Comments on Air Quality Trends Report

1. What year should be used to start the trend report?

   - VDEQ - Start ozone in 1990 when the CAA started and start PM2.5 in 1999 when FRM data became available

   - MDE - Start in 2005 since the last report covers through 2004

2. What pollutants should we include?

   - VDEQ - The criteria pollutants
   - VDEQ - Analysis of the PM2.5 speciation data
     - Speciation data is always interesting and tells a good story about sulfates and organics
     - Also, does the Park Service have a visibility monitor in DC? If so, that might be interesting data to include

3. What graphs and tables to include?

   - VDEQ - Existing graphs and tables are fine

   - VDEQ - For PM2.5 speciation data, a bar chart or pie chart is generally helpful. If you end up finding any visibility data, the VIEWS website usually has all sorts of fun graphics to depict visibility improvements.

4. What should the boundaries for attainment pollutants be?

   - VDEQ - For consistency, I'd suggest keeping to the boundaries of the 2008 ozone NAAQS nonattainment area

5. Should exceptional events data be included to show trends in non-design value parameters?

   - VDEQ - I think leaving out all exceptional events data from trend analyses would be the better approach since the trends analysis is designed show progress or lack thereof in meeting federal health based standards. Since EE data are not counted in the federal analyses of whether an area is attainment or not attaining a standard, leaving EE data in this analysis might be considered inconsistent.

     If you wanted to include EE data to ensure completeness, I'd suggest segregating that data in a separate chapter that thoroughly describes what EE data is, and what a state must demonstrate to get EE data flagged. Since EE data is becoming more

influential now that the ozone and PM2.5 standards are more stringent, including a description of EE data may actually be helpful in the future if the area ever has to develop an exceptional events submittal. People who read this report would at least be a bit familiar with the concept.

Other Questions

1. Should we include raw data for each pollutant (Tables in Appendix A)?

2. Should we show Table 1 if the information is in Table 2?
    a. If we keep Table 1, should we show the precursors in each pollutant?

3. Should we include Tables 4-9 if the information is already in Table 2?

4. Should we include the different calls and rules that helped reduce ozone levels?
    a. Example: ARP, NOX SIP Call, HDDV Rule, and CAIR phase

5. Should we add language that acknowledges there is still more work to be done regarding ozone even with recent downward trends?
    a. For example, the PG Co monitor has a 2015-2017 design value above the new standard and has already had 3 exceedances as of 6/22.

6. Is this the average or the maximum design value for each year? (Figure 4, Ozone Design Values)
    a. Answer:

7. Do Figure 8 and 9 show the average of the design values? Or is the maximum design value for each year? Clarify in the text (page 14) and in the figures (page 15).
    a. Answer:

8. Is this a typo or was lead values actually zero?
    a. Answer:

9. There is a minor discrepancy in Tables A-1 to A-4, which show trends to 2016, and Table A-5 to A-8, which show trends to 2015. Not sure why there is a discrepancy in the last year shown.
    a. Answer: 2016 data is preliminary and has not been verified by EPA yet. It will be given by EPA at the end of ozone season.