

March 12, 2001

Susan Lyon Stone
U.S. Environmental Protection Agency (MD-15)
Research Triangle Park, North Carolina 27711

Dear Ms. Stone:

On behalf of the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO), we wish to provide comments on the U.S. Environmental Protection Agency's (EPA's) *Federal Register* notice regarding the National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO₂), as published on January 9, 2001 (66 FR 1665). The purpose of EPA's notice is to 1) provide a status report on EPA's ongoing activities to characterize 5-minute peak SO₂ levels that may pose a risk to sensitive individuals with asthma, including the agency's plans to consider taking final action on a previously proposed intervention level program for SO₂ and the agency's efforts to respond to a court remand of the May 1996 final decision not to establish a short-term NAAQS for SO₂ and 2) announce the availability of and seek comments on new information on 5-minute average SO₂ concentrations.

Intervention Level Program

With respect to EPA's plans to consider taking final action on the intervention level program for SO₂ proposed by the agency on January 2, 1997 (62 *Federal Register* 210) we note that our associations raised significant concerns regarding this proposed program in a March 31, 1997 comment letter to EPA (copy attached). At that time, STAPPA and ALAPCO clearly expressed our belief that:

...if EPA deems there is a public health threat sufficient to warrant federal action, the agency should establish a NAAQS for short-term high concentrations of SO₂, as required by the Clean Air Act; if no such threat exists, the agency should leave any case-by-case action to address short-term peaks to the discretion of states and localities....[A]lthough EPA claims that this proposal will provide states and localities with flexibility

to address individual situations, in reality, this approach will constrain such flexibility by presupposing levels at which a state or local area might choose to take corrective action...[I]f there is adequate evidence in support of a short-term NAAQS for SO₂, such a standard should be set; if not, no further action on EPA's part is required....

Today – four years later – STAPPA and ALAPCO continue to hold this belief and, for this reason, reiterate that the associations continue to consider federal establishment of an intervention level program for 5-minute concentrations of SO₂ to be inappropriate.

Specific Issues on Which EPA Seeks Comment

In the January 9, 2001 *Federal Register* notice, EPA requests comments on several specific issues relative to 5-minute average SO₂ concentrations “to better inform future actions to reduce the health risk that may be posed by potential exposure of exercising asthmatics to short-term peaks of SO₂.” Accordingly, we offer the following comments.

First, EPA seeks comment on the appropriateness of using 1-hour average SO₂ monitoring data as one element to estimate the potential for 5-minute peak concentrations greater than or equal to 0.6 ppm SO₂. STAPPA and ALAPCO believe that a 1-hour SO₂ monitoring value should not be used as a surrogate for a 5-minute SO₂ monitoring value. Current SO₂ automated methods and data acquisition systems are capable of measuring and recording 5-minute averages. Existing technology makes substituting a 1-hour surrogate for a 5-minute SO₂ value unnecessary.

Second, EPA seeks comment on the appropriateness of using – for the purpose of assessing the need for additional monitoring around SO₂ sources – just the hourly maximum 5-minute average SO₂ concentration (rather than all the 5-minute averages in an hour), including any relevant data storage and management considerations. We are concerned about the data storage problem inherent to the long-term storage and data management of all 5-minute SO₂ averages for each hour. We believe that storing the maximum 5-minute SO₂ concentration each hour would be sufficient for identifying potential SO₂ air quality concerns.

Finally, with respect to monitoring, our associations have substantial concerns with EPA's draft “Guideline for the Ambient Monitoring of 5-minute SO₂ Concentrations”; these concerns were articulated in our February 15, 2001 comments to EPA (copy attached). Among these concerns is the level of resources needed to pursue a monitoring effort such as that outlined in the draft guideline. EPA has suggested that up to four SO₂ monitors be placed around targeted sources emitting SO₂. Resources allocated for SO₂ monitoring a decade ago are now used to conduct fine particulate and ozone monitoring. Even if EPA relaxed NAMS SO₂ siting requirements so that existing SO₂ monitors could be moved from their present locations, the number of SO₂ monitors

available would be inadequate to complete a comprehensive monitoring study for more than a handful of locations across the U.S.

STAPPA and ALAPCO suggest that a better approach would be to use SO₂ monitoring as the last step in the verification of an SO₂ problem. Rather than statistically manipulating 1-hour SO₂ data to target an SO₂ source and then chasing after its plume with SO₂ monitors, we believe the SO₂ problem should be first identified at the source through in-stack continuous SO₂ monitors and identification of fugitive sources during plant inspections. If stack and/or fugitive SO₂ emissions have a potential to cause high SO₂ emissions at ground level, facilities should be required to complete detailed air quality modeling analyses to identify locations of potential high 5-minute SO₂ concentrations. Once these locations are identified, the source should be required to install SO₂ ambient monitors for at least a year to determine whether a 5-minute SO₂ air quality problem exists.

STAPPA and ALAPCO appreciate the opportunity to provide comments regarding this issue. If you have any questions please free to contact us or the STAPPA/ALAPCO Secretariat at (202) 624-7864.

Sincerely,

Brock M. Nicholson
STAPPA Chair
Criteria Pollutants Committee

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Attachments