

Challenges to be Met with the New O₃ NAAQS

Ambient Monitoring Considerations

EPA Perspectives

EPA Will Be Doing a New Rule on O₃ Monitoring

Why? – we think it's necessary and some public commentators agree (including some of you).....Comments from the O₃ NAAQS Proposal

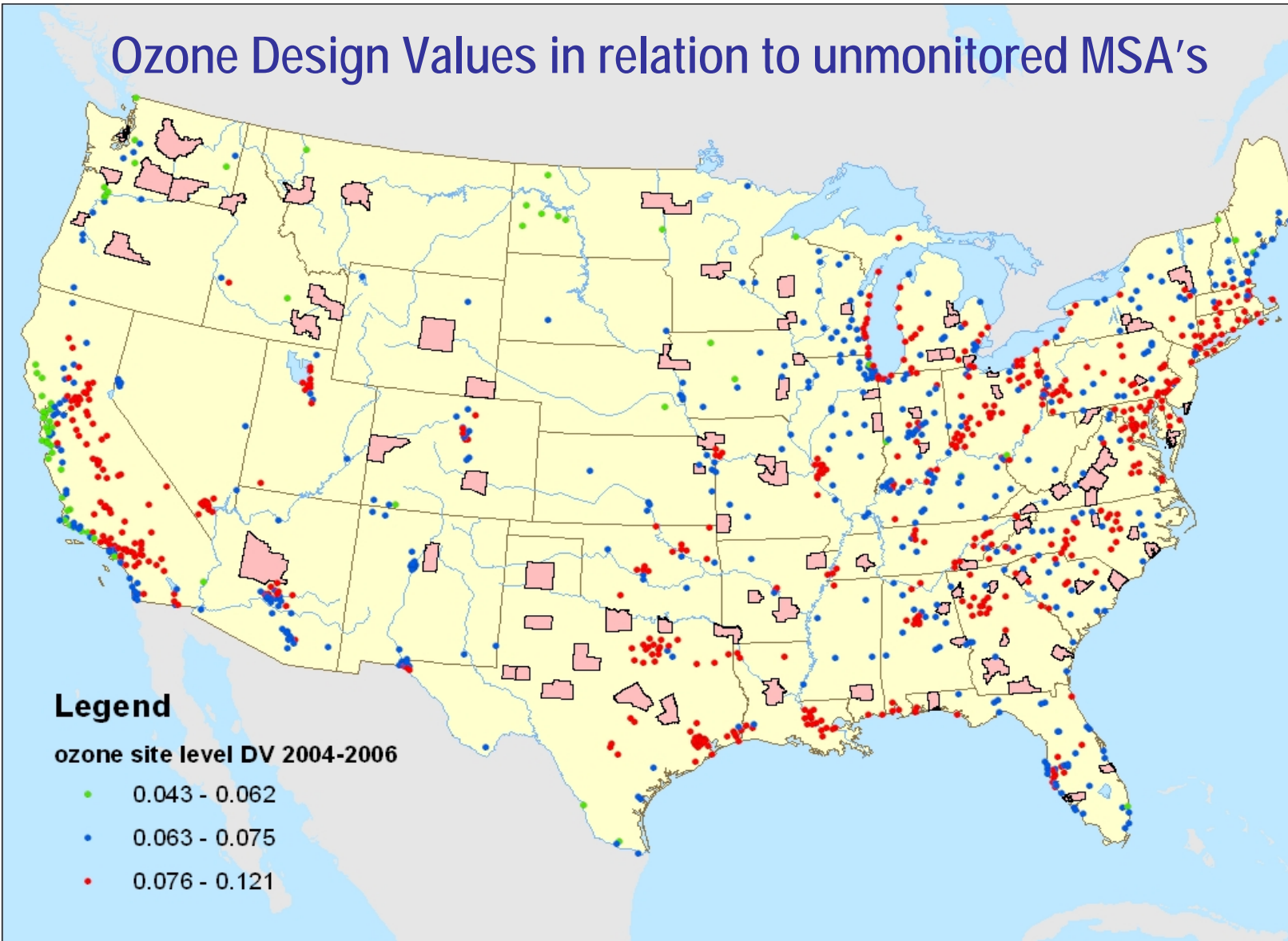
- "...The proposed rule, however, ignores the needs that states and localities will have for additional monitors to measure ozone levels in currently under-monitored areas and, in particular, **in unmonitored areas that have populations under 350,000....**"
- "... The agency's own statements point to the logical conclusion **that additional ozone monitors are needed in rural areas...**"
- "...We urge EPA to consider including monitoring requirements in the final rule that support the new secondary ozone standard by **requiring ozone monitors in locations that contain ozone sensitive crops or ecosystems....**"
- "... If the standards are dropped to the low end of the proposed standards, it is likely that Ozone concentrations could be elevated in relation to the standards during periods **prior to and following the currently designated Ozone season**"

