



# pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

SECRETARY

April 8, 2013

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

Dear Mr. Garvin:

This letter is in response to your February 6, 2013, letter to Governor Tom Corbett providing the U.S. Environmental Protection Agency's (EPA) proposed designations for the 2010 1-hour sulfur dioxide (SO<sub>2</sub>) National Ambient Air Quality Standard (NAAQS). Thank you for considering Pennsylvania's recommendations for designations and for carefully considering the associated technical information relating to the 2010 1-hour SO<sub>2</sub> NAAQS of 75 parts per billion. EPA promulgated the 1-hour SO<sub>2</sub> NAAQS on June 2, 2010, published at 75 Fed. Reg. 35520 (June 22, 2010). The Commonwealth submitted its recommendations to EPA, in accordance with Section 107 of the Clean Air Act, 42 U.S.C.A. § 7407, on June 23, 2011.

The Pennsylvania Department of Environmental Protection's (DEP) designation recommendations for attainment, nonattainment and unclassifiable areas were based solely on 2008-2010 ambient air quality monitoring of SO<sub>2</sub> concentrations and used EPA's default county boundaries. DEP's June 23, 2011, letter recommended designation of Allegheny, Beaver, Indiana and Warren counties as 1-hour SO<sub>2</sub> nonattainment areas, and recommended designation of the remaining counties in the Commonwealth as "unclassifiable" areas. At the time of those recommendations, EPA had indicated that it would also consider air quality dispersion modeling submitted by states to support larger or smaller areas. However, DEP had not yet conducted such modeling, mainly due to EPA's delayed issuance of the March 24, 2011, designations guidance, entitled "Area Designations for the 2010 Revised Primary Sulfur Dioxide National Ambient Air Quality Standards," and the large number of SO<sub>2</sub>-emitting sources in the Commonwealth. Thus, in its June 23, 2011, recommendation letter, DEP stated that it may alter its recommendations after performing additional analyses.

EPA responded to the Commonwealth's designation recommendations, agreeing with all of Pennsylvania's original designation recommendations, but also including a portion of Armstrong County as part of a nonattainment area. After consideration of EPA's intention to add a portion of Armstrong County, and after further analysis, DEP recommends that EPA remove the intended partial designation of Armstrong County for the reasons outlined in Enclosure No. 1 to this letter.

After further consideration and analysis of its original recommendations, DEP is also proposing the following changes to EPA's intended designations:

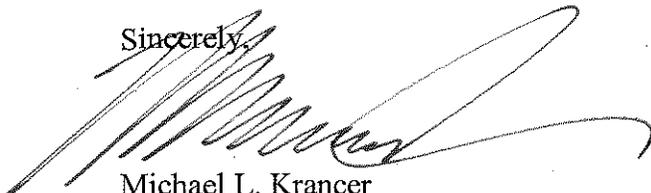
- Reduce the Beaver County nonattainment area to six municipalities: Brighton, Potter and Vanport Townships and Industry, Midland, and Shippingport Boroughs. The reason for the modification of the Beaver County nonattainment area is outlined in Enclosure No. 2.
- Reduce the Allegheny County nonattainment area to the municipalities of the City of Clairton, the City of McKeesport, Dravosburg, Elizabeth, Glassport, Jefferson Hills, Liberty, Lincoln, Pleasant Hills, Port Vue, Versailles, West Elizabeth and West Mifflin Boroughs, and Elizabeth and Forward Townships. The reason for the modification of the Allegheny County nonattainment area is outlined in Enclosure No. 3.
- Reduce the Warren County nonattainment area to four municipalities: Conewago, Glade and Pleasant Townships and the City of Warren. The reason for the modification of the Warren County nonattainment area is outlined in Enclosure No. 4.

The EPA indicated in its March 24, 2011, designations guidance, entitled "Area Designations for the 2010 Revised Primary Sulfur Dioxide National Ambient Air Quality Standards," that it would evaluate each potential nonattainment area on a case-by-cases basis. EPA recognized on pages 4 and 5 and in Enclosure 2 of that guidance document that area-specific analyses can support a boundary with a smaller area than the county boundary EPA used as a presumptive boundary. EPA stated that the five-factor analysis it set forth in that guidance, as well as other relevant available information, all of which DEP used in its analyses, may support designating only a portion of a county as "nonattainment."

Accordingly, DEP respectfully requests that EPA modify its intended designations using the Commonwealth of Pennsylvania's recommendations contained in this letter and supported by the enclosures to this letter.

Should you have questions or need additional information during the development of the final SO<sub>2</sub> NAAQS designations for Pennsylvania, please contact Dean E. Van Orden, Assistant Director, Bureau of Air Quality, by e-mail at [dvanorden@pa.gov](mailto:dvanorden@pa.gov) or by telephone at 717.783.9264.

Sincerely,



Michael L. Krancer  
Secretary

Enclosures