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To

Group A-AND-R-DOCKET@EPA

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Subject

Docket ID No. EPA-HQ-OAR-2001- 0017

Docket ID No. EPA-HQ-OAR-2004- 0018

Melinda Ronca-Battista

Health Physicist, CQA

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16206 South 26th Street

Phoenix, AZ 85048

Re: Docket ID No. EPA-HQ-OAR-2001- 0017
Docket ID No. EPA-HQ-OAR-2004- 0018

Environmental Protection Agency
Mail Code 6102T
1200 Pennsylvania Ave., NW
Washington, DC
20460

Dear Administrator Johnson:

I work with and for over 30 federally recognized tribal environmental organizations. This letter is to provide on the EPA proposed revisions to the National Ambient Air Quality Standards for Particulate Matter, (40CFR 50) and air monitoring rules (40CFR 53 and 58) published in the Federal Register on January 17, 2006. My comments pertain to the primary mission of the Agency, which is the protection of public health.

My comments are as follows

PM_{2.5} NAAQS

Studies show the current PM NAAQS are not protective of human health. As I live in Phoenix I am very concerned that the proposed 35ug/m³ would result in impaired visibility and degradation in public health. A PM_{2.5} secondary NAAQS to provide more urban visibility protection would also enhance reasonable progress to meet regional haze goals, especially for the Class I areas near urban areas. Additional analytical work might be indicated to establish an appropriate level and statistical form for a PM_{2.5} NAAQS, and to consider the urban haze impacts of other pollutants.

PM₁₀ NAAQS revocation in attainment areas-replace with qualified PM_{10-2.5} Primary and Secondary NAAQS, re-defined to exclude rural dusts

I strongly object to revoking the annual and 24-hour PM₁₀ NAAQS, (except for heavily populated non-attainment areas) and replacing them with a 24-hour PM_{10-2.5} NAAQS that excludes rural dusts. EPA must set Primary NAAQS to protect human health with a margin of safety. This includes health protection for non-urban populations as well. Studies of PM health effects have been conducted in urban settings, where population exposures and statistical significance are greatest. There is very little data on PM health effects in rural populations. Rural dusts can and do damage human health. In past NAAQS promulgations EPA has recognized this lack of rural health data in establishing the PM₁₀ and the PM_{2.5} primary NAAQS. It applied the required margin of safety using the urban studies as a basis for annual and 24-hour concentrations, defining PM in terms of aerodynamic particle size, regardless of origin, applicable throughout the country.

Just because there are now no statistically significant PM health data for rural areas does not provide a scientific basis to conclude there is a significant difference between urban-rural health effects. The approach to setting PM_{10-2.5} primary NAAQS should be conservative to address the margin of safety requirement for both the annual and 24-hour time periods. Excluding rural dusts in the definition of PM_{10-2.5}, after revoking the PM₁₀ NAAQS would leave state and tribal

populations in most areas throughout the West unprotected by a health or a welfare-based PM NAAQS.

With regard to secondary NAAQS, there is very little discussion of welfare (including visibility) effects of $PM_{10-2.5}$. The proposal to only have the secondary $PM_{10-2.5}$ standard apply where the primary standard does has the same problems cited above, i.e., excluding rural dust from consideration, in this case for visibility and other welfare protection. $PM_{10-2.5}$ has been identified as a significant component of visibility-impairing suspended aerosols in the west, including Class I areas. Data to support this conclusion are contained in numerous reports and data bases from visibility monitoring with co-located PM_{10} and $PM_{2.5}$ samplers including the IMPROVE air monitoring network.

In summary, $PM_{10-2.5}$ is a very significant component of suspended PM in large areas of the west, with potential health implications and well-established visibility impacts. I strongly support a transition from PM_{10} to $PM_{10-2.5}$ NAAQS in a way that does not leave rural areas without enforceable $PM_{10-2.5}$ primary and secondary NAAQS.

If EPA cannot apply a $PM_{10-2.5}$ NAAQS everywhere for everyone, I recommend leaving the current PM_{10} 24-hour NAAQS in place in rural attainment and unclassifiable areas, adjusted to avoid double counting, until sufficient data are available to more appropriately characterize urban and rural dusts. Of course the application of a single adjustment factor across the country will be difficult, but that should not be justification for not doing it.

Exemption of sources or groups of sources from control measures

I strongly oppose exemption of named sources or groups of sources from controls as a consideration of NAAQS. Exempting any named source or class of sources from controls to meet a NAAQS, as part of the NAAQS process is not consistent with the Clean Air Act. It preempts and ignores the role of states to include or exclude sources as they may determine to implement control strategies. Agricultural and certain mining operations often produce particulate emissions containing metals and organics, and in many areas of the west, emissions from these activities quite often occur in or adjacent to populated MSAs, affecting populations in those areas.

The $PM_{10-2.5}$ NAAQS proposal, if promulgated with the exclusions as proposed would remove the basis for emission controls on two selected sources of $PM_{10-2.5}$ in vast areas of the West, with very little basis for doing so. In addition to major policy and legal implications related to the standard-setting process, it would create a regulatory environment that would undermine state and tribal capacity to set and achieve reasonable progress goals for regional haze in Class I areas.

The proposed national monitoring strategy should enhance better characterization of rural and urban dusts

$PM_{10-2.5}$ is a major fraction of particulate air pollution in urban and non-urban areas in the west. CASAC is correct that there is a clear need to better characterize the species and health effects of both rural and urban dusts. Good decisions are based on good data. In the absence of good data, EPA should not assume that public health is protected with an adequate margin of safety without an applicable standard, and should take affirmative steps to fill data gaps.

The PM NAAQS proposal suggests EPA will work (with states and tribes) to establish a rural dust monitoring network, taking into account the existing IMPROVE and CASTNET networks. However, the PM_{10-2.5} siting criteria in the proposed monitoring rule are designed to support the proposed PM_{10-2.5} NAAQS and effectively limit monitoring for coarse particles except in densely populated urban areas. I recommend as a minimum, to support the commitment for a rural dust monitoring network that EPA modify the proposed siting criteria for PM_{10-2.5} and any interim surrogate PM₁₀ monitoring to include guidance for siting PM monitors in less populated areas.

I have noted that most of the existing data on speciation of PM_{10-2.5} come from the IMPROVE network, which has been in place for years. I would urge continued support of IMPROVE as one component of the national monitoring strategy to continue to provide speciated PM work. A national monitoring strategy that includes monitoring sites on tribal lands that are properly sited are an important component of a PM monitoring network.

Proposed national air monitoring guidance prepared by the National Monitoring Steering Committee assumed about the same level of resources for state and tribal programs. However, the recently released EPA budget proposal, especially the reductions in grant support for PM monitoring make such an assumption specious. Together, the proposed siting criteria and the proposed funding support suggest the prospects for implementing any commitment for rural PM monitoring as recommended by CASAC are minimal. Most states and tribes are projecting sharp reductions in monitoring activity due to funding shortfalls. Siting requirements in proposed revised monitoring regulations closes out much of the PM₁₀ and PM_{10-2.5} monitoring in rural areas. A number of tribes and states are projected not to have any rural PM monitoring sites. Under the proposed siting criteria, I know of three western states and all tribes that are projected to operate no PM₁₀ or PM_{10-2.5} sites at all.

I recognize that monitoring networks should be reviewed and adjusted from time to time to meet changing needs, to ensure data gathering is designed to address specific issues and is accomplished as economically as possible. I agree with CASAC that the need for appropriate PM monitoring in urban and rural areas is clear. I would urge strong consideration of CASAC recommendations in this regard.

Thank you for the opportunity to comment.



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