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Environmental Quality Board  
P. O. Box 8477  
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**Subject: One Page Summary of Proposed Rulemaking, 25 Pa. Code Chapters 121 and 139:  
Measurement and Reporting of Condensable Particulate Matter Emissions**

EPGA believes two changes should be made to the proposed revisions to 25 Pa. Code Chapters 121 and 139 that were published in the July 7, 2012 *Pennsylvania Bulletin*. The two requested changes will improve clarity, and provide consistency with the analogous federal regulatory provisions as well as current provisions found elsewhere in Chapter 121.

The first recommended change involves making clear that sources subject to  $PM_{10}$  and  $PM_{2.5}$  emission limits that were issued prior to January 1, 2011 are not required to consider condensable particulate matter when determining compliance with such limits. That condensable particulate matter should not be considered is clear in the relevant federal provisions [40 CFR 51.166(b)(49)(i)(d)(vi) and 52.21(b)(50)(i)], but is not clear from the proposed wording of §139.12(c). Therefore, EPGA believes the wording of proposed §139.12(c) should be revised as follows (text to be added denoted in **bold underline**):

“Compliance with a particulate matter,  **$PM_{10}$ , or  $PM_{2.5}$**  emission limitation issued by the Department prior to January 1, 2011 will not be based on condensable particulate matter unless required under the terms and conditions of a plan approval, operating permit or the State Implementation Plan codified in 40 CFR 52.2020 (relating to identification of plan).”

The second recommended change involves eliminating the terms “primary  $PM_{10}$ ” and “primary  $PM_{2.5}$ ” from the definition of condensable particulate matter in the proposed §121.1. The terms “primary  $PM_{10}$ ” and “primary  $PM_{2.5}$ ” are not defined elsewhere in Chapter 121, and their use in this definition creates uncertainty in the meaning of the definition. Accordingly, EPGA believes the wording of proposed §121.1 should be revised as follows (text to be deleted denoted by ~~strikethrough~~):

“*Condensable particulate matter*—Material that is vapor phase at stack conditions but which condenses or reacts, or both, upon cooling and dilution in the ambient air to form solid or liquid particulate matter immediately after discharge from the stack. All condensable particulate matter, if present from a source, is typically in the  $PM_{2.5}$  size fraction and therefore all of it is a component of both ~~primary~~  $PM_{2.5}$  and ~~primary~~  $PM_{10}$ .”