

ATTACHMENT 1

Summary of past interactions between EPA and CASAC on PMc measurement methods

The CASAC's Technical Subcommittee on Fine Particle Monitoring first discussed measurement methods for coarse-fraction particulate matter (PMc) (i.e., particles with a nominal diameter in the range of 2.5 to 10 micrometers) at a meeting on the implementation of measurement methods for fine particles (i.e., PM_{2.5}) held on April 18-19, 2000. EPA's interest in PMc measurement methods arose at that time in part as a result of a 1999 decision by the U.S. Court of Appeals for the District of Columbia Circuit (in litigation challenging EPA's 1997 revisions to the PM NAAQS) revoking EPA's use of PM₁₀ as an indicator for standards intended to address coarse particle pollution. At that meeting, staff from EPA's Office of Research and Development (ORD) presented several alternative approaches for the measurement of PMc for discussion by the Subcommittee. It was recognized at that time, however, that only a difference method (utilizing a PM₁₀ low-volume FRM, based on the existing PM_{2.5} FRM without a second stage separator, and a PM_{2.5} FRM run side-by-side, with PMc concentration to be calculated by difference) could be developed in time for an expected target date of 2002 for the possible promulgation of a revised PM NAAQS that included new standards for PMc. The Subcommittee offered a few suggestions and in its report to EPA expressed its desire for EPA ". . . to move as rapidly as practical toward implementation of continuous monitoring methods of particulate matter as is now used for most of the other criteria pollutants." A record of this meeting is available on the web at: <http://www.epa.gov/sab/pdf/casca006.pdf>.

On October 1, 2001 the CASAC met via public teleconference to conduct a consultation with EPA staff on the PMc measurement methods. On this teleconference EPA provided a summary of its field testing of the PMc difference method. Despite relatively good precision and performance of the difference method in the field studies, there remained a number of technical and logistical concerns with relying on this method should the Agency need to deploy a national network of PMc samplers. Although notes are not provided, a record of this meeting is available at: <http://www.epa.gov/sab/pdf/casacn02001.pdf>

Over the next year, the Agency needed to revise its schedule for reviewing the PM NAAQS due to protracted work on the development of EPA's Air Quality Criteria Document for Particulate Matter (PM Criteria Document). As a consequence, the target date for completion of the review of the PM NAAQS was substantially extended. These extensions in the PM NAAQS review schedule afforded an opportunity for EPA to evaluate continuous measurement technologies for PMc as well as a late-model filter-based sequential dichotomous sampler, consistent with the CASAC Technical Subcommittee's earlier recommendations.