



# pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

SECRETARY

April 11, 2017

Mr. Cecil A. Rodrigues  
Acting Regional Administrator  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street, (Mail Code: 3RA00)  
Philadelphia, PA 19103-2029

Dear Mr. Rodrigues:

On October 3, 2016, the Commonwealth of Pennsylvania (Commonwealth) provided designation recommendations to the U.S. Environmental Protection Agency (EPA) pursuant to Section 107 of the Clean Air Act (CAA) pertinent to the 2015 8-hour National Ambient Air Quality Standard (NAAQS) for ozone, 70 parts per billion (ppb). These recommendations used the most current certified ambient monitoring data available at the time using the three-year period from 2013 through 2015.

The Commonwealth recently submitted to EPA certified ozone monitoring data for the 2016 ozone season. This updated monitoring data demonstrates that all monitors in Indiana County and the Pittsburgh-Beaver Valley Area, which includes Allegheny, Armstrong, Beaver, Butler, Fayette, Washington, and Westmoreland Counties, are measuring attainment for the 2015 ozone NAAQS. The purpose of this letter is to revise the Commonwealth's recommendations based on updated certified ambient monitoring data for the three-year period from 2014 through 2016.

Due to the implementation of state, regional and national control measures that reduced volatile organic compounds and oxides of nitrogen, the Pittsburgh-Beaver Valley Area and Indiana County now measure at or below the ozone concentration of 70 ppb based on the most recent three years of air monitoring data. They are, therefore, attaining the 2015 standard for ozone. Monitors in the Pittsburgh-Beaver Valley Area and Indiana County have measured a clear long-term downward trend in the ozone design values over the years. For instance, the 2013 through 2016 design values for the monitors that measured the highest ozone concentration in the Pittsburgh-Beaver Valley Area were 80, 75, 72, and 70 ppb, respectively. The 2013 through 2016 design values for the ozone monitor in Indiana County were 75, 74, 71, and 70 ppb. With new requirements for point sources, new emission standards for light-duty highway vehicles, and lower sulfur gasoline requirements recently going into effect, the ozone design values should continue this established downward trend.

The Commonwealth's October 3, 2016, designation recommendations used the five-factor analysis described in the EPA guidance entitled, "Area Designations for the 2015 Ozone National Air Quality Standards," to determine an area's recommended nonattainment status and boundaries of those areas. The Department is following the same five-factor analysis for the revised recommendation but is only updating one of the factors, monitoring data, for the revised recommendations for Pittsburgh-Beaver Valley Area and Indiana County. The original analysis of the other four factors remains unchanged. If EPA accepts Pennsylvania's revised

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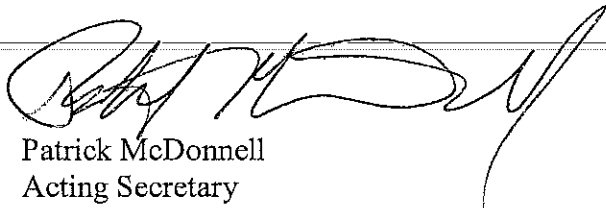
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recommendations based on ozone monitoring data showing attainment of the 2015 ozone NAAQS, the seven counties in the Pittsburgh-Beaver Valley Area and Indiana County would be designated as attainment.

Please note that the 2014 through 2016 certified ambient monitoring data indicates that Berks County, which the Commonwealth originally recommended to be an attainment area, is now measuring a 2016 design value of 71 ppb, which indicates nonattainment of the 2015 ozone standard. The Commonwealth, however, is not recommending that Berks County be designated nonattainment. Currently, the Commonwealth is preparing an analysis per the Exceptional Events Rule and Guidance that will present data to EPA that potentially will demonstrate that large fires had an influence on 2016 ozone monitoring data. EPA approval of the analysis would invalidate certain 2016 ozone monitoring values and could result in a demonstration that Berks County attained the 2015 ozone NAAQS. In addition, Lebanon County, which the Commonwealth recommended to be designated nonattainment, may also return to attainment by a favorable EPA exceptional events decision.

Thank you in advance for your favorable consideration of the Commonwealth's revised designation recommendations for the 2015 ozone standard. Should you have questions or need additional information, please contact Krishnan Ramamurthy, Acting Director of the Bureau of Air Quality, by email at [kramamurth@pa.gov](mailto:kramamurth@pa.gov) or by telephone at 717.787.9702.

Sincerely,



Patrick McDonnell  
Acting Secretary