

WESTERN STATES AIR RESOURCES COUNCIL



July 7, 2006

Air and Radiation Docket and Information Center  
U.S. Environmental Protection Agency  
Mail Code 6102T  
1200 Pennsylvania Ave., NW  
Washington DC 20460

Attn: Docket ID No. EPA-HQ-OAR-2005-0175

Dear Sir or Madam:

The Western States Air Resources (WESTAR) Council, an association of 15 western state air quality managers, appreciates the opportunity to comment on the Advanced Notice of Proposed Rulemaking for the Transition to New or Revised Particulate Matter (PM) National Ambient Air Quality Standards (NAAQS), published on February 9, 2006. WESTAR states have made great strides in controlling particulate matter pollution and have a significant interest in protecting the public from unhealthful levels of particulate matter. As a new or revised standard is implemented, we believe it is critical to carry forward the gains achieved from the implementation of the existing PM standards.

WESTAR is particularly concerned about the potential impact of the proposal to revoke the existing PM<sub>10</sub> standard in most areas of the West. We believe it is important to preserve the improvements in air quality resulting from existing PM<sub>10</sub> program control plans and to prevent backsliding. These control plans often address a combination of sources including residential wood burning, transportation, industrial facilities and crustal sources. During the transition to the revised standards, EPA must proceed in a manner that does not undermine the legal underpinnings of existing state programs. Therefore, we urge EPA to maintain the current standards and implementation requirements in all areas until the necessary data, policies, and techniques for characterizing and controlling particulate pollution are in place. This will ensure that the public is not exposed to unhealthy levels of particulate matter and provide for a smooth transition to the revised standards.

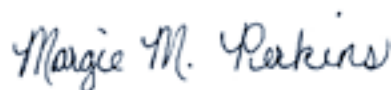
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To provide for a smooth transition to the new standard, significant new and updated technical and policy tools will be needed. Despite the promulgation of a PM<sub>2.5</sub> standard in 1997, states are relying on PM<sub>10</sub> technical information. Much work is needed to develop these technical and policy tools for PM<sub>2.5</sub>, and the adoption of a new PM<sub>10-2.5</sub> standard will require the development of additional implementation tools. Essential areas that need further work include relevant PM emission factors and monitoring methods, near-field dispersion models, and implementation guidance relevant to daily PM<sub>2.5</sub> violations, PSD increments, and permitting programs.

We urge EPA to work with the states and other interested parties to develop the necessary techniques, guidance, and rules for implementing new or revised particulate matter standards. It is important that EPA work quickly to identify and take action to support state implementation of the new PM standards.

If you have any questions, please do not hesitate to contact Dan Johnson, WESTAR Executive Director, at 206-254-9145, [djohnson@westar.org](mailto:djohnson@westar.org).

Sincerely,

A handwritten signature in blue ink that reads "Margie M. Perkins". The signature is written in a cursive, flowing style.

Margie Perkins, President  
Western States Air Resources Council