



**DVRPC**

**DELAWARE  
VALLEY  
REGIONAL  
PLANNING  
COMMISSION**

C R E A T I N G > T O M O R R O W > T O D A Y

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November 26, 2007

Tim Leon-Guerrero  
Air Resource Management Division  
Bureau of Air Quality  
P.O. BOX 8468  
Harrisburg, PA 17105-8468

Re: Proposed 24-Hour PM<sub>2.5</sub> Non-Attainment Area Designation

Dear Mr. Leon-Guerrero:

The Delaware Valley Regional Planning Commission (DVRPC) supports the Pennsylvania Department of Environmental Protection's (DEP) recommendations to include Bucks, Delaware, Chester, Philadelphia and Montgomery Counties in the Philadelphia – Wilmington 24-Hour PM<sub>2.5</sub> Non-attainment Area. DEP's recommendation that the non-attainment areas, in Pennsylvania, for the new 24-hour standard remain the same as the current annual PM<sub>2.5</sub> non-attainment area, insures continuity of planning for attainment of both of these standards. This continuity will allow DVRPC to focus resources on promoting air quality improvements over developing new procedures to address regulatory requirements of new non-attainment area boundaries.

DVRPC would like to inform PA DEP and the Environmental Protection Agency (EPA) Region III that DVRPC will be requesting that New Jersey DEP and EPA Region II include Mercer County in the Philadelphia – Wilmington 24-Hour PM<sub>2.5</sub> Non-attainment Area, along with Burlington, Camden and Gloucester Counties, which are currently part of the Philadelphia – Wilmington Annual PM<sub>2.5</sub> Non-attainment Area. This change to the non-attainment area in New Jersey would place the entire DVRPC planning area within one PM<sub>2.5</sub> non-attainment area and also make the PM<sub>2.5</sub> non-attainment area consistent with the Philadelphia – Wilmington – Atlantic City 8-hour Ozone Non-attainment Area. DVRPC feels that this logical grouping of counties in the non-attainment areas will reduce confusion for the public and promote more efficient air quality planning.

DVRPC appreciates the opportunity to comment on DEP's recommendations and looks forward to working with the DEP on this issue in the future.

Sincerely,

Barry J. Seymour  
Executive Director,  
Delaware Valley Regional Planning Commission

BS / sg

cc: Martin Kotsch, EPA Region III

---

**From:** Gavin Biebuyck [mailto:gbiebuyck@libertyenviro.com]  
**Sent:** Monday, November 19, 2007 9:22 AM  
**To:** Leon-Guerrero, Timothy  
**Cc:** Craig Hafer; Epps, Joyce  
**Subject:** PM2.5 24-Hr Proposed Designations

Tim:

I have been reviewing the DEP's proposed recommendations for PM2.5 24-Hr nonattainment designation. I read your discussion of "Meteorology and Topography" with interest. The inclusion of Lebanon and Lehigh counties largely because they are located between areas with PM2.5 monitors showing nonattainment is a concern. Why not include Schuylkill, Carbon, and Monroe counties? I assume the basis for excluding these counties would include the "terrain barrier", commuting patterns, population growth, etc?

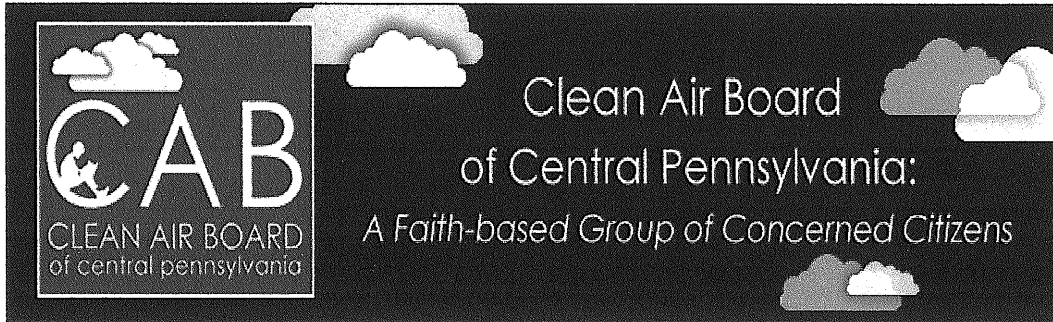
It would seem that Adams and Franklin counties should be considered for inclusion with the York or the Harrisburg-Lebanon-Carlisle nonattainment area based on population growth projections, traffic patterns (trucks on I-81 and Routes 15/30).

