



VIA ELECTRONIC MAIL

July 21, 2016

Gina McCarthy, Administrator
United States Environmental Protection Agency
EPA Docket Center
1200 Pennsylvania Ave. NW.
Washington, DC 20460-0001.

RE: *Docket ID No. EPA-R02-OAR-2016-0320; New York; Disapproval of Interstate Transport Requirements for the 2008 Ozone NAAQS*

Dear Administrator McCarthy:

The Connecticut Department of Energy and Environmental Protection (DEEP) supports the U.S. Environmental Protection Agency's (EPA's) proposed disapproval of the interstate transport element of New York's infrastructure state implementation plan (SIP) as a necessary first step to improving air quality in Connecticut and other downwind states.

For over 40 years, Connecticut and New York have partnered in a shared struggle to provide clean air to our citizens, particularly in the southwest portion of Connecticut and New York City metro region. We will continue this collaboration, as we clearly understand the health and economic impacts experienced by a state with a nonattainment area. Our strong partnership notwithstanding, it is critical for EPA to ensure all upwind states fully address their good neighbor obligations under Section 110 (a)(2)(D) of the Clean Air Act (CAA) and do so in an expeditious manner. The health impacts of high ozone are well documented and each 'bad air' day in Connecticut puts the health of millions of people at risk.

When finalizing actions on state transport SIPs, DEEP encourages EPA to describe, with as much specificity as possible, the steps states should take to meet its good neighbor responsibilities under the CAA. Such a description would include the proposed partial remedy provided by the Cross State Air Pollution Rule Update and other measures designed to bring a state's contribution to Connecticut's impaired air quality down to an acceptable level. EPA's specific description of controls will also inform and potentially support action in other states with outstanding interstate transport obligations. Unless adequate actions are taken by New York and other upwind states to fully address CAA section 110(a)(2)(D) obligations for the 2008 NAAQS, Connecticut will not meet this standard in either nonattainment area. Thus, we also urge EPA to immediately propose and finalize a full transport remedy for the 2008 ozone NAAQS rather than allowing compliance efforts for the 2015 NAAQS to drive compliance with the 2008 NAAQS. Guidance and immediate action on transport are needed now more than ever from EPA.

Sincerely,

Robert J. Klee
Commissioner

cc: Kenneth Fradkin, Fradkin.Kenneth@epa.gov.