



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1  
NEW ENGLAND REGIONAL LABORATORY  
OFFICE OF ENVIRONMENTAL MEASUREMENT & EVALUATION  
11 TECHNOLOGY DRIVE  
NORTH CHELMSFORD, MASSACHUSETTS 01863-2431

September 24, 2012

Nancy Seidman, Deputy Assistant Commissioner for Climate Strategies  
Bureau of Waste Prevention  
Department of Environmental Protection  
One Winter Street  
Boston, MA 02108

Dear Ms. Seidman:

Thank you for the Massachusetts 2012 Annual Monitoring Network Plan which was submitted to EPA in final form on September 6, 2012. We appreciate that you have addressed many of the comments we provided to you on June 27, 2012. EPA New England has evaluated your plan and finds that your plan meets the minimum requirements of 40 CFR, Part 58. Our comments follow:

1. Under "Sulfur Dioxide" on page 7 – EPA strengthened the primary NAAQS for sulfur dioxide by establishing a new 1-hour standard at a level of 75 ppb (not 100 ppb as noted). Monitors are required to be sited according to a population weighted emissions index (PWEL) which is based on the most recent population and emissions information. According to the most information released in this regard, as you correctly note, Massachusetts is obligated to site 4 SO<sub>2</sub> monitors under EPA's Population Weighted Emissions Index (PWEL) criteria in the multistate areas of Boston, MA-NH (2) and the Providence- Fall River, MA- RI, as well as the Springfield area. Massachusetts correctly indicates that existing monitors in Massachusetts meet this requirement, and as such these monitors are required going forward. If, in the future, Massachusetts sought to eliminate any of these SO<sub>2</sub> monitors, it would need to demonstrate that the requirement was still fulfilled. As you also know, EPA recently initiated a stakeholder process to refine the agency's approach for implementing the SO<sub>2</sub> standard. One outcome of that process may be a greater reliance on SO<sub>2</sub> monitoring in some circumstances. We have initiated a dialogue with you regarding whether there are any areas in Massachusetts where additional SO<sub>2</sub> monitoring may have some merit.

2. Page 7. Massachusetts DEP briefly discusses near roadway monitoring that will need to be established under the revised NO<sub>2</sub> NAAQS rule promulgated on January 22, 2010 which should be listed as 100 ppb for the 1-hour standard (not 75 ppb). According to this rule, Massachusetts is obligated to site up to (5) NO<sub>2</sub> monitors under this "near roadway" criteria in the multistate areas of Boston, MA-NH (2) and the Providence- Fall River, MA- RI, as well as the Springfield and Worcester areas. As correctly noted, EPA has put forward a funding strategy that would ensure the largest areas begin monitoring for nitrogen dioxide near road first, and as such, EPA has been working with Massachusetts on siting such a near road NO<sub>2</sub> monitor in the Boston area.

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In addition, working with the States, EPA Regional Administrators identified at least 40 NO<sub>2</sub> monitors nationwide to help protect communities that are susceptible and vulnerable to NO<sub>2</sub> related health effects. Working closely with Massachusetts, EPA identified the Boston- Harrison Avenue (25-025-0042), Boston- Kenmore Square (25-025-0002), and Springfield- Liberty Street (25-013-0016) locations that will serve to meet this obligation for monitors to protect susceptible and vulnerable populations. Massachusetts is also obligated to operate monitors meeting the urban community wide monitoring requirements, although existing year round monitors in Lynn or Newburyport may meet this requirement.

3. We acknowledge the intended changes to the Massachusetts network for next year which are articulated in your plan on page 16, "Summary of Network Changes."

-MassDEP had to close its ozone and upper air profiler site in Stow (25-017-1102) in September 2011 due to the closing of the host U.S. Air Force meteorology laboratory. MassDEP is proposing to rely on and enhance ozone monitoring at EPA's Region 1 Laboratory in Chelmsford to serve as the maximum ozone concentration downwind monitoring location for Worcester.

-MassDEP had to close its ozone monitoring site at the Leroy Wood Elementary School in Fairhaven (25-005-1002) in April 2012 due to school renovation/construction. MassDEP began ozone monitoring at its Fall River site (25-005-1004) on March 1, 2012 to offset the loss of the Fairhaven site. MassDEP proposes to establish another ozone monitoring site in Fairhaven for the 2013 season.

-MassDEP proposes to close the ozone monitoring site in Boston - Long Island (25-025-0041) and rely on a nearby ozone monitoring site in Boston.

-MassDEP proposes to move the ozone monitor in Adams/Mt Greylock (25-023-4002) to a lower elevation location to better account for population exposure.

-MassDEP proposes to move the ozone monitor in Amherst (25-015-0103) to a different location in Franklin County prior to the 2013 ozone monitoring season.

-MassDEP proposes to establish a near-road NO<sub>2</sub> monitoring site by January 2013 and also measure carbon monoxide at the same site as required by EPA. MassDEP proposes to discontinue NO<sub>x</sub>/NO<sub>2</sub> monitoring in Haverhill (25-009-5005) and begin NO<sub>x</sub>/NO<sub>2</sub> PAMS oriented-monitoring year-round in Newburyport (25-009-4005).

-Massachusetts closed the Lowell- Old City Hall CO monitor (25-017-0007) in 2011. MassDEP discontinued lead-TSP monitoring at Boston - Harrison Avenue (25-025-0042) in 2011.

-MassDEP proposes to close the Springfield- Main Street (25-013-2009) PM<sub>10</sub> and PM<sub>2.5</sub> site and begin monitoring PM<sub>10</sub> (and lead-PM<sub>10</sub>) at the Springfield – Liberty Street site (25-013-0016). MassDEP proposes closing the Boston-City Square site (25-025-0027) for PM<sub>10</sub> and PM<sub>2.5</sub>, contingent on MassDEP ensuring that PM<sub>2.5</sub> monitoring continues at the nearby Boston-North Street site (25-025-0043).

-MassDEP is suspending the collection of PAMS VOC samples for the 2012 PAMS season at Milton - Blue Hill (25-021-3003) and Boston - Long Island (25-025-0041).

-MassDEP began monitoring lead-TSP at Nantucket Memorial Airport (25-019-0001) in January 2012 as part of a year-long special study.

With this letter, I am approving your Annual Network Plan, with the exception of NCore, PAMS, STN, and the NO<sub>2</sub> monitoring plan required under 40 CFR 58.10(a)(5). Per 40 CFR 58.11(c), your NCore, PAMS, STN, and NO<sub>2</sub> network design and changes are subject to approval of the Administrator. We have forwarded your network plan to EPA headquarters for review and approval of these sections.

EPA New England appreciates your partnership in conducting ambient air monitoring. We look forward to working with you to continuously improve the quality of ambient air in Massachusetts. If you have any questions or comments regarding this network review, please contact Bob Judge at (617) 918-8387, or Alysha Lynch at (617) 918-8381.

Sincerely,



Robert E. Maxfield, Director  
Office of Environmental Measurement and Evaluation  
EPA New England

cc: Tom McGrath, MA DEP- Lawrence  
Glenn Keith, MA DEP