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Executive Summary to the Evaluation of Air Toxics Monitoring in EPA Region 9

Final Report

Promoting Environmental Results

Through Evaluation

Acknowledgements

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Hazardous Air Pollutants (HAP), also known as air toxics, are pollutants that are known or suspected to cause cancer and other serious conditions including damage to respiratory, immune, and neurological systems, as well as having negative reproductive and developmental effects on those who are exposed at sufficient concentrations and durations. The Environmental Protection Agency (EPA) and a number of state and local agencies and tribes (SLT) across the United States (US) have air toxics monitoring experience extending back more than two decades. Building on this breadth of experience, EPA initiated the national air toxics monitoring program in 1998, which provided a consistent platform for continued air toxics monitoring activities across the nation.

EPA Region 9—comprised of SLTs in Arizona, California, Hawaii, and Nevada—has one of the largest and most well-developed sets of air toxics monitoring programs in the country. EPA Region 9 has also been cited as having areas with the highest level of risk from air toxics. This evaluation effort was launched to assess the design and implementation of locally- and nationally- funded air toxics monitoring activities across the region and identify ways in which program effectiveness can be improved based on the experiences of SLTs throughout EPA Region 9 and EPA Program Managers and staff. We conducted this review to pursue four key objectives:

1. Characterize air toxics monitoring programs across EPA Region 9, including identification of SLT objectives as well as those of EPA Region 9.
2. Assess the design of EPA Region 9's air toxics monitoring programs and the extent to which they meet stated objectives.
3. Distinguish ways in which EPA Region 9's monitoring programs contribute to the objectives of the national air toxics monitoring program and areas for improvement.
4. Identify potential performance metrics for evaluating air toxics monitoring programs at national and regional levels.

To conduct this evaluation, we reviewed and analyzed key documents including various studies, reports, and strategic planning documents; interviewed officials from EPA headquarters and EPA Region 9; interviewed officials from nine Region 9 SLTs; and analyzed data from EPA's Air Quality System (AQS) database.

This Executive Summary provides an overview of the major findings from the evaluation effort and includes recommendations for advancing the effectiveness and efficiency of air toxics monitoring activities in EPA Region 9. The full report contains additional detail, including a section describing current air toxics monitoring activities across EPA Region 9, detailed descriptions of the evaluation findings, and several appendices with supporting information.

The findings and recommendations presented in this report reflect the ideas and opinions of the EPA and SLT officials that contributed to the evaluation. In general, this report includes those ideas and opinions that were expressed by more than one party, rather than presenting a comprehensive description of all ideas provided by the contributing officials. This report is not intended to provide a full evaluation or audit of any SLT's air toxics monitoring program or of the national air toxics monitoring program. Rather, the report looks across the Region 9 agencies to identify and assess current air toxics monitoring activities, and to identify ideas that can be used to inform ongoing improvements to national, state, local, and tribal air toxics monitoring programs.

The six findings summarized in this Executive Summary are presented to indicate common air toxics monitoring challenges experienced by EPA and Region 9 SLT officials, and are intended to be used as a basis for continued discussions on how to improve air toxics monitoring regionally. Following the findings are five recommendations, based on the findings in this report and from a January 31, 2008 meeting between EPA headquarters, EPA Region 9, and Region 9 SLT officials, that provide ideas for improving air toxics monitoring communication, collaboration, and coordination in EPA Region 9 and nationally.

