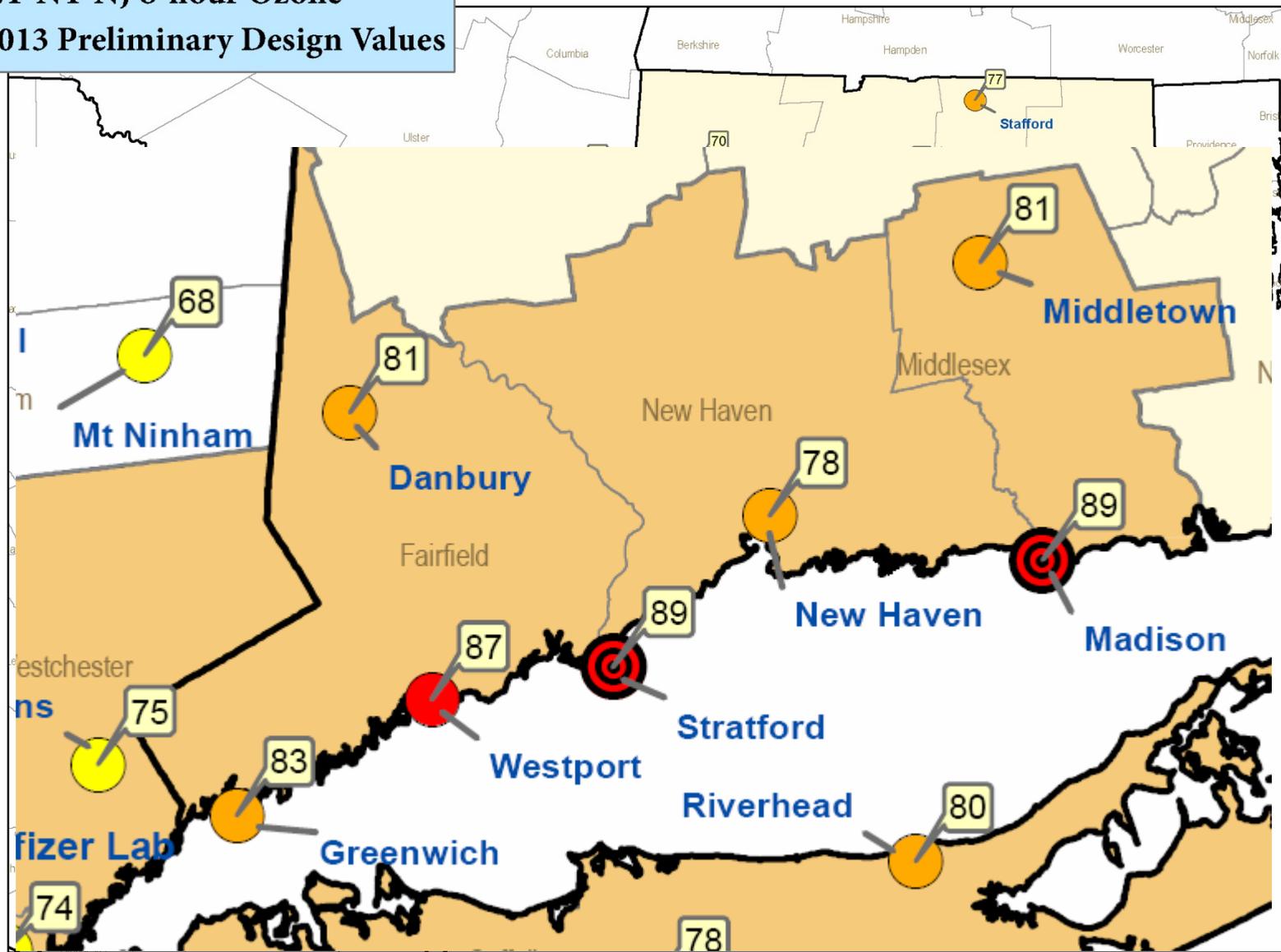


Ozone Design Value Trend NY-NJ-CT Nonattainment Area



Connecticut Department of Energy and Environmental Protection

CT-NY-NJ 8-hour Ozone 2013 Preliminary Design Values



Revised January 27, 2014
Inc=Incomplete



EPA's Proposal

(79 FR 27830; 5/15/2014; comments due 6/16/2014)

