

**COUNTY OF**



**ALLEGHENY**

April 1, 2024

Mr. Nick Lazor, Director  
Bureau of Air Quality  
Department of Environmental Protection  
Rachel Carson Building  
400 Market Street  
P O Box 8468  
Harrisburg, PA 17105-8468

Dear Mr. Lazor:

The Allegheny County Health Department (ACHD) hereby submits a partial withdrawal of a previously submitted revision to Allegheny County's portion of the Pennsylvania State Implementation Plan (SIP) for the Attainment and Maintenance of the PM<sub>2.5</sub> National Ambient Air Quality Standards (NAAQS). This SIP revision consisted of a Redesignation Request and Maintenance Plan for the Liberty-Clairton, PA and Allegheny County, PA PM<sub>2.5</sub> Nonattainment Areas for the 1997, 2006, and 2012 NAAQS.

This SIP revision was approved and adopted by ACHD on October 17, 2022, and forwarded to the Pennsylvania Department of Environmental Protection (PA DEP) for review and approval. The PA DEP subsequently approved and forwarded the SIP revision to the U.S. Environmental Protection Agency (U.S. EPA) Region III office on November 29, 2022, for review and approval. To date, the EPA has not made a rulemaking on this SIP revision, although discussions have occurred between the EPA and ACHD.

The ACHD wishes to withdraw the portion of the SIP revision pertaining to the request to redesignate the Allegheny County, PA nonattainment area for the 2012 PM<sub>2.5</sub> NAAQS to attainment. The ACHD wishes to retain, however, the portion of the SIP revision pertaining to the request to redesignate the Liberty-Clairton, PA nonattainment area for the 1997 and 2006 PM<sub>2.5</sub> NAAQS to attainment. Furthermore, the ACHD wishes to retain the portion of the SIP revision that pertains to the Maintenance Plan for both nonattainment areas and all three NAAQS.

The structure of the submitted SIP revision included a Redesignation Request and Maintenance Plan for both nonattainment areas and all three NAAQS in one package document. While information included in the SIP revision continues to be applicable, such as permanent and



**ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM**

836 FULTON STREET  
PITTSBURGH, PA 15233

PHONE (412) 578-8103 • FAX (412) 578-8144  
24-HR (412) 687-ACHD (2243)

[WWW.ALLEGHENYCOUNTY.US/HEALTHDEPARTMENT](http://WWW.ALLEGHENYCOUNTY.US/HEALTHDEPARTMENT)



enforceable reductions and clean monitored data, the ACHD is no longer seeking a redesignation to attainment for the Allegheny County, PA nonattainment area for the 2012 PM<sub>2.5</sub> NAAQS at this time. This action is being requested, in part, due to the new 2024 PM<sub>2.5</sub> NAAQS that was just enacted by the U.S. EPA and our understanding that the redesignation of the 2012 PM<sub>2.5</sub> NAAQS may confuse the public and regulated entities. The ACHD reserves the opportunity to request redesignation of the Allegheny County, PA nonattainment area for the 2012 PM<sub>2.5</sub> NAAQS at a later date, pending future efforts for the new 2024 PM<sub>2.5</sub> NAAQS.

Note that the maintenance demonstration in the SIP revision included projected emissions to a maintenance year of 2035 for the Allegheny County, PA area, based on a 10-year timeframe following expected redesignation to attainment. While the maintenance demonstration methodology and projections would continue to be valid through 2035, the ACHD acknowledges that updated projections to a year beyond 2035 may need to accompany a future redesignation request for the Allegheny County, PA area. The Maintenance Plan as submitted is sufficient to ensure maintenance through year 2035 for the Allegheny County, PA area, and it also included emissions inventories, verification of continued attainment, and contingency provisions that would correct any violations of the NAAQS.

ACHD is a separate local air pollution control agency in the Commonwealth of Pennsylvania, approved by the PA DEP in accordance with Section 12 of the Air Pollution Control Act (35 P.S. § 4012). The Local Health Administration Law, 1951, Aug. 24, P.L. 1304, 16 P.S. §§12001 et seq., states that the ACHD Director “shall be the administrator” of the health department (16 P.S. § 12012(a)), and in that capacity is responsible for implementing and enforcing revisions to Allegheny County’s Portion of the Pennsylvania SIP for the Attainment and Maintenance of the NAAQS.

The ACHD requests that the PA DEP approves this partial withdraw and forward it to the U.S. EPA Region III office with a recommendation for partial withdrawal. If you have any questions, please contact me, at 412-578-8103 or [geoffrey.rabinowitz@alleghenycounty.us](mailto:geoffrey.rabinowitz@alleghenycounty.us).

Sincerely,

DocuSigned by:  
  
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Geoff Rabinowitz, Deputy Director  
Bureau of Environmental Health Department

cc: Patrick Dowd (ACHD)  
Kirit Dalal (PA DEP)  
Stephen Hepler (PA DEP)  
Cristina Fernandez (US EPA)