

Comment Letter

The Honorable Leta Mach, Chair
Metropolitan Washington Air Quality Committee:

Dear Honorable Mach,

On behalf of the Air and Climate Advisory Committee has reviewed Virginia's proposed changes to the Virginia monitoring network,¹ the Air Quality and Climate Public Advisory Committee is concerned with the proposed closure of the Mount Vernon monitoring station.

Virginia's Department of Environmental Quality (DEQ) offered the following explanation for the decision to close the air quality monitors that had been operated by Fairfax County:

VA DEQ has evaluated these monitoring site relative to the historic ozone and PM2.5 data and have determined that ceasing operation of these sites after June 30, 2010 while still retaining the current DEQ site at Lee Park in Fairfax County (51-059-0030, 46-B9) will not compromise DEQ's ability to make accurate and informed determinations relative to the NAAQS compliance status of Fairfax County relative to ozone and PM2.5. VA DEQ believes that the data from these sites are redundant with the information generated at the Lee Park site and that the Metropolitan Washington D.C. MSA has more than the regulatorily required number of monitors.

The primary concern with the elimination of the Mount Vernon station is that Virginia DEQ data report that the Mount Vernon station has reported the highest ozone values for more years than any other monitor in Northern Virginia. As the monitor with the highest reported ozone values, this ozone monitor has helped to guide efforts to clean the air and should help guide future efforts to improve air quality. Eliminating this ozone monitor would result in targeting efforts to meet the ozone standard based upon other monitors that have historically reported lower ozone concentrations than the Mount Vernon monitor. If we believe that the highest levels of future ozone levels will be distributed in patterns that are similar to historic levels, then the elimination of the Mount Vernon monitor would make it easier to demonstrate attainment (i.e., result in targeting less work to clean the air) and ignore higher levels of ozone that exceed the standard. The air quality standard for ozone exists to protect health and the environment. While we understand the need to be efficient in the allocation of resources, we should seek to employ monitors that report the highest ozone values because exposure above the standard poses a threat to health and the environment. We find the rationale for asserting

¹ See: <http://www.deq.state.va.us/air/permitting/monitoring.htm>

that the Mount Vernon monitor is redundant with other monitors to be lacking. The rationale fails to address how the higher ozone levels reported at Mount Vernon that would impact health and the environment would continue to be effectively represented. Furthermore, we believe that the analysis to show how elimination of this monitor would continue to comply with monitoring requirements²

Fairfax County is in a nonattainment area and we expect a new ozone standard to be adopted in August of this year that will be much more stringent than the current standard. Fairfax County has performed a service in collecting the data that shows the Mount Vernon monitor has the highest ozone levels. We should now use that knowledge to ensure that we are placing monitors where they can do the most good to ensure that health and the environment will be protected.

Given that the comment period for this proposal ends April 30, we recommend that you forward this letter to the Virginia DEQ for their consideration in making this decision and recommend that the Mount Vernon monitor not be eliminated.

We thank the MWAQC for their consideration of this important issue and welcome any questions on this recommendation.

Sincerely,

Deron Lovaas, Chair, AQPAC

Dr. Larry Zaragoza, Vice Chair, AQPAC

² CFR 40 Part 58, Subpart B §58.14