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March 14, 2013

Mr. H. Curtis Spalding, Regional Administrator USEPA Region 1 – New England 5 Post Office Square Mail Code: ORA01-4 Boston, MA 02019-3912

Re: Revised Recommendation Regarding Designations for the 1-Hour SO<sub>2</sub> Air Quality Standard

Dear Administrator Spalding:

Thank you for your February 7, 2013 letter with respect to air quality designations for the 2010 sulfur dioxide (SO<sub>2</sub>) 1-hour national ambient air quality standard (NAAQS). As much as I appreciate the Environmental Protection Agency's (EPA) flexibility in light of the state's resource constraints, protecting Connecticut citizens' health is of utmost importance and the benefits of acting now to reduce harmful emissions outweigh the continued delay.

Please accept this correspondence as an update to Connecticut's June 6, 2011 request<sup>1</sup> to the EPA. Our commitment to clean air is clear. The enclosed technical justification and demonstration of attainment in Connecticut, and our source-specific air quality modeling, exceeds the parameters discussed in EPA's whitepaper outlining the next steps for SO<sub>2</sub> area designations as well as EPA's draft modeling guidance. Therefore, Connecticut demonstrates attainment of the SO<sub>2</sub> NAAQS and I ask you to consider this submittal as my request to have Connecticut designated as in attainment for the 1-hour SO<sub>2</sub> NAAQS.

Connecticut is committed to cleaner fuels and cleaner energy sources- and these commitments will yield cleaner air in the future. While Connecticut's air quality now meets the current  $SO_2$  standard, we must continue to ensure the protection of public health through long-term compliance with the  $SO_2$  NAAQS. In the near term, Connecticut will update selected air permits, pursue regulatory revisions to lower the sulfur content of heavy oil, and pursue the regional implementation of ultra-low sulfur heating oil.

I also note that Connecticut committed to a cheaper, cleaner, and more reliable energy future, as detailed in the recently finalized <u>Comprehensive Energy Strategy</u><sup>2</sup>. This dynamic strategy includes proposals to expand energy efficiency programs, implement economic incentives to foster

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<sup>&</sup>lt;sup>1</sup> Letter from Governor Malloy to EPA Region 1 Administrator Spalding; June 6, 2011.

<sup>&</sup>lt;sup>2</sup> Finalized February 19, 2013.

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increased renewable and alternate energy choices, develop the infrastructure needed to expand the use of alternatively fueled vehicles, and increase the availability of natural gas to industrial and residential users. Our ambitious Comprehensive Energy Strategy will help us meet our important clean air goals.

The enclosed document provides the technical basis for EPA to designate Connecticut as attaining the SO<sub>2</sub> NAAQS. Please contact Anne Gobin, Chief of DEEP's Bureau of Air Management at (860) 424-3026 with any questions regarding this recommendation.

Sincerely,

Daniel C. Esty Commissioner

Enclosure

cc: David Conroy (EPA Region 1)

Anne Gobin