

Ambient Air Monitoring Group, OAQPS  
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Earlier this calendar year, OAQPS monitoring staff circulated a ranking analysis of PM2.5 speciation sites, and held conference calls with Regional Office staff and the STAPPA/ALAPCO ambient monitoring committee to discuss the ranking. The purpose was to identify both short term and long term candidates for shutdown in order to free up resources for future monitoring needs. The ranking was based on several factors that contribute to the overall information value of a site, such as whether it is in a nonattainment area, whether other sites are nearby, etc. Our understanding of the information value of some sites evolved through this process based on information conveyed by Regional and State monitoring staff and some other stakeholders during these discussions.

For many sites, we found that there was good agreement that shutdown would be appropriate once FY2005 funding ran out. For other sites, it was agreed that the site had high continuing information value, mostly from the perspective of the PM2.5 NAAQS program in particular. We used our best understanding of the value of each site to develop the Regional allocations of PM2.5 speciation operation and maintenance funding for FY2006, balancing filter-based PM2.5 speciation and other uses of PM2.5 funding such as FRM site operations, filter analysis, starting up additional precursor gas sites, and starting up continuous speciation sites. In the FY2006 program and grant guidance, we were able to include in the preliminary FY2006 allocations (before consideration of the planned shift of \$3.5 million for CASTNET upgrades) all of the sites for which either HQ or RO staff saw a high information value.

In short, few if any hard choices were needed. Unfortunately, it appears that lack of complete and understandable documentation of the process and outcome may have left some participants and affected parties more concerned with the practical effect of the ranking analysis than they actually need to be. Some stakeholders may still be worried about sites that in the end we came to agree should be treated as having high information value.

To finish making this process transparent, OAQPS monitoring staff are conveying two spreadsheets which document the preliminary allocations of PM2.5 monitoring funds given in Table A-2 of the FY2006 program and grant guidance.

The first spreadsheet contains the Region-by-Region assumptions about PM2.5 monitoring activities and pricing factors used to develop the preliminary allocations of PM2.5 monitoring funds by Region that are given in Table A-2 of the Final FY2006 program and grant guidance issued in April 2005. Each Regional Office air monitoring program manager has received a similar table that also shows the state-level assumptions.

The second spreadsheet contains three tables related just to PM2.5 speciation activity. The first table is a list of all currently operating PM2.5 speciation sites. The second table lists 193 sites that were identified as high value sites and that we believe should continue

operation in FY2006 unless factors not yet considered indicate otherwise. The third table contains a list of 48 sites that were identified as lower value sites which OAQPS believes can be shut down in FY2006 unless factors not yet considered indicate otherwise. These recommendations are consistent with the assumptions about PM2.5 speciation operations that were the basis for the preliminary allocations of PM2.5 monitoring funds given in Table A-2 of the Final FY2006 program and grant guidance issued in April 2005. In other words, at the state level, the sites in the second spreadsheet are consistent with the activities and funding in the first spreadsheet.

Two important points are not reflected in these spreadsheets. First, the actual allocation of PM2.5 funds for each Regional Office will be less than in Table A-2 and the first spreadsheet described above, because of the one-time shift of \$3.5 million for the upgrade of CASTNET sites. OAQPS monitoring staff expect the actual allocations to be documented soon in a memo from Rob Brenner to the Regional Air Division Directors.

Second, the numbers, types, and locations of monitors in the first and second spreadsheet were only for the purpose of establishing the Regional Office-level allocations of total PM2.5 monitoring funds. Each RO is responsible for planning the actual uses of the funds among states and types of PM2.5 monitoring. The three firm HQ expectations are that

- (a) PM2.5 speciation trends sites be continued unless OAQPS concurs in their movement or discontinuation,
- (b) FRM and continuous PM2.5 siting minimums in 40 CFR 58 must be met unless waived by the Regional Administrator, and
- (c) where the State-level funding spreadsheet for your specific Region shows funding for precursor gas capital acquisition, operations, or maintenance in particular states those funds should not be used in other states or for other purposes without OAQPS consultation (Tim Hanley is the point of contact for this; generally we are open to shifts of prospective precursor gas sites among states if all the involved states are in agreement).

Beyond these, OAQPS's advice is one of many inputs the ROs should consider.

EPA Regional Offices make the actual decisions about funding of specific sites. Questions and concerns about the future of funding for specific sites should be addressed to them.

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