

**Recommendations to EPA for
Fine Particulate (PM_{2.5}) Attainment/Nonattainment Areas**

Comment/Response Document

List of Commentators:

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Comments and Responses

1	Comment:	The commentator notes that the air quality of an area could be weighted more heavily than consistency with existing ozone planning areas in the designation recommendations. (1)
	Response:	<i>DEP considered a number of factors outlined in EPA guidance in developing recommendations for PM_{2.5} designations. The relative weighting of the factors will continue to be assessed by DEP prior to the expected promulgation of final designations by EPA in December 2004.</i>
2	Comment:	Nonattainment areas for ozone and PM _{2.5} should be different. (1)
	Response:	<i>DEP recommends utilizing existing planning area boundaries wherever possible to allow for integrated air quality planning.</i>
3	Comment:	There is no evidence that Southern New Jersey exceeds or contributes to violations of the PM _{2.5} standard. (1)
	Response:	<i>DEP will continue to work with EPA and adjacent states to determine appropriate PM_{2.5} nonattainment boundaries.</i>
4	Comment:	The commentator agrees that Pike County should not be included in the NYC nonattainment area. (1)
	Response:	<i>DEP appreciates the support of the commentator.</i>
5	Comment:	The commentator supports designation of the Allentown-Bethlehem-Easton MSA as attainment (1)
	Response:	<i>DEP appreciates the support of the commentator.</i>
6	Comment:	The commentators recommend that county emissions, particularly SO ₂ be given more weight in the designation process. Counties with high SO ₂ emissions should be designated nonattainment. (2,3,6)
	Response:	<i>DEP has taken a number of factors into account, including county emissions, in developing these recommendations. However, we do not believe that all counties containing large point sources, such as power plants, should be automatically included in nonattainment areas. These large point sources contribute to the regional component of PM_{2.5} and must be addressed on a national or regional level, not at the local planning level.</i>
7	Comment:	The commentator urges PA not to consider an extension of the February 2010 attainment date. (2,3)
	Response:	<i>DEP appreciates the input. We remain concerned that provisions dealing with transport of PM_{2.5} and its precursors in the Interstate Air Quality rule are not sufficient to bring all areas of the Commonwealth into attainment by 2010.</i>

8	Comment	The commentators agree that both regional and local controls will be needed (2, 5)
	<i>Response:</i>	<i>DEP agrees.</i>
9	Comment:	PA should achieve the PM _{2.5} standard with or without the participation of other states (2)
	<i>Response:</i>	<i>It is unlikely that Pennsylvania will achieve attainment of the PM_{2.5} standard on its own and we also recognize the importance of the Commonwealth's contributions to downwind nonattainment areas. PM_{2.5} is a regional problem that will require national, regional, state, and local strategies.</i>
10	Comment:	The commentator is concerned that the timeline and SO ₂ credit banking provisions of the Interstate Air Quality Rule will not bring all areas into attainment by the PM _{2.5} attainment deadline. (2)
	<i>Response:</i>	<i>DEP shares the commentators concerns.</i>
11	Comment:	The commentators generally support following existing planning area boundaries. (2,3)
	<i>Response:</i>	<i>DEP appreciates the commentators support.</i>
12	Comment:	The commentators recommend including several counties with no monitoring data in nonattainment areas. (2,3)
	<i>Response:</i>	<i>DEP considered a number of factors in developing the recommendation that these counties be designated attainment, including nearby monitoring data, population density, meteorology and emissions.</i>
13	Comment:	The commentators support an interstate Philadelphia nonattainment area. (2,3)
	<i>Response:</i>	<i>DEP will continue to work with EPA and adjacent states to determine appropriate nonattainment boundaries for the PM_{2.5} annual standard.</i>
14	Comment:	The commentator recommends designating Centre County as nonattainment due to highway expansion, increasing vehicle miles traveled and long range transport. (2)
	<i>Response:</i>	<i>Centre County is monitoring PM_{2.5} concentrations that are well below the annual PM_{2.5} standard.</i>
15	Comment	Emission reductions under this program should not be made solely through an emissions trading program. Sources should be required to install technology controls. (2)
	<i>Response:</i>	<i>Emission reduction requirements for nonattainment areas will be developed within a planning process for nonattainment areas after</i>

