

# New York State Department of Environmental Conservation

## Division of Air Resources

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June 25, 2007

To: Pat Lavin

From: Dirk Felton

Re: Notes from the NACAA Steering Committee Meeting

### Direct Final Monitoring Rule:

There was an error in the explanation of the calculation for the PM-2.5 24-Hr design value. Apparently it was not clear whether the percentile ranking was a bottom up or top down. An example will be published.

### OAR STAG Resources (Bill Houck on the 2008 budget)

Could still be a recession from the 08' budget.

Section 103 authorization retained for PM-2.5 and toxics through 08'.

Amount of PM and toxics funds not specified by Congress. This means that like last year, the Agency will have the discretion to move funds such as the move to underground storage tanks in 2007.

Bill thinks PM-2.5 monitoring is a criteria pollutant and we should be planning to move it to section 105 in a year when it can be properly funded rather than in a year facing cuts.

When asked, Bill said that the PART assessment/review was incidental to funding decisions.

### STAG reallocation process

This process involves switching from the formula introduced in 1963 that involves many factors including a State's individual financial need. This version of the allocation formula is expected to last through 2015. The proposed allocation is in the form of an automated model though they like to call it a tool that incorporates 10-15 factors, expected CAIR funds, new ICR cost estimates and may not include programs such as acid rain. The glitzy part of the process is the GIS type National graphics that change as the \$\$ inputs and priorities are varied. It is not yet known how monitoring will be fit into the allocation process. The two ideas so far are to use a bottom up determination of need based on air quality and requirements vs a top down percentage of total approach. It is expected that the contractor will present the finished tool to OAR in September. NACAA will be consulted and make a recommendation concerning how long an implementation period is needed for States to adjust to new funding levels. This new allocation process could be used as early as 2009.

## NCore DQOs

The EPA and Battelle have been working on data quality objectives necessary to detect 5% - 10% trends with a 25 or 50 site network. The conclusion indicates a data completeness requirement of 90%, warning limits for precision and bias of 10% and 20% for invalidation. These limits were developed from Trace CO, SO<sub>2</sub> and NO<sub>y</sub> data from an EPA site in NC. It will be interesting to see how they compare in a rural site like Pinnacle.

## New Ozone NAAQS

A level of .07 would make about 70 more areas above standard Nationwide. The EPA claims that only 5 more monitors would be required. I don't think that is adequate but they claim that the other 65 areas are adequately covered.

In NY, at .07 more than 2/3 of the State is non-attainment. At .075 about half.

The Ozone season will stay the same because only the std is changing, not the text of the monitoring rule. The RA can approve shorter Ozone monitoring seasons if asked but cannot require a longer season.

The secondary std if adopted may actually make the existing rural network inadequate. It was decided to table discussion on this until the new Ozone standard is final.

Other upcoming NAAQS reviews:

Lead currently underway, NO<sub>2</sub> 07'-10', SO<sub>2</sub> 07'-10', PM 07'-11'.

## CASTNET

Program is expecting a 25% cut in 2008. NPS also expects to cut up to 8 sites in 2008.

CASTNET claims that the Ozone QA upgrade (NAAQS suitable) may have to wait until funding is restored. They also will not say if the NPS sites will get the Ozone QA upgrade. This affects the West Point Ozone monitor. CASTNET is also installing passive weekly ammonia monitoring as a pilot at some sites this year.

## Mercury Initiative (NADP)

The EPA has invested a total of \$600k to fund the program this year. Unexpectedly, Eric Prestbo who was hired to implement much of the Tekran program has been hired by Tekran and will be leaving Frontier Geosciences. This delays the technical SOP he was working on and certainly complicates the real or assumed conflict of interests. The EPA/NADP/MI will be hosting a technical Hg monitoring meeting in September.

## PAMs Assessment

The EPA has scraped \$100K together to initiate a contractor led review of the PAMs program. It will review; monitoring locations, options for monitoring beyond minimum requirements, determine if funds need to be reallocated, determine if overall funding is adequate and it will examine options to integrate and coordinate PAMs activities with other monitoring programs.

## Ammonia Monitoring

OAQPS is working on a MetOne SuperSass module that will be fit with an acid coated aluminum denuder to collect 24-Hr Ammonia samples. This sampler is used at 80% of the Speciation sites Nationwide and has an extra channel now that the IMPROVE protocol URG sampler is being used to collect carbon filter. NY has recently switched from R&P 2300 STN samplers to MetOne SuperSass STN samplers.

## Toxics

The pilot PAH sampling program is operating at the first of 5 locations.

Two new NATTs sites were added in LA. Up to 4 more NATTs sites will be added at sites that indicate a high risk (NATA 99) from sources other than mobile.

The Community Scale Grant Awards may be announced at the end of July.

The EPA has announced that the air toxics data analysis workshop will be Oct 2-4, 2007 in Chicago.

## Met QA Redbook Revision

The first draft was not well received. It is too prescriptive, too costly and will require the purchase of state of the art equipment for every parameter. Comments are due by July 1 and the next draft will be available in the Fall. The EPA hopes to finalize by next January.

## PM-2.5 Speciation

The lab contract is being put out to bid later this year. NY has requested "ala carte" analysis availability which will be included.

The support for samplers for other than the MetOne and FRM may be discontinued.

The STN has proposed to drop: Sc, Ga, Y, Nb, Mo, Cs, Sm, Eu, Tb, Hf, Ta, W, Ir, Au, Hg from the XRF target list.

It is hoped that the cost will drop to something closer to what IMPROVE is charging.