September 19, 2018

Krishnan Ramamurthy  
Director  
Bureau of Air Quality  
P.O. Box 8468  
Harrisburg, PA 17105-8468

Dear Mr. Ramamurthy:

Pursuant to the requirements of Section 7.6 of the Air Pollution Control Act, on August 21, 2018, staff from the Bureau of Air Quality briefed the Citizens Advisory Council’s (Council) Policy and Regulatory Oversight Committee (Committee) on the draft proposed rulemaking for PM$_{2.5}$ Precursors. PM$_{2.5}$ is shorthand for particulate matter less than and equal to 2.5 micrometers in diameter. The proposed rulemaking would amend 25 Pa. Code Chapters 121 and 127 to comply with EPA’s PM$_{2.5}$ rule that requires states to amend their new source review (NSR) regulations to include emissions of volatile organic compounds (VOC) and ammonia as PM$_{2.5}$ precursors in certain counties of this Commonwealth that are designated as nonattainment for the PM$_{2.5}$ National Ambient Air Quality Standard (NAAQS). The draft proposed rulemaking also proposes significant impact levels (SIL) for PM$_{2.5}$ and proposes offset ratios for emissions of VOCs and ammonia as PM$_{2.5}$ precursors.

On the recommendation of the Committee, Council voted at their September 18, 2018, meeting to support the advancement of the above-referenced proposed rulemaking to the Environmental Quality Board for action with the following comments:

1. The Council recommends that the revised definition of “major facility” in the draft proposed rulemaking be clarified to reflect what was explained to the Council, that the 70 tons per year threshold is determined for each listed pollutant separately, not by adding the amounts of various listed pollutants together.
2. The Council recommends that a technical justification for the ammonia emissions rate threshold be included in the Preamble to the proposed rulemaking.
Council appreciates the Bureau’s cooperation in providing detailed briefings on air rulemakings. If you have any questions regarding Council’s action on the above-referenced rulemaking, please contact me at 717.787.8171 or by email at ksalador@pa.gov.

Sincerely,

Keith J. Salador  
Executive Director  
Citizens Advisory Council

cc: Kirit Dalal  
    John Krueger  
    Randy Bordner  
    Susan Hoyle  
    Laura Edinger