You cite a statistical analysis of the correlation of different monitored PM2.5 levels (Summary of Pennsylvania's PM2.5 Nonattainment Analysis, Appendix C, DEP 2007) in the report. I assume the analysis is similar to the one you provided in your PowerPoint presentation to Berks County in April 2006 (Relocation of Reading COPAMS). Could you please send me the 2007 report and Appendix C for review.

Thanks,  
Gavin

Gavin Biebuyck  
Principal  
Liberty Environmental, Inc.  
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December 4, 2007

Joyce E. Epps, Director  
Bureau of Air Quality  
P. O. Box 8468  
Harrisburg, PA 17105-8468

2007 DEC -5 PM 3:50  
RECEIVED  
DIRECTOR'S OFFICE  
DEP BUREAU OF AIR QUALITY

Subject: Designation of Nonattainment Areas

Dear Ms. Epps,

On November 14 2007, the Department of Environmental Protection invited comment on its recommendations to the Environmental Protection Agency on attainment and nonattainment areas for the revised 24 hour fine particulate ambient air quality standard (PM<sub>2.5</sub>). The Department recommended that the Cumberland, Dauphin, Lebanon, York and Lancaster counties in central Pennsylvania be designated nonattainment.

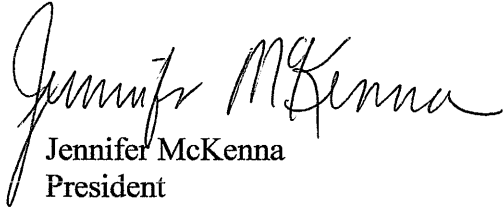
The Clean Air Board of Central Pennsylvania commends the Department of Environmental Protection for the installation of a PM<sub>2.5</sub> monitor in a residential neighborhood of Carlisle. This monitor will be useful in measuring the quality of air the residents of Carlisle and the surrounding communities breathe. There are two DEP monitoring sites for PM<sub>2.5</sub> in and near Carlisle. The first is located in Carlisle Springs, outside Carlisle. The second is the PM<sub>2.5</sub> monitoring station installed at the Macaluso farm, identified as the Carlisle West site. Both sites are designed to provide urban spatial scale and measure population exposure in accordance with the EPA ambient air monitoring requirements. More accurate information about air quality in our region will enable us to design better measures to alleviate poor air quality.

Based on the data that DEP has released, the Clean Air Board believes that Cumberland County should be designated a nonattainment area for 24 hour PM<sub>2.5</sub>. According to the monitoring data for PM<sub>2.5</sub> for 2006, recorded at the Carlisle Springs site and the Arendtsville site in Adams County, the Cumberland Valley area has experienced many exceedances of the 24 hour standard (35ug/m<sup>3</sup>).

528 Garland Drive Carlisle, PA 17013  
[cleanairboard@gmail.com](mailto:cleanairboard@gmail.com)

We believe that the data DEP has released for Dauphin, Lebanon, Lancaster, and York also support a designation of nonattainment for these counties. For these reasons, CAB supports the designation of Cumberland, Dauphin, Lebanon, York, and Lancaster counties as nonattainment for the 24 hour PM<sub>2</sub> standard.

Sincerely,

A handwritten signature in black ink that reads "Jennifer McKenna". The signature is written in a cursive style with a large initial "J".

