



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

JAN 13 2017

Mr. Patrick McDonnell, Acting Secretary  
Pennsylvania Department of Environmental Protection  
Rachel Carson State Office Building  
P.O. Box 2063  
Harrisburg, Pennsylvania 17105-2063

Dear Mr. McDonnell: *Pat*

By letter dated December 14, 2017, the Pennsylvania Department of Environmental Protection (PADEP) submitted to the U. S. Environmental Protection Agency (EPA) a request to change the characterization pathway under EPA's sulfur dioxide (SO<sub>2</sub>) Data Requirements Rule (DRR) for the cluster of sources in Lehigh and Northampton Counties in Pennsylvania. The letter sets out the rationale for the cluster of sources to change characterization pathways from monitoring to modeling and EPA concurs with the rationale the letter presents.

Consistent with the requirements of the DRR, modeling for the cluster of sources in Lehigh and Northampton Counties is due to EPA on January 13, 2017, and the letter documents progress towards achieving that deadline, although your letter incorrectly identified the deadline as January 17, 2017. As per discussion, this typo will not affect your ability to satisfy the DRR. In addition, as the letter states, the change of pathway from monitoring to modeling under the DRR means that the applicable sources are now subject to all requirements under the DRR for modeled areas, including annual reporting requirements.

If you have any questions, please do not hesitate to contact me or have your staff contact Ms. Kinshasa Brown, EPA's Pennsylvania Liaison, at (215) 814-5404. For questions regarding this concurrence letter, your staff may contact Ms. Cristina Fernandez, Director, Air Protection Division, at (215) 814-2178.

Sincerely,

A handwritten signature in blue ink, appearing to read "Shawn M. Garvin".

Shawn M. Garvin  
Regional Administrator

