



Citizens Advisory Council

to the Department of Environmental Protection

P.O. Box 8459 • Rachel Carson State Office Building
Harrisburg, PA 17105-8459 • 717-787-8171 • Fax 717-705-4980

September 19, 2018

Krishnan Ramamurthy
Director
Bureau of Air Quality
P.O. Box 8468
Harrisburg, PA 17105-8468

Dear Mr. Ramamurthy:

Pursuant to the requirements of Section 7.6 of the Air Pollution Control Act, on August 21, 2018, staff from the Bureau of Air Quality briefed the Citizens Advisory Council's (Council) Policy and Regulatory Oversight Committee (Committee) on the draft proposed rulemaking for PM_{2.5} Precursors. PM_{2.5} is shorthand for particulate matter less than and equal to 2.5 micrometers in diameter. The proposed rulemaking would amend 25 Pa. Code Chapters 121 and 127 to comply with EPA's PM_{2.5} rule that requires states to amend their new source review (NSR) regulations to include emissions of volatile organic compounds (VOC) and ammonia as PM_{2.5} precursors in certain counties of this Commonwealth that are designated as nonattainment for the PM_{2.5} National Ambient Air Quality Standard (NAAQS). The draft proposed rulemaking also proposes significant impact levels (SIL) for PM_{2.5} and proposes offset ratios for emissions of VOCs and ammonia as PM_{2.5} precursors.

On the recommendation of the Committee, Council voted at their September 18, 2018, meeting to support the advancement of the above-referenced proposed rulemaking to the Environmental Quality Board for action with the following comments:

1. The Council recommends that the revised definition of "major facility" in the draft proposed rulemaking be clarified to reflect what was explained to the Council, that the 70 tons per year threshold is determined for each listed pollutant separately, not by adding the amounts of various listed pollutants together.
2. The Council recommends that a technical justification for the ammonia emissions rate threshold be included in the Preamble to the proposed rulemaking.

Allegheny County
Cynthia Carrow
John J. Walliser, Esq

Bedford County
William Fink

Chester County
Donald S. Welsh

Cumberland County
Duane Mowery
James Welty
R. Timothy Weston, Esq

Delaware County
James A. Schmid

Fayette County
John R. Over, Jr.

Greene County
Terry L. Dayton

Indiana County
John St. Clair

Philadelphia County
David Dunphy
Jerome Shabazz

Tioga County
Thaddeus K. Stevens

Washington County
Mark Caskey

Council appreciates the Bureau's cooperation in providing detailed briefings on air rulemakings. If you have any questions regarding Council's action on the above-referenced rulemaking, please contact me at 717.787.8171 or by email at ksalador@pa.gov.

Sincerely,



Keith J. Salador
Executive Director
Citizens Advisory Council

cc: Kirit Dalal
John Krueger
Randy Bordner
Susan Hoyle
Laura Edinger