



national association of clean air agencies

July 1, 2019

U.S. Environmental Protection Agency  
EPA Docket Center  
Air and Radiation Docket  
Mail Code 28221T  
Docket ID No. EPA-HQ-OAR-2019-0137  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

To Whom It May Concern:

The National Association of Clean Air Agencies (NACAA) offers the following comments on the U.S. Environmental Protection Agency's (EPA's) proposed rule, "Extension of Start Date for Revised Photochemical Assessment Monitoring Stations," which was published in the *Federal Register* on May 31, 2019 (84 Fed. Reg. 25,221). NACAA is the national, non-partisan, non-profit association of air pollution control agencies in 41 states, including 114 local air agencies, the District of Columbia and four territories. The air quality professionals in our member agencies have vast experience dedicated to improving air quality in the U.S. These comments are based upon that experience. The views expressed in these comments do not represent the positions of every state and local air pollution control agency in the country.

NACAA welcomes this EPA proposal to extend the deadline by which state and local air agencies must begin implementation of the re-engineered Photochemical Assessment Monitoring Stations (PAMS) network.

The requirements for the revised PAMS network were promulgated in conjunction EPA's 2015 revision of the National Ambient Air Quality Standards for ozone and were to be implemented beginning June 1, 2019. EPA has worked over the past several years on national contracts to assist state and local air agencies, using State and Tribal Air Grant funds, in acquiring the equipment necessary for making PAMS measurements, including automated gas chromatographs (auto-GCs), ceilometers and true NO<sub>2</sub> analyzers. Because making PAMS measurements is a new responsibility for many state and local air agencies, once they receive the equipment, they need adequate time to install it, hire staff and conduct the training necessary to ensure their staff is proficient in using it.

However, due to budget constraints and delays in EPA's contracting process, many state and local air agencies that are relying on the national contracts still do not have the equipment they need to begin implementing the required PAMS monitoring. At this time, EPA estimates that approximately two thirds have received auto-GCs and just one third will be in possession of their ceilometers and true NO<sub>2</sub> analyzers in 2019. Accordingly, EPA proposes to extend the start date for the required PAMS monitoring at all PAMS sites by two years, to June 1, 2021.

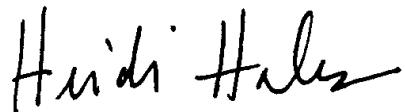
NACAA supports EPA's proposal for an across-the-board, two-year deadline extension to June 1, 2021. A blanket extension is the most straightforward way to address the problem and would provide the

most certainty for state and local agencies. It would also be simpler to implement than either Alternative Option 1 or Alternative Option 2 presented in the proposed rule, under which agencies would be required to begin PAMS measurements based on the dates when they receive the equipment. We note also that those state and local agencies that have received and installed their equipment and conducted the required training may begin making PAMS measurements earlier if they so desire (and some already are).

On behalf of NACAA, we appreciate EPA's flexibility and willingness to work with state and local air agencies to successfully implement the PAMS program.

If you have questions or would like to discuss this issue, please contact either of us or Karen Mongoven, NACAA Senior Staff Associate.

Sincerely,



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