

December 8, 2016

Mr. David Conroy, Chief, Air Programs Branch  
USEPA Region 1 – New England  
5 Post Office Square  
Mail Code: ORA01-4  
Boston, MA 02019-3912

***Re: Part 51 Subpart BB-Data Requirements for Characterizing Air Quality for the Primary SO<sub>2</sub> NAAQS***

Dear Mr. Conroy,

On January 8, 2016, Connecticut Department of Energy and Environmental Protection (DEEP) informed the United States Environmental Protection Agency (EPA) that Connecticut does not have any sources that meet the applicability requirements of 2,000 tons annual actual sulfur dioxide (SO<sub>2</sub>) emissions as outlined in Section 51.1202 of 40 CFR Part 51, Subpart BB. However, the notification identified the largest individual major SO<sub>2</sub> source in Connecticut that, although under the 2000-ton threshold, warranted further air quality characterization. On March 17, 2016, EPA agreed with this finding.

DEEP submitted a protocol to EPA on July 1, 2016 describing how SO<sub>2</sub> emissions will be characterized in the vicinity of its largest source of SO<sub>2</sub>, Bridgeport Harbor Station in Bridgeport, Connecticut. The protocol, accepted by EPA on July 10, 2016, relied mainly on predictive dispersion modeling and monitoring data to characterize the impact of Bridgeport Harbor Station Emission Unit No. 3 on maximum 1-hour SO<sub>2</sub> concentrations in the nearby area.

This letter is to inform you that DEEP has completed the SO<sub>2</sub> characterization in the vicinity of Bridgeport Harbor Station in Bridgeport, Connecticut. The modeling analysis, supported by monitoring data, demonstrates compliance with the 1-hour SO<sub>2</sub> National Ambient Air Quality Standard (NAAQS) of 75 ppb (196µg/m<sup>3</sup>) in southwest Connecticut where Bridgeport Harbor Station is located. Most importantly, the analysis provided herein confirms DEEP's initial designation request of attainment in a February 19, 2013 letter to EPA Region I.

Please find attached the final modeling report. The emissions and modeling files will be sent to your office through electronic mail. If you require additional information, please contact Sam Sampieri of my staff at (860) 424-4152.

Sincerely,



Anne R. Gobin  
Chief, Bureau of Air Management

ARG:JC  
Attachment

cc: Leiran Biton, US EPA Region 1, New England (via electronic mail)  
Sam Sampieri, DEEP