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Planning & Implementation Branch (3AD30)  
Air & Radiation Division  
U.S. Environmental Protection Agency, Region III  
1600 John F. Kennedy Boulevard  
Philadelphia, Pennsylvania 19103  
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Re: Docket ID No. EPA-R03-OAR-2025-1777; Pennsylvania  
Redesignation Request for the Allegheny County Area for the 2012  
Annual Fine Particulate Matter Standard

Dear Sir or Madam:

The Midwest Ozone Group<sup>1</sup> ("MOG") is pleased to offer these comments regarding the Environmental Protection Agency (EPA) proposal to approve a request from the Commonwealth of Pennsylvania (PADEP) to redesignate the Allegheny County, Pennsylvania nonattainment area (Allegheny County Area) to attainment for the 2012 annual fine particulate matter (PM<sub>2.5</sub>) national ambient air quality standard (NAAQS or standard). The deadline for the submittal of comments is December 22, 2025.

MOG is an affiliation of companies and associations that draws upon its collective resources to seek solutions to the development of legally and technically sound air quality programs that may impact on their facilities, their employees, their communities, their contractors, and the consumers of their products. MOG's primary efforts are to work with policy makers in evaluating air quality policies by encouraging the use of sound science.

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<sup>1</sup> The members of the Midwest Ozone Group include: Ameren, American Electric Power, American Forest & Paper Association, American Iron and Steel Institute, American Wood Council, Appalachian Region Independent Power Producers Association, Associated Electric Cooperative, Berkshire Hathaway Energy, Big Rivers Electric Corp., Citizens Energy Group, City Water, Light & Power (Springfield IL), Cleveland Cliffs Inc., Council of Industrial Boiler Owners, Duke Energy Corp., East Kentucky Power Cooperative, ExxonMobil, Hoosier Energy REC, Inc., Indiana Energy Association, Indiana-Kentucky Electric Corporation, Indiana Municipal Power Agency, LGE/ KU, Marathon Petroleum Company, Monongahela Power Company, National Lime Association, North American Stainless, Nucor Corporation, Ohio Utility Group, Ohio Valley Electric Corporation, Olympus Power, Steel Manufacturers Association, and Wabash Valley Power Alliance.

MOG has been actively engaged in a variety of issues and initiatives related to the development and implementation of air quality policy, including the development of transport rules, NAAQS standards, attainment/nonattainment designations, petitions under Sections 126, 176A and 184(c) of the Clean Air Act, NAAQS implementation guidance, the development of Good Neighbor State Implementation Plans, exceptional events and 179B demonstration, and related regional haze and climate change issues.

MOG agrees that PADEP has correctly demonstrated that the Allegheny County Area nonattainment area should be redesignated to attainment. The Clean Air Act requires a state to show that it is in attainment of the NAAQS to qualify for redesignation.

Clean Air Act Section 107(d)(3)(E) addresses the requirements for redesignation of an area from nonattainment to attainment. The factors are as follows:

- (i) the Administrator determines that the area has attained the national ambient air quality standard;
- (ii) the Administrator has fully approved the applicable implementation plan for the area under section 110(k);
- (iii) the Administrator determines that the improvement in air quality is due to permanent and enforceable reductions in emissions resulting from implementation of the applicable implementation plan and applicable Federal air pollutant control regulations and other permanent and enforceable reductions;
- (iv) the Administrator has fully approved a maintenance plan for the area as meeting the requirements of section 175A; and
- (v) the State containing such area has met all requirements applicable to the area under section 110 and part D.

Clean Air Act Section 107(d)(3)(E).

MOG notes that, with respect to meeting CAA requirements for redesignation, on March 16, 2022 (87 FR 14799), the EPA determined that the Allegheny County Area had clean data and attained the 2012 annual PM<sub>2.5</sub> NAAQS based on certified air quality data from 2018–2020. Additionally, on May 19, 2023 (88 FR 32117), the EPA determined that the Allegheny County Area had attained the 2012 annual PM<sub>2.5</sub> NAAQS by the applicable attainment date based on certified air quality data from 2019–2021. MOG agrees that the basis and effect of these determinations of attainment for the 2012 annual

PM2.5 NAAQS were discussed in the publications of the proposed and final rules which determined the Allegheny County Area attained the 2012 PM2.5 NAAQS.<sup>2</sup>

MOG also agrees that, based on actions taken by the Allegheny County Health Department, the improvement in air quality in the Allegheny County Area is the result of permanent and enforceable emissions reductions, satisfying CAA section 107(d)(3)(E)(iii), that the Allegheny County Area has met all applicable requirements under CAA Section 110 and Part D, and that the Allegheny County Area has a fully approved SIP under Section 110(k).

In summary, MOG agrees with and supports EPA's determination that the Allegheny County Area continues to attain the 2012 annual PM2.5 NAAQS and that all other redesignation criteria have been met for the Allegheny County Area. MOG also agrees with EPA that PADEP has met each of the designation requirements and more with its exceptional events demonstration. Accordingly, MOG strongly supports redesignation of the Allegheny County Area to attainment for the 2012 annual PM2.5 NAAQS.

### **I. Conclusion**

For the reasons set forth above, the Midwest Ozone Group urges the EPA to finalize its approval of the Redesignation Request and Maintenance Plan for the Allegheny County Area to attainment for the 2012 annual PM2.5 NAAQS.

Sincerely,



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Edward "Skipp" Kropp  
*Counsel for the Midwest Ozone Group*

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<sup>2</sup> See notice of the proposed rulemakings at 86 FR 49497 (September 3, 2021) and 88 FR 8249 (February 8, 2023).