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Office of the Secretary

717-787-2814

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

Dear Mr. Welsh:

Thank you for your letter of December 3, 2003 in response to Pennsylvania's eight-hour ozone designation recommendations. We are pleased that the U.S. Environmental Protection Agency (EPA) generally concurred with our designation recommendations and look forward to working with EPA to implement the health based 8-hour ozone standard expeditiously.

We are especially pleased that EPA concurred with Pennsylvania's position that Ocean County, New Jersey should remain part of the New York City Metropolitan Area and not be included in the Philadelphia Metropolitan Statistical Area (MSA). We firmly believe that this approach comports with EPA guidance. In the event that the proposed designation for Ocean County, New Jersey is reconsidered we will need to meet with EPA personnel. To this end, I am requesting a meeting with EPA to discuss the issues pertinent to the eight-hour ozone designation boundaries for the Philadelphia MSA prior to the April 15, 2004 promulgation date for the designations, if EPA's decision is contrary to the proposed designations set forth in 120-day letters to all potentially affected jurisdictions.

According to your December 3 letter, EPA intends to propose changes to Pennsylvania's recommended designations for Blair, Clearfield, Greene, Franklin and Tioga counties. Based on 2001-2003 monitored ozone data, EPA has proposed that Blair and Tioga counties be designated nonattainment. In light of the more recent air quality data showing slight exceedances of the 8-hour ozone standard, we anticipated that our Blair and Tioga counties designation recommendations would be modified. However, Pennsylvania continues to be concerned about the handling of rural counties that are only monitoring nonattainment of the health based 8-hour standard due to transport. Rural counties such as Clearfield, Franklin, Greene and Tioga are typical examples. These areas, while adjacent to metropolitan statistical areas (MSA's), are clearly rural and should not be required to implement local emission reduction strategies to address nonattainment caused solely by transported air pollutants.

In addition, I should also mention that EPA's intent to include Monroe County in the Scranton, Wilkes-Barre nonattainment area is also a matter of concern. Although Monroe County was part of the Scranton, Wilkes-Barre MSA area when one-hour ozone designations were made, it was not included as part of the MSA in the 1999 or 2003 Office of Management and Budget groupings. Therefore,

Pennsylvania is requesting that you reconsider EPA's proposed designation for Monroe County and promulgate an attainment designation for the county.

Finally, EPA intends to modify Pennsylvania's recommendation for Indiana and Lycoming counties by designating the counties nonattainment areas. We believe that it is appropriate to designate these counties as "unclassifiable/attainment" areas. Prior to the start of the 2004 ozone season, we will install and commence operation of an ozone monitor in Indiana County to obtain monitored ozone data. While ozone design values in surrounding counties are marginally above the eight-hour ozone standard, 84 ppb, the closeness of those levels to attainment indicates we need measured data to determine the appropriate designation for Indiana County. For EPA's proposed Lycoming County designation, it is apparent that your staff did not consider the relocation of the Williamsport monitor to nearby Montoursville. With two years (2002-2003) of data available from Montoursville and one year (2001) of data from the Williamsport site, Lycoming County should also be designated as an attainment/unclassifiable area. If the Montoursville site has three years of monitored ozone data showing nonattainment of the 8-hour standard after the end of the 2004 ozone area, then it should be appropriately designated nonattainment. Therefore, pending the collection of monitored air quality data, Pennsylvania is requesting that EPA reconsider its proposed designations and appropriately designate Indiana and Lycoming counties as attainment/unclassifiable areas.

Should you have any questions or need additional information, please contact Joyce E. Epps, Bureau of Air Quality, at 717-787-9702. Thank you in advance for your favorable reconsideration of Pennsylvania's designation recommendations

Sincerely,

Kathleen A. McGinty
Secretary

Mr. Donald S. Welsh

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bcc: ARM Reading File