Key Findings

Finding 1: *There Is a Significant Amount of Consistency in Air Toxics Monitoring Objectives across Agencies in EPA Region 9 with the National Objectives, although Differences in Program Design and Implementation Reflect Variation in Priorities across These Objectives.*

Officials from EPA headquarters, EPA Region 9, and SLTs in EPA Region 9 agree that the overarching goal of current national, state, tribal, and local air toxics monitoring programs is to reduce human health risks caused by exposure to air toxics. The objectives in EPA's 2004 National Monitoring Strategy achieve this goal through a dual emphasis on NATTS program sites and community-scale monitoring efforts. Objectives set by SLTs within EPA Region 9 are highly consistent with EPA's air toxics monitoring objectives: three SLTs in the region maintain NATTS program sites and all of the SLTs in EPA Region 9 that have received community-scale monitoring grants manage these efforts consistent with the objectives detailed in the 2004 National Monitoring Strategy. The data resulting from these NATTS program sites and community-scale monitoring efforts provides a picture of the distribution of air toxics concentrations at and between NATTS program sites in the region. In addition, some SLTs in EPA Region 9 are working towards objectives which complement and expand on the current scope of objectives listed in the EPA strategy.

However, SLTs in the region vary in the relative emphasis they place on the NATTS program, their own trends networks, and various local-scale monitoring efforts, reflecting a balance between nationally- and locally- funded air toxics monitoring efforts. The patchwork of SLT air toxics monitoring activities across EPA Region 9 largely reflects the varying emphasis on specific program objectives, as well as the relative priority of air toxics compared with other air quality and environmental issues at each agency.

Finding 2: *National and SLT Trends Monitoring Networks Are Complementary Efforts, although SLTs Have Experienced Challenges with Participation in the NATTS Program that Differ from Challenges They Face in Their Own Air Toxics Monitoring Efforts.*

National ambient monitoring networks and SLT trends monitoring networks are complementary efforts that jointly provide data on the prevalence of air toxics in EPA Region 9 and across the nation. Most of the air toxics monitoring in Region 9 is not part of the national monitoring network, rather, these monitoring activities are independent efforts managed by SLTs. The SLTs in EPA Region 9 participating in the NATTS program have received substantial benefits from the program, but have also encountered unanticipated set-up and analytical challenges that in some cases exceeded the resource needs covered by

EPA funding. Most of the NATTS sites in EPA Region 9 were established at sites where air toxics monitoring was already being conducted by experienced districts with well-developed methods. These methods differed from EPA's methods, setting up a challenge for the SLTs in conforming to the national methods. Joining the NATTS program necessitated redesign of the SLTs' methods and retraining of agency personnel. In addition, these SLTs were faced with the decision of whether to switch all their air toxics sites or just the NATTS program sites to the EPA methods. In addition, both EPA and SLT officials noted that many of the challenges associated with past participation in the NATTS program are direct results of the program being relatively new, and are similar to challenges encountered at the infancy of other large-scale monitoring programs. These officials cited a need to learn from the experiences of the early implementers of the NATTS program.

Finding 3: *Short-Term and Community-Scale Air Toxics Monitoring Projects Play an Important Role in Characterizing Air Toxics and Their Health Effects in EPA Region 9, while Presenting Unique Resource and Management Challenges for SLTs.*

SLTs in EPA Region 9 have undertaken a variety of short-term and community-scale air toxics monitoring projects in addition to participation in broader local, state, tribal, and national trends monitoring networks. Short-term and community-scale air toxics monitoring projects greatly contribute to the characterization of air toxics at the local level and provide a means for performing risk assessments, identifying source air toxics emission profiles, and evaluating new monitoring methods. These air toxics monitoring projects provide unique opportunities for SLTs to collaborate with a variety of community stakeholders and educate the public on air toxics issues, but can also prompt public scrutiny of agencies' abilities to diminish air toxics concentrations. Some SLTs fund short-term and community-scale air toxics monitoring projects through a variety of state, local, and tribal funding mechanisms, while others receive community-scale air toxics monitoring grants from EPA. Agencies that have received EPA grants welcome the opportunity they provide to collect and analyze air toxics data and acknowledge the benefits of the grant program, such as informing and motivating mitigation strategies. SLTs expressed a desire to use grant funds to perform further analyses and public communication than has been conducted in previous grant cycles. These agencies also noted aspects of the community-scale and other short-term funding structures that can hinder their ability to effectively use the grant funds to their full benefit.

