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WISCONSIN
DEPT. OF NATURAL RESOURCES

July 22, 2013

Mr. Nealson Watkins
Office of Air Quality Planning & Standards
U.S. Environmental Protection Agency (EPA)
Research Triangle Park, NC 27711

Subject: Draft Monitoring Technical Assistance Document (TAD) for the 2010 Sulfur Dioxide (SO_2) National Ambient Air Quality Standard (NAAQS)

Dear Mr. Watkins:

The Wisconsin Department of Natural Resources (WDNR) hereby submits comments on the draft SO_2 NAAQS Designations Monitoring TAD dated May 2013. The WDNR supports the U.S. EPA's effort to provide flexibility in characterizing ambient air quality in areas with significant SO_2 emission sources either through ambient monitoring or dispersion modeling, but requests the following changes and clarifications.

Data Requirements Rule

The SO_2 Monitoring TAD refers to an "anticipated data requirements rule" numerous times and identifies that the rule will be worked on in 2013 and 2014. The WDNR strongly recommends that the data requirements rule be drafted and completed prior to finalizing the SO_2 Monitoring TAD. While there are many aspects of the TAD that can be commented on prior to completion of the data requirements rule, it is not possible for state and local agencies to design and operate an adequate network of SO_2 monitors based on a rule that does not yet exist. The scope of some of our comments may change based on the forthcoming data requirements rule.

Number of Monitors

The WDNR appreciates the flexibility given to the states in determining the number of monitors that may be appropriate for attainment designation purposes. Without a specified minimum and upper limit of monitors per source, it is anticipated that network design could be unnecessarily delayed while each agency tries to identify a sufficient number of monitors per source. WDNR strongly suggests a minimum of one (1) be specified in the TAD. Additionally, the WDNR suggests that the U.S. EPA determine an appropriate upper limit of monitors for a site and specify that number in the TAD. WDNR believes, in certain cases, a monitor may also be shared by two or more sources.

Not identifying a reasonable number of monitors per facility makes it impossible to estimate the number of required monitors and therefore, the cost for additional monitors to measure source-oriented concentrations of SO_2. The U.S. EPA has suggested involving industry in the cost of monitoring, but if this is not possible, the total cost is assumed to be the responsibility of the state and local agencies, with no additional funding from the U.S. EPA. This additional burden would likely lead to the shutdown of other monitors to cover associated costs of SO_2 monitoring. Even if affected industries set up and operate their own monitors, there will be resources needed by the state or local agency associated with technical assistance, performance audits, data quality assurance and submittal activities. These activities are funded by each states' 105 grant from U.S. EPA. 105 grant funding is diminishing, while federal requirements continue to mount. WDNR believes EPA should fully fund this federal

monitoring mandate initially through a 103 grant in order to establish all required sites and then provide adequate on-going funding through each states' 105 grant.

Monitor Shutdown

The WDNR strongly suggests that the U.S. EPA develop flexible monitor shutdown procedures specific for implementation of the 2010 SO_2 NAAQS and not mirror shutdown criteria in 40 CFR Part 58.14. Since implementation of this standard is source-oriented, monitor shutdown criteria specific to source operation should be developed. For example, if the facility for which monitoring is being performed makes some operational change and the monitor demonstrates attainment with the NAAQS, the state or local agency conducting monitoring for the source should have a clear and simple path to shutting down the associated monitor sooner than would otherwise be allowed under 40 CFR Part 58.14. This will save limited resources and meet the spirit of the SO_2 NAAQS.

Exploratory Monitoring

The SO_2 TAD identifies three methods for determining siting monitors, in order of appropriateness. The use of "Exploratory Monitoring" is indicated as the second choice in the TAD. The TAD indicates that an agency could use relatively low cost "sensors" to determine monitor placement. These sensor methods are largely untested and therefore highly indefensible. The WDNR suggests that the U.S. EPA either remove this method of monitor siting from the TAD, or provide information about the reliability and accuracy of various methods that can be recommended for use in this exercise. Without this demonstration of accuracy and reliability, the U.S. EPA appears to be indicating acceptance of sensor methods as a comparison to federally-approved sampling methodologies. If the U.S. EPA is unable to provide information about the reliability and accuracy of sensor methods, the WDNR requests careful wording of this portion of the TAD. The U.S. EPA should note that the use of sensor methods and a preliminary screening device does not imply a comparison to a federally-approved sampling method.

Regional Consistency

The WDNR strongly recommends that the U.S. EPA develop and share network approval criteria to ensure a consistent approach is followed across states and regions. The TAD, in its current form, does not lay out any distinct criteria for number of monitors, placement of monitors, how and when to take changes to a facility into account, how to quickly shutdown a monitor that is no longer needed, leaving the state and local agencies open to dramatic differences in network design across state and local agencies. Additionally, if the U.S. EPA regional offices are meant to have ultimate oversight of the network design and operation, it should be clearly indicated that ultimately the regional offices will be determining and/or approving sources for which a modeling or monitoring exercise must be performed.

Additionally, the WDNR requests that the U.S. EPA modeling and monitoring staff work together with state and local agency modeling and monitoring staff on agency specific approaches. This may be best done by redrafting the TADS into one SO_2 Implementation Plan that encourages better communication between the groups.

Timing

The WDNR requests that the timing of the final designations be the same whether using the modeling or monitoring approach. At this time, the monitoring approach gives facilities significantly more time to comply with the 1-hour SO_2 NAAQS. This should be changed such that a state or local agency can demonstrate compliance with the standard in a similar timeframe regardless of the method used. Since it will take three years of monitored data to obtain a design value, the modeling timeframes should be aligned with those proposed for monitoring.

Thank you for the opportunity to comment on the Draft SO_2 NAAQS Designations Source-Oriented Monitoring Technical Assistance Document. Please feel free to contact Gail Good of my staff at (608) 266-1058 or Gail.Good@Wisconsin.gov if you have any questions concerning these comments.

Sincerely,

Bart Sponseller
Bureau of Air Management Director
Wisconsin Department of Natural Resources