



Pennsylvania Department of Environmental Protection

Rachel Carson State Office Building

P.O. Box 2063

Harrisburg, PA 17105-2063

August 11, 2010

Secretary

717-787-2814

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

Dear Mr. Garvin:

This letter is in response to your recent letter to Governor Rendell concerning Pennsylvania's designation recommendations for the revised 2008 lead national ambient air quality standards (NAAQS). We commend the U.S. Environmental Protection Agency's (EPA) efforts to expeditiously implement the 2008 lead NAAQS, which was lowered to 0.15 micrograms per cubic meters to further reduce exposure to lead, which adversely affects public health (especially the health of children and other vulnerable populations) and the environment.

The Department of Environmental Protection (DEP) supports EPA's intended partial-county lead NAAQS designations for Lower Beaver Valley, Beaver County, and North Reading, Berks County. According to EPA's "120-day letter," the partial-county boundaries for the Lyons Area will be expanded to include the Borough of Kutztown. Based on DEP's review of EPA's detailed analyses in support of adding Kutztown Borough to the Lyons Nonattainment Area, DEP concurs with the intended 2008 lead NAAQS boundaries for the Lyons Nonattainment Area.

Your June 14, 2010, letter to Governor Rendell states that "...EPA is designating as "nonattainment" any area that is violating the 2008 lead NAAQS based on data from the pre-2010 monitoring network." Your intended "unclassifiable areas" includes the following areas that are monitoring attainment of the 2008 lead standard: Cambria, Delaware, Philadelphia, and Westmoreland counties. (See enclosure.) However, EPA failed to explain why the areas should be listed as "unclassifiable areas." Based on our analysis of existing lead monitoring data from the Commonwealth's pre-2010 monitoring network, we continue to believe that EPA should designate these areas as "attainment" in October 2010 and urge EPA to designate the areas accordingly.

While DEP understands EPA's rationale for intending to designate certain areas in the Commonwealth as "unclassifiable areas," we firmly believe that it is appropriate to designate unmonitored areas that will not require "newly-deployed" source-oriented lead monitors in 2011 as "unclassifiable/attainment." A one-year extension of deadline for lead designations in those areas will not provide any additional monitoring data.



We intend to expand our source-oriented lead monitoring network in 2011, as appropriate, and will continue to work closely with your staff during the implementation of the lead NAAQS, which is vital to the protection of public health and the environment. Should you have questions or need additional information prior to finalizing the designations, please contact Joyce E. Epps, Director, Bureau of Air Quality, by e-mail at jeepps@state.pa.us or by telephone at 717-787-9702.

Sincerely,

A handwritten signature in black ink that reads "John Hanger". The signature is written in a cursive style with a large, prominent "J" and "H".

John Hanger
Secretary

Enclosure

**Design Values at Pennsylvania Lead Sampling Sites Recommended for Attainment
2007 - 2009**

<u>SiteName</u>	<u>East Conemaugh</u>	<u>Chester</u>	<u>Philadelphia</u>	<u>Monessen</u>
County	Cambria	Delaware	Philadelphia	Westmoreland
	0.07	0.05	0.04	0.05

