

STAPPA / ALAPCO

STATE AND TERRITORIAL
AIR POLLUTION PROGRAM
ADMINISTRATORS

ASSOCIATION OF
LOCAL AIR POLLUTION
CONTROL OFFICIALS

S. WILLIAM BECKER
EXECUTIVE DIRECTOR

November 22, 2005

Ms. Sharon Nizich
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mailroom C504-04
Research Triangle Park, NC 27711
Sent via electronic mail

Dear Ms. Nizich:

On behalf of the Agriculture Committee of the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO), we are submitting comments received from our members on the draft "Quality Assurance Project Plan for the National Air Emissions Monitoring Study: Micrometeorological Component" ("Lagoon QAPP"). In addition to the attached comments, we provide below some of the overarching issues we see with the draft Lagoon QAPP.

The draft Lagoon QAPP does not provide an opportunity for involvement by affected state and local air agencies. If a monitored farm is located within the jurisdiction of a state or local air agency, that agency should be provided an opportunity to review data collection, procedures and reports on the monitoring at the farm.

EPA's involvement in the monitoring process appears to be minimal. There are no EPA personnel identified as being on the project team (page 1), and no one from EPA is identified as being part of the key personnel (Table A-1).

The plan does not provide for monitoring of enough farms or collection of enough data. First, only one chicken farm in the entire country will be monitored and only one dairy in the Midwest (section 3.2). We are concerned that this may not generate emission data that represents conditions at chicken farms across the country or other dairies in the Midwest. Second, while we recognize that this protocol was designed only to measure emissions from lagoons, we urge EPA to ensure that all emissions sources at a farm are addressed in this study. Measuring emissions only from lagoons and barns does not give a complete picture of total emissions from farms. Third, given the very strict variance requirements (i.e., not much variability in wind conditions or temperature is permitted in data collection, or else the data is disqualified), we are

concerned that not enough data is being collected (page 6, definition of “data representativeness”). We have similar concerns with respect to requirements for “data completeness.” (id.) Fourth, there are no contingency plans in case there are gaps in the data. Finally, the plan should monitor the fluctuation of animals into and out of facilities and manure management practices at the farms, since animal counts and manure management practices affect emissions.

Another method rather than WATER9 should be used to measure VOC emissions. The draft Lagoon QAPP provides that liquid samples be collected and EPA’s WATER9 model be used to estimate emissions (Sections 3.2, 7.4 and elsewhere). A more effective means of measuring VOCs generated by lagoons is to use ambient VOC sampling or FTIR. FTIR equipment would also be useful in detecting other compounds.

EPA should make use of this opportunity to collect other useful information from participating farms. For example, EPA should require that emissions of methane be measured, which can be done with FTIR equipment. Recovered methane could be a useful source of energy for these farms. In addition, the Animal Feeding Operations Consent Agreement provides more time to obtain permits to farms that use methane recovery, so it would be useful to know which farms might make use of that opportunity. Methane is a potent greenhouse gas (GHG) contributing to global warming, and methane emissions data would be useful for enhancing the U.S. GHG emissions inventory. In addition, the project should collect speciated data on VOCs. Finally, the project should collect process information from the farms (e.g., amount of feed and type of feed) in order to help contribute to creating the process-based model recommended by the National Academy of Sciences for estimating emissions from animal farms.¹

Data should be distributed more widely and maintained for review by EPA and others. It is our understanding that validated and raw data from the project would be made immediately available to the public. Accordingly, validated raw data as described in section 6 should be sent to EPA for immediate posting on the Internet. States and localities should have an opportunity to review this data. We also do not understand why the project data streams chart in 15.0.1 does not indicate that any data is being sent directly to EPA. We are also concerned that data can be destroyed without EPA review (section 18 and 19). EPA may disagree about the validity of data, and if data is discarded right away, then there is no opportunity for EPA review. Accordingly, this sentence should be inserted at the end of 18:

Purdue must maintain records of rejected or qualified data for EPA review and must not delete any data without written EPA approval.

In addition, verified raw computer data must also be maintained until as long as deemed necessary by EPA, and state and local air agencies should be consulted before any data is destroyed. Accordingly, this sentence should be inserted at the end of 19:

¹ National Research Council, National Academy of Sciences, *Air Emissions from Animal Feeding Operations: Current Knowledge, Future Needs* (February 2003).

Invalid data shall also be maintained throughout the study period, until as long as deemed necessary by the Program Administrator and EPA. No data shall be destroyed without EPA's permission. EPA shall not consent to any data destruction without concurrence by state and local air agencies.

Thank you for providing us with this opportunity to comment. If you have any questions, please feel free to contact either of us or Amy Royden-Bloom, Senior Staff Associate of STAPPA/ALAPCO.

Sincerely,



Shelley Kaderly
STAPPA Co-Chair
Agriculture Committee



Doug Quetin
ALAPCO Co-Chair
Agriculture Committee

Encl.:

Comments from Michelle Bohn, Nebraska
Comments from Norm Covell, Sacramento, California
Comments from Betsy Frey, Delaware
Comments from David Grande, Wisconsin
Comments from Iowa
Comments from Amy Royden-Bloom, STAPPA/ALAPCO
Comments from San Joaquin Valley, California (2)
Comments from Annette Sharp, CenSARA