

**BOARD OF DIRECTORS**

**Co-Presidents**

David Shaw  
New York  
Lynne A. Liddington  
Knoxville, TN

**Co-Vice Presidents**

Mary Uhl  
New Mexico  
Bruce S. Andersen  
Kansas City, KS

**Co-Treasurers**

George S. Aburn, Jr.  
Maryland  
Merlyn Hough  
Springfield, OR

**Past Co-Presidents**

G. Vinson Hellwig  
Michigan  
Larry Greene  
Sacramento, CA

**Directors**

Andrew Ginsburg  
Oregon  
Anne Gobin  
Connecticut  
James Goldstone  
California  
Thomas Huynh  
Philadelphia, PA  
John S. Lyons  
Kentucky  
Shelley Schneider  
Nebraska  
Richard Stedman  
Monterey, CA  
Paul Tourangeau  
Colorado  
Barry R. Wallerstein  
Los Angeles, CA

**Executive Director**

S. William Becker

June 22, 2011

Gina McCarthy  
Assistant Administrator  
Office of Air & Radiation  
Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Dear Assistant Administrator McCarthy:

On behalf of the National Association of Clean Air Agencies (NACAA), we are writing to recommend methods for implementing ambient air monitoring requirements in order to best maximize state and local resources for the protection of public health and the environment. NACAA is the association of air pollution control agencies in 51 states and territories and over 165 major metropolitan areas across the country.

Over the next two to three years, state and local air pollution control agencies will be required to implement a number of new monitoring requirements for lead (Pb), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), ozone (O<sub>3</sub>) and carbon monoxide (CO), which together represent the installation and/or relocation of hundreds of monitoring sites nationwide. We estimate that the near roadway NO<sub>2</sub> network alone – which will require the installation of 126 sites and serve as the backbone for a multipollutant near roadway network – will cost approximately \$25 million.<sup>1</sup> While we greatly appreciate that EPA has again requested an additional \$15 million in Fiscal Year (FY) 2012 state and local air grant funds for the purchase of new monitoring equipment – which should be provided under Clean Air Act section 103, rather than section 105 which requires matching funds from already strapped state and local budgets – this amount falls far short of the funding needed to fully implement the new requirements. Fulfillment of these requirements entails the creation of entirely new monitoring sites, purchase and installation of new equipment, relocation of existing monitors, and additional staff and operation and maintenance costs at a time when state and local agencies are already struggling with critical budget and staffing shortfalls. We are disappointed

<sup>1</sup>See NACAA Comments on EPA's Proposed National Ambient Air Quality Standard for Nitrogen Dioxide (Sep. 14, 2009).

that the agency's request for additional FY 2011 state and local air grant funds was denied, and are doing our best to continue our mission to safeguard public and environmental welfare in the absence of full funding.

In order to continue our mission and work toward meeting the new monitoring requirements listed above, it will be necessary to phase in and prioritize the implementation of new monitoring requirements to make the best possible use of limited state and local resources. NACAA urges EPA to work with state and local agencies to develop methods for prioritizing these new requirements and looks forward to continuing this conversation with EPA in the coming months. As follows, we offer recommendations regarding: 1) implementation of the NO<sub>2</sub> near roadway monitoring network and 2) prioritization and implementation of other new monitoring requirements. To the extent that these recommendations may require changes in existing implementation schedules and/or requirements, NACAA encourages EPA to work with state and local agencies to determine the best way for moving forward in a clear and consistent manner.

First, NACAA recommends phasing implementation of the NO<sub>2</sub> near roadway monitoring network, particularly as EPA intends to use this network for other compounds likely to occur in the near roadway environment and adversely affect the health of nearby populations. Since the proposal of the near roadway NO<sub>2</sub> network in 2009, NACAA has stressed that technical siting concerns must be addressed and full funding provided prior to full network implementation.<sup>2</sup> NACAA is pleased that EPA has followed our previous recommendations to undertake a near roadway pilot study and consult the Clean Air Scientific Advisory Committee (CASAC) prior to the network rollout. Phasing implementation of the near roadway network will allow information gleaned from the pilot study to inform network design and siting, which will be further tested and refined as each implementation phase informs the next. CASAC also recommended that the near roadway network be implemented in stages, noting that more time is needed to absorb lessons from EPA's current near roadway pilot study to ensure the best possible siting of the near roadway network so that the network is able to "evolve based on lessons learned from the Pilot Study as well as from the operation of the initial sites."<sup>3</sup> This phased approach will allow the first round of sites to be used to gather information on appropriate siting in the near roadway environment, near roadway gradient, and spatial relationships.