		<i>EPA addresses these issues in a final implementation rule.</i>
16	<i>Comment:</i>	Monitor placement may result in peak county values not being measured, and an area being designated attainment. (3)
	<i>Response:</i>	<i>DEP carefully studies siting of monitors to ensure collection of representative data. In addition, the siting of monitors is approved by EPA.</i>
17	<i>Comment:</i>	The commentator opposes including any Delaware counties in the Philadelphia nonattainment area (4)
	<i>Response:</i>	<i>DEP will continue to work with EPA and adjacent states to determine appropriate nonattainment boundaries.</i>
18	<i>Comment:</i>	The commentator supports nonattainment designation of the seven-county Pittsburgh area. (6)
	<i>Response:</i>	<i>DEP appreciates the support of the commentator.</i>
19	<i>Comment:</i>	The commentator recommends including out of state counties in control strategy planning. (6)
	<i>Response:</i>	<i>DEP agrees that coordination with "out of state" counties will be important.</i>
20	<i>Comment:</i>	The commentator opposes designation of the seven-county Pittsburgh area as a nonattainment area due to the variance in the monitored values and the impacts of transported pollution on the region. (5)
	<i>Response:</i>	<i>DEP realizes that the Pittsburgh area has some unique local influences as well as regional transport impacts. We will continue to assess this situation as more data and EPA's implementation rule become available.</i>
21	<i>Comment:</i>	The commentator suggests either designating a large enough nonattainment area to include significant upwind sources or designating those areas having a strong local component as a separate nonattainment area, such as the area around the Liberty monitor. (5)
	<i>Response:</i>	<i>DEP does not believe that the creation of large nonattainment areas is an effective way to achieve the PM_{2.5} standard. Regional contributions to PM_{2.5} levels will be addressed by EPA's Interstate Air Quality rule. See also response to #20.</i>
22	<i>Comment:</i>	The commentator expressed concern about disparities in designations across county or state lines leading to unfair disadvantages and the economic implications of nonattainment designation for the Pittsburgh region. (5)
	<i>Response:</i>	<i>DEP recognizes the need to minimize disadvantages due to</i>

		<i>nonattainment status and will advocate for regional and national strategies, as appropriate.</i>
23	Comment:	DEP's recommendations should stress that controls necessary for local areas may not be reasonable to apply across a region. (5)
	Response:	<i>DEP agrees that a combination of appropriate local and regional scale reductions will be necessary to achieve the PM_{2.5} standard.</i>
24	Comment:	Southwestern PA is highly impacted by upwind, out of state sources. Coordination with regulatory agencies in upwind states will be necessary to effectively address interstate transport. (5)
	Response:	<i>DEP agrees that regional coordination is important to developing the most effective solutions to air quality problems. The adoption of stringent caps in the interstate transport rule would significantly reduce the impact of upwind states.</i>
25	Comment:	Investigation of the sources of PM _{2.5} must be completed before developing designations, regulations, and the SIP. (5)
	Response:	<i>Further investigation of the sources and science of PM_{2.5} will be an ongoing process. In 1997, EPA had compiled sufficient scientific information to set a new health-based National Ambient Air Quality Standard for PM_{2.5}. The Clean Air Act provides a specific opportunity for the Commonwealth to submit recommendations at this time. DEP will have additional opportunities (including revisions to the recommendations) for dialog with EPA.</i>
26	Comment:	The commentator urges DEP to devote necessary resources to analyze the PM _{2.5} problem to ensure cost-effective regulations. (5)
	Response:	<i>DEP expects that developing cost-effective regulations to address the PM_{2.5} problem will be one of its top priorities. Revisions to the State Implementation Plan will be due within 3 years after the PM_{2.5} designations are promulgated by EPA.</i>
27	Comment:	The commentator urges DEP to engage stakeholders to develop strategies at the regional, rather than state, level. (5)
	Response:	<i>DEP believes that a combination of local, state and multi-state strategies will be necessary to achieve the PM_{2.5} standard. The role of stakeholders will be fully evaluated following EPA's adoption of an implementation rule.</i>
28	Comment:	The commentator suggests making all monitoring data from Southwestern PA monitors (including the Allegheny County monitors) available to the public in one location. (5)
	Response:	<i>DEP concurs with your concern and will assess ways to make the monitoring data more accessible.</i>

29	Comment:	The commentator suggests improving access to PM _{2.5} information on DEP's website by locating it more visibly. (5)
	Response:	<i>DEP appreciates the suggestion and will explore the feasibility of improving electronic access to the information.</i>
30	Comment:	The commentator is concerned that counties are too large to use as the basis for PM _{2.5} designation because problem spots may be missed. (7)
	Response:	<i>Many counties have more than one monitor. For designation purposes, the highest value is used when considering attainment status.</i>
31	Comment:	Residents of minority and poverty areas have comparatively poor health and need more protection. (7)
	Response:	<i>The Department shares your concerns about the air quality impacts in minority and impoverished areas. EPA is required to set the National Ambient Air Quality Standards at the level necessary to protect public health, including the health of "sensitive" populations such as asthmatic, children, and the elderly.</i>
32	Comment:	The commentator urges DEP to meet the more stringent Canadian 24-hour standard of 30 ug/m ³ . (7)
	Response:	<i>EPA has already begun a review of the current available science relating to PM_{2.5} and may revise the standard to be more protective of public health.</i>