Jennifer McKenna  
President  
Clean Air Board  
717.243.4571



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Canonsburg, PA 15317  
[vbrisini@reliant.com](mailto:vbrisini@reliant.com)  
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December 6, 2007

Mr. Timothy A. Leon-Guerrero  
Chief, Air Quality Modeling Section  
Pennsylvania Department of Environmental Protection  
Bureau of Air Quality  
P.O. Box 8468  
Harrisburg, PA 17105-8468

Dear Mr. Leon-Guerrero:

**Reference: Reliant Energy Comments on the Pennsylvania Department of Environmental Protection's Proposed Recommendations to the U.S. EPA for 24-Hour Fine Particulate (PM<sub>2.5</sub>) Attainment/Non-attainment Areas**

Reliant Energy appreciates the opportunity to provide comments to the PADEP's proposed recommendations to the U.S. EPA for the 24-hour PM<sub>2.5</sub> area designations. Reliant Energy supports the Pennsylvania Department of Environmental Protection (PADEP) excluding some areas from historically designated non-attainment areas based on 2004-2006 ambient monitoring data. An example is the exclusion of Greene County from the Pittsburgh non-attainment area. Specifically, the Department recognizes that while the area is characterized by relatively high terrain (a feature common throughout western and central Pennsylvania), monitors just north of Greene County are measuring concentrations below the PM<sub>2.5</sub> 24-hour standard. Consequently, PADEP is appropriately narrowing the scope of the Pittsburgh non-attainment area.

It is difficult, however, to determine if the Department is being consistent in the application of the data because only the 2004 ambient air quality reports are available on the Department's website. The PADEP's proposed recommendations reference monitoring data for 2004 through 2006, but no detail is provided as to how the data were used to assess attainment/non-attainment status. For example, in the case of Greene County are all the data lower than the standard or is the three-year average below the standard? Reliant Energy believes that if the data show a downward trend with the most recent measured concentration at or below the standard then the area should be designated as attainment. These downward trends are strong indicators that current state and federal programs are resulting in reduced ambient concentrations of fine particulate matter. Further, the Department acknowledges that EPA's Clean Air Interstate Rule (CAIR) will provide the electric generating unit (EGU) reductions appropriate to allow

the Commonwealth to attain the 24-hour PM<sub>2.5</sub> standard. Consequently, if there is a downward trend with 2004-2006 data, it is reasonable to assume that trend will continue with CAIR becoming effective for nitrogen oxides (NO<sub>x</sub>) in 2009 and sulfur dioxide in 2010.

Because all of the data used for decision making are not available for review, it does appear that the Department was inconsistent in its use of the ambient air monitoring data (or the lack of ambient air monitoring data) as it appears to take an approach which is opposite to the Greene County action by adding townships to non-attainment areas simply because a coal fired electric generating power plant is located in that township. Greene County has high terrain and an electric power plant, but importantly, the monitoring results do not support the premise that the high emissions are "trapped" and consequently are above the standard. This situation does not support the Department using high terrain and power plant location to assume other areas should be added to the Johnstown and Pittsburgh non-attainment areas.

The inclusion of East Wheatfield Township, Indiana County to the Johnstown non-attainment area because of the location of Seward Power Plant is inappropriate not only because there haven't been any measurements of non-attainment in that township, but the topography makes it very unlikely those emissions would cause high levels in the Johnstown non-attainment area. Further, Seward Plant consists of two circulating fluidized boilers which result in very low sulfur dioxide (SO<sub>2</sub>) emissions (0.6 Lbs SO<sub>2</sub>/MMBtu and 95% removal); a fabric filter which results in very low particulate emission (0.01 Lbs PM/MMBtu); and selective non-catalytic reduction (SNCR) for NO<sub>x</sub> emissions (0.15 Lbs NO<sub>2</sub>/MMBtu).