NACAA recommends that, following CASAC's advice, implementation of the near roadway network be staggered over a multiyear period. The association suggests initially phasing in and funding sites in the largest Core-Based Statistical Areas (CBSAs) – e.g., those with a population of 1 million or more – over a two to three year period. Data gathered from those initial sites should then be analyzed and used to evaluate network implementation for the remaining sites if necessary and as appropriate, based on protection of public health, data needs, and utilization of available resources. This would allow for lessons learned during siting of the initial near roadway monitors to inform future placement, and thus help ensure that monitors are

---

<sup>2</sup> *Id.* See also NACAA Comments on EPA's Proposed National Ambient Air Quality Standard for Carbon Monoxide (Apr. 12, 2011).

<sup>3</sup> See Letter to EPA Administrator Lisa Jackson from Dr. Armistead Russell and Dr. Jonathan Samet, "Review of the 'Near-road Guidance Document – Outline' and 'Near-road Monitoring Pilot Study Objectives and Approach'" (Nov. 24, 2010).

placed in the most scientifically justifiable locations. This phase-in process will also provide flexibility during discussions on the association's second set of recommendations regarding prioritization and implementation of other monitoring requirements by allowing state and local agencies to better allocate scarce resources.

Second, NACAA recommends that EPA work with state and local agencies to develop methods for prioritizing the implementation of other new monitoring requirements to ensure the most efficient use of state and local resources for the protection of public health and the environment. One such exercise was recently undertaken by the Lake Michigan Air Directors Consortium (LADCO), and is offered as a good starting point for further discussions.<sup>4</sup> NACAA encourages EPA to work with state and local agencies on a regional basis to determine the best use of state and local monitoring resources.

To aid in promoting regional consistency, NACAA offers the following guiding principles for these discussions, and encourages ongoing conversations with state and local agencies regarding criteria for implementing new requirements. First, the implementation of new monitoring requirements should be prioritized where the best opportunities exist for the protection of public health and the environment. Second, core monitoring networks should be maintained, while providing opportunities for divestments of monitoring sites that are redundant or no longer necessary. State and local agencies must be afforded flexibility to relocate such unnecessary and/or duplicative monitors in order to meet new monitoring requirements, keeping in mind that significant savings only result from closure of entire monitoring sites. For example, EPA should reevaluate the existing CO monitoring network and eliminate sites that are redundant or no longer necessary so that resources can be transferred to higher priority areas. State and local agencies have often faced resistance from EPA – which can vary from region to region – when faced with divestment opportunities. EPA should provide clear national guidance and support for divestment in order to ensure regional consistency. Finally, where possible, efforts should be made to leverage existing networks and infrastructure.

Thank you for this opportunity to share our recommendations regarding implementation of the near roadway and other new ambient air monitoring requirements. If you have any questions or need further information, please do not hesitate to contact either of us or Misti Duvall of NACAA.

Sincerely,



Dick Valentinetti  
Vermont  
Co-Chair  
NACAA Monitoring Committee



Jack Broadbent  
San Francisco, California  
Co-Chair  
NACAA Monitoring Committee

---

<sup>4</sup> See Letter to EPA Region 5 from LADCO States with recommendations concerning implementation of air monitoring requirements (Apr. 7, 2011), available at: [http://www.ladco.org/reports/general/new\\_docs/state\\_recommendations\\_paper\\_april\\_7\\_2011.pdf](http://www.ladco.org/reports/general/new_docs/state_recommendations_paper_april_7_2011.pdf).

**Cc:**

Janet McCabe, Deputy Assistant Administrator, OAR

Jim Jones, Deputy Assistant Administrator, OAR

Richard Wayland, Director, AQAD, OAQPS