

Addendum to General Comments on the “Quality Assurance Project Plan (QAPP) for the National Air Emissions Monitoring Study: Open Source Emissions Component,”  
Revision No. 1.

The following addendum responds to comments sent by STAPPA/ALAPCO and listed on Pages 3 and 4 of the Quality Assurance Project Plan Review checklist dated May 25, 2006

*(Note some of these comments are abridged):*

*The draft Lagoon QAPP does not provide an opportunity for involvement by affected state and local air agencies.*

Response from EPA: The official approval authority is EPA only, as through the consent agreement language dated January 31, 2005, FR Notice OAR-2004-0237 (<http://a257.g.akamaitech.net/7/257/2422/01jan20051800/edocket.access.gpo.gov/2005/pdf/05-1536.pdf> .) Thus, state and local agencies are not listed in the review chain. However, it is the intent of EPA to include all affected state and local air agency staff in the site evaluation, technical system audits, and validated data discussions, as they occur. Please note that since this is an industry study and not an EPA study, and due to possible cross-farm contamination concerns, the actual amount of staff allowed on the farm sites may be limited.

As of June 1, 2006, EPA has received only one site monitoring plan and was later informed that the plan and site have been removed from consideration. Thus, EPA does not have the plans to share with the affected states, but will do so when received.

*EPA’s involvement in the monitoring process appears to be minimal. There are no EPA personnel identified as being on the project team and no one from EPA is identified as being part of the key personnel.*

Since this an industry study (hereinafter referred to as the National Air Emissions Monitoring Study, or NAEMS), EPA does not have a role in the daily procedures, thus EPA is not listed in areas listing key personnel. However, we agree that identifying EPA’s role in the inspection and oversight of the NAEMS is warranted, and a request to include this language will be conveyed to the Science Advisor. Please note that EPA is listed in “Section 21. Reports to Management,” as a party receiving reports.

*“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. . . “*

A panel of industry, academic, and federal scientists convened in 2003 to develop the monitoring protocol as listed in Attachment A of the Consent Agreement (refer to FR

notice noted above). Due to budgetary constraints, this panel decided to develop the protocol with a number of sites that could represent the majority of farms most in operation today. We agree it is unfortunate that more sites could not be monitored, but a wider scale and more costly study was not feasible. It is important to note that emission inventories and factors have been developed with much less data than is being collected in this study.

Regarding the number of broiler sites for the NAEMS study. There is a second site that is being considered and is currently under a consent agreement with the Sierra Club. This is a Tyson Foods site located in Kentucky. The site was originally planned for an ammonia study, but the investigators have included instrumentation to cover pollutant characterization required in the NAEMS. The investigators at this site are following EPA protocols and are also included as respondents in the consent agreement. In addition, they have been identified as principal investigators for other species in the overall NAEMS and are working closely with the Science Advisor. EPA is tracking their quality assurance procedures and their data will also be validated and released with the NAEMS data.

*“Measuring emissions only from the lagoons and barns does not give a complete picture of total emissions from farms.”*

We realize that additional emission points exist at animal feeding operations, however this study was not designed to characterize all emission points. Rather it is based on satisfying the requirements of the consent agreement and final order. Additional studies and modeling are underway through independent sources that will be evaluated at the latter part of the characterization process

*“Another method rather than WATER9 should be used to measure VOC emissions.”*

Characterizing VOC emissions at a lagoon site is one of the more problematic study components. EPA and the Science Advisor are still exploring options. The use of the FTIR is still being considered.

*“EPA should make use of this opportunity to collect other useful information from participating farms.”*

Only pollutants regulated under the Clean Air Act, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the Emergency Planning and Community Right-To-Know Act (EPCRA) are included in the consent agreement and thus the NAEMS. There may be other pollutants measured on a case by case basis, and as approved by the Agricultural Air Research Council. For instance, the USDA and other groups are looking at studies that will characterize pollutants not included in the

NAEMS. However, EPA has no authority regarding these types of studies at the NAEMS sites, unless there is an adverse effect on the NAEMS.

*“Finally, the project should collect process information from the farms, (e.g. amount of feed and type of feed). . .”*

This data will be collected and will be described in a standard operating procedure (SOP) labeled “SOP S6: Nutrient Balance.” Please note however, that process data may be considered confidential business information, whereby EPA is not allowed to share or distribute this data. For the sake of developing emission estimation methodologies, this data may be utilized through anonymous means so that a full picture of input and emissions can be developed.

*“Data should be distributed more widely and maintained for review by EPA and others.”*

EPA agrees that validated data be available for public review. Paragraph 59 of the Final Order (note FR notice above) lists this responsibility as well. The procedure for handling invalidated data, general validation, data distribution, and non-EPA involvement in the data validation process has yet to be determined. We anticipate developing a strategy for handling data later this summer, after the quality assurance approvals have been completed.