

Regional Network Assessment: Policy Guidance

Based on direction provided by the Region V State Air Directors, the following guiding principles have been agreed upon by the States in implementing the recommendations from the assessment:

1. **Monitoring Objectives:** Air monitoring is conducted to support a number of objectives. Based on consideration of policy needs and concerns, the following objectives are listed below in priority order:
 - Long-standing objectives which place a heavy emphasis on monitoring in areas of high concentration and high population: provide data to public in a timely manner, support compliance with NAAQS and control strategy development, and support air pollution research studies
 - Multi-pollutant monitoring – see EPA’s new monitoring requirements for NCore
 - Source-oriented monitoring – see EPA’s proposed/final new monitoring requirements for Pb, NO₂, and SO₂
 - Rural monitoring (and medium-sized city monitoring)– see EPA’s proposed new monitoring requirements for O₃
 - Environmental justice monitoring
 - School monitoring (e.g., air toxics)
2. **Allocation of Existing Funding for Monitoring:** Any resource savings associated with the shutdown of a monitor or site in a given state should be used (shifted) to cover the resource needs for new monitoring (both improvements to the current networks and new monitoring requirements) within that state. Also, reallocation of available PAMS funding should be considered to improve ozone precursor measurements in the highest ozone areas within the region. The LADCO Project Team should work with the state monitoring contacts to prepare a recommendation on the best use of the available PAMS funding.
3. **Compliance with New EPA Monitoring Requirements:** Consistent with the priority monitoring objectives noted above, the known new monitoring requirements will attempted to be met (as resources permit) in the following order: NCore, Pb (source-oriented), NO₂ (near-roadway and population-oriented), SO₂ (source-oriented), and O₃ (rural and medium-sized cities). This order may be revised to accommodate any subsequent new monitoring requirements (e.g., CO).
4. **Future Funding:** Two significant changes in funding for air monitoring are expected over the next several years: new money to meet the new monitoring requirements and conversion of PM_{2.5} funding from section 103 to section 105. Consistent with the priority monitoring objectives noted above, the new money should be used preferentially for NCore and source-oriented (including near-roadway) monitoring. The LADCO Project Team should work with the state monitoring contacts to prepare a recommendation on the best use of the new money. The conversion of PM_{2.5} funding may mean less money in some states for PM_{2.5} monitoring. Once EPA and NACAA agree on an appropriate funding transition, then each state should determine which reductions, if any, are necessary.

5. Basis for Network Changes: Each state will make the final decision on which recommended network changes to make based on policy, practical, and financial considerations. It is expected that any changes to be made will be identified in the states' 2011 annual network plans (i.e., July 1, 2011 submittal).
6. Training: In light of many new monitoring requirements and potentially new staff (due to retirements and increased work load), LADCO should include necessary monitoring-related training in its schedule of sponsored training classes. Based on input from the state monitoring contacts on specific courses or topics of interest, LADCO will work with the state training coordinators to arrange the desired training.
7. Outstanding Issues: Despite EPA's encouragement for states to move from filter-based to continuous measurements for PM_{2.5}, the LADCO States remain concerned about use of continuous data for compliance purposes. We recommend that the EPA-NACAA Monitoring Steering Committee and, perhaps, CASAC's Ambient Air Monitoring and Methods Subcommittee assess the utility of PM_{2.5} continuous monitoring data for regulatory use.