- **Revoke Clean Data Determination**
 - does not affect finding that area attained on time
 - no bump-up to “serious”

- **“SIP Call” for Revised Attainment SIPs (3 options)**
 - 1997 NAAQS / re-attain “as expeditiously as practicable”
 - 2008 NAAQS / “marginal” / 2015 attainment
 - 2008 NAAQS / request “moderate” / 2018 attainment
 - NY/NJ/CT must all request moderate bump-up



Proposed “SIP Call” Based On Portion of CAA Section 110(k)(5)

(5) CALLS FOR PLAN REVISIONS. — Whenever the Administrator finds that the applicable implementation plan for any area is substantially **inadequate to attain or maintain the relevant national ambient air quality standard** ... the Administrator shall require the State to revise the plan as necessary to correct such inadequacies.



CT's Comments

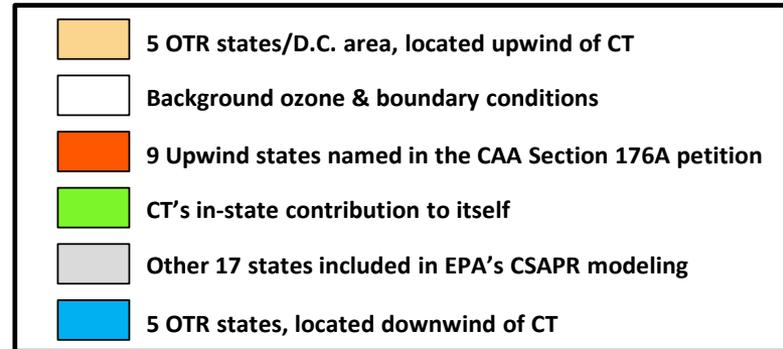
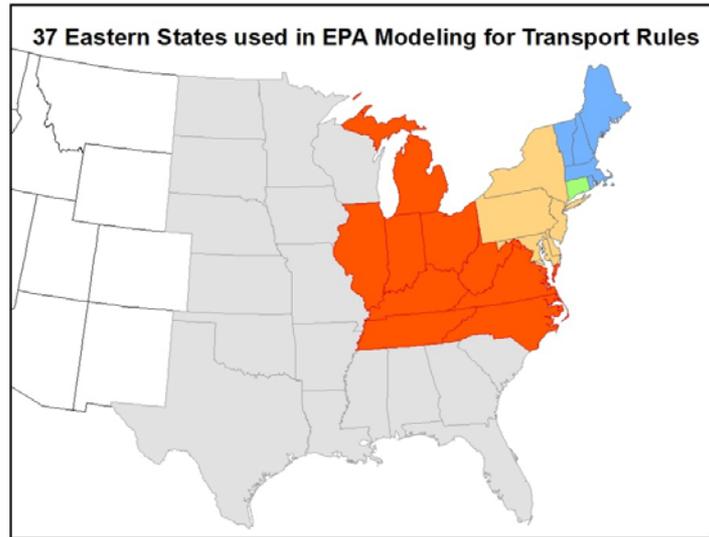
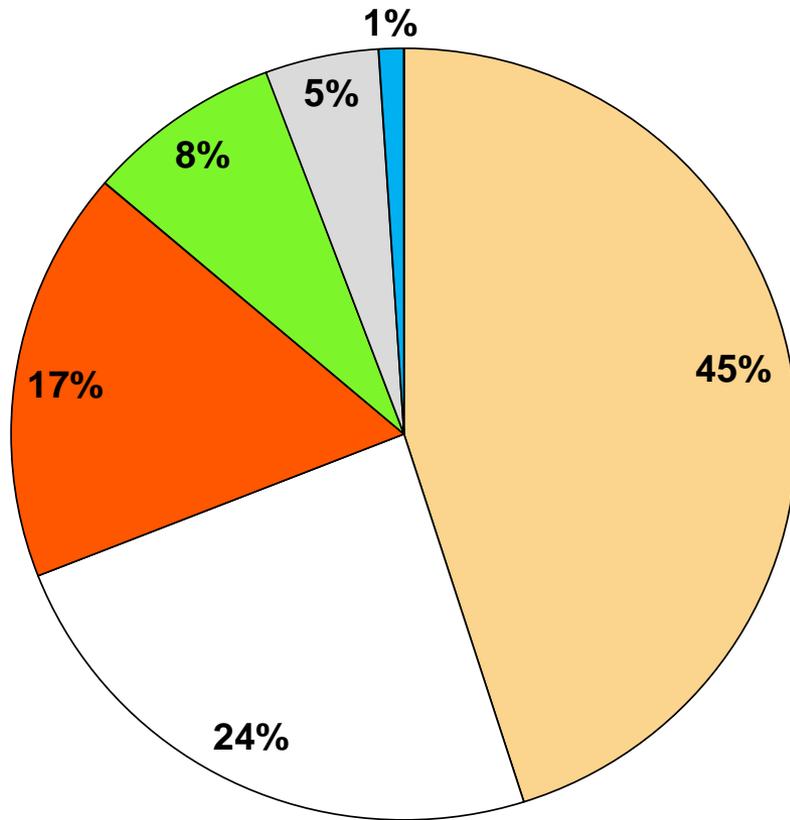
Apply ALL of CAA Section 110(k)(5)

