

January 11, 1999

Miki Wayland  
Office of Air Quality Planning and Standards  
MD-14  
U.S. Environmental Protection Agency  
Research Triangle Park, NC 27711

Dear Ms. Wayland:

On behalf of the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO), thank you for the opportunity to comment on EPA's draft *Guideline on Data Handling Conventions for the Revised PM NAAQS*. STAPPA and ALAPCO support the draft guidance and believe it provides excellent information on data handling and analysis, including how to calculate three-year average means and percentiles for both the PM<sub>10</sub> and PM<sub>2.5</sub> standards and how to address various monitoring and sampling frequency situations.

The associations support the optional mechanisms included in the guidance by which state and local agencies may fill in incomplete monitoring data for assessing compliance with the PM NAAQS. These mechanisms would enable agencies to either 1) replace missing data with data from colocated monitors for the same year and quarter or 2) replace missing data with the maximum data value across all three years for the same quarter. STAPPA and ALAPCO believe that these optional mechanisms are appropriate for situations involving missing monitoring data because they create an incentive for state and local agencies to maximize the completeness of their monitoring data. Moreover, making these alternative approaches available will ensure that monitoring data for the PM standards is available and usable in all applicable states and localities, and that future designation deadlines are met.

STAPPA and ALAPCO believe, however, that these optional mechanisms do not completely and equitably address the situation confronting several state and local agencies caused by circumstances outside their control; namely, delays in their receiving PM<sub>2.5</sub> monitors, spare parts and other necessary equipment (e.g., calibration kits) under EPA's national monitor procurement contract. These delays have caused affected agencies to miss the January 1, 1999 deadline for getting their requisite number of federal reference method PM<sub>2.5</sub> compliance monitors established and operational (e.g., quality assured). Further, the associations are aware that recent cold and wet weather conditions across many parts of the country have caused substantial numbers of equipment failures, for which vendors are making adjustments. Requiring affected agencies to use the missing-data provisions in EPA's draft data-handling guideline would require them to either use contemporaneous colocated monitoring data, which they would likely not yet

have, or fill in each missing scheduled sampling day with the highest monitored value for the same quarter from any of the three years, which would inappropriately create a biased first quarter value. We believe that it is inappropriate to require affected agencies to use the highest monitored value for all missing data where, but for delays in receiving monitoring equipment or start-up malfunctions, they would have been able to obtain actual monitoring data that could produce annual site averages sufficiently different than the averages derived using the missing data provisions in EPA's guideline.

To address this situation, STAPPA and ALAPCO recommend that EPA make available to affected agencies the following additional option for filling in missing monitoring data during the first quarter of 1999. To qualify, an affected agency should demonstrate that late FRM deliveries and/or start-up equipment malfunctions resulted in a loss of more than 25 percent of the first-quarter data. Under this approach, affected agencies unable to meet minimum data objectives due to delays in receiving monitors or start-up malfunctions could replace missing data for the first quarter of 1999 with monitored data from first quarter 2000. For example, an affected agency unable to begin use of a PM<sub>2.5</sub> compliance monitor until February 15, 1999, could use the monitoring data collected between January 1, 2000 and February 14, 2000 as a substitute for the missing 1999 monitoring data for that monitoring station. Similarly, an agency that lost data due to equipment malfunctions between, for example, January 15, 1999 and March 1, 1999 could use the period of data from January 15, 2000 to March 1, 2000 as a substitute. Thus, affected agencies would be able to use a comparable substitution period for their first-year annual site averages.

The associations further recommend that EPA make this additional missing-data option available through a separate policy statement that would complement the agency's data-handling guideline. We do not suggest that EPA add this option to the data-handling guideline, because of the temporal duration (i.e., first quarter 1999) of the option.

STAPPA and ALAPCO share EPA's desire to ensure that state and local agencies have as many valid first-year averages as possible, and believe that providing agencies with the additional missing-data option will better ensure that affected agencies are able to use the most representative first-year data. Please contact either of us, or Dave Wallenberg of STAPPA/ALAPCO, if you have questions about this recommendation or desire additional information.

Sincerely,

(original signed)  
Dick Valentinetti  
STAPPA Chair  
Monitoring Committee

(original signed)  
Mel Zeldin  
ALAPCO Chair  
Monitoring Committee