The inclusion of West Wheatfield Township, Indiana County to the Johnstown non-attainment area because of the location of Conemaugh Power Plant is inappropriate not only because there haven't been any measurements of non-attainment in that township, but the topography makes it very unlikely those emissions would cause high levels in the Johnstown non-attainment area. Further, Conemaugh Plant consists of two pulverized coal fired boilers equipped with low NO<sub>x</sub> burner technology with separated overfire air; electrostatic precipitators (ESP) with over 99% particulate control; and forced oxidation wet limestone flue gas desulfurization (FGD) systems which remove over 95% of the sulfur dioxide with a co-benefit removal of about 70% additional particulate removal after the ESP.

The inclusion of Plum Creek Township, Armstrong County into the Pittsburgh non-attainment area because of the location of Keystone Power Plant is inappropriate not only because there haven't been any measurements of non-attainment in that township, but the location in Armstrong County, which is northwest of Pittsburgh makes it very unlikely that the emissions from Keystone Plant will influence the area in the contiguous Pittsburgh non-attainment area. Further, Keystone Plant consists of two pulverized coal fired boilers equipped with low NO<sub>x</sub> burner technology with separated overfire air; selective catalytic reduction (SCR) which achieves additional NO<sub>x</sub> removal of up to 90%; electrostatic precipitators with over 99% particulate control; and wet limestone flue

gas desulfurization (FGD) systems with up to 98% SO<sub>2</sub> removal and about 70% additional particulate matter removal as a co-benefit are currently being installed and coming into service in 2009.

The inclusion of Taylor Township, Lawrence County into the Pittsburgh non-attainment area because of the location of New Castle Power Plant is inappropriate because there haven't been any measurements of non-attainment in that township and because there hasn't been any demonstration that New Castle Power Plant emissions are a significant contribution to the Pittsburgh non-attainment area. New Castle Plant consists of three coal fired boilers which are equipped with low NO<sub>x</sub> burner technology with separated overfire air; electrostatic precipitators (ESPs) with over 99% particulate control; and selective non-catalytic reduction (SNCR) for NO<sub>x</sub> control which achieves an additional 25% removal of NO<sub>x</sub>.

To include a township in a non-attainment area simply because of the location of a coal fired electric power plant subjects that township to the same economic hardships as the demonstrated non-attainment areas. That burden is completely inappropriate as these power plants have not been demonstrated as causing non-attainment in these areas and these plants are already, or will be, some of the most highly controlled in Pennsylvania and the US. Further, this rationale for designation is inappropriate as EPA has demonstrated the effectiveness of the CAIR program for controlling electric generating units (EGUs) in achieving and maintaining attainment of the PM<sub>2.5</sub> standards.

The PADEP contention that the inclusion of these selected areas is appropriate based on the potential sulfur compound emissions from coal-fired EGUs in these areas does not appear to be supported by its own ambient air monitoring data. As noted in the 2004 Annual Air Quality Monitoring Report, the ratio of sulfate to total PM<sub>2.5</sub> is essentially the same for 13 monitoring sites located throughout the Commonwealth (reference Figures 2-11 through 2-17 of the aforementioned report), thus suggesting that sulfates (i.e., sulfur compound emissions) are a regional issue as opposed to a local issue. Similarly, annual average SO<sub>2</sub> concentrations measured at multiple monitoring sites located throughout the Commonwealth show nearly uniform values (reference Appendix A, Table A-11 of the aforementioned report). The implementation of CAIR is expected to effectively address the regional transport of SO<sub>2</sub> and NO<sub>x</sub> (PM<sub>2.5</sub> precursors). The Department's own ambient air monitoring data do not support the non-attainment designation of small selected areas that are external to large contiguous non-attainment areas.

Based on the discussion outlined above EPA requests that the PADEP consider the following recommendations:

1. PADEP maintains the exemption of Greene County from the Pittsburgh non-attainment area based on ambient air monitoring data.
2. Make all the monitoring data used in the attainment/non-attainment determinations available for public review on the Department's web page.