- (5) CALLS FOR PLAN REVISIONS.—Whenever the Administrator finds that the applicable implementation plan for any area is substantially **inadequate to attain or maintain the relevant national ambient air quality standard, to mitigate adequately the interstate pollutant transport described in section 176A or section 184, or to otherwise comply with any requirement of this Act**, the Administrator shall require the State to revise the plan as necessary to correct such inadequacies.

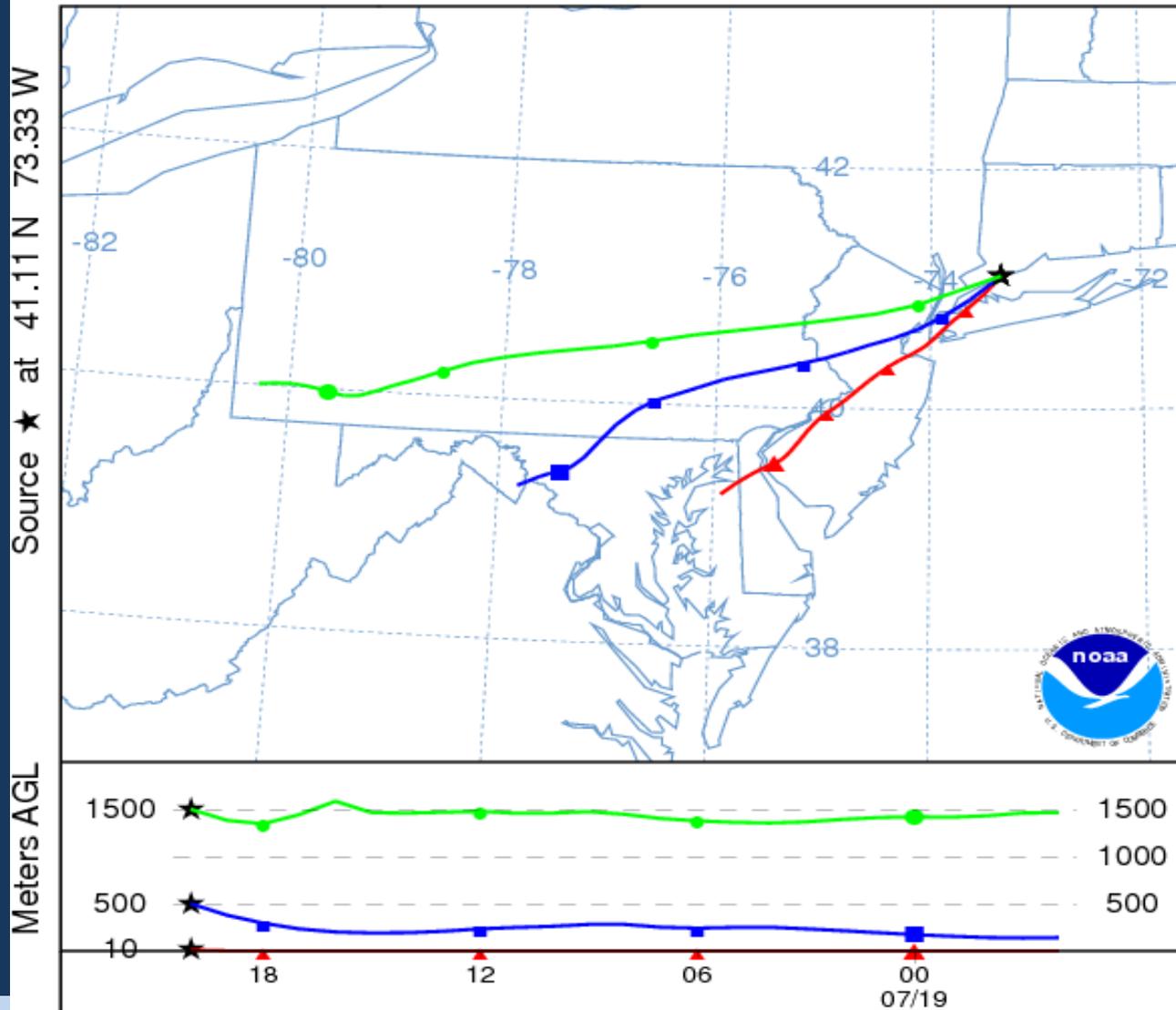


Overwhelming Transport to CT

Percent Contributions to Connecticut Peak Ozone Levels



NOAA HYSPLIT MODEL
 Backward trajectories ending at 2000 UTC 19 Jul 13
 NAM Meteorological Data



Job ID: 133059 Job Start: Wed May 28 21:31:31 UTC 2014
 Source 1 lat.: 41.112500 lon.: -73.333600 hgts: 10, 500, 1500 m AGL

Trajectory Direction: Backward Duration: 24 hrs
 Vertical Motion Calculation Method: Model Vertical Velocity
 Meteorology: 0000Z 19 Jul 2013 - NAM12



Co

on

Possible DEEP Comments (early draft)

- Fully Apply CAA Section 110(k)(5)
 - re-issue proposal with SIP Calls for all states significantly impacting violating monitors
- SCOTUS Homer City Ruling
 - enables EPA to issue FIPs for all states contributing to transport for 1997 & 2008 NAAQS
- Other Comments
 - should issue SIP Calls to other violating areas (Sheboygan WI)
 - questions authority to require Attain SIPs for 2008 NAAQS
 - numerous technical/policy questions



Questions?

- **Proposed SIP Call: 79 FR 27830**

- comments due June 16, 2014

- <http://www.gpo.gov/fdsys/pkg/FR-2014-05-15/pdf/2014-10827.pdf>

- **DEEP Ozone Planning Web Page**

- http://www.ct.gov/deep/cwp/view.asp?a=2684&q=322158&deepNav_GID=1619

- paul.bodner@ct.gov

860-424-3383

