



Pennsylvania Department of Environmental Protection

Rachel Carson State Office Building

P.O. Box 2063

Harrisburg, PA 17105-2063

June 2, 2004

Secretary

717-787-2814

Mr. Donald S. Welsh
Regional Administrator
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

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EPA, REGION III
OFFICE OF REGIONAL ADMINISTRATOR

Dear Mr. Welsh:

It has been brought to my attention that the U.S. Environmental Protection Agency ("EPA") recently developed a "weighted emissions score" process that will be utilized during the fine particulate designation process. In February 2004, on behalf of Governor Rendell, I recommended that EPA designate 16 counties in the Commonwealth of Pennsylvania ("Commonwealth" or "Pennsylvania") as nonattainment with regard to the national ambient air quality standard ("NAAQS") for particulate matter less than 2.5 micrometers in diameter (PM_{2.5}).

By letter dated April 22, 2004, Ms. Judith M. Katz, Director, Air Protection Division, EPA Region III, requested additional technical justification for any county that deviates from the presumption that the entire metropolitan statistical area that contains a county with a violating monitor be designated nonattainment. In Pennsylvania, these counties include: Mercer, Butler, Armstrong, Fayette, Adams, Perry, Pike, and Somerset. In addition, EPA has informally indicated that Greene, Lawrence, Indiana, Clearfield, Northampton, and Lehigh Counties are also under consideration for addition to PM_{2.5} nonattainment areas based on the weighted emissions process. It appears that the emissions weighting process expands nonattainment areas to include counties monitoring attainment solely because of the emissions from certain major sources including coal fired power plants in attainment areas.

In light of EPA's newly developed "weighted emissions" scoring process, the Commonwealth is providing written notice of its revised PM_{2.5} designation recommendations prior to EPA's issuance of "120-day" letters. To this end, I have enclosed a listing of Pennsylvania's revised PM_{2.5} designation recommendations. The revised recommendations identify Bucks, Montgomery, and Lebanon counties as attainment areas. Based on the limited emissions data recently provided by EPA concerning the scoring process, Pennsylvania continues to believe that counties such as Clearfield, Greene, Lawrence, Lehigh, and Northampton should not be designated nonattainment. Additional information relevant to other counties potentially affected by the designation process is also enclosed for your consideration. This re-analysis is based on EPA guidance and the data recently released by EPA concerning the PM_{2.5} designation process.

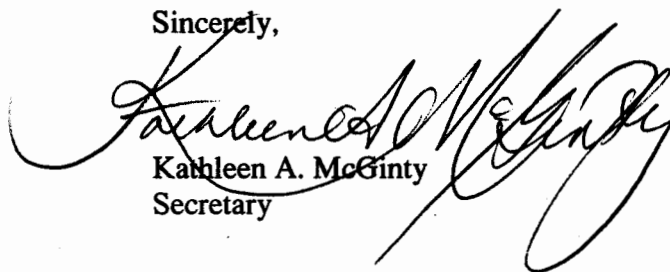


It is my understanding that this newly developed weighted emissions process has not been published for review and comment. We strongly believe that the ranking details employed by EPA for this arbitrary process should be fully disclosed prior to finalizing the PM_{2.5} designations.

If you have questions or need additional information concerning our PM_{2.5} designation recommendations, please contact Nicholas A. DiPasquale, Deputy Secretary for Air, Recycling and Radiation Protection, by e-mail at ndipasqual@state.pa.us or by phone at 717-772-2724 or Joyce E. Epps, Director of the Bureau of Air Quality, by e-mail at jeepps@state.pa.us or by phone at 717-787-9702.

Thank you in advance for your favorable consideration of Pennsylvania's revised PM_{2.5} designation recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen A. McGinty', written in a cursive style. The signature is positioned above the typed name and title.

Kathleen A. McGinty
Secretary