



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

SECRETARY

October 28, 2014

Mr. Shawn M. Garvin
Regional Administrator
U.S. Environmental Protection Agency, Region III
1650 Arch Street (Mail Code: 3RA00)
Philadelphia, PA 19103-2029

RE: EPA's 120-day Letter Concerning Proposed Designations for the 2012 Fine Particulate Matter National Ambient Air Quality Standard

Dear Mr. Garvin:

This letter is in response to your August 19, 2014, letter to Governor Tom Corbett, providing the U.S. Environmental Protection Agency's (EPA) proposed modifications to Pennsylvania's designation recommendations for the 2012 annual fine particulate matter (PM_{2.5}) National Ambient Air Quality Standard (NAAQS). As stated in your August 19 letter, EPA intends to modify Pennsylvania's recommended boundaries for the Cambria County (Johnstown), Liberty-Clairton (Allegheny County), and Northampton County (Allentown) areas.

The Pennsylvania Department of Environmental Protection (DEP) appreciates EPA's concurrence with the majority of its designation recommendations dated December 10, 2013, and July 30, 2014. However, we urge EPA to reconsider its proposed PM_{2.5} nonattainment boundaries for Allegheny and Northampton Counties. To this end, DEP has completed additional analyses and requests the following changes to EPA's proposed designations for Pennsylvania:

- Establish partial county designations for Allegheny County consistent with the nonattainment boundaries for the 1997 and 2006 PM_{2.5} NAAQS. The nonattainment areas for the Liberty-Clairton area of Allegheny County should continue to be comprised of the City of Clairton and the Boroughs of Glassport, Liberty, Lincoln, and Port Vue. The remainder of Allegheny County, which is monitoring attainment of the 1997, 2006 and 2012 PM_{2.5} NAAQS, based on 2011-2013 design values, should be designated as an "unclassifiable/attainment" area. Historically, EPA has agreed that "a separate, distinctively local-source impacted, nonattainment area" is appropriate for the Liberty-Clairton area. Supporting documentation developed in consultation with the Allegheny County Health Department is outlined in Enclosure 1.

Additionally, I have enclosed a recent letter (dated October 15, 2014) from Ken Zapinski, the Senior Vice President of Energy and Infrastructure for the Allegheny Conference on Community Development (ACCD), in support of DEP's request for a partial county

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Liberty-Clairton nonattainment area for the 2012 annual PM_{2.5} NAAQS (see Enclosure 2). ACCD expresses its concern that EPA has reversed its position that previously recognized the unique meteorology, topography and localized emissions in the Liberty monitoring area without reasonable justification.

- Change the boundaries for the Allentown nonattainment area to include only Northampton County (see Enclosure 3).
- Northampton County is expected to attain the PM_{2.5} standard, based on 2014 design values, prior to the effective date of EPA's final designations (see Enclosure 4).

The DEP respectfully requests that EPA modify its intended designations for the Allentown and Allegheny County areas, taking into consideration the significant air quality improvements and the additional documentation enclosed for your consideration. If any additional areas in Pennsylvania attain the PM_{2.5} NAAQS prior to the effective date of EPA's designations for the 2012 PM_{2.5} NAAQS, DEP will request withdrawal of the nonattainment designation for the area.

Should you have questions or need additional information during the development of the final PM_{2.5} NAAQS designations for Pennsylvania, please contact Joyce E. Epps, Director, Bureau of Air Quality, by e-mail at jeepps@pa.gov or by telephone at 717.787.9702.

Sincerely,



Dana K. Aunkst
Acting Secretary

Enclosures