3. Consider trending of the data in the attainment/non-attainment determination process (particularly in light of upcoming CAIR reductions) as opposed to only absolute values being compared to the 24-hour standard.
4. Withdraw the inclusion of townships from non-attainment areas based upon the location of a power plant within that township.

Reliant Energy provides electricity and energy services to retail and wholesale customers in the U.S. The company has approximately 20,000 megawatts of power generation capacity in operation, under construction or under contract in the U.S. In Pennsylvania, the company owns and/or operates 18 power plants which produce approximately 8,800 net megawatts of generation capacity. Reliant Resources, Inc. is based in Houston, Texas and the Eastern Regional Office is located in Canonsburg, PA.

Thank you for the opportunity to comment on these proposed PADEP recommendations to the U.S. EPA.

Sincerely yours,

A handwritten signature in cursive script that reads "Vincent J. Brisini /jk". The signature is written in black ink and is positioned above the printed name and title.

Vincent J. Brisini  
Manager Air Resources





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December 7, 2007

Mr. Timothy A. Leon-Guerrero  
Chief, Air Quality Modeling Section  
Pennsylvania Department of Environmental Protection  
Bureau of Air Quality  
P.O. Box 8468  
Harrisburg, PA 17105-8468

**Subject: Electric Power Generation Association (EPGA) Comments on Proposed Recommendations to the U.S. EPA for 24-Hour Fine Particulate (PM<sub>2.5</sub>) Attainment/Non-attainment Areas**

Dear Mr. Leon-Guerrero:

EPGA appreciates the opportunity to provide comments to the PADEP's proposed recommendations to the U.S. EPA for the 24-hour PM<sub>2.5</sub> area designations. EPGA applauds the PADEP for excluding some areas from historically designated non-attainment areas based on 2004-2006 ambient monitoring data. An example is the exclusion of Greene County from the Pittsburgh non-attainment area. Specifically, the Department notes that while the area is characterized by relatively high terrain (a feature common throughout western and central Pennsylvania), area monitors just north of Greene County are yielding data values below the PM<sub>2.5</sub> 24-hour standard. Hence, PADEP is appropriately narrowing the scope of the Pittsburgh non-attainment area.

It is difficult, however, to determine if the Department was consistent in the application of the data because only the 2004 ambient air quality reports are available on the Department's website for review by the public. The PADEP's proposed recommendations reference data for 2004 through 2006, yet no detail is provided as to how the data were used to make attainment/non-attainment determinations. As in the example above with Greene County, were all the data lower than the standard or was the three-year average below the standard? EPGA believes that if the data shows a downward trend with the most recent data point at or below the standard then the area should be designated as attainment. These downward trends are strong indicators that current state and federal programs are having positive influences. Further, the Department acknowledges that EPA's Clean Air Interstate Rule (CAIR) will assist the state in attaining the 24-hour PM<sub>2.5</sub> standard. Consequently, if there is a downward trend with 2004-2006 data, it is reasonable to assume that trend will continue with CAIR becoming effective for nitrogen oxides (NO<sub>x</sub>) in 2009 and sulfur dioxide in 2010.

Because all of the data used for decision making are not available for review, it does appear that the Department was inconsistent in its use of the ambient air monitoring data (or the lack of ambient air monitoring data) as the PADEP takes the opposite approach to the action first mentioned, by adding townships to non-attainment areas simply because a coal fired electric generating power plant is located in the township. Greene County has high terrain and an electric power plant, yet the monitoring data does not support the notion that the high emissions are “trapped” and presumably above the standard. Why then does the Department use high terrain and power plant location (to the apparent exclusion of the monitoring data) assumptions in other areas, namely Johnstown and Pittsburgh, to make a non-attainment designation?

