

Thanks for adjusting the content of the meeting today based on the feedback. I really liked the color handouts! A closer review of the monitors and results was very helpful for me, and Elizabeth's review of SIP requirements was good and sparked helpful discussion. As I mentioned afterwards, I have a couple requests:

1. ADEQ should review the PM2.5 monitor data and determine what, if any, of that data has been or can be analyzed for chemical speciation – sulfates, nitrates, soot, organic carbon, crustal matter. This data will help identify any seasonal variability and help to do source attribution.
2. ADEQ should determine the standard deviation of ozone and PM2.5 monitor data for the last 5 years to predict a range of concentrations that would be expected at each monitor. If the data is consistently trending down at every monitor, then maybe detailed statistics are not necessary? This may be true for PM2.5, but I think ozone shows more ups & downs. We should try and determine monitors that may be close to standard now, but whose historical data shows the measurements always stay within a fairly tight range, and the upper bound of that range is still below the NAAQS (hopefully). We could then worry less about those monitors/areas.

Final thought: Stan's, David's, and Mark's comments about the wording of the CAA and Sec. 110 are important and should be researched. My opinion is that references to "attainment and maintenance of the NAAQS" is ONLY referring to 1) getting back into "attainment" when an area is currently nonattainment, and 2) "maintenance" of a NAAQS when an area has been out but recently came back into attainment. A good example of a "maintenance" control strategy is Reg 19, Chapter 10, for VOC sources in Pulaski County, because way back in the 80's Pulaski County was NA for ozone. See Purpose in Reg 19.1002.

So what to do when an area is (and has always) attained the NAAQS? That is the question, and I don't think the CAA speaks much to this situation other than "keep doing what you're doing". Get new NAAQS into regs and then follow your infrastructure SIP, operate and evaluate monitors, enforce your existing Air regulations including your major and minor NSR programs, maintain a healthy inspection and citizen complaint program, adopt & support federal standards/programs that will reduce emissions, etc. It's only common sense to consider preventative measures when your data is close to the NAAQS (as some of Arkansas' is), but the CAA does not give many hard-and-fast tools for this prevention. States have broad flexibility. I think the voluntary programs for non-stationary sources like were discussed today are exactly what should be promoted and encouraged while air quality is good and you have the luxury of not being "enforceable".

Many young people today are passionate about protecting the environment, tap into that energy. I'd love to see state, county, and city governments and big private employers in metro areas resolve to implement better clean air/fleet management/commuter practices. Some accountability and tracking (not regulation) of prescribed burns would also be helpful in the off-chance we ever need to link a bad monitor day to a burn event (Stan's idea). The major NSR program and some type of air quality evaluation for minor NSR will also help insure stationary sources don't "significantly deteriorate" air that is already clean (the very definition of PSD!). The outcome of the modeling subgroup will help with the minor NSR piece and will hopefully placate EPA but, as the NEI data showed, minor stationary sources are only a tiny piece of the AQ puzzle.

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Charles R. (Chuck) Buttry
Regional Manager - Southeast