



REGIONAL AIR POLLUTION CONTROL AGENCY

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January 18, 2008

U. S. Environmental Protection Agency
Air and Radiation Docket
Environmental Protection Agency
Mail code 2822T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Docket ID: EPA-HQ-OAR-2006-0605

Dear Sir/Madam:

The Regional Air Pollution Control Agency (RAPCA) appreciates the opportunity to submit comments on EPA's proposed rule, titled, "Prevention of Significant Deterioration (PSD) for Particulate Matter Less Than 2.5 Micrometers (PM_{2.5}) – Increments, Significant Impact Levels (SILs), and Significant Monitoring Concentration (SMC)." RAPCA is a six-county local air pollution control agency serving the citizens of the Southwest Ohio counties of Clark, Darke, Greene, Miami, Montgomery, and Preble.

RAPCA staff have reviewed this proposal and have participated in the drafting of comments by the National Association of Clean Air Agencies (NACAA). We concur with the comments of NACAA and offer the following to supplement those comments and emphasize several points.

Whereas we appreciate EPA's intention to address increments, significant impact levels and significant monitoring concentrations of PM_{2.5}, we are concerned with the lack of a "total package" of tools necessary to properly regulate emissions of PM_{2.5}. EPA's final implementation rule for PM_{2.5}, promulgated in March of 2007 does not include new source review (NSR) requirements for the PM_{2.5} standards. EPA stated at the time that "these requirements will be addressed in a separate rulemaking." We really would like to see EPA address all the PM_{2.5} NSR issues in one document and back that document with substantive training for state/local/tribal agencies and affected industries.

With regard to the specific issues raised in this proposal, we have the following recommendations.

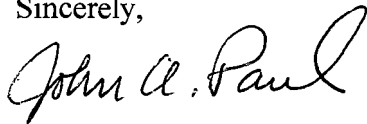
- EPA should use the authority of CAAA Section 166(f) and develop increments for PM_{2.5}

which would substitute for TSP and PM10 increments upon their implementation.

- EPA should address the treatment of condensable and secondary particulates in testing, modeling, and all the various aspects of the program.
- EPA should keep the PM10 PSD program (especially the increments) in place until the full PM2.5 program is adopted and in place.
- With regard to the establishment of significant impact levels (SILs) and the significant monitoring concentrations (SMCs), we feel EPA should set these in the same ratio to the PM10 SILs and SMCs as the ratio of the PM10 standard to the PM2.5 standard.

We appreciate this opportunity to comment on EPA's proposal. Please contact this writer with any questions or comments.

Sincerely,

A handwritten signature in cursive script that reads "John A. Paul". The signature is written in black ink and is positioned below the word "Sincerely,".

John A. Paul, RAPCA Administrator