



April 17, 2006

Stephen L. Johnson, Administrator
U.S. Environmental Protection Agency
Mailcode 6102T
1200 Pennsylvania Avenue N.W.
Washington, DC 20460

Re: Docket ID No. OAR-2001-0017; Comments on EPA's Proposed Rule to Revise the National Ambient Air Quality Standards for Particulate Matter (January 17, 2006, 71 FR 2620-2708)

Re: Docket ID No. OAR 2001-0018; Comments on EPA's Proposed Revisions to Ambient Monitoring Regulations (January 17, 2006, 71 FR 2710-2808)

Dear Administrator Johnson:

On behalf of the Western States Air Resources (WESTAR) Council, an association of state air quality managers from 15 western states, thank you for the opportunity to comment on EPA's January 17, 2006 National Ambient Air Quality Standards (NAAQS) for particulate matter (PM) Proposal and 40 CFR Parts 53 and 58 Revisions to Ambient Air Monitoring Regulations.

WESTAR states are especially interested in the proposed changes to the NAAQS and Ambient Air Monitoring Regulations as these changes would have a major effect in the Western States as indicated by the maps predicting the locations of new non-attainment areas in the supporting regulatory impact analysis accompanying the proposal. EPA's proposed revisions to ambient monitoring will also have a significant impact in western states. As EPA moves to a PM coarse standard, its proposed changes in the monitoring requirements would result in a major decrease in federal resources dedicated to monitoring ambient levels of particulate matter in the West despite the Preamble's acknowledgement that there is insufficient data in less densely populated areas and despite the recommendations of the Clean Air Act Scientific Advisory Committee for more monitoring, not less, to enable good public policy decisions. Considering the significant impacts that these proposed changes have on our states, we respectfully submit the following comments.

WESTAR recommends EPA adopt a primary standard for particulate matter based upon sound, scientific evidence of health effects and in recognition of our responsibility to protect public health in the face of uncertainty.

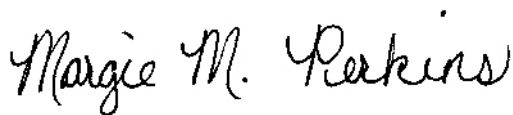
The proposed rule revokes the 24-hour PM₁₀ standard except in areas having one or more violating monitors and populations of more than 100,000. The annual PM₁₀ standard is proposed to be revoked immediately upon promulgation of the revised PM standards. WESTAR recommends retaining the 24-hour PM₁₀ standard until such time as a nationally applicable PM coarse standard is promulgated and areas are formally designated to ensure people living in all areas are protected.

Further, WESTAR recommends that any PM coarse standard should be implemented in both rural and urban areas. Consistent with maintaining a coarse standard throughout the country, WESTAR recommends that monitoring of all particulate matter standards continue in both rural and urban areas regardless of source or location. Monitoring PM coarse values in both urban and rural areas needs to continue as we study and collect scientific evidence as to the health effects of these pollutants. WESTAR urges EPA to continue to study and clarify the health and welfare effects of PM coarse. WESTAR also recommends that federal resources dedicated to monitoring ambient levels of particulate matter in the West be maintained and not decreased so that adequate data will be available to assess and respond to air quality concerns.

Finally, WESTAR recommends that the EPA re-examine the proposed level of equivalency of the PM coarse standard to the existing PM₁₀ standard. EPA proposes an “equivalent standard” of 70ug/m³ under the assumption that this level of PM coarse would provide equivalent protection to that provided by the current 24-hour PM₁₀ standard. Our examination of this relationship indicates that the ratio of PM_{10-2.5} to PM₁₀ is not consistent throughout the country, and that further analysis is needed to determine levels that truly represent equivalent protection.

We urge EPA to work with the states and other interested parties in developing the particulate matter standards. If you have any questions, please do not hesitate to contact Dan Johnson, WESTAR Executive Director, at 206-254-9145, djohnson@westar.org.

Sincerely,



Margie Perkins, President
Western States Air Resources Council

Cc: Steve Page
Lydia Wegman