

**Pennsylvania Department of Environmental Protection
Proposed RACT SIP Revision Under the 8-Hour Ozone National Ambient Air
Quality Standard (NAAQS)**

Comment and Response Document

1. The U.S. Environmental Protection Agency Region 3 submitted a written comment, (letter dated September 13, 2006, from Judith Katz to Joyce Epps) stating: “EPA Region 3 staff has examined the regulations currently in the Pennsylvania SIP (as tabulated in 40 CFR 52.2020) as well as those currently before the agency for approval. The staff could not identify a regulation covering the source categories covered by the 1978 flat wood paneling CTG.” The comment goes on to list eight sources within Pennsylvania that EPA believes to be flat wood paneling sources. The comment concludes with the statement: “Therefore, in order to completely fulfill the 8-hour ozone RACT requirement relative to flat wood paneling source categories covered by the 1978 Flat wood paneling CTG, DEP will need to identify which adopted regulation in the approved SIP or submitted revision covers sources, adopt and submit regulations covering this category or certify that there are no sources covered by the 1978 flat wood paneling CTG.”

Response: The eight sources listed in EPA’s comment letter were previously coded in the Department’s stationary source inventory as flat wood paneling sources and have been re-coded in the 2005 Air Information Management System (AIMS) to correctly reflect their true operations, i.e. wood furniture and cabinet manufacturing. Therefore, the Department is certifying that there are no sources subject to this CTG.

2. The U.S. Environmental Protection Agency Region 3 submitted a written comment, (letter dated September 13, 2006, from Judith Katz to Joyce Epps) stating: “The SIP revision cites an extensive number of documents.” The comments states further, “One identified as “RACT Phase II Cost Analysis (Excel Document)” has no issuing agency identified. In order to ensure our administrative record is complete and to fully support your SIP revision, I would remind DEP to submit a copy of those cited documents which were not issued by EPA.”

Response: A copy of all cited documents in the SIP revision which were not issued by EPA have been included in the SIP revision submittal to EPA Region 3 as reference documents to ensure an administratively complete record. The Excel document (RACT Phase II Cost Analysis) has been incorporated into the text of the revision document and therefore is no longer listed as a reference document.

Additional Comment Note: In areas in the RACT SIP revision document where the Department determined that further clarification was needed to better support the revision, minor additional information was added to the revision.

