

June 27, 2016

Gina McCarthy, Administrator
U.S. Environmental Protection Agency
Mail Code: 2822T
1301 Constitution Avenue, N.W.
Washington, DC 20460
Attention: Docket ID No. EPA-HQ-OAR-2015-0486

Re: Revision to the Near-road NO₂ Minimum Monitoring Requirements

Dear Administrator McCarthy:

The Northeast States for Coordinated Air Use Management (NESCAUM) offer the following comments on the U.S. Environmental Protection Agency's (EPA's) Proposed Rule, published in the Federal Register May 16, 2016 and entitled "Revision to the Near-road NO₂ Minimum Monitoring Requirements" (81 FR 30224-30229). NESCAUM is the regional association of air pollution control agencies representing Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

Overall, we support the agency's proposal to remove the requirement for near-road NO₂ monitoring stations in Core Based Statistical Areas (CBSAs) having populations between 500,000 and 1,000,000 persons that are to be operational by January 1, 2017. Specific comments on the proposed rule follow.

We support the changes EPA is proposing to the near-road monitoring network that will reduce the operating and regulatory burden on State air agencies without posing any additional risk to near-road communities or the environment. In the NESCAUM states, this proposal would eliminate eight Phase 3 NO₂-only sites that, based on existing data, would have minimal regulatory or research value. We agree with the agency that the data collected so far from the Phase 1 and Phase 2 near-road NO₂ monitoring network of more than 70 sites with PM_{2.5}, CO, and other pollutant measurements, such as black carbon (BC), is adequate to show that near-road NO₂ concentrations in smaller cities would be unlikely to approach or exceed the hourly or annual NO₂ national ambient air quality standard (NAAQS), thus making the planned Phase 3 near-road NO₂ monitoring sites unnecessary.

We also note that the near-road monitoring network bears out our suggestion from our previous comments on the 2009 proposed NO₂ NAAQS revision that maximum short-term NO₂ concentrations in some regions may not occur near roadways. Instead, maximum NO₂ levels can

occur in urban canyons, and in certain situations near stationary sources such as power plants (including peaking units), industrial facilities, and airports.¹

Irrespective of the monitored near-road NO₂ levels, however, there is a large body of literature showing a wide range of adverse health outcomes in populations living near large roads. NESCAUM would like to take this opportunity to comment on the larger issue of the near-road air pollution monitoring network and traffic-related air pollution health effects. These observed health effects are unlikely to be driven by any of the NAAQS pollutants measured at the near-road sites (PM_{2.5}, CO, NO₂) given the weak spatial gradients away from the road (PM_{2.5}, NO₂) or the very low concentrations being reported (CO). Part of the original intent of the near-road monitoring network was to include measurements of other (non-NAAQS) particle pollutants, such as BC and particle number concentration (also known as ultra-fine particles or UFP), that could be better indicators of traffic related air pollution. Measurement of these other pollutants is not currently required by EPA, yet characterization of them in the near-road environment is likely to be at least as important as the NAAQS-required measurements, and may be critical in developing a better understanding of the observed near-road health effects.

EPA recently updated its list of near-road monitoring sites and measurements.² Of the 79 sites listed, only 21 sites have BC measurements (including 2 that are not yet operational) and only 3 have UFP measurements. We realize that this list is based on data submitted to the EPA Air Quality System (AQS) database, and that there may be additional sites making BC and UFP measurements at near-road sites, but not reporting the data because that is not required for these non-NAAQS pollutants (see 40 CFR 58.16). We encourage EPA to update the list of near-road monitoring sites and pollutants to document all measurements being made, and to work with states to improve reporting to AQS of all near-road pollution measurements being made in order to make the data more accessible.

Conclusion

In general, we support the changes in this proposed rule, and encourage the agency to make better use of the existing near-road network platform for monitoring of traffic-related air pollutants.

Sincerely,



Arthur N. Marin
Executive Director

¹ NESCAUM, *Re: Primary National Ambient Air Quality Standard for Nitrogen Dioxide – Proposed Rule*, Comments to EPA, September 14, 2009 (available at <http://www.nescaum.org/documents/nescaum-no2-naaqs-comments-final-20090914.pdf>).

² EPA posted the list at <https://www3.epa.gov/ttn/amtic/files/nearroad/nearroadsites.xlsx> (accessed June 24, 2016).

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