NESCAUM
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Arthur N. Marin, Executive Director

September 29, 2011

Lisa. P. Jackson, Administrator
U.S. Environmental Protection Agency
Mail Code 6102 T
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Attention: Docket ID No. EPA-HQ-OAR-2007-1145

Re: Secondary National Ambient Air Quality Standards for Oxides of Nitrogen and Sulfur – Proposed Rule

Dear Administrator Jackson:

The Northeast States for Coordinated Air Use Management (NESCAUM) offer the following comments on the U.S. Environmental Protection Agency's (EPA's) Notice of Proposed Rulemaking, published on August 1, 2011 in the Federal Register, entitled "Secondary National Ambient Air Quality Standards for Oxides of Nitrogen and Sulfur" (76 FR 46084-46147). NESCAUM is the regional association of air pollution control agencies representing Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

While NESCAUM's comments are focused on the proposed monitoring program, we want to express concern that EPA's proposal is not consistent with the Clean Air Scientific Advisory Committee's (CASAC's) recommendation to apply an ecologically relevant level and form for this secondary National Ambient Air Quality Standard (NAAQS).

We agree with EPA that a pilot monitoring program with method development work is needed to support a possible future oxides of nitrogen and sulfur (NOx and SOx) secondary NAAQS. As described in the proposed rule's preamble, the pilot augments three to five existing Clean Air Status and Trends Network (CASNET) sites with additional relevant methods, both integrated and continuous. The NESCAUM states believe that rural NCore sites would be much more cost-effective than upgrading CASTNET sites for a pilot program, and would offer more flexibility to agencies struggling with resource issues.

Additional Sites and Programs to Maximize Resources

The proposed three to five monitoring sites will not adequately assess sensitive eco-regions throughout the U.S. More sites should be added to this pilot study on a volunteer basis, but they need not drain significant resources. Allowing the use of rural NCore sites could allow for expanding the number of potential monitoring sites beyond the proposed three to five sites.

Nearly all the continuous monitoring methods needed for a pilot project are in place at these sites, as well as the infrastructure to support additional measurements. We realize that there may be a tradeoff in leverage existing sites, as some rural NCore sites may not be located in areas most appropriate for the pilot. EPA should evaluate all available monitoring efforts to maximize the cost-effectiveness of the pilot and the number of sites.

Other Measurements

To the extent that pilot program costs could be reduced by leveraging existing networks, EPA should consider adding some additional measurements such as those recommended by the CASAC in its letter of May 25, 2011.

We agree with EPA that the existing or modified CASNET filter pack (CFP) sampler should be run at the pilot sites. The cost of adding weekly CFP sampling to NCore sites would be modest.

The NESCAUM states consider it very important to add wet and dry deposition measurements at the pilot sites. EPA's National Acid Deposition Program (NADP) is an established and cost-effective mechanism for these measurements.

Water Body Sampling

Siting for the pilot network should take into account any existing target water body sampling such as done in the Temporally Integrated Monitoring of Ecosystems (TIME) and the Long-Term Monitoring (LTM) programs. If implementation costs could be reduced, then EPA should consider adding such sampling at some or all of the pilot sites, as ecosystem impact is the ultimate goal of a secondary NOx and SOx NAAQS.

We agree with EPA that further evaluation of NOy measurement methods needs to be done in order to establish a federal reference method (FRM) for NOy. This will be needed for any future NOy monitoring for a NOx and SOx secondary NAAQS. This method work, however, should not be part of the NAAQS pilot field program. It is more suited as a research project conducted by EPA's Office of Research and Development or through EPA's Science to Achieve Results (STAR) grant program.

Funding and Participation

The additional measurements for an NCore-based pilot monitoring program should be fully funded from sources other than State and Territorial Air Grant (STAG) funds. An agency's participation in the pilot program should be optional, because some states cannot support additional monitoring even if it were to be fully funded.

Analyses and Results

Any sampling equipment and related chemical analysis needed for the pilot should be made available through an EPA national contract mechanism for state and local agencies to use.

EPA should provide more detail as to who would analyze the pilot data and what types of data analyses would be done. Moreover, some level of initial and ongoing external peer review would be needed for evaluating design of the pilot monitoring and the data analysis portion of the program. This could be done by establishing a new standing workgroup or through the National Association of Clean Air Agency's Monitoring Steering Committee.

Need for Collaboration

We appreciate EPA's efforts to launch a monitoring pilot program for method development to support a possible future NOx and SOx secondary NAAQS. State air agencies must be part of the planning process for such a pilot program to be successful, and the NESCAUM states are poised to work with you on these planning issues.

If you or your staff has any questions, please contact George Allen of NESCAUM at 617-259-2035.

Sincerely,

Arthur N. Marin
Executive Director

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