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 Delaware County 2012 annual fine particulate matter ($PM_{2.5}$) nonattainment area (Delaware 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 Delaware County 2012 $PM_{2.5}$ Redesignation Request and Maintenance Plan

Comments on the Redesignation Request

I. DEMONSTRATION OF ATTAINMENT AND AIR QUALITY TRENDS ANALYSIS
B. Air Quality Trends Analysis

The demonstration of attainment should address all monitors in the Delaware County Area, because a nonattainment area can only be redesignated to attainment if the entire nonattainment area has air quality that meets the national ambient air quality standards (NAAQS). Therefore, this section should include monitoring data for the Marcus Hook monitoring site (site ID #420450109). Please include annual means and the design values for this monitor to demonstrate that this monitor is meeting the 2012 annual $PM_{2.5}$ NAAQS.

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

A maintenance plan does not fulfill requirements of Clean Air Act section 189(a). 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 Delaware County Area.
- As Pennsylvania explains elsewhere in the redesignation request, NNSR is not a prerequisite for redesignation. If EPA approved Pennsylvania's redesignation request for the Delaware 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 Delaware County suspends the requirements for the attainment demonstration, RACM, and other associated planning required. See 81 FR 89868 and 82 FR 8499.

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.