We plan on issuing a proposal in early summer 2008 and finalizing a rule in 2009. This schedule is subject to change based on the period of time needed for internal EPA and interagency reviews.

Initial Thoughts About Urban Area Requirements

- There are about 100 MSA's in the U.S. between 50,000 and 350,000 population that do not have ozone monitors – and the current rules do not require monitoring to be commenced
 - Approximately 13,000,000 million people live in these unmonitored areas
 - In many cases, nearby monitors are violating the revised 0.075 ppm NAAQS or are close to violating
- We are thinking of proposing a change that would require a monitor in these unmonitored MSA's
 - Regional EPA Administrators would have discretion to reduce such requirements
- We don't think the change would result in the need for 100 new monitors because:
 - Nearby monitors could be used to represent the MSA or relocated to the MSA
 - Excess monitors elsewhere in the State could be relocated
 - The R.A. could waive the requirement based on other factors such as historical data

Ozone Design Values in relation to unmonitored MSA's



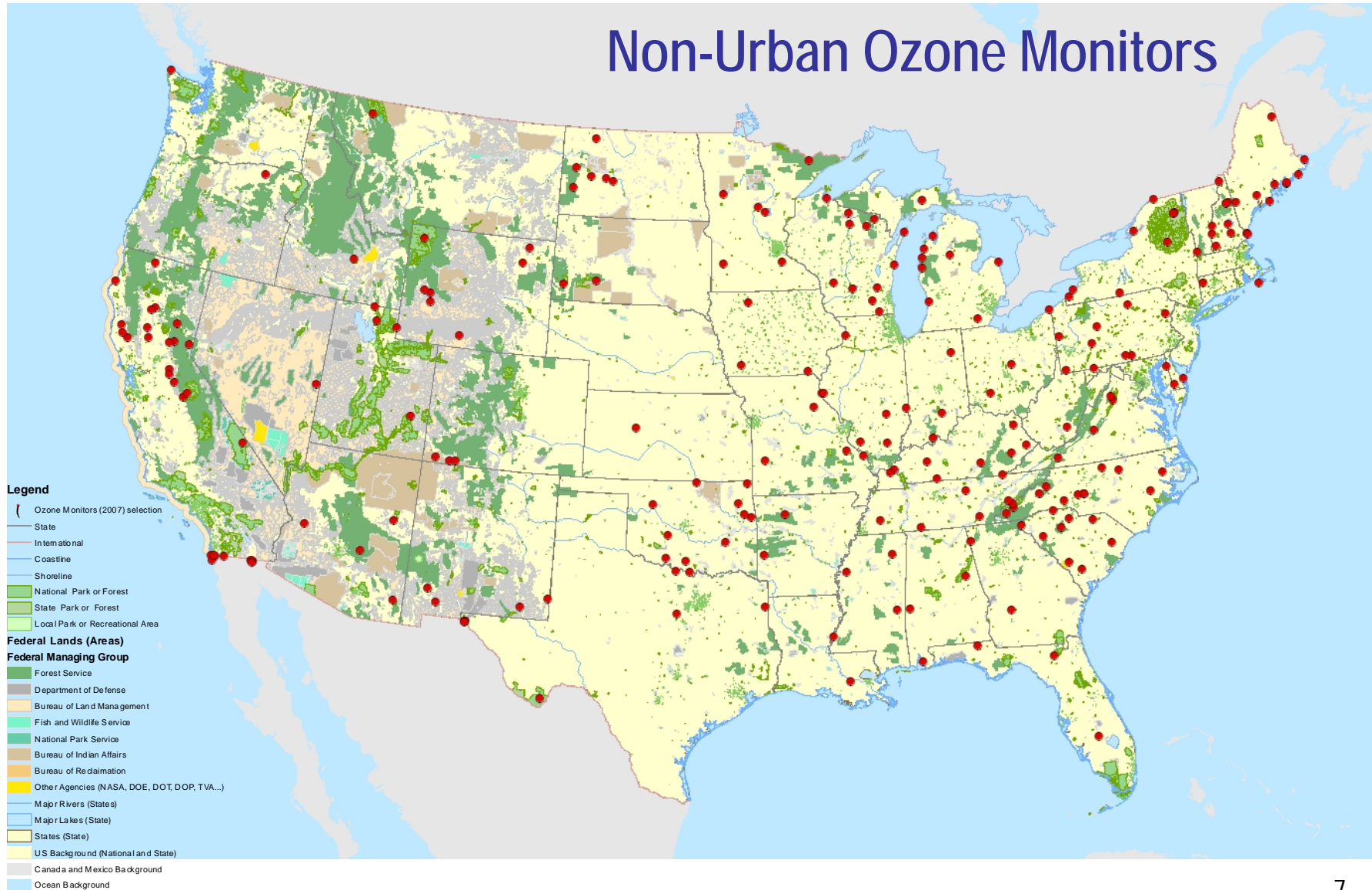
Initial Thoughts About Rural Area Requirements

