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Steve Page
US Environmental Protection Agency
Director, Office of Air Quality Planning and Standards
C404-04, USEPA Mailroom
Research Triangle Park, NC 27711

Dear Steve:

It was good to see you in Washington recently at the Clean Air Act Advisory Committee meeting. I write because, as you are aware, HEI has issued an RFA to solicit health research studies focused on the systematic evaluation of speciated particulate matter components information collected by the EPA's PM_{2.5} Chemical Speciation Trends Network (STN). However, we need your assistance in ensuring the best, most consistent data are made available to health investigators for these studies.

A cornerstone of this effort, as the recent NAAQS Federal Register notice commented, is the STN and other data which HEI, with help from your staff, has set up in a website/database to give investigators easy access to data that will help them conduct different types of health studies. The measurements of organic carbon-based compounds in this database are especially important because their potential induction of health effects is currently of great interest. However, a critical issue in the speciated data collected by the STN is that measurements of organic carbon at these sites have not been blank corrected and the EPA has not recommended a particular approach to deal with these blank corrections. This is a crucial issue, because as the EPA has itself pointed out, the organic carbon content measured by different samplers is variable. In accessing the AQS data from the TTN, the speciation data file includes the following note. "The data should be modified to account for blanks, etc. before using in analyses. Please contact AMTIC TTN area at <http://www.epa.gov/ttn/amtic/> for assistance with this." To our knowledge this statement does not really resolve the question as there is not yet specific guidance and the speciation data base does not contain the carbon blank data.

Hence the dilemma is that we have neither the blank data nor explicit guidance for its application if it becomes available. In the absence of guidance from the EPA, and/or the blank data, it is likely that researchers will use the raw data or attempt some generic correction. In either case this introduces the potential for inconsistencies in its application amongst investigators, resulting in different site specific air quality being reported from the same set of STN data and potentially different health results (where the only real difference is the measurement correction, not the health effects).

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We anticipate that the studies we want to fund through this RFA will start in the late summer. We hope that the EPA will be able to resolve this issue before then; HEI stands ready to work with you and your staff to do that.

Thanks in advance for your attention to helping to get this done.

Sincerely,



Dan Greenbaum
President

Cc:
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