

November 19, 2012

Lisa. P. Jackson, Administrator  
U.S. Environmental Protection Agency  
Mail Code 6102 T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
*Attention: Docket ID No. EPA-HQ-OAR-2012-0486*

*Re: Revision to Ambient Nitrogen Dioxide Monitoring Requirements*

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 Friday, October 19, 2012 in the Federal Register, entitled "Revision to Ambient Nitrogen Dioxide Monitoring Requirements" (77 FR 64244-64249). NESCAUM is the regional association of air pollution control agencies representing Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

In January 2010, EPA revised the National Ambient Air Quality Standards for nitrogen dioxide (NO<sub>2</sub>). The revisions included the creation of a new near-road NO<sub>2</sub> monitoring network of 126 sites, to be operational by January 1, 2013. Previously, in August 2011, EPA revised the carbon monoxide (CO) monitoring network, requiring CO monitoring at 52 of the planned near-road NO<sub>2</sub> sites (in areas with over one million population) to be phased in between 2015 and 2017. EPA's proposed revision changes the timing of the near-road NO<sub>2</sub> network deployment to a phased-in approach that is more consistent with the earlier CO rule. It would extend the deadline from January 1, 2013 to between January 1, 2014, and January 1, 2017.

The NESCAUM states support the proposed changes to the NO<sub>2</sub> near-road monitoring network deployment schedule. The proposed phase-in and additional time is consistent with what the Clean Air Scientific Advisory Committee's (CASAC's) Ambient Air Monitoring and Methods Subcommittee recommended to EPA in 2010.<sup>1</sup> The Subcommittee's rationale was that a phased implementation would allow states to learn from the experiences of the first rounds of deployment with respect to siting and other issues. A phased implementation is more aligned

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<sup>1</sup> CASAC Ambient Air Monitoring & Methods Committee, *Review of the "Near-road Guidance Document – Outline" and "Near-road Monitoring Pilot Study Objectives and Approach,"* submitted to EPA, EPA-CASAC-11-001 (November 24, 2010). Available at [http://yosemite.epa.gov/sab/sabproduct.nsf/ACD1BD26412312DC852577E500591B37/\\$File/EPA-CASAC-11-001-unsigned.pdf](http://yosemite.epa.gov/sab/sabproduct.nsf/ACD1BD26412312DC852577E500591B37/$File/EPA-CASAC-11-001-unsigned.pdf).

with states' abilities to deploy the new network, particularly given constrained staff resources and the level of network-specific funding available from EPA.

The NESCAUM states also support EPA's proposal to revise the approval authority from the EPA Administrator to the EPA Regional Administrators for annual NO<sub>2</sub> monitoring network plans. This would provide for a more streamlined process.

We support the creation of a new near-road monitoring network that can adequately assess exposure to near-road pollutants. To best achieve this goal, EPA should finalize its proposal, allowing adequate time for the network to be properly designed and deployed.

If you or your staff has any questions regarding the issues raised in this letter, please contact George Allen of NESCAUM at 617-259-2035.

Sincerely,



Arthur N. Marin  
Executive Director

Cc: NESCAUM Directors  
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