The inclusion of East Wheatfield Township, Indiana County into the Johnstown non-attainment area because of the location of Seward Power Plant is inappropriate not only because there haven't been any measurements of non-attainment in that township, but the topography makes it very unlikely those emissions would cause high levels in the Johnstown non-attainment area. Further, Seward Plant consists of two circulating fluidized boilers which result in very low sulfur dioxide (SO<sub>2</sub>) emissions (0.6 Lbs SO<sub>2</sub>/MMBtu and 95% removal); a fabric filter which results in very low particulate emission (0.01 Lbs PM/MMBtu); and selective non-catalytic reduction (SNCR) for NO<sub>x</sub> emissions (0.15 Lbs NO<sub>2</sub>/MMBtu).

The inclusion of West Wheatfield Township, Indiana County into the Johnstown non-attainment area because of the location of Conemaugh Power Plant is inappropriate not only because there haven't been any measurements of non-attainment in that township, but the topography makes it very unlikely those emissions would cause high levels in the Johnstown non-attainment area. Further, Conemaugh Plant consists of two pulverized coal fired boilers equipped with low NO<sub>x</sub> burner technology with separated overfire air; electrostatic precipitators (ESP) with over 99% particulate control; and forced oxidation wet limestone flue gas desulfurization (FGD) systems which remove over 95% of the sulfur dioxide with a co-benefit removal of about 70% additional particulate removal after the ESP.

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The inclusion of Taylor Township, Lawrence County into the Pittsburgh non-attainment area because of the location of New Castle Power Plant is inappropriate because there haven't been any measurements of non-attainment in that township and because there hasn't been any demonstration that New Castle Power Plant emissions are a significant contribution to the Pittsburgh non-attainment area. New Castle Plant consists of three coal fired boilers which are equipped with low NO<sub>x</sub> burner technology with separated overfire air; electrostatic precipitators (ESPs) with over 99% particulate control; and selective non-catalytic reduction (SNCR) for NO<sub>x</sub> control which achieves an additional 25% removal of NO<sub>x</sub>.

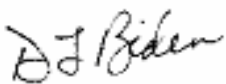
To include a township in a non-attainment area simply because of the location of a coal fired electric power plant subjects that township to the same economic hardships as the demonstrated non-attainment areas. That burden is completely inappropriate as these power plants have not been demonstrated as causing non-attainment in these areas and these plants are already, or will be, some of the most highly controlled in Pennsylvania and the US. Further, this rationale for designation is inappropriate as EPA has demonstrated the effectiveness of the CAIR program for controlling electric generating units (EGUs) in achieving and maintaining attainment of the PM<sub>2.5</sub> standards. The Department's contention that the inclusion of these selected areas is appropriate based on the potential sulfur compound emissions from coal-fired EGUs in these areas does not appear to be supported by its own ambient air monitoring data. As noted in the 2004 Annual Air Quality Monitoring Report, the ratio of sulfate to total PM<sub>2.5</sub> is essentially the same for 13 monitoring sites located throughout the Commonwealth (reference Figures 2-11 through 2-17 of the aforementioned report), thus suggesting that sulfates (i.e., sulfur compound emissions) are a regional issue as opposed to a local issue. Similarly, annual average SO<sub>2</sub> concentrations measured at multiple monitoring sites located throughout the Commonwealth show nearly uniform values (reference Appendix A, Table A-11 of the aforementioned report). The implementation of CAIR is expected to effectively address the regional transport of SO<sub>2</sub> and NO<sub>x</sub> (PM<sub>2.5</sub> precursors). The Department's own ambient air monitoring data does not support the non-attainment designation of small selected areas that are external to large contiguous non-attainment areas.

Based on the discussion outlined above EPA requests that the Department consider the following recommendations:

1. PADEP maintains the exemption of Greene County from the Pittsburgh non-attainment area based on ambient air monitoring data.
2. Make all the monitoring data used in the attainment/non-attainment determinations available for public review on the Department's web page.
3. Consider trending of the data in the attainment/non-attainment determination process (particularly in light of upcoming CAIR reductions) as opposed to only absolute values being compared to the 24-hour standard.
4. Withdraw the inclusion of townships from non-attainment areas based upon the location of a power plant within that township.