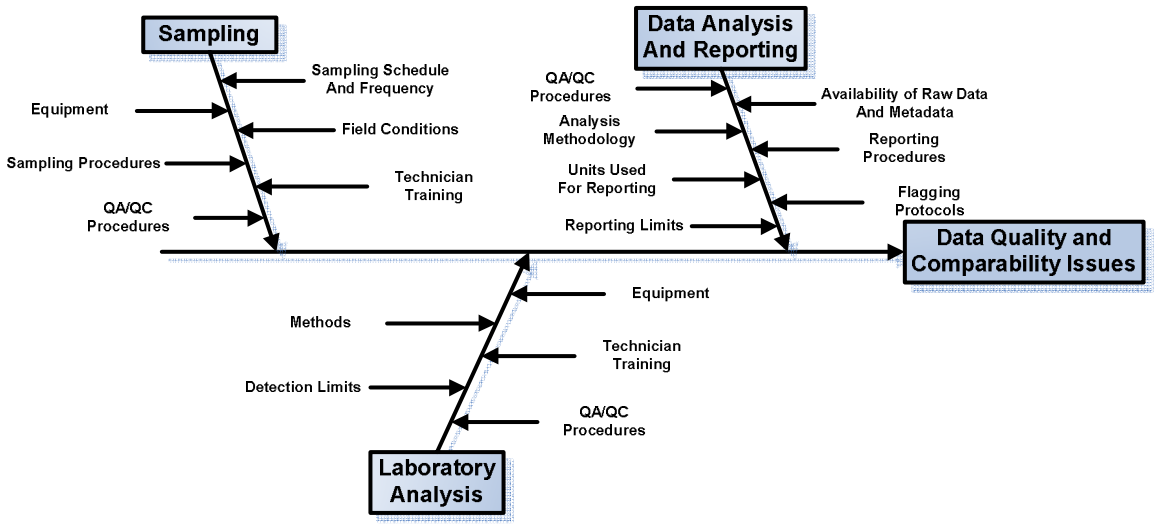
Finding 4: *The Complex Nature of Air Toxics Monitoring Increases Data Quality and Cross-Agency Data Comparability Challenges.*

EPA, state, local, and tribal agencies all strive to develop and utilize methods and quality control procedures that will ensure high quality air toxics data that can be used for a variety of national, state, tribal, and local activities such as rulemaking, modeling, and mitigation efforts. Because the national air toxics monitoring program is relatively new, fewer time-tested methods and procedures exist than do for criteria pollutants, and therefore, for certain pollutants, there is significant variation across sampling and laboratory methods and QA/QC procedures employed by SLTs in EPA Region 9. EPA has sought to foster standard approaches for ensuring data quality and comparability through the guidance provided in the air toxics TAD, TO- and IO- compendiums, and PT testing available to all agencies, and some EPA Region 9 SLTs have also led methods development efforts to foster collaboration between SLTs in the region. Despite EPA efforts, individual SLTs cited difficulties in navigating the available options and balancing national, state, tribal, and local needs. In addition, some SLTs questioned the need for and value of adhering to national standard approaches for non-NATTS monitoring sites.

Many EPA and SLT officials interviewed for this report cited the complexity of air toxics monitoring and laboratory procedures as the root cause of the majority of the data quality and comparability challenges encountered in EPA Region 9. These officials noted that EPA and each SLT in EPA Region 9 can be impacted by the data quality and comparability challenges encountered by their agency as well as by the challenges encountered by collaborating SLTs and contractors. EPA is involved in a number of national air toxics analyses, modeling efforts, and risk assessment activities that can be negatively impacted if any SLT contributing data to these efforts experiences data quality or comparability challenges. Similarly, SLTs that analyze data collected by other agencies, such as CARB, and SLTs that rely on other agencies or contractors for laboratory analyses, such as ADEQ, can be negatively impacted if these collaborating entities encounter data quality and comparability challenges.

