UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

DEC 06 2018

Mr. Krishnan Ramamurthy, Director
Pennsylvania Department of Environmental Protection
Bureau of Air Quality
Rachel Carson Building
400 Market Street, P.O. Box 8468
Harrisburg, P A 17105-2063

Dear Mr. Ramamurthy:

Thank you for giving the U.S. Environmental Protection Agency (EPA) the opportunity to review and comment on Pennsylvania's proposed redesignation request and maintenance plan for the Lebanon County 2012 annual fine particulate matter ($PM_{2.5}$) nonattainment area (Lebanon County Area). EPA's comments for the public record are provided in the enclosure to this letter. We look forward to working with you to resolve these comments.

If members of your staff have any questions, they may direct them to Ms. Maria A. Pino, Office of Air Program Planning, at (215) 814-2181, or at pino.maria@epa.gov. She is the principal contact for this rulemaking.

Sincerely,

Cristina Fernandez, Director
Air Protection Division

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Enclosure: EPA's Comments on Pennsylvania's Proposed Lebanon County 2012 $PM_{2.5}$ Redesignation Request and Maintenance Plan

Comments on the Redesignation Request

II. SIP Approvals and Applicable Requirements
B. CAA Title I, Part D (42 U.S.C. Chapter 85, Subchapter I, Part D) - Plan Requirements for Nonattainment Areas
4. Section 189 of the CAA

This section states that Pennsylvania's maintenance plan meets the requirements of Clean Air Act section 189(a). This is not the case. Please revise this section to explain that:

- The requirements of section 189(a), including requirements for a nonattainment new source review (NNSR) permitting program, a modeled attainment demonstration, and reasonably available control measures (RACM), apply to moderate $PM_{2.5}$ nonattainment areas such as the Lebanon County Area.
- As Pennsylvania explains elsewhere in the redesignation request, NNSR is not a prerequisite for redesignation. If EPA approves Pennsylvania's redesignation request for the Lebanon County Area, NNSR would no longer be required in the area.
- EPA's determination of attainment of the 2012 annual $PM_{2.5}$ standard (known as a "clean data determination") for Lebanon County suspends the requirements for the attainment demonstration, RACM, and other associated planning required. See 83 FR 9435.

Comments on the Maintenance Plan

The discussion of the slight increase in ammonia emissions over the maintenance period, which Pennsylvania included in the draft redesignation request, should be included in the maintenance plan, in "Maintenance Plan Emissions Test" section. This discussion should point out that while projected ammonia emissions in 2022 and 2030 are slightly higher than those in the 2014 attainment year, they are significantly lower than they were in the 2011 base year.

Emissions Inventory Comments on the Maintenance Plan and Redesignation Request

EPA's 2017 emissions inventory guidance, "Air Emissions Inventory Guidance for Implementation of Ozone and Particulate Matter NAAQS and Regional Haze Regulations," requires that coarse particulate matter (PM_{10}) emissions must be included as part of the State Implementation Plan (SIP) submittal. That guidance can be found at the following website: https://www.epa.gov/air-emissions-inventories/air-emissions-inventory-guidance-implementation-ozone-and-particulate.

While the inventory files associated with the maintenance plan contain PM_{10} emissions, there is no mention of them in the draft maintenance plan or redesignation request. The emission inventory summary tables and the emissions inventory discussion in the maintenance plan and redesignation request should include PM_{10} emissions.