



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

Bleed
Attachment

27 JUN 1990

MEMORANDUM

SUBJECT: Carbon Monoxide Target Level for State Implementation Plan Revisions

FROM: G.T. Helms, Chief *Tom*
Ozone/Carbon Monoxide Programs Branch (MD-15)

TO: George Able, Chief
Air Programs Branch, Region X

Your staff recently expressed concern regarding John Calcagni's letter of April 27, 1990 to Cheryl Richardson of the Alaska Clean Air Coalition (attached). Specifically they were concerned about the statement of what is the appropriate target carbon monoxide (CO) level for State implementation plan (SIP) revisions. In an attempt to clarify our reasoning, I offer the following comments.

The Calcagni letter stated that for planning purposes, 9 ppm, the current CO national ambient air quality standard (NAAQS), should be used as the target level. The problem arises because of the definition of a violation, which is 9.5 ppm due to the rounding convention explained in the letter. The 9.5 ppm value is used to allow for uncertainty in monitoring equipment and methodologies. This definition of a violation has no bearing on the target level for demonstrations of attainment. As for all other criteria pollutants, modeling should always apply the NAAQS (9 ppm for CO) as the appropriate level to be achieved. By designing a SIP around 9.5 ppm, a State has increased the likelihood of future violations and have not insured maintenance of the NAAQS as required in section 110(a) of the Clean Air Act. For proper planning, the design value for the area should be taken down to 9 ppm, giving you the amount of control necessary to attain and maintain the NAAQS.

If you have any further questions, please call Jill Vitas of my staff at FTS 629-5313.

Attachment

cc: Air Branch Chiefs, Regions I- IX



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

APR 27 1990

Ms. Cheryl Richardson
Anchorage Clean Air Coalition
1747 Laurence Court
Anchorage, Alaska 99501

Dear Ms. Richardson:

This letter is in response to your March 29, 1990 letter requesting clarification of the carbon monoxide (CO) national ambient air quality standards (NAAQS).

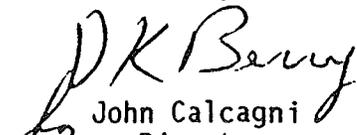
On April 30, 1971, the Environmental Protection Agency (EPA) promulgated the NAAQS for CO under section 109 of the Clean Air Act (36 FR 8186). Identical primary and secondary standards were set at levels of 9 parts per million (ppm), 8-hour average; and 35 ppm, 1-hour average; neither to be exceeded more than once per year. In 1978, EPA began its review of the CO standards and on September 13, 1985 EPA reaffirmed the primary standards and rescinded the secondary standards (50 FR 37484). Therefore, primary NAAQS for CO remain at 9 ppm, 8-hour average; and 35 ppm, 1-hour average.

As for the definition of a violation, EPA guidance since the late 1970's has been that in order to compare a monitor reading to the NAAQS, first the value must be rounded off to the same number of significant figures as the NAAQS with which the reading is being compared. Since the CO NAAQS (8-hour average) has only one significant figure, the monitored value must be rounded to the nearest whole number. Values of 0.5 and up are rounded up and values less than 0.5 are rounded down. Therefore, the lowest monitored value that could be considered a violation of the CO NAAQS is 9.5 ppm. This approach is described in 40 CFR 50.8(d) (copy enclosed).

With respect to the target CO level for State implementation plan revisions, EPA has employed the CO NAAQS (9 ppm) as the appropriate target level.

If you have any further questions, please call Jill Vitas of my staff at (919)541-5313.

Sincerely,


John Calcagni
Director
Air Quality Management Division

Enclosure