Thank you for the opportunity to comment on these PADEP recommendations to the U.S. EPA. EPGA is a regional trade association of electric generating companies with headquarters in Harrisburg, Pennsylvania. Its members include Allegheny Energy Supply, AES Beaver Valley, Dynegy Inc, Exelon Generation, FirstEnergy Generation Corporation, L S Power Associates, Midwest Generation, Mirant Corporation, Cogentrix Energy Inc., PPL Generation, Reliant Energy, Sunbury Generation, and UGI Development Company. These companies own and operate more than 141,000 megawatts of electric generating capacity, approximately half of which is located in the mid-Atlantic region.

Sincerely yours,



Doug Biden  
President



**Wightman School Community Bldg.**  
**5604 Solway Street, Room 204, Pittsburgh, PA 15217**  
**(Tel) 412-325-7382 (Fax) 412-325-7390**  
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Mr. Timothy Leon Guerrero  
Chief, Air Quality Modeling Section  
Air Resource Management  
Bureau of Air Quality  
PA Department of Environmental Protection (EPA)

December 7, 2007

**Comments from Group Against Smog and Pollution (GASP) to the Pennsylvania Department of Environmental Protection on the Proposed Recommendations to the U.S. EPA for 24 hour PM 2.5 Designations for Attainment or Nonattainment Areas**

On June 8, 2007, the Environmental Protection Agency (EPA) issued guidance for states and tribes to use in identifying areas that meet or do not meet EPA's recently revised national air quality standards for fine particle (PM<sub>2.5</sub>) concentrations over a 24-hour period.

The guidance states, "When determining boundaries in urban areas for the annual PM<sub>2.5</sub> standards, EPA applied a presumption that the boundaries for urban nonattainment areas should be based on metropolitan area boundaries as defined by the U.S. Office of Management and Budget. For the PM<sub>2.5</sub> 24-hour standards, EPA is establishing no such presumption."

Further the Guidance notes, "In developing boundary recommendations for nonattainment areas for the 24-hour PM<sub>2.5</sub> standards, this guidance encourages states and tribes to evaluate each area on a case-by-case basis. For each monitor or group of monitors that indicate violations of the standard, nonattainment area boundaries should cover a sufficiently large area to include both the area that violates the standard and the areas that contribute to the violations.

This guidance indicates a case by case evaluation and that "nonattainment area boundaries should cover a sufficiently large area to include both the area that violates the standard and the areas that contribute to the violations."

*Noting these comments, GASP partially agrees with the recommendations for the Pittsburgh Beaver Valley Nonattainment Area. However, we urge that more examination be given to Armstrong County, an area of moderate population density, proposed to be designated partial nonattainment. The partial nonattainment is likely due to several large emission sources on the western and northern ends of the county. However, there is a monitor in Allegheny County very near Armstrong County's southern border according to Figure B 1 of the presentation "Pennsylvania's Proposed 24-Hour PM 2.5*

*Designation Recommendations November 2007” given by Timothy Leon Guerrero on November 27 in Pittsburgh that has a 24 hour PM 2.5 design value of 41.5.*

*On the western side of Armstrong County is Butler County proposed as non attainment which appears to have no monitor but has a monitor in Beaver County to its west with a design value of 43.9 for the PM 2.5 24 hour standard and one in Allegheny County just over the southern border with a design value of 45 for the PM 2.5, 24 hour standard. The prevailing wind direction is from the west or southwest. That wind direction flows over Butler and Allegheny County most of the time just before hitting Armstrong County. It is hard to believe that with a monitor reading 41.5 for the 24 hour PM 2.5 standard just over the southern border in Allegheny County from Armstrong County and the prevailing winds sweeping over Allegheny County into Armstrong County that at least the immediate southern section of Armstrong County if not most of the county is in attainment for the new 24 hour PM 2.5 standard.*

