

## PM2.5 Implementation Workshop – Questions and Concerns:

OR:

1. If there is a new PM2.5 standard will we be able to use existing PM2.5 data from our network to immediately determine if we are in attainment, or will we need to collect another 3 years of data to make that determination.
2. When will EPA update the operational costs of running the fine PM networks? They are still using the same costs that they "guessed" at back in 1998. Our personnel and services costs have gone up a lot since then. We are now losing money operating this network.
3. Please let there be a "manual" method for the new PM coarse standard (PM10 minus PM2.5). Don't have the only acceptable methods be expensive, unreliable continuous methods.
4. If EPA is anticipating a large increase in the number of nonattainment areas (especially in the west) because of a lower PM2.5 NAAQS, then why is EPA currently proposing to cut the PM2.5 monitoring network. They should be providing states more money for PM2.5 monitoring not taking it away. This includes new money for chemical speciation work.
5. Is EPA making advancements on emission factors and speciation info for area, mobile, and non-road sources as well as industrial sources? What's the plan?
6. Can there be stronger funding link made between PM2.5 nonattainment and air toxics. i.e. can EPA fund more cross-program emission reduction work for PM2.5/toxics (not just diesel), as part of PM2.5 attainment planning requirements.
7. Can EPA please unify the new NAAQS thresholds with the national AQI thresholds! The threshold used to define "unhealthy air" should be the same for both the PM2.5 NAAQS and PM2.5 AQI; otherwise it causes great confusion to the public and others when they get conflicting health advisories.

WY:

1. I have some timing questions. One has to do with when states are required to implement those portions of the implementation rule that don't require changes to the SIP, such as modeling for PM2.5 during new source review. Obviously we have had a PM2.5 standard on the books for some time, can we continue to wait on changes to the SIPs before implementing all aspects of the rule?
2. The second has to do with confirming the date for when SIP revisions are due for attainment areas. Again, this is primarily an NSR issue. On page 66043 of the proposed rule, it looks like EPA is thinking about April 5, 2008, which is the same date that nonattainment SIPs appear to be due.

WA:

- 1) What is EPA's latest thinking on the application of the "qualified PM coarse" standard to rural areas?
- 2) If the qualified standard does not apply to rural areas, what are states supposed to tell rural areas, especially rural areas with limited resources that are spending a relatively large amount of money on PM<sub>10</sub> controls about the value of what they have done and are doing to protect public health? Are the communities supposed to continue to implement control measures? What is the justification for continuing controls?

I am thinking particularly about Colville (population 5,000). They have had a winter traction materials problem. The City of Spokane gave them a good deal on some good, though older street sweepers Spokane was surplus. My understanding is that Colville has run the street sweepers for as much 12-14 hours per day. Colville is also switching over from locally available traction materials to more expensive materials that do not break down so easily.

NV:

I think one important question would be the revoking of the PM10 standard. How are we supposed to handle this? Also, if we are currently working on any plans regarding nonattainment issues, do we have to finish them and then revoke them? (I guess I would like to have EPA tell the communities that are in nonattainment and are implementing BACMs that all is not necessary anymore...)

AK:

1. Concerned about transition issues, including: cost of monitoring (EPA's assumed unit costs are out of date and EPA is cutting PM monitoring funds);.
2. If the PM10 standard is dropped and the new coarse standard doesn't apply in rural areas, aren't we backsliding? How do we explain this to the rural public? Are we expected to discontinue work on PM10 maintenance plans? We just monitored a new PM10 violation – do we propose a non-attainment designation? Do we inform the public that the air is unhealthy?
3. Same as 2, but this is going to be a real problem in native communities, where health issues are already a problem.
4. Need to have a clear and workable natural events policy for all PM standards, and for precursors.

<Note: review comments from AZ, CA, NM on PM standard/staff paper>