



**Yakima Regional
Clean Air Authority**

Six South 2nd Street, Suite 1016, Yakima, WA 98901

(509) 834-2050 • Fax: (509) 834-2060

web site: <http://www.co.yakima.wa.us/cleanair>

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Docket ID No. EPA-HQ-OAR-2001-0017
Environmental Protection Agency
Mailcode: 6102T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: **Comments on Proposed National Ambient Air Quality Standards (NAAQS)**

YRCAA supports the adoption of the proposed PM_{2.5} annual and 24 hour NAAQS, but we have the following comments about both proposed standards:

A. General Comments

1. YRCAA supports revocation of the current PM₁₀ NAAQS upon promulgation of the PM_{10-2.5} NAAQS. If the PM₁₀ NAAQS is rescinded, an issue will be how to address EPA, state, and local attainment designations and rules for BACT, RACT, BACM, LAER, PSD and other enforceable requirements for PM₁₀. Requiring continued compliance with a non-existent PM₁₀ NAAQS is very problematic. YRCAA requests EPA to develop simple and effective policies and procedures to remove no longer needed existing PM₁₀ rules and policies without having to prepare SIP supplements or permit revisions.
2. Conversion of rules and permit conditions from the PM₁₀ NAAQS to the PM_{10-2.5} NAAQS could be costly, time consuming and possibly contentious. YRCAA recommends the rule implementation be delayed until this issue is defensibly resolved, technical guidance developed and the processes are well documented.
3. The revocation of the PM₁₀ NAAQS has the potential of removing the eligibility of a PM₁₀ maintenance area for Congestion Management / Air Quality (CMAQ) transportation funds to reduce mobile source related PM emissions. These emissions will still exist in the future as either PM_{2.5} or PM_{10-2.5} emissions. We request that EPA work with the Federal Highway Administration to insure the continuing eligibility for CMAQ funds in the current PM₁₀ maintenance areas.
4. The proposed PM_{10-2.5} NAAQS excludes agricultural and mining dust. The presumption is there exists a significant health difference between agricultural and mining dust and re-suspended dust from high-density traffic, industrial, and construction sources. We can not comment about possible differences in the health effects. But, separating these sources of fugitive dust creates significant monitoring, source apportionment and inventory challenges for affected agencies. Fugitive dust from these sources generally have the same geologic parent material, and their proportions will vary during a year depending on meteorological conditions. Therefore, the proper classification of these dust fractions for either monitor data or inventories will be expensive and difficult. We request EPA to fully research the differences between these fugitive dust sources before excluding agricultural and mining dust.

B. Specific Comments

1. The PM_{10-2.5} rule is not clear about what types of dust is included as "mining dust." Does this include dust from rock crushing, borrow pits, stock piles, spoils piles or dredging? If "mining dust" is included as a source type in the promulgated rule, the rule needs to include a definition of this source type.
2. The PM_{10-2.5} rule does not identify the various types of material that are considered "re-suspended road dust". Does this include exhaust and brake wear emissions, track-out material, traction sanding material, and / or unpaved road dust? The latter three can be very significant sources during different times of the year, so a clear definition of "re-suspended road dust" is needed in the rule.
3. The proposed rule does not define "high-density traffic". Without a definition referring to commonly used terminology such as level of service (LOS) or some guidance on how to identify high density traffic volumes, we expect significant variability in the application of this part of the rule.
4. On Pages 2647 and 2653 of the Federal Register notice there is a proposal to limit the spatial averaging of data from PM_{2.5} monitors for the purpose of calculating an annual mean to monitors with a correlation coefficient of 0.9 or greater. In natural science, a correlation coefficient of 0.9 indicates an almost perfect agreement of the data, which the natural variability in the emissions, control programs, and data makes it very difficult to attain. When the data from two monitors do have a correlation coefficient of 0.9 or greater, an argument could be made that one of the monitors is not needed. We request that EPA develop spatial averaging rules that recognize reasonable variability in monitor data and do not cause the deactivation of monitors simply because they have a correlation coefficient that is above a specific value.
5. On Page 2681 of the Federal Register notice there is a proposal to set a secondary PM_{2.5} NAAQS for urban visibility with an averaging time between four and eight hours. NAAQS averaging times become the control period times that local air quality agencies use to control emissions. A four to eight hour period is not a realistic control period. If a four to eight hour control period is needed, it should be the average of these hours during a 30 day period, or another "levelling" tool.

Thank you for this opportunity to comment on this proposed rule. If you have any questions about our comments, please contact Charlie Stansel, Planner at (509) 834-2050.

Sincerely,



Les Ornelas
Air Pollution Control Officer

cc: Board Members
WAQMG
Gary Cuillier, Board Counsel
Lawrence Odle, YRCAA
J. Page Scott, YVCOG
Cheryl Menard, YRCAA
Doug Schneider, Ecology