Enclosure 2

The Commonwealth of Pennsylvania’s Response to the U.S. Environmental Protection Agency’s Proposed Designations for the 2012 Annual PM$_{2.5}$ National Ambient Air Quality Standard

Letter of Support for Partial County Liberty-Clairton PM$_{2.5}$ Nonattainment Area from the Allegheny Conference on Community Development

Bureau of Air Quality
Department of Environmental Protection
October 15, 2014

Acting Secretary Dana Aunkst
Rachel Carson State Office Building
400 Market St.
Harrisburg, PA 17101

Dear Acting Secretary Aunkst:

The Allegheny Conference on Community Development has a history of supporting the strong enforcement of environmental regulations. The Conference was founded 70 years ago to improve environmental conditions impacting the quality of life of our region’s citizens. We continue striving to be a leader in environmental stewardship by monitoring and engaging on a variety of environmental conditions in the region, including air quality.

We are concerned with EPA’s preliminary response to Pennsylvania’s recommendation for area designations for the 2012 primary National Ambient Air Quality Standard for annual PM$_{2.5}$. EPA has inexplicably reversed its position recognizing the unique meteorology, topography and localized emissions in the Liberty monitoring area without reasonable justification. Simply put, EPA’s proposal to designate all of Allegheny County as a non-attainment area is not supported by the evidence.

We continue to be encouraged by the historical downward trend of all monitors in the region and the progress this region has made to meet air quality standards.

Air quality attainment designations are an important factor when companies consider expanding or relocating to this region. While it is critical we continue to improve the air quality in areas not meeting the standards, it is just as important we do not place unwarranted requirements on areas that do meet them.

On behalf of the Allegheny Conference, I strongly urge the non-attainment area be kept at its current size and not unnecessarily expanded.

Sincerely,

Ken Zapinski
Senior Vice President, Energy and Infrastructure

cc: Joyce E. Epps, Director, Bureau of Air Quality