From: CARDWELL Nancy
To: GOLDSTEIN Meyer
Subject: Response to Comments
Date: Thursday, August 27, 2015 14:19:46

Hi Meyer,

These are the response to comments from the gentleman's letter that I started working on a month ago but got pulled away to other things. I had met with David and will be responding to all of his comments in the letter. Should I put this into the format you said you put on SharePoint for me? Thanks.

Letter: Response

- 1. - 24 hr vs annual standard for PM 2.5: Confusing 24 hour standard w/ annual standard. This rulemaking is for the annual standard of PM 2.5 and Oregon is in attainment for the annual standard.
- 2. A. - Claims typo: 2nd line of 2nd paragraph -- the first "if" should be "of." → There is no typo.
- 2. B. and C - Fiscal impact (economic and housing): This SIP doesn't impose regulatory requirements so there is no fiscal impact. The SIP update demonstrates OR's ability to implement the CAA (protect public health & environment) if we need to. The purpose of the infrastructure SIP is to demonstrate OR has the ability to implement the CAA to protect public health if we needed to. In this case there are no imposing regulations with this rule change so no fiscal impact. If there was ever a violation to the annual standard, there would be a fiscal impact.
- 3. A. - Crosswalk format change: Oakridge not listed in Crosswalk (OAR340-240 Unique air quality needs) → ask Meyer if we should add LRAPA's link to Oakridge? If so, where in the crosswalk do we make the link to LRAPA? (Oakridge link to LRAPA who has authority in Lane County).
- 3. B. - Heavy duty vehicles not addressed: For heavy duty vehicles the state relies on the federal standards. We haven't elected to adopt rules for heavy duty vehicles at this time. Relying on federal standards for now. Ask Kevin Downing.
- 3. C. - Residential wood heating: Yes many of the strategies such as wood stoves reduce both PM 10 and PM 2.5. We can eliminate the note altogether and/or say strategies such as this reduce both PM 10 and Pm 2.5.
- 4. A. - Interstate Transport re non-attainment areas: Clarify again there are no non-attainment areas for the annual PM 2.5 standard. Regarding the 24 hour PM 2.5 standard, Klamath Falls is in attainment but Oakridge is not.
- 4.B. - Why only 1 monitoring station for NO2: Monitoring for NO_2 has always been low. Only have 1 monitor because we don't expect problems. → Ask Anthony.
- 4. B. 1. & 3. - Vertical scales should be the same: They can't be the same because PM 2.5 standard is 12 ug/m^3 and the NO_2 standard is 100 ppb. If show PM 2.5 on a 100 ppm scale it become meaningless because it will disappear on the scare. Different national air quality standards require different scales to make sense.
- 4.B.2. - Explain the gap on Fig 8: Washington did not monitor for No2 during that period and don't know why. Perhaps because it was so far below the standards. Based on the Primary NAAQS for NO2 final rule signed in 2010, monitoring resumed in January 2013 (from Dept. of Ecology 2011 Ambient Air Monitoring Network report).
- 4. C. - NO2 standard show as 0.053 ppb: He is correct it was supposed to be 0.053 ppm not ppb. (0.053 ppm = 53 ppb)
- Lack of monitoring stations in Oregon: We do have a 5 year monitoring plan for the state with

limited resources and utilize monitors where we think there is the biggest public health risk. → ask Sarah for p she used for how we prioritize monitoring. Ask Anthony /Rachel as well.

- Specific monitoring status of Oakridge with its unique geography – Questions role of DEQ in Lane County. Why does LRAPA continue to be the air monitoring agency in only one Oregon county→ Ask Merlyn. PDF the letter to Merlyn.

Nancy Cardwell
Air Quality Planner, Headquarters
Oregon Department of Environmental Quality
503.229.6610