Due to these potential effects of data quality and comparability challenges, EPA and SLT officials noted the benefit of clearly defining the issues which have arisen in the past in order to prompt proactive discussions on air toxics data quality and comparability challenges, with the goal of continually improving the quality of data used for local and national analyses, risk assessments, and modeling activities. Figure 1 outlines the major factors affecting air toxics data quality comparability described in this and subsequent findings and Appendix M describes an analysis of a selection of 2006 AQS data that demonstrates some of the data comparability challenges described below.

Figure 1: Factors Affecting Air Toxics Data Quality and Comparability



Finding 5: *Agencies across EPA Region 9 Expressed Strong Interest in Expanding Cross-Agency Communication, Information Sharing, Collaboration, and Training Related to Air Toxics Monitoring.*

EPA Region 9 SLTs expressed an interest in enhancing communication and collaboration related to air toxics monitoring priorities, methods, results, and trends within their region and within the larger national framework. Currently existing communication and collaboration forums address some of the region's needs but there is a desire for a more cohesive collaboration strategy that consolidates and enhances the current systems. Specifically, Region 9 SLTs see a need for improvements to the available guidance and resources, enhancements to the current set of national and regional communication forums, and improvements to training tools. SLT officials noted the important role for EPA headquarters and EPA Region 9 at both the national and regional levels to provide leadership and foster coordination among agencies engaged in air toxics monitoring. At the same time, EPA and SLT officials observed that there are opportunities for SLTs in Region 9 to enhance communication and information sharing among peers.

Finding 6: *Air Toxics Monitoring Data Is Being Used and Analyzed to Varying Degrees Across EPA Region 9, and There Is a General Sense that Increased Attention Is Needed to Effectively Expand the Use of the Data for Program Planning and Accountability.*

Much attention over the past decade has focused on expanding efforts to monitor ambient air toxics concentrations, and there is a general sense that greater attention is needed for

analyzing and using air toxics monitoring data. SLTs undertake varying levels of data analysis and EPA has had a national monitoring effort underway for the past several years. EPA and SLT officials generally asserted that additional efforts are needed to maximize the value of monitoring data. At the state and local level, agencies in California have substantial experience in analyzing, using, and reporting ambient air toxics data for purposes of program accountability and planning. Other SLTs are generally at the early stages of beginning to analyze and use collected data. EPA and SLT officials noted that any efforts to further analyze air toxics data at the national and regional levels will likely be led by EPA and a select number of SLTs in the region.

Recommendations

Recommendation 1: Enhance Opportunities for Regional and National Information Sharing, Communication, and Coordination on Air Toxics Monitoring Methods and Results.

Enhanced communication opportunities within EPA Region 9 would provide SLTs an opportunity to share ideas and best practices and to coordinate with EPA on air toxics monitoring methods. Specifically, a regional technical air toxics committee could greatly enhance SLTs' abilities to collaborate and coordinate on air toxics topics. At the January 31, 2008 meeting, EPA and regional SLTs discussed formation of such a committee structured in the following ways:

- EPA Region 9 program officials would coordinate initial formation of the committee, which would include representatives from regional SLTs and EPA Region 9.
- The committee would hold quarterly conference calls and call agendas would be set by the committee members.
- The committee would meet in-person once a year.
- Responsibility for hosting, organizing, or presenting on specific conference calls or at in-person meetings would rotate among SLTs.
- Conference calls and meetings would be used to share information on past or future air toxics studies within the region and to discuss technical topics, such as methods.
- Some or all conference calls would be web broadcast, allowing officials from SLTs across the nation to join the discussions and learn from Region 9's experience.
- An EPA headquarters liaison would either attend the quarterly conference calls and meetings or would be briefed by the EPA Region 9 representative following the discussions.