*It should be noted that there are many monitors in Allegheny County with PM 2.5 design values well above the new 24 hour PM 2.5 standard including the Liberty Monitor with one of the highest design value in the country according to monitor data analysis by Mark Schmidt of the EPA Air Quality Trends and Analysis Group. PM 2.5 is thus likely forming downwind of Allegheny County sources which would bring some of that formation to the area of Armstrong County. Allegheny County ranks high for Area Source VOC, NOx and SO2 emissions among others according to appendix B of the “Pennsylvania Proposed Recommendations to the US EPA For 24-Hour Fine Particulate (PM 2.5) Attainment/Nonattainment Areas.” which has implications for downwind fine particulate formation.*

*Additionally, sources within Armstrong County which necessitate the partial non attainment may also contribute to countywide fine particulate pollution. Armstrong County has very high rates for Point Source sulfur dioxide and nitrogen dioxide emissions (tons per year per square mile) according to Appendix B of the “Pennsylvania Proposed Recommendations to the US EPA For 24-Hour Fine Particulate (PM 2.5) Attainment/Nonattainment Areas.” Armstrong County also has more ammonia contribution than other nearby nonattainment counties. Without a monitor it is unclear how one would assess the design value of the county but simply not having a monitor in a county when nearby evidence suggests an air quality problem should not be acceptable. For the above reasons, we believe that Armstrong County or at least the southern portion should be designated as nonattainment and monitoring should be done in the county.*

The Liberty Clairton area is a separate nonattainment area within Allegheny County but the area’s emissions influence the downwind area which moves over Allegheny County. This is a serious health hazard for the immediate and downwind community. We urge that PM 2.5 reductions be reached expeditiously in this area in particular and that this higher level of emissions not be allowed to continue through any extension periods.

Thank you for the opportunity to make these comments concerning Pennsylvania’s proposed attainment/nonattainment designations for the revised 24 hour PM 2.5 standard. We here limit our comments to southwestern Pennsylvania.

Suzanne Seppi  
(GASP Project Manager)



**Delaware River Basin Commission**  
 DELAWARE • NEW JERSEY  
 PENNSYLVANIA • NEW YORK  
 UNITED STATES OF AMERICA

**Delaware River Basin Commission**

25 State Police Drive  
 PO Box 7360  
 West Trenton, New Jersey  
 08628-0360  
 Phone: (609) 883-9500 Fax: (609) 883-9522  
 Web Site: <http://www.drbc.net>

*F BAO*

**Carol R. Collier**  
 Executive Director

**Robert Tudor**  
 Deputy Executive Director

December 4, 2007

Mr. Thomas K. Fidler  
 Deputy Secretary  
 PA Department of Environmental Protection  
 Office of Waste, Air and Radiation Management  
 Rachel Carson State Office Building  
 P.O. Box 2063  
 Harrisburg, PA 17105-2063

**RECEIVED**

DEC 10 2007

**DEPARTMENT OF ENV. PROTECTION  
 WASTE, AIR AND RADIATION MGMT.**

Dear Mr. Fidler:

This is in reference to DEP's proposed recommendations to EPA on nonattainment areas for fine particulate matter (PM2.5) national ambient air quality standards, as described in your letter dated November 14, 2007.

The Delaware River Basin Commission strongly supports DEP's proposed recommendations for nonattainment areas and subsequent development of a State Implementation Plan. In addition to the inherent health benefits associated with reducing atmospheric fine particulate matter, our work on the Total Maximum Daily Load for Polychlorinated Biphenyls (PCBs) for the Delaware River demonstrates that atmospheric particulates play a role in the transport of PCBs into the waters of the Basin. Reducing atmospheric particulate pollution provides the added benefit of limiting the migration of PCBs and reducing our exposure to PCBs and other hydrophobic toxic chemicals.

Sincerely,

*Carol R. Collier*

Carol R. Collier  
 Executive Director

c: Cathy Curran Myers

DEP BUREAU OF AIR QUALITY  
 DIRECTOR'S OFFICE

2007 DEC 12 AM 10:01

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