



528 Garland Drive, Carlisle, PA 17013 (717) 243-4571

March 6, 2009

The Honorable John Hanger  
Acting Secretary  
Department of Environmental Protection  
Rachel Carson State Office Building  
PO Box 2063  
Harrisburg, PA 17105-2063

Dear Secretary Hanger:

On February 14, 2009, the Department of Environmental Protection published in the Pennsylvania Bulletin a notice of its intent to submit a proposed designation for the 8-hour ozone standard for the multicounty area including Cumberland, Perry, Dauphin, and Lebanon Counties.

The Clean Air Board of Central Pennsylvania, Inc. is dedicated to achieving clean air to protect our health and quality of life. The Clean Air Board seeks to raise public awareness of air quality issues, advocate, promote and coordinate policy and practices for clean air, and monitor local air quality.

In August 2008, CAB urged the EPA to reduce the current ozone standard, 0.08 parts per million to one below 0.070 parts per million. EPA's own Clean Air Scientific Advisory Committee had stated that the primary ozone standard should be between 0.060 ppm and 0.070 ppm to protect the public health. The Cumberland Valley experiences very high ozone concentrations in the summer, even on days when an ozone alert is not declared. In March 2008, EPA modified the 8 hour ozone standard to 75 parts per billion.

CAB commends DEP for the steps it has taken to reduce the emission of ozone forming pollutants into the atmosphere. CAB believes that the Commonwealth has made great strides in attaining the ozone ambient air quality standard. Nevertheless, CAB submits the following comments regarding the proposed designation.

CAB believes the air quality in Harrisburg, Carlisle, and Lebanon metropolitan area does not meet the current 8 hour ozone standard. The data identified by DEP to support a non-attainment designation of the metropolitan area are from monitors located in Harrisburg and Hershey (Dauphin County) and at Little Buffalo State Park (Perry County). These monitoring stations are

located at least 20 miles from Carlisle. No monitoring data for ozone has been submitted for Cumberland County or for Lebanon County. However, ozone monitors generally upwind and around Cumberland County show that the current 8 hour standard is not being met. Based on our review of the data in DEP's monitoring network, these data show the 4<sup>th</sup> highest 8 hour ozone readings at each of the monitoring locations.

	Biglerville	Perry	Harrisburg	Hershey
2006	74	77	77	81
2007	81	73	82	79
2008	76	81	79	78
Avg.	77	77	79.3	79.3

We are concerned that DEP has installed no monitoring stations for ozone either in Cumberland County or in Lebanon County. CAB believes that the lack of actual measurements of ambient ozone concentrations in Cumberland County is a serious impediment to assessing the quality of our air. However, CAB agrees with DEP that that Cumberland County and Lebanon County should be declared nonattainment based on the data from nearby monitors. CAB believes that DEP should make every effort to install an ozone monitor in Cumberland County. Thank you for the opportunity to comment on the proposed designation.

Sincerely,

Jennifer McKenna  
President

Cc: Arleen Shulman