Potential discussion topics for the regional technical air toxics committee could include:

- Sampling and laboratory analysis challenges for specific air toxics (e.g., acrolein or diesel particulate matter).
- Integration of regional information collection and storage systems (e.g., integration of Laboratory Information Management Systems with other data management systems).
- Information sharing mechanisms for air toxics data, methods, and study results (e.g., websites, databases, clearinghouses, message boards, and blogs).
- National, regional, state, local, and tribal objectives and priorities for air toxics monitoring (see Recommendation 2).
- Scoping and innovative funding opportunities for community-scale air toxics monitoring projects (see Recommendation 3).
- Data comparability needs and solutions to common data comparability challenges (see Recommendation 4).
- Air toxics data analysis and use (see Recommendation 5).

In addition, EPA could support Region 9's communication and information sharing efforts through enhancements to the EPA Region 9 and TTN AMTIC websites. For example, EPA could consider the following website improvement ideas to help disseminate air toxics information to SLTs in Region 9 and nationally:

- More clearly articulate national and regional air toxics monitoring objectives and provide ready access to detailed information on EPA-funded monitoring efforts, the data collected through these efforts, and resulting final reports and analyses. During these enhancements, EPA could consider adding more explanatory text to the main pages of the websites, so that users can access summary information without downloading large reports.
- Improve ability to access information by air toxics themes (e.g., pollutants or source types) or to search EPA websites by common air toxics key words.
- Improve access to the data contained in the AQS database. This could be achieved through continued improvements to current user interfaces such as AQS Discoverer.
- Provide access to user-friendly spreadsheet tools that enable SLTs to benchmark their air toxics monitoring data against annual averages from other SLTs and/or NATTS locations.

- Identify and provide contact information for air toxics experts (e.g., representatives from EPA, Northeast States for Coordinated Air Use Management (NESCAUM), academia, and EPA Region 9 SLTs).
- Add training resources (e.g. audio and visual presentations on air toxics topics).

In addition, officials from EPA and SLTs in EPA Region 9 could coordinate to help develop agendas for future national Air Toxics Data Analysis Workshops and National Air Monitoring Conferences. Many SLTs in the region are involved in innovative air toxics monitoring projects and could use their experience to help inform agenda planning for these meetings.

Recommendation 2: Increase Communication and Alignment of Regional Air Toxics Monitoring Program Objectives and Elevate Importance of Linking Air Toxics Monitoring to Emissions Reductions.

Further communication about air toxics monitoring program objectives could help SLTs in EPA Region 9 better understand regional priorities and could facilitate completion of monitoring activities that address these priorities. For example, many Region 9 SLTs have indicated interest in more consistently identifying the links between air toxics monitoring efforts and actual emission reductions within air districts, and in communicating these achievements to the public. Region 9 SLTs could discuss this and other enhancements to regional priorities at the quarterly meetings of the EPA Region 9 technical air toxics committee.

In addition, regional SLTs could work with EPA Region 9 to better understand the connections between the national air toxics monitoring program objectives and regional objectives. The National Air Toxics Program Logic Model could be used as a tool for understanding the connections between each agency's objectives and anticipated monitoring program outcomes, and to better understand the national objectives specific to the NATTS program and the community-scale monitoring grant program. These discussions of objectives could help Region 9 SLTs and EPA better understand future directions for air toxics monitoring programs and identify any needed enhancements to regional or national objectives.

Recommendation 3: Enhance Scoping of Local-Scale Air Toxics Monitoring Efforts and Communication about These Activities to Improve Alignment with National, Regional, State, Local, and Tribal Objectives.

