

Air Quality Public Advisory Committee

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<http://www.mwcog.org/environment/committee/>

The Air Quality Public Advisory Committee (AQPAC) is an advisory body to the Metropolitan Washington Air Quality Committee (MWAQC).

July 18, 2007

Dear MWAQC:

At our most recent AQPAC meeting, we were briefed on response options related to the designation of the Washington metropolitan area to the fine particulate matter (PM_{2.5}) annual ambient air quality standard. As discussed at a special meeting of the MWAQC Technical Advisory Committee, these options are (1) to submit a State Implementation Plan (SIP), (2) to request re-designation as an attainment area, and (3) to request an attainment determination using EPA's Clean Data methodology.

We strongly recommend that MWAQC take the most rigorous approach to reducing fine particle pollution. Based on the information we have, we believe the first option is the most rigorous approach. Thus, even though the region technically meets the current annual PM_{2.5} standard, we recommend that MWAQC submit a SIP for the PM_{2.5} annual ambient air quality standard, for the following reasons.

As we recommended for ozone, the region's policy should not be to merely meet the minimum requirements of the current annual PM_{2.5} standard (15 µg/m³), but to reduce ambient concentrations sufficiently below the standard to achieve optimal protection of the health of the region's residents. Reductions significantly below the current standard will provide a margin to accommodate changing ambient air quality standards, as well as compensate for the uncertainties inherent in modeling and monitoring technologies. As a matter of policy, we should beat the current standard by a margin that is sufficient to facilitate the region's compliance on an on-going basis. The measures taken now to bring the region well below the current annual standard will help us meet the new more stringent daily standard, as well as potential future reductions in the annual standard.

Accordingly, we further recommend that the region's goal should be to at least meet the annual standard recommended by the EPA's Clean Air Scientific Advisory Committee of 13 µg/m³.

Based on the information we have been given, our understanding is that the option of preparing a SIP would be the most protective of human health, would maximize our ability to meet upcoming PM_{2.5} standards, and would be achievable in the most timely manner and with current resources.

Please feel free contact me if you have any questions concerning the AQPAC input to the fine particle SIP.

Sincerely,

Jill Engel-Cox, Ph.D.
AQPAC Chair

cc: AQPAC members
Joan Rohlfs, COG