



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
New England Regional Laboratory
11 Technology Drive, North Chelmsford, MA 01863

August 7, 2014

Anne Gobin, Chief
State of Connecticut Department of Environmental Protection
Bureau of Air Management
79 Elm Street
Hartford, CT 06106-5127

Dear Ms. Gobin:

Thank you for your submission of the Connecticut 2014 Annual Monitoring Network Plan which was submitted to us in final form on May 23, 2014. We appreciate that you addressed the comments we provided to you on May 9, 2014. EPA New England has evaluated your plan and finds that your plan meets the minimum requirements of 40 CFR Part 58.

We acknowledge the following modifications and future plans which you articulated as follows:

- *Discontinuing federal reference method (FRM) PM_{2.5} sampling at the New Haven State Street site. Note that sample at this site was suspended as of January 1, 2014, due to construction activities.*
- *Discontinuing FRM PM_{2.5} sampling at the East Hartford High Street site.*
- *Establishing FRM PM_{2.5} sampling at the near-road Hartford Huntley Place site.*
- *Establishing FRM PM_{2.5} sampling at the Groton Fort Griswold site.*
- *Discontinuing continuous PM_{2.5} sulfate, organic carbon and elemental carbon sampling at the New Haven Criscuolo Park and Cornwall Mohawk Mountain sites.*
- *Commencing reporting of continuous PM_{2.5} data from the East Hartford McAuliffe Park monitoring site as federal equivalent method (FEM) data eligible for comparison to the PM_{2.5} NAAQS.*
- *Continuing the suspension of carbonyl sampling at the East Hartford McAuliffe Park site for 2014.*
- *Establishing particulate black carbon/UV carbon aethalometer monitoring at the Danbury Western Connecticut State University (WCSU) site.*

I also note that you are now monitoring for PM₁₀ at Huntley Place in Hartford. Per the discussion in the above paragraph, all network modifications that involve discontinuation or moving of any sites are subject to EPA approval, even if the remaining network meets EPA's minimum requirements. In light of possible future state and federal budget restrictions, we encourage CT DEEP to consider further cost savings measures and discuss those opportunities with the EPA prior to implementation.

Consistent with 40 CFR 58.11(e), I am approving the exclusion of some of your PM_{2.5} continuous monitoring data. Thank you for your submission of the Demonstration of PM_{2.5} Comparability included in this Plan. As you know, this comparison of continuous PM_{2.5} Federal Equivalent Methods (FEMs) to collocated PM_{2.5} Federal Reference Methods (FRMs) is required under 40 CFR Part 58.11(e) in cases when PM_{2.5} continuous FEM data is used to support NAAQS compliance.

You evaluated each of the seven continuous FEM monitors with collocated PM_{2.5} FRMs in your network. Consistent with last year's Network Plan Approval, we agreed with the plan that the Bridgeport Roosevelt School, Waterbury Bank Street and Groton Fort Griswold PM_{2.5} continuous monitors (BAMs) would begin being reported as NAAQS compliance monitors (and PM_{2.5} data from those BAMs coded as 88101) on January 1, 2014. Based on this 2014 plan, we understand that you intend to begin reporting the East Hartford McAuliffe Park continuous BAM for NAAQS compliance purposes beginning on January 1, 2015. (We note that you are considering the BAM at Huntley Place in Hartford to be an SPM as it has been operating for less than 24 months.) In four of the cases, the analysis shows that the performance is outside of the acceptable range. Since you have demonstrated that these monitors do not meet requisite performance criteria, but you believe this data is acceptable for AQI purposes, we agree the data from these monitors should be reported using parameter code 88502, indicating that this data is appropriate for AQI use, but not for comparison to the National Ambient Air Quality Standard (NAAQS). Should you determine this data not be of acceptable quality for neither AQI reporting or for comparison to the NAAQS, parameter code 88501 should be used. You should continue reporting to the same parameter code when generating any new data with the PM_{2.5} continuous FEMs. (Note that the network design requirements for PM_{2.5} remain in effect. Your agency will be required to operate FRMs or other FEMs at all required sites to be used for comparison to the NAAQS.)

If you make a determination that any of these continuous monitors approved for exclusion are operating within acceptable ranges, they should be coded as 88101, and the next Annual Network Plan should describe that change.

The monitors specifically identified as not appropriate for NAAQS comparison since 2010 follow (all will be coded as 88502, as eligible to be reported for AQI purposes, but not NAAQS compliance):

- 1) 09-009-0027 New Haven- Criscuolo Park
- 2) 09-001-1123 Danbury- WSCU
- 3) 09-003-2006 East Hartford- High Street
- 4) 09-005-0005 Cornwall- Mohawk Mountain

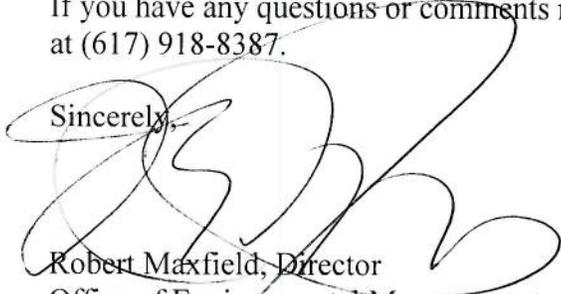
I am certain that you are aware that many jurisdictions across the country have determined that their continuous monitors do meet the performance criteria necessary for comparison to the NAAQS. I recognize that you have improved performance at some of these sites. Continuous monitors for PM_{2.5} can provide both real time data for health and AQI reporting purposes, and being able to use that data could save your Agency resources by allowing you to reduce the number of filter based federal reference method based monitors you operate.

Regarding future annual monitoring network plans, please identify the PM_{2.5} continuous FEMs and any pre-FEM continuous monitors in use or planned for use in your network. Your plan should clearly indicate the PM_{2.5} continuous monitors in your network, and whether they have already been approved (pursuant to this or other approval letter) to be excluded from comparison to the NAAQS. To maintain such waivers, each subsequent Annual Network Plan must detail the PM_{2.5} continuous FEMs, where they are located, and the monitoring objectives that they will support (i.e., eligible for use with the NAAQS and/or AQI) for the coming year. We also recommend that an assessment of the most recent three years of data for all collocated FRM/continuous FEM monitors be included in each subsequent annual plan where the monitoring agency wishes to continue to exclude such data from comparison to the NAAQS.

With this letter, I am approving your Annual Network Plan. We will work with our Headquarters offices to address the portions of the plan which would require their attention, most notably monitoring associated with NCore, PAMS, and STN.

EPA-New England appreciates your partnership in conducting ambient air monitoring. We look forward to working with you to continuously improve the quality of ambient air in Connecticut. If you have any questions or comments regarding this network review, please contact Bob Judge at (617) 918-8387.

Sincerely,



Robert Maxfield, Director
Office of Environmental Measurement and Evaluation
EPA New England

cc: Peter Babich, CT DEEP
Randall Semagin, CT DEEP