



October 5, 2023

Honorable Michael S. Regan
Administrator
United States Environmental Protection Agency
Air and Radiation Docket
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Attn: Docket ID No. EPA-HQ-OAR-2004-0489

RE: Comments on EPA's Proposed Revisions to the Air Emissions Reporting Requirements
(88 Fed. Reg. 63046; Sept. 14, 2023)

Dear Administrator Regan:

The Pennsylvania Department of Environmental Protection (Pennsylvania or DEP) submits the following comment in response to the United States Environmental Protection Agency's (EPA) request for comments on the proposed rulemaking entitled "Revisions to the Air Emissions Reporting Requirements," published at 88 Fed. Reg. 63046; Sept. 14, 2023. DEP appreciates the opportunity to provide comment on this important rulemaking.

EPA is proposing transitioning the deadline for state, local and tribal agencies to submit their air quality emission inventories from December 31 to May 31. While DEP agrees that the expectation for quicker data delivery continues to grow amongst the public, the May 31 deadline is unrealistic. This date does not allow for the time needed by Pennsylvania and other state, local and tribal agencies to adequately review the data submitted by facilities before transmitting it to EPA.

Most reporting facilities do not finish compiling their emission data until the end of January for various reasons, but particularly to wait for energy use information from utilities. Pennsylvania's current regulatory submission deadline is March 1. Pennsylvania has approximately 1,800 facilities reporting emissions from 17,500 individual point sources. In addition to the sheer volume of data that needs to be reviewed, DEP staff must often subsequently contact reporting facilities for clarification and possible revision and resubmission of data. Pennsylvania believes it needs until September 30 to complete a thorough review of the emission inventory data before transmitting it to EPA.

DEP acknowledges EPA's willingness to help by sending the data directly to EPA via the CAERS system. This system is not ideal because it takes the review and revision process out of

Secretary

Rachel Carson State Office Building | P.O. Box 2063 | Harrisburg, PA 17105-2063 | 717.787.2814 | www.dep.pa.gov

the state's hands and can further hinder the state's ability to properly regulate the facilities within its borders.

DEP appreciates the opportunity to provide feedback on EPA's proposed revisions to the Air Emissions Reporting Requirements and appreciates your consideration. Should you have questions or need additional information, please contact Nicholas Lazor, Director, Bureau of Air Quality, by email at nlazor@pa.gov or by phone at (717) 787-9702.

Sincerely,

A handwritten signature in blue ink that reads "Richard Negrin". The signature is fluid and cursive, with a large initial "R" and a long horizontal stroke at the end.

Richard Negrin
Secretary