

Ozone and Particulate Matter Committee  
of the  
2006-2008 Agricultural Air Quality Task Force

**Committee Members:**

Phil Wakelyn, Chairman	Susanna Von Essen
William Achor	Steven Kirkhorn
Kevin Abernathy	Kevin Rogers
Ron Heavner – USDA/NRCS Liaison	

**PM Issues:**

Unresolved issues from previous task forces:

PM Sampler Oversampling for Ag Particulate – over sampling of PM<sub>2.5</sub> and PM<sub>10</sub> ambient concentrations in atmospheres dominated by large (>12 µm, mass median diameter) particles.

PM Monitoring and Implementation: Placement of monitors for attainment designations and enforcement; measurements and estimates for existing sources and for new sources. Actions: 1) request that EPA codify preamble language from the PM NAAQS about not placing monitors at fence lines (i.e., not within 500m of a single source). 2) request that EPA clarify how PM precursors and condensibles will be counted. 3) Prepare list of Conservation Management Practices (CMPs), with the help of USDA, NRCS, that if ag operations are required to control emissions, these CMPs would be considered BACT and would be all that ag operations will be required to do at if exceedances are modeled or monitored.

What is the representative pollutant and under what conditions should each be used (TSP, PM<sub>10</sub>, PM<sub>2.5</sub>)? Actions: 1) Prepare letter from the TF to EPA requesting that EPA clarify that TSP is not a regulated pollutant. 2) EPA should clarify that the PM NAAQSs should not be enforced at the fence line since this is a misapplication of section 110 of the CAA. 3) Get clarification from EPA about how fugitive dust should be regulated (eg, how CA regulates fugitive dust and their 5 µg/m<sup>3</sup> standard).

EPA exceptional events rule: How this rule should apply to agricultural emissions (fugitive emissions and prescribed fires). Determine how this replaces the “Natural Events Policy”.

**Other PM Issues:**

The Committee will review and prepare comments for the Task Force on EPA’s PM monitoring implementation plans for PM<sub>2.5</sub> and PM<sub>10</sub>.

The Committee will coordinate efforts with the Animal Feeding Operations and Emerging Issues Committees to track research that relates to agricultural contributions of ammonia and volatile organic compound (VOC) emissions and their roles in secondary particulate formation and how States will regulate these emissions in their State Implementation Plans (SIPs).

**Ozone and VOC Issues:**

Ozone NAAQS Rulemaking [proposal due 5/30/06; final rule 2/12/08]:

The Committee will gather information and prepare recommendations to the Task Force on the types and quantity of emissions of ozone precursors from agricultural operations, including VOCs from pesticides, with emphasis on highly reactive VOCs (HRVOC). The Committee will gather information in support of ranking agricultural VOC emissions according to ozone formation potential (reactivity and volatility).

The Committee will review EPA's proposed revised ambient ozone standards when issued and evaluate the potential impacts of the primary and secondary ozone standards on agriculture, including the impact of ozone on vegetation/commercial crops. The committee will review data regarding the appropriate indicator for the secondary ozone standard. [Summaries of EPA staff papers will be presented at future AAQTF meetings.]

VOC measurements and research:

Any adjustments to VOC measurements should be determined using sound science and be subject to notice and comment rulemaking. (For example the Midwest Scaling factor should not be used to make adjustments to VOC measurements unless and until it is shown to be valid by sound science.) The AAQTF will determine if there are scientific/technical problems with the measurement of ozone and ozone precursors and whether adjustments or implementation guidance is necessary.

There will be follow up of the agriculture and pesticide VOC research at U of CA at Davis, that resulted from earlier actions by the AAQTF.