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Daniel Hooper
Clean Air Markets Division
Office of Atmospheric Programs
MC 6294M
Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

RE: Docket ID: EPA-HQ-OAR-2020-0272 EPA's Proposed Cross-State Air Pollution Rule Revision

Dear Mr. Hooper,

On behalf of the Pennsylvania Chamber of Business and Industry, the largest, broad-based business advocacy organization in the Commonwealth, thank you for the opportunity to comment on EPA's proposed revisions to the Cross-State Air Pollution Rule for the 2008 Ozone NAAQS. The PA Chamber is the largest, broad-based business advocacy organization in the Commonwealth, representing more than 9,000 member companies of all commercial and industrial categories.

Because the proposed CSAPR revisions deal with ozone and NO_x, an ozone precursor, it is salient to write into the record Pennsylvania's approach to reducing emissions of NO_x and the resulting improvements in ambient air quality. State and federal monitoring data make clear the state of Pennsylvania is nearing statewide attainment of the existing ozone NAAQS standards. Industry has worked in concert with regulators to achieve a dramatic reduction in both ozone precursor emissions and the monitored ambient levels of ozone over the past several decades. According to data provided by the Pennsylvania Department of Environmental Protection, since 1996 emissions of volatile organic compounds have declined 36% and emissions of NO_x have declined 65%. Further, DEP has also noted that in just one year, the number of monitoring points measuring non-attainment for the 2015 8-hour ozone standard declined, from 8 such locations in 2018 to 4 in 2019.¹ This progress is also apparent through the data displayed on EPA's interactive Design Values Map. Pennsylvania is in statewide attainment of the 2008 8-hour standards. It is expected that additional reductions will occur as existing state and federal requirements are implemented, including, notably, Pennsylvania's obligations under the Ozone Transport Region, which requires Lowest Achievable Emissions Rate permitting obligations regardless of whether the county or region in which a new or expanded major source is situated is in attainment for ozone, as well as through PA DEP's promulgation of a RACT rule for existing sources to implement the 2015 ozone standards. Just as other states will do when they revise their RACT for the 2015 ozone standards, Pennsylvania will establish cost feasibility thresholds for additional NO_x controls for existing sources.

¹ Ambient Air Quality Update for 2019. Pennsylvania DEP, Dec. 12, 2019.
<http://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Advisory%20Committees/Air%20Quality%20Technical%20Advisory%20Committee/2019/12-12-19/Ambient%20Air%20Quality%20summary%20AQTAC%20Dec%2012%202019.pdf>

Given this progress and the stringency of existing regulatory requirements, the PA Chamber supports the EPA's proposed finding that there are not any additional cost effective reductions of NOx from non-EGU sources that can be secured in Pennsylvania and, if there were, they are not necessary to eliminate significant contribution under the good neighbor provision of the 2008 ozone NAAQS. The PA Chamber also encourages EPA to finalize this rule in a timely manner ahead of the 2021 ozone season so as to allow for a reasonable amount of time for affected sources to integrate the final rule's requirements into their operations.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Sunday". The signature is written in a cursive style with a large initial "K" and "S".

Kevin Sunday
Director, Government Affairs