

Clean Air Board of Central Pennsylvania
Comments on 2020 Annual Ambient Air Monitoring Plan

The Department of Environmental Protection published a draft Ambient Air Monitoring Plan for 2020 and requested comments. The Clean Air Board of Central Pennsylvania (CAB), a citizens group interested in improving air quality, has reviewed the plan and submits the following comments.

Again DEP has no plans to monitor for ozone in Cumberland County. We believe that this is an important oversight by the DEP. Ozone continues to be a pollutant of concern, since DEP has issued Code Orange Air Quality Action Day alerts for the Susquehanna Valley, including Cumberland County. Unless DEP has collected actual data from ground level monitors, DEP cannot know whether the alerts are warranted or the extent of the area affected.

DEP needs to increase the number of ozone monitors in and near densely populated areas. Currently, there are many counties in Pennsylvania that do not have ozone monitors. DEP frequently declares air quality action days for these counties, but does not have relevant monitoring stations these counties. The Clean Air Board supports the additional ozone monitoring proposed for southeast Pennsylvania.

More monitors are needed to capture the long term activity from natural gas drilling and production. The monitors need to be located close to areas where drilling pads have been constructed. Drilling activity can induce many kinds of ancillary activity, including the transport of water, waste, and fluids, the installation of tanks, generators, and compressors, the construction of gathering lines and water lines, and construction of centralized facilities. There are multiple sites throughout Pennsylvania which can have significant multiple pollutant impacts. Unless monitors are installed that can measure these pollutants, the public health impact remains unknown.

A state's air quality monitoring plan is a necessary component of the state implementation plans under the federal Clean Air Act. DEP cannot adequately protect the health of the residents of the Commonwealth unless it has up-to-date and accurate information on the pollutants from all sources in the Commonwealth.

The Clean Air Board hopes DEP will take these comments seriously in revising the draft plan.

Respectfully submitted,

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