

**Proposed Lead “Infrastructure” State Implementation Plan Revision**

**COMMENT AND RESPONSE DOCUMENT**

**Bureau of Air Quality  
Department of Environmental Protection  
Commonwealth of Pennsylvania**

**September 2012**

## COMMENTS AND RESPONSES

### Proposed Lead “Infrastructure” State Implementation Plan Revision

The public comment period began June 9, 2012 and closed July 13, 2012. A public hearing was held on July 10, 2012 at DEP’s Southcentral Regional Office. No witnesses presented testimony. Public comment was received from one commentator, listed below:

Fred P. Osman, P.E. BCEE  
President  
Osman Environmental Solutions, LLC  
4708 Rock Ledge Drive  
Harrisburg, PA 17110  
on behalf of Berks County

1. **COMMENT:** The commentator realizes that this State Implementation Plan (SIP) revision is intended to show only that the “infrastructure” is in place in Pennsylvania to implement measures to adequately monitor lead nonattainment and to enforce needed controls to achieve attainment. However, the commentator believes one item is not properly addressed in the SIP revision: the requirements in §110(a)(2)(B)(i) regarding ambient monitoring.

**RESPONSE:** The Department agrees that the intent of this SIP revision, with regard to ambient monitoring, is to describe the authority and ability of the Commonwealth, under the Commonwealth’s already-approved SIP, to install an ambient monitoring network in compliance with Part 58, Appendix D. The purpose of this SIP revision is not to identify the placement of any specific lead monitor. Therefore, the Department disagrees that this item is not properly addressed in this SIP revision.

The requirements in 40 CFR 58.10(a)(4) pertaining to lead monitoring have been met. As required, the Department submitted a plan to the U.S. Environmental Protection Agency (EPA) for establishing source-oriented lead monitoring sites for lead sources emitting 1.0 tpy or greater as part of the 2010 annual network plan submitted in 2009. Prior to submittal, the Department held a 30-day public comment period on this plan and prepared a comment and response document, which was provided to EPA as part of the plan. The monitoring in Berks County was described as part of this submittal. In July 2011, the Department also submitted a plan, after public comment, to EPA for establishing source-oriented lead monitoring sites for lead sources emitting equal to or greater than 0.50 tpy but less than 1.0 tpy. EPA concurred with both plans.

Due to ongoing concerns from the Berks County Commissioners, the Department is open to evaluating the possibility of future additional sampling in the vicinity of the largest lead emission source, Exide Technologies.

Because the North Reading area in Berks County has been designated as nonattainment for lead, the Commonwealth must submit to EPA a SIP revision additional to this

“infrastructure” SIP revision, which will contain emission inventories, a demonstration that Reasonably Available Control Technology/Reasonably Available Control Measures will be used, a demonstration of reasonable further progress, a modeled attainment demonstration showing attainment by December 31, 2015, and contingency measures. The additional SIP revision will also contain items related to monitoring, such as air quality trends and a commitment for continued monitoring and will be subject to public comment and an opportunity for a public hearing. This additional SIP revision will describe the current monitoring operational in the North Reading area. Comments on the fulfillment of monitoring requirements for the North Reading area would be relevant to that SIP revision.

2. **COMMENT:** The requirement to locate a monitor at the maximum lead concentration location impacted by the Exide-Reading lead smelter facility has not been met. A monitor should be placed at an alternative site that may record significantly higher levels than DEP’s Laureldale North site. The commentator cites results from Exide’s own monitoring system, EPA’s modeled emission estimates for the Secondary Lead Smelter NESHAPs rule regarding fugitive emissions and guidance documents related to 40 CFR Part 58, Appendix D as evidence that the requirements have not been met. The commentator finds it “inconceivable” that DEP would propose and EPA approve the siting of the Laureldale North site.

**RESPONSE:** Since the intent of this SIP revision, with regard to ambient monitoring, is to describe the authority and ability of the Commonwealth to install an ambient monitoring network in compliance with 40 CFR Part 58, Appendix D, not to identify the placement of any specific lead monitor, no change has been made to the SIP revision as a result of this comment. The Department notes, however, that EPA approved the Laureldale North site as compliant with EPA requirements.

3. **COMMENT:** DEP should not conclude that since fugitive dust emissions will be better controlled in the future, there is no need for the alternative monitoring location discussed in the comments. The commentator states that a plan approval (to put a total enclosure around the facility) is an authorization to construct, not a requirement to do so. The commentator also states that only the alternative monitoring location will validate that the proposed measures are working after they are implemented.

**RESPONSE:** Please see responses to comments 1 and 2.