



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION III**  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, Pennsylvania 19103-2852

The Honorable Josh Shapiro  
Governor of Pennsylvania  
Office of the Governor  
508 Main Capitol Building  
Harrisburg, Pennsylvania 17120

Dear Governor Shapiro:

The purpose of this letter is to notify you, as required by section 107(d)(3)(A) of the Clean Air Act (CAA), of the U.S. Environmental Protection Agency's (EPA's) intention to revise the designation of certain portions of Cambria and Westmoreland Counties; to provide you with the available information supporting that intended redesignation; and to solicit your response to this notification. As explained in greater detail below, recent sulfur dioxide (SO<sub>2</sub>) air quality modeling indicates that the air quality designation for certain portions of Cambria and Westmoreland Counties currently designated as "unclassifiable" and "attainment/unclassifiable," respectively, should be revised to "nonattainment" for the 2010 SO<sub>2</sub> National Ambient Air Quality Standard (NAAQS).

Reducing levels of SO<sub>2</sub> pollution is an important part of EPA's commitment to a clean, healthy environment. On June 22, 2010, EPA strengthened the NAAQS for SO<sub>2</sub> to a 1-hour level of 75 parts per billion (ppb).<sup>1</sup> Current scientific evidence links short-term exposures to SO<sub>2</sub>, ranging from 5 minutes to 24 hours, with an array of adverse respiratory effects including bronchoconstriction and increased asthma symptoms. These effects are particularly important for asthmatics at elevated ventilation rates such as while exercising or playing. Studies also show a connection between short-term exposure and increased visits to emergency departments and hospital admissions for respiratory illnesses, particularly in at-risk populations including children, the elderly and asthmatics.

Initial designations for the 2010 SO<sub>2</sub> NAAQS were completed by EPA in four rounds.<sup>2</sup> In Round 1, the EPA designated the Indiana, PA area as nonattainment. Cambria and Westmoreland Counties are immediately east and south of Indiana County, respectively. EPA originally designated Cambria County, Pennsylvania as unclassifiable, and Westmoreland County, Pennsylvania as attainment/unclassifiable in Round 3. At the time of the initial Cambria County designation, Cambria County contained a cluster of sources (i.e., Cambria Cogeneration Company, Colver Power, and Ebensburg Power) subject to characterization under EPA rules found at 40 CFR Part 51, Subpart BB – Data Requirements for Characterizing Air Quality for the Primary SO<sub>2</sub> NAAQS – codified at 40 CFR 51.1203(d). The Pennsylvania Department of Environmental Protection (PADEP) submitted dispersion modeling for these

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<sup>1</sup> 75 FR 35520, June 22, 2010.

<sup>2</sup> 78 FR 47191, August 5, 2013 (Round 1); 81 FR 45039, July 12, 2016 (Round 2); 81 FR 89870, December 13, 2016 (Supplement to Round 2); 83 FR 1098, January 9, 2018 (Round 3); 83 FR 14597, April 5, 2018 (Supplement to Round 3); 86 FR 16055, March 26, 2021 (Round 4); 86 FR 19576, April 14, 2021 (Supplement to Round 4).

sources, which EPA found to be inadequate due to modeling deficiencies.<sup>3</sup> EPA concluded that there was insufficient information to designate Cambria County as attainment, and subsequently designated the area unclassifiable. Westmoreland County was initially designated attainment/unclassifiable because the county did not contain any significant point sources of SO<sub>2</sub> emissions and therefore, was not required to be characterized under 40 CFR 51.1203(c) or (d). During Round 3, EPA did not have available information including (but not limited to) appropriate modeling analyses and/or monitoring data suggesting that the area was not meeting the NAAQS or contributing to ambient air quality in a nearby area that did not meet the NAAQS.

