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Docket No. EPA-HQ-OAR-2013-0619; FRL-9915-16-OAR
Environmental Protection Agency, Mail Code 2822T
1301 Constitution Avenue NW
Washington, D.C. 20460
Mail Code: 2822T

RE: Comments on the Proposed Rule *Revisions to Ambient Monitoring Quality Assurance and Other Requirements*.

Respectfully, the Division for Air Quality (Division) submits the following comments in response to the September 11, 2014 Federal Register notice (79 FR 54356) soliciting comments on the proposal referenced above. The Division supports and appreciates EPA's proposal to clarify the regulatory language relating to the public participation requirements for for Annual Monitoring Network Plans

Additionally, the Division supports the EPA's proposal to allow air pollution control agencies to provide a rationale for continuing to classify monitors as Special Purpose Monitors (SPMs) for a period longer than 2-years, as opposed to automatically re-classifying SPMs to a State or Local Air Monitoring Stations (SLAMS) designation. The Division suggests that the final rule include clarifying language regarding the ability for state, local, and tribal agencies to discontinue a SLAMS monitor that is not specifically required by the network design criteria of 40 CFR 58, Appendix E. Without clarification, different EPA regions may establish and apply different criteria for granting shutdown requests.

Regarding system modifications resulting from the "Five Year Network Assessments", the Division requests EPA to explicitly state that air pollution control agencies are only required to address network modifications that are specifically required by regulation. Much of the analysis performed for a "Five Year Network Assessment" is voluntary and relies upon air agencies exceeding regulatory requirements.

Specifically relating to the proposed changes to the quality assurance requirements, the Division strongly disagrees with statements in Section 3 (Proposed Changes to Quality Assurance Requirements) suggesting that there is no additional burden to reducing the levels for one-point QC checks or annual performance audits for continuous monitors with the rationale that the frequency of the checks does not change. Section 3.1.1 requires 1-point QC checks to be conducted between a range of 0.005 and 0.08 part per million (ppm). Additionally, the rule requires that the check gas concentration selected within the prescribed range must be related to the mean concentrations normally measured at sites within the monitoring network.

Where the current monitors report significantly low mean concentrations for some criteria pollutants, adjusting the 1-point QC check to the median concentration within the network will pose a challenge to the current monitoring equipment. The Division currently does not operate an NCore site and does not maintain the more sensitive

monitoring instruments with lower detection limits referenced in Section 3 of the proposed rule. Purchasing new equipment poses a significant financial burden. To properly equip a monitoring station, new monitors, calibrators, zero air units and gas cylinders would be required.

The Division also recommends the wording be changed to allow the 1-point QC check to be related to the mean concentrations measured within the network or at the level of the NAAQS. This change would allow agencies more flexibility, while still providing beneficial information as to the quality of data being generated at the decision making level.

Similarly to the 1-point QC changes, the Division also views the changes to the annual performance audits detailed in Section 3.1.2 as an area where an increased burden will be imposed upon air pollution control agencies. As written in the proposal, two of the audit points must be within 10-80% of the typical ambient air concentrations measured by the monitor or within the primary quality assurance officer's (PQAO) network of monitors. The Division interprets "typical ambient air concentrations" similarly to the language in Section 3.1.1 and as the median ambient air concentration normally measured at sites within the monitoring network. In the absence of NCore monitoring, the equipment currently in use will be significantly challenged to meet this requirement. After assessing concentrations recorded at the monitoring sites, the audit range will extend to, and in some cases below, the detection limits of the current equipment. The Division recommends the language be modified to require two audit points within 10-80% of the typical ambient concentrations or design value for the PQAO's network of monitors.

In conclusion, the Division appreciates the opportunity to comment on the proposed rule. If you have any questions regarding these comments, please contact me or have your staff contact Ms. Stacie Masters, Environmental Control Supervisor of the Quality Assurance Section in the Division's Technical Services Branch, at (502) 564-3999.

Sincerely,



Sean Alteri
Director

SA:slm