



GROUP AGAINST SMOG & POLLUTION

**5135 Penn Avenue
Pittsburgh, PA 15224
412-924-0604
gasp-pgh.org**

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VIA EMAIL: RA-epair@pa.gov

Nicholas Lazor, Chief
Division of Air Quality Monitoring
Bureau of Air Quality
Pennsylvania Department of Environmental Protection
P.O. Box 8468
Harrisburg, PA 17105-8468

**Re: Comments of the Group Against Smog and Pollution Regarding
Pennsylvania's 2015-2016 Annual Ambient Air Monitoring Network
Plan**

Dear Mr. Lazor:

Please accept these comments regarding Pennsylvania's 2015-2016 Annual Ambient Air Monitoring Network Plan, which I am submitting on behalf of the Group Against Smog and Pollution ("GASP"). According to the Notice published in the May 16, 2015 Pennsylvania Bulletin, the Pennsylvania Department of Environmental Protection is accepting comments submitted on or before June 16, 2015.

Thank you for your attention to these comments.

Very truly yours,

/s

John K. Baillie
Staff Attorney

**COMMENTS OF THE GROUP AGAINST SMOG AND POLLUTION (“GASP”)
REGARDING THE PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL
PROTECTION’S 2015 AMBIENT AIR MONITORING NETWORK PLAN**

The Clean Air Act requires that each state implementation plan “provide for establishment and operation of appropriate devices, methods, systems, and procedures necessary to ... monitor, compile, and analyze data on ambient air quality.”¹ 40 C.F.R. Part 58 specifies the state implementation plan requirements for monitoring and reporting data regarding ambient air quality, including “[m]inimum ambient air quality monitoring network requirements.”² Ambient air quality monitoring networks operated by state or local agencies must satisfy the criteria in Appendix D to Part 58.³

Appendix D identifies three basic monitoring objectives: the provision of timely air pollution data to the public;⁴ supporting compliance with ambient air quality standards and emissions strategy development;⁵ and supporting air pollution research studies.⁶ “Monitoring sites must be capable of informing managers about many things, including the **peak air pollution levels**, typical levels in populated areas, air pollution transported into and outside of a city or region, and **air pollution levels near specific sources.**”⁷ These objectives should inform an agency’s location of monitors within a network. Because states’ control strategies must be keyed on achieving the National Ambient Air Quality Standards (the “NAAQS”) in all areas of the state⁸ (including expected points of maximum concentration of criteria pollutants),

¹ 42 U.S.C. § 7410(a)(2)(B).

² 40 C.F.R. § 58.2(a)(5).

³ 40 C.F.R. § 58.11(c).

⁴ 40 C.F.R. Part 58, App. D (“App. D”), § 1.1(a) .

⁵ App. D, § 1.1(b).

⁶ App. D, § 1.1(c).

⁷ App. D, § 1.1.1 (emphasis added).

⁸ This is consistent with the Clean Air Act’s directive that each state, and each local agency designated to implement the requirements of the Clean Air Act within a specific area of a state, must adopt an implementation plan to achieve and maintain the NAAQS “within the entire geographic area” of the state or specific area over which the local agency is responsible. *See* 42 U.S.C. § 7407(a).

monitoring sites should be located at or near points of maximum concentration to confirm that the NAAQS are being attained in all areas.⁹ Thus, when there is a single source “that contributes overwhelmingly” to pollution in a given area, it is “very desirable to monitor the maximum ground-level contribution from that source since the attainment and maintenance of the NAAQS in the area would be highly dependent on the effectiveness of control measures applied to that source.”¹⁰ DEP should locate monitors at (or as close as possible to) expected points of maximum concentration of air pollutants to confirm that all areas of Pennsylvania attain the NAAQS.

