

COMMENT /RESPONSE DOCUMENT
Revision to Proposed Berks County Maintenance Plan
November 2003

The public hearing was held on November 12, 2003 in the offices of the Berks County Planning Commission in Reading. The comment period closed November 14.

COMMENTATORS:

1. Cecilia M. Zuber
165 Douglas St. #3
Reading, PA 19601

2. James Lewis, Jr.
152 Bingaman Road
Reading, PA 19606

Numbers in parentheses refer to the commentator(s) making the comment.

Comment:

1. Ozone monitoring performed by the department was inappropriate to establish ozone levels, including monitoring only when humidity was at a certain level and only during the daytime and in winter months. (1)

Response:

Ozone monitoring is performed continuously throughout the day and year. Ground-level ozone is created when volatile organic compounds and nitrogen oxides react in the presence of sunlight. More intense solar radiation (watts per square meter) is an important factor, and the stagnant weather conditions prevalent in the summer concentrates the ozone to unhealthy levels. DEP's continual monitoring shows that ozone levels are significantly higher in the summer. Unhealthy ozone levels rarely occur in any months other than July and August. Ozone levels typically peak in late afternoon. Therefore, DEP performs its modeling of highway emissions for a typical summer weekday, at the humidity and temperatures typical of peak ozone-creating conditions. This is consistent with the Clean Air Act mandate to protect public health.

Comment:

2. The comments stated that ozone levels are an offshoot of global warming, which does not exist.

Response:

The proposed SIP revision concerns ground-level ozone, not greenhouse gases. These comments are therefore not relevant.

Comment:

3. Smog has declined by 70 percent since 1970 even though the number of cars has doubled. The commentator makes similar comments about acid rain, airborne soot, toxic emissions and cancer. (1)

Response:

The commentator is correct that ground-level ozone concentrations have decreased significantly. This is due to federal and state governmental actions, which require cleaner cars, industry, consumer products, and other measures. The proposed SIP revision accounts for both the reductions expected from these measures as well as projected vehicle and economic growth.

Comment:

4. A majority of the population believes that pollution, including ozone, is growing worse, but the reality is quite different. (1)

Response:

This statement is true. Surveys indicate that most people do not know that air quality is getting better.

Comment:

5. Countries that have done the most to end air pollution have the highest rate of asthma. (1)

Response:

Ground-level ozone has been shown to trigger asthma attacks; some recent studies indicate that it may as well be one of the many causes of asthma itself. However, there are many other factors at play; researchers have not reached consensus on asthma causes.

Comment:

6. Computer models are in direct variance to actual scientific fact and it is time to stop pushing your computer models. (1)

Response:

It is unclear whether the commentator is referring to global warming models or to the MOBILE model at issue in the SIP. Computer models are the only possible way to make calculations of highway emissions since direct measurement is not possible. DEP has used the EPA-approved computer model in this SIP revision.

Comment:

7. The commentator submitted a statement about the vehicle emissions testing program that will go into effect in Berks County in January 2004.

Response:

The proposed SIP revision includes the vehicle emissions testing program in its estimation of highway emissions. The estimation uses the specific program parameters expected in Berks County for 2007. However, the program itself is not open for public comment in this SIP revision. The commentator's testimony will also be submitted for the record for the proposed SIP on the I/M program.

NOTE: Martin Kotsch, U.S. Environmental Protection Agency, informally pointed out by telephone call that Table 1 on page 4 contained a typographical error in the tons per day entries whereby the NOx emissions for 2004 were transposed with the VOC emissions for 2007. The same information when repeated in subsequent tables and in the appendix is correct as originally proposed. This error in Table 1 has been corrected in the final version.