

AFO SUBCOMMITTEE

Meeting Name: AAQTF Meeting
Location: Indianapolis, Indiana
Date: October 5, 2007

SUBJECT TO BE DISCUSSED:

National Air Emissions Monitoring Study (NAEMS)

BACKGROUND INFORMATION:

As discussed at the meeting in San Diego (May 2007), the field data collection associated with the NAEMS project commenced in the summer and fall of 2007. While there have been delays with collection of data related to some air constituents (i.e., H₂S and VOCs), it appears that data collection at all sites will be fully implemented by the end of 2007 or first of 2008. In San Diego, the AFO Subcommittee raised initial concerns with some aspects of the data collection methodology and concerns with the ultimate interpretation and use of the dataset by EPA.

RECOMMENDATIONS:

The AAQTF recommends:

1. The Secretary of Agriculture submit a letter to the EPA Administrator requesting access (in a form that does not compromise the confidentiality of the participants) to the quarterly field data provided by the NAEMS research contractor; NAEMS contractor and sub-contractor investigators; quality assurance (QA) plan; amendments to the QA plan; and the technical support documentation to justify a deviation from the initially approved QA plan by EPA. The letter from the Secretary should also request concurrence from the Administrator that scientific peer review of the NAEMS research dataset is essential prior to any potential regulatory actions that may be taken by EPA.
2. The Secretary request that the Administrator establish a Scientific and Independent Peer Review and Advisory Panel (SIPRAP) to conduct a scientific review of the first six months of initial data collected by the NAEMS research contractor. The scientific peer review panel would initially meet face-to-face. The AAQTF suggests that none of the panel include scientists or engineers that have received funding or materially participated in the NAEMS project development or implementation.
3. The Secretary/Administrator host a semi-annual meeting or teleconference of the SIPRAP to review field data collected to-date and provide an expert opinion to EPA on interpretation of the quality and applicability of the data as the basis for emissions estimation methodologies and subsequent emission factors. The outcomes of these semi-annual meetings should be captured in a written report.
4. The Secretary/Administrator provide adequate funding and support staff to facilitate the establishment and support for SIPRAP over the course of the next four years to ensure input and participation in the interpretation of the NAEMS research project dataset.
5. The SIPRAP provide an update to the full AAQTF at each meeting.

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OPEN DISCUSSION WITH TASK FORCE:

FINAL RECOMMENDATIONS:

RECOMMENDATIONS APPROVED:

Administrator Steve Johnson
U.S. Environmental Protection Agency
Washington, D.C.

Dear Mr. Johnson:

The USDA Agricultural Air Quality Task Force (AAQTF) met October 2-5, 2007 in Indianapolis, Indiana to continue discussions on a broad array of air quality issues facing American agriculture producers. One topic addressed during the meeting that is of interest to both of our agencies is the National Air Emissions Monitoring Study (NAEMS), which was developed as a result of the Animal Feeding Operations Air Consent Agreement for dairy, swine and poultry livestock operations. The NAEMS project is managed by Purdue University.

Specifically, the AAQTF members participated in a tour and discussed the scientific process associated with the review of data produced as an outcome of the NAEMS project and its potential to serve as the basis of regulatory actions to be taken by EPA. The AAQTF is requesting access to the quarterly field data provided by the NAEMS research contractor; NAEMS contractor and sub-contractor investigators; quality assurance (QA) plan; amendments to the QA plan; and the technical support documentation to justify a deviation from the initially approved QA plan by EPA. I am convinced that a complete and unbiased scientific peer review of the NAEMS project data is essential to the project's long-term success.

The AAQTF requests that you establish a Scientific Independent Peer Review and Advisory Panel (SIPRAP) to conduct a scientific review of the first six months of initial data collected by the NAEMS research contractor. The scientific peer review panel would initially meet face-to-face in the first quarter of 2008 to provide a forum for an in-depth discussion. The AAQTF suggests that none of the panel members include scientists or engineers that have received funding or materially participated in the NAEMS project development or implementation.

Working jointly with EPA, I recommend that we host a semi-annual meeting or teleconference of the SIPRAP to review field data collected to-date. These meetings should be captured in a written report to assess the quality, applicability and appropriateness of the data to serve as a basis for emissions estimation methodologies and subsequent emission factors.

USDA is willing to cost-share with EPA to provide adequate funding for the establishment and support of the SIPRAP over the course of the next four years to ensure input and scientific peer reviewed interpretation of the NAEMS research project dataset.

Finally, I am requesting that the written, semi-annual findings of the SIPRAP be presented at each AAQTF meeting.

Sincerely,

Chuck Conner
Acting Secretary of Agriculture