I. A SO₂ Monitor For SO₂ Must Be Installed Downwind From The Cheswick Power Station

The Cheswick Power Station (“Cheswick”) is the the largest source of SO₂ emissions in Allegheny County – in 2013, the most recent year for which emissions data is reported on the Pennsylvania Department of Environmental Protection’s (“DEP”) eFACTS website, Cheswick emitted over 1,686 tons of SO₂. Notwithstanding Cheswick’s substantial SO₂ emissions, there is no monitor installed and operated to ascertain concentrations of SO₂ in the immediate downwind vicinity of the Facility. All SO₂ monitors in the Allegheny County Health Department’s (“ACHD”) monitoring network are located upwind of Cheswick,¹¹ and the nearest downwind SO₂ monitor (which is operated by DEP) is in Johnstown, Cambria County, approximately fifty miles from Cheswick. Ground-level concentrations of SO₂ emitted by Cheswick are likely to be greatest in the communities to the east and northeast of the facility. However, there is no monitor installed and operated in those communities to ensure that the SO₂ emitted by Cheswick does not cause ground level concentrations of SO₂ there to exceed the NAAQS. Accordingly,

⁹ ROBERT J. BALL & GERALD E. ANDERSON, OPTIMUM SITE EXPOSURE CRITERIA FOR SO₂ MONITORING 9 (U.S.E.P.A. Pub. No. EPA-450/3-77-013) (1977).

¹⁰ BALL AND ANDERSON, at 10.

¹¹ The prevailing wind in Allegheny County is generally from the west or southwest. See http://www.windfinder.com/windstatistics/pittsburgh_intl_airport.

DEP should install and operate an SO₂ monitor downwind from Cheswick to ensure that its emissions of SO₂ are not causing NAAQS violations in nearby communities.

II. The Charleroi Monitor Should Be Moved Downwind Of The Newly-Reactivated Monessen Coke Plant

In 2014, ArcelorMittal Monessen LLC reactivated the Monessen Coke Plant in Monessen, Westmoreland County; that facility is permitted to emit 275 tons per year of SO₂. The Monessen Coke Plant is also required to operate as an area source of Hazardous Air Pollutants (“HAPs”), and thus may not emit more than twenty-five tons per year of all HAPs or ten tons per year of any particular HAP.

DEP operates a monitor in Charleroi, Washington County, which is relatively close to Monessen Coke Plant but is located to the southwest of the facility, and is therefore generally upwind of the facility. Consequently, the Charleroi monitor is not well-situated to measure the impacts that emissions from the Monessen Coke Plant have on ambient air quality in the vicinity of the facility, where they are likely to be greatest – indeed, when DEP studied such impacts in the Spring of 2014, it measured them from sites in Monessen closer to, and downwind of, the coke plant.¹² To measure the Monessen Coke Plant’s impacts on ambient air quality, and confirm that areas downwind from the plant attain the NAAQS, DEP should either relocate its Charleroi monitor so that it is downwind from the Monessen Coke Plant or install an additional monitor downwind from the Monessen Coke Plant that measures SO₂, PM_{2.5}, and air toxics.

¹² See Pennsylvania Department of Environmental Protection, Monessen, Washington County, Pennsylvania Ambient Air Monitoring Report, at 1 (March 2015), available at http://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Monitoring%20Topics/Toxic%20Pollutants/toxics/projects/Monessen/Monessen_Report_Revised_Final_March_2015.pdf.

III. DEP Should Measure PM_{2.5} Concentrations At Its Monitor In Strongstown, Indiana County

Together, the Keystone Generating Station (located in Armstrong County) and Homer City Generation, the Conemaugh Generating Station, and the Seward Generating Station (in Indiana County) are coal-fired power plants that emit significant amounts of PM_{2.5} pollution. DEP's monitoring station in Strongsville, Indiana County, is the closest monitoring station that is generally downwind from all four power plants, but does not measure PM_{2.5}. DEP's closest downwind PM_{2.5} monitor is in Johnstown, which is further away from the power plants than Strongstown, and is thus not as likely to measure PM_{2.5} pollution from the plants where its concentration is likely to be greatest, as would be more likely at Strongstown than Johnstown. In order to ensure that the plants do not cause a violation of the PM_{2.5} NAAQS, DEP should locate a PM_{2.5} monitor in Strongstown.