- There are no current requirements for rural ozone monitoring
 - The distribution of “discretionary” rural monitors is uneven with large spatial gaps in some areas of the U.S.
 - Many monitors are not subject to the traditional S/L/T – EPA Regional Office oversight process and therefore not included in the newly required Annual Monitoring Network Plans
- We are thinking of proposing basic rural-based minimum requirements to support ongoing studies and the next O₃ NAAQS review
 - Minimum number per State, perhaps sited with support from modeling outputs or spatial interpolation of existing monitors to locate in areas of maximum concentrations
 - Regional EPA Administrators would have discretion
 - We will continue working with CASTNET to upgrade existing ozone sites for acceptable level of QA. We expect that States may propose use of CASTNET sites to meet minimum requirements, based on inclusion in Annual Monitoring Network Plans, Appendix A compliance, and designation of such sites as SLAMS

Initial Thoughts About Rural Area Requirements

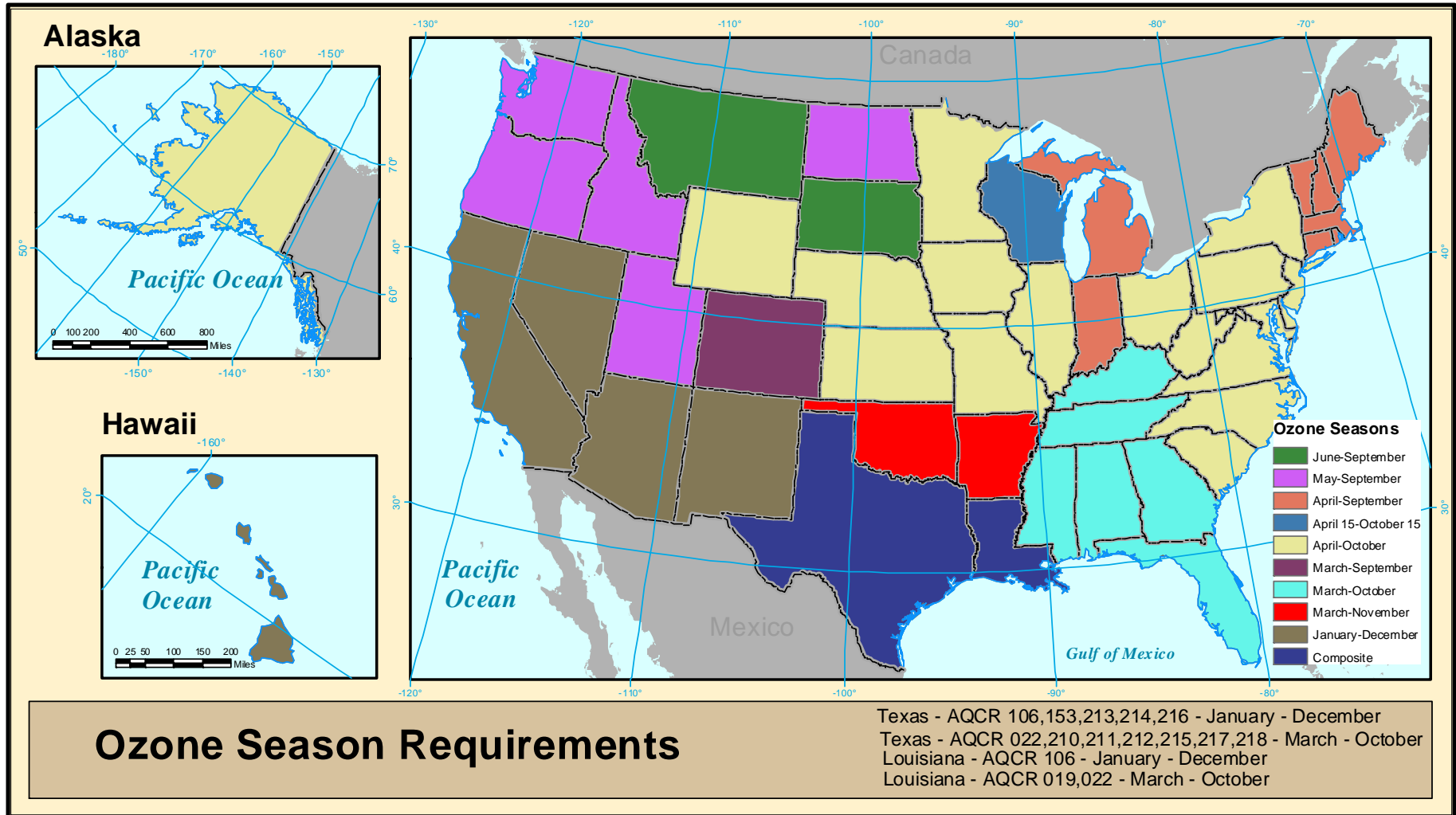
- We are thinking about proposing a network design that would place emphasis on wilderness areas and National Parks; ecosystems with known distributions of ozone sensitive plants where air pollution damage would affect land usage

Non-Urban Ozone Monitors



Initial Thoughts About Ozone Seasons

- Our analysis is looking at the pattern of exceedances of the revised NAAQS (at least 8-hour 0.076 ppm) and occurrences of Moderate AQI levels (at least 8-hour 0.060 ppm) in each State for existing year-round monitors
 - Statistical modeling is being used where monitoring data are unavailable
- We are finding some out-of-season NAAQS exceedances in a few States
- We are finding many occurrences of out-of-season Moderate AQI levels in numerous States
- Changes are likely to be proposed in the ozone seasons
 - Many monitors are already being run year-round so the impact on affected S/L/T agencies may be mitigated



* Actual monitoring seasons may be different in some cases due to R.A. decisions

How You Can Participate

- There will be a public comment period following proposal on the O₃ monitoring rule
- Your specific comments on proposed changes and alternatives will help inform the final rule
- Other Notes
 - New monitors that result from the finalized changes will not likely be required until 2010, typically 1 year after promulgation
 - The estimated costs of the proposed changes to requirements will be documented in an Information Collection Request (ICR) that will be made available around the same time as the proposal