Air Quality Technical Advisory Committee

to the Pennsylvania Department of Environmental Protection P.O. Box 8468 Harrisburg, PA 17105-8468

October 20, 2011

Honorable Michael L. Krancer Secretary Department of Environmental Protection Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

Re: Proposed rulemaking for Chapter 139 Condensable Particulate Matter Measurement and Reporting Requirements

Dear Secretary Krancer:

On October 20, 2011, the Air Quality Technical Advisory Committee (Committee) discussed the proposed rulemaking to amend § 139.12 (relating to emissions of particulate matter) of Chapter 139 (relating to sampling and testing) to require the measurement and reporting of filterable and condensable particulates when testing to determine emissions of particulate matter (PM) from stationary sources, including coarse particles with diameters equal to or less than 10 micrometers and larger than 2.5 micrometers (PM-10) and fine particles with diameters equal to or less than 2.5 micrometers (PM_{2.5}). The proposed rulemaking would also amend § 139.53 (relating to filing monitoring reports) to require submittal of periodic emissions monitoring test reports to the applicable Regional Air Program Manager instead of the Regional Air Pollution Control Engineer, and a copy of the report to the Chief of the Division of Source Testing and Monitoring. The proposed rulemaking would also add definitions for the terms "condensable particulate matter" and "filterable particulate matter" to Chapter 121 (relating to general provisions), § 121.1 (relating to definitions).

The Committee recommended clarification be made to the definition of "condensable particulate matter" and clarification be made to proposed subsection § 139.12(b) to specify an effective compliance date. The Committee voted 11 to 5 to concur with the Department's recommendation to present the proposed rulemaking to the Environmental Quality Board for consideration.

Sincerely.

Patrick K. O'Neill Esq.

Chair