



Pennsylvania Department of Environmental Protection

Rachel Carson State Office Building

P.O. Box 2063

Harrisburg, PA 17105-2063

August 30, 2004

Secretary

717-787-2814

Mr. Donald S. Welsh
Regional Administrator
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Mr. Welsh:

I am writing to you to urge you to reconsider the U.S. Environmental Protection Agency's (EPA's) proposed designations for the Particulate Matter (PM_{2.5}) National Ambient Air Quality Standard. EPA notified the Commonwealth of Pennsylvania (Commonwealth or Pennsylvania) in a letter dated June 29, 2004, that it intends to modify Pennsylvania's PM_{2.5} designation recommendations boundaries for the Particulate Matter (national ambient air quality standard). Pennsylvania's recommendations for nonattainment area boundaries were submitted on behalf of the Governor in February 2004. These recommendations were subsequently revised in June 2004 following the receipt of information concerning EPA's recently developed "weighted emissions scoring" process.

Based on further analysis, Pennsylvania finds it necessary to amend our recommendations for the Pittsburgh area. Pennsylvania recommends designation of two additional nonattainment areas within the Pittsburgh nonattainment area. Additional analysis of the monitoring and meteorology data has been conducted that supports two partial-county nonattainment areas. The analysis, conducted by the Pennsylvania Department of Environmental Protection and the Allegheny County Health Department (ACHD), shows that unique, local PM_{2.5} problems exist in the vicinities of the Liberty Borough, Clairton and North Braddock monitors. Bringing these areas into attainment will take longer than bringing the rest of the Pittsburgh area into attainment. It would be illogical to tie the attainment status of the remainder of an extensive nonattainment area to this local problem. The creation of two additional nonattainment areas within the Pittsburgh nonattainment area is necessary to address the attainment timing issues and unique needs of these two local areas. This approach is also strongly supported by the ACHD, industry and certain Pennsylvania legislators. ACHD and public comment received by the Department support this approach. The details of the analysis and recommendations for the boundaries of the two areas are included in the enclosure.

I am convinced that examination of the air quality monitoring data and the other factors cited in EPA's long-standing guidance, including emissions, meteorology, and demographics, shows that attainment is the correct designation status for the counties that EPA is proposing to add to Pennsylvania's recommended nonattainment areas. These counties include Mercer



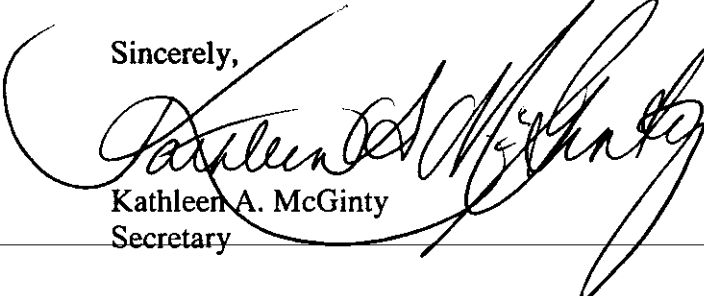
County in the Youngstown area, Lawrence, Butler, Armstrong, and Greene Counties in the Pittsburgh area, Indiana County in the Johnstown area, Lebanon County in the Harrisburg area, and Bucks and Montgomery Counties in the Philadelphia area. Pennsylvania's comments on EPA's analysis for these counties are included in the enclosure.

I am concerned with EPA's overall approach for the PM_{2.5} designations. The recently developed "weighted emissions" approach expands nonattainment areas to include counties monitoring attainment solely because of the emissions from certain major sources, including coal-fired power plants, located in these counties. Pennsylvania strongly opposes this approach. It has been my position throughout this process that emissions from large point sources, including power plants, must be addressed by national or regional legislation or regulation. In addition, EPA has not yet proposed an implementation rule for the PM_{2.5} standard. Without an implementation rule, the impacts of a nonattainment designation on these counties cannot be fully assessed.

If you have questions or need additional information concerning our PM_{2.5} designation recommendations, please contact Nicholas A. DiPasquale, Deputy Secretary for Air, Recycling and Radiation Protection, by e-mail at ndipasqual@state.pa.us or by phone at 717-772-2724, or Joyce E. Epps, Director of the Bureau of Air Quality, by e-mail at jeepps@state.pa.us or by phone at 717-787-9702.

Thank you in advance for your favorable consideration of Pennsylvania's enclosed analysis supporting Pennsylvania's recommendations for PM_{2.5} nonattainment areas and our comments regarding EPA's proposed modifications of Pennsylvania's recommendations.

Sincerely,



Kathleen A. McGinty
Secretary