In response to PADEP’s SO<sub>2</sub> attainment plan for the Indiana, PA nonattainment area, EPA received a modeling analysis from the Sierra Club in 2018 that claimed to show violations of the 2010 SO<sub>2</sub> NAAQS in portions of Cambria and Westmoreland Counties due to sources within the Indiana, Pennsylvania nonattainment area. In 2022, EPA received additional modeling from Sierra Club and Keystone-Conemaugh Projects, LLC (KEY-CON), the licensee of Keystone and Conemaugh power plants. EPA conducted its own assessment and characterization of Cambria and Westmoreland Counties. After careful review of this assessment, other third-party assessments, supporting documentation, and all available data, the EPA is providing notification of our intent to redesignate portions of Cambria and Westmoreland Counties to nonattainment for the 2010 SO<sub>2</sub> NAAQS.

Under CAA section 107(d)(3), EPA may at any time notify a state that a designation should be revised, which in this case is from “unclassifiable” and “attainment/unclassifiable” to “nonattainment.” EPA’s guidance regarding the factors to consider when establishing nonattainment area boundaries based on modeled NAAQS violations is included in the *2015 Updated Guidance for Sulfur Dioxide Area Designations*.<sup>4</sup> EPA will follow this guidance in this redesignation process. When identifying the nonattainment area boundary for this notification, EPA considered recent Air Quality Data, Air Quality Modeling, Emissions and Emissions-related Data, Meteorology, Geography/Topography, and Jurisdictional Boundaries. Consistent with the CAA, and after carefully considering available information, particularly EPA’s most recent air quality modeling analysis, EPA is notifying the Commonwealth of the newly identified nonattainment area boundary in Pennsylvania described in the table below. The enclosed Technical Support Document provides a detailed analysis of the available information and the factors considered to identify the nonattainment area boundaries for portions of Cambria and Westmoreland Counties, which are intended to be combined into a single nonattainment area. EPA is not proposing to change the designations for the remaining portions of Cambria and Westmoreland Counties.

<b>Area</b>	<b>County</b>	<b>Notification of EPA’s Redesignation</b>
Lower Yoder Township	Cambria, Pennsylvania	Nonattainment
St. Clair Township Seward Borough New Florence Borough	Westmoreland, Pennsylvania	Nonattainment

<sup>3</sup> See page 103 of EPA’s *Technical Support Document: Intended Round 3 Area Designations for the 2010 1-Hour SO<sub>2</sub> Primary National Ambient Air Quality Standard for Pennsylvania* ([https://www.epa.gov/sites/default/files/2017-08/documents/35\\_pa\\_so2\\_rd3-final.pdf](https://www.epa.gov/sites/default/files/2017-08/documents/35_pa_so2_rd3-final.pdf))

<sup>4</sup> See <https://www.epa.gov/sites/default/files/2016-06/documents/20150320so2designations.pdf>

Per CAA section 107(d)(3)(B), your response, including any recommendations for area redesignations and boundaries, to this notification of EPA's identified area for redesignation is **due 120 days after receipt (i.e. by June 22, 2023)**.

Once received, EPA will review your submission and recommendation. If EPA deems any modifications of Pennsylvania's recommendations necessary, EPA will inform Pennsylvania of such modification at least 60 days prior to issuing the redesignation. EPA will also make any intended redesignation decision and supporting documentation for this new nonattainment area available to the public for review and comment through publication in the *Federal Register*, which will provide Pennsylvania an additional opportunity to comment. EPA intends to promulgate any redesignation for this area after consideration of the Commonwealth's recommendation and any comments received during the public comment period.

We look forward to a continued dialogue with you and your staff as we work together to implement the 2010 SO<sub>2</sub> NAAQS. For additional information regarding designations under the 2010 SO<sub>2</sub> NAAQS, please visit our website at <https://www.epa.gov/sulfur-dioxide-designations>.

Should you have any questions, please do not hesitate to contact Cristina Fernández, Region 3 Air and Radiation Division Director, at [Fernandez.Cristina@epa.gov](mailto:Fernandez.Cristina@epa.gov) or at (215) 814-2178.

Sincerely,

Adam Ortiz  
Regional Administrator

Enclosure: Technical Support Document: "EPA's Intended Redesignation of Westmoreland and Cambria Counties, PA for the 2010 Sulfur Dioxide National Ambient Air Quality Standard," January 2023.

Cc: Richard Negrin, Acting Secretary, Pennsylvania Department of Environmental Protection  
Mark Hammond, Director, Bureau of Air Quality, Pennsylvania Department of Environmental Protection