

June 28, 2016

Mr. Neelson Watkins
Air Quality Assessment Division
Office of Air Quality Planning and Standards (OAQPS)
U.S. Environmental Protection Agency (EPA)
109 T.W. Alexander Drive
Research Triangle Park, NC 27711

Subject: Docket ID No. EPA-HQ-OAR-2015-0486; Revision to the Near-Road NO₂ Minimum Monitoring Requirements

Mr. Watkins:

The Association of Air Pollution Control Agencies (AAPCA)¹ is pleased to provide comment on U.S. EPA's proposed rule, Revision to the Near-Road NO₂ Minimum Monitoring Requirements, published in the *Federal Register* on May 26, 2016.² AAPCA supports the proposed revision to remove Phase 3 requirements for near-road nitrogen dioxide monitoring requirements in Core Based Statistical Areas (CBSAs) with populations between 500,000 and 1,000,000 persons. This revision is based on clear evidence from Phases 1 and 2 of the near-road NO₂ network, and would alleviate unnecessary burdens for affected state and local agencies.

The proposed rule states "no near-road NO₂ site has collected data that are above or are threatening the annual NO₂ NAAQS of 53 ppb or the 100 ppb level of the 98th percentile 1-hour daily maximum value" and "the likelihood of measuring elevated NO₂ concentrations approaching or exceeding the NAAQS in smaller CBSAs is very small."³ These data, coupled with mobile source emissions that continue to decline, demonstrate the need to remove the monitoring requirements for Phase 3.

AAPCA appreciates that the proposed revision would relieve requirements for an estimated 53 near-road NO₂ monitors. State and local air pollution control agencies continue to make great strides in improving air quality, and the proposed rule would allow resources to be devoted to the highest priority monitoring needs.

AAPCA appreciates EPA's proposed rule, and we thank you for considering the Association's comments. If you have any questions, please contact cwoods@csg.org or (859) 244-8040.

Sincerely,

A handwritten signature in black ink that reads "Clinton J. Woods". The signature is written in a cursive, slightly slanted style.

Clinton J. Woods, Executive Director
AAPCA

¹ The Association of Air Pollution Control Agencies (AAPCA) is a national, non-profit, consensus-driven organization focused on assisting state and local air quality agencies and personnel with implementation and technical issues associated with the federal Clean Air Act. Eighteen state environmental agencies currently sit on AAPCA's Board of Directors. AAPCA is housed in Lexington, Kentucky as an affiliate of The Council of State Governments. You can find more information about AAPCA at: <http://www.cleanairact.org>.

² 81 FR 30224-30229.

³ 81 FR 30227.