Further scoping and preparation for local-scale air toxics monitoring efforts could help SLTs in EPA Region 9 focus their activities to better reflect national, regional, state, local,

and tribal objectives. For example, SLTs could further scope their local-scale monitoring efforts by clearly identifying the extent of monitoring that will be conducted, the objectives of the monitoring effort, the anticipated impacts of the monitoring on the local community, and how that community will be involved in the monitoring process and any mitigation efforts that may result from the monitoring. It may also be important for SLTs to more clearly articulate the links between the monitoring effort and actual air toxics reductions. For example, SLTs could identify key stakeholders—such as regulators and source representatives—as part of their scoping efforts and describe the ways in which these parties could contribute to air toxics mitigation efforts if monitoring shows evidence of significant levels of toxics emissions. SLTs could also more clearly articulate the levels of risk at which mitigation or other actions are needed, as well as the levels at which monitoring will conclude. In some cases the regulators or stakeholders may be the federal government, and engaging the appropriate federal Branch and Division early in the scoping process may help align expectations and maximize mitigation opportunities. To better involve local sources and encourage voluntary mitigation efforts, SLTs could also consider broader incorporation of source attribution studies (e.g., through the use of local emissions inventories and receptor modeling) as part of their local-scale monitoring efforts.

Enhancements to EPA's current community-scale air toxics monitoring grant program could further focus SLT air toxics monitoring efforts on identified air toxics monitoring objectives. For example, new applicants during a given grant cycle could be encouraged to focus on particular themes that tie directly to current national objectives for problem identification, trends analysis, and science support, while giving equal weight to the review of applications that aim to complete activities outside the selected themes. Potential themes could be developed around specific source types or monitoring and methods development for specific air toxics. These themes could include near-roadway effects, goods movement, micro-scale chrome platers, diesel particulate matter, hexavalent chromium, acrolein, and naturally-occurring asbestos. In addition, EPA could help SLTs further scope their community-scale monitoring efforts by more clearly articulating national objectives for community-scale monitoring activities and how these may differ from objectives of other air toxics monitoring programs (e.g., the NATTS and PAMS programs) in the grant program guidelines.

Further communication about local-scale monitoring activities could also enhance Region 9's ability to meet identified air toxics monitoring objectives. For example, regional SLTs and EPA Region 9 could collaborate to share the results of regional local-scale monitoring projects through agency websites by posting documentation on study designs, objectives, and results. Adding key word searches to these websites would also facilitate access to information on past air toxics monitoring studies. In addition, SLTs could increase public communication efforts at the conclusion of air toxics monitoring efforts to further enhance the public's understanding of the results of the monitoring efforts and any mitigation

measures resulting from the monitoring. EPA could also enhance the distribution of EPA-funded monitoring study results by providing communication links to other federal agencies and offices concerned with air toxics, such as the Federal Highway Administration and EPA Office of Transportation and Air Quality.

Additionally, EPA Region 9 and SLTs within the region could collaborate to enhance SLTs' abilities to conduct future local-scale air toxics monitoring studies. For example, these agencies could open a regional dialogue aimed at understanding funding options for local-scale air toxics monitoring projects. Officials from these agencies could share ideas for funding opportunities from all available sources—including federal, state, local, tribal, and private options—and discuss best practices for securing funding for mid-term community-scale monitoring projects. In addition, SLTs could optimize these discussions by identifying potential collaborative projects that could distribute resource needs between several agencies.

Recommendation 4: Collaborate to Identify Solutions to Common Data Quality and Comparability Problems and Develop Tools to Enhance Data Usability.

EPA Region 9 and SLTs in the region could use the regional technical air toxics committee to discuss the common data comparability issues documented in this report, including methods, detection limits, QA/QC procedures, and other technical topics relevant to air toxics of concern in the region (including those compounds currently outside the scope of the NATTS program). For example, at the January 31, 2008 meeting EPA and SLT officials from Region 9 expressed interest in discussing standard approaches for setting MDLs for specific compounds, differences in AQS reporting procedures for agencies with higher or lower MDLs, seasonal issues affecting data comparability, co-located data reporting precision, needs for future round robin and through-the-probe audits, and common series of data flags for AQS reporting. It may also be necessary for the participants in these technical committee discussions to agree on a decision-making framework to use during these meetings so that all parties follow the same process when there are disagreements on methods development or other technical issues.

EPA and Region 9 SLTs could also open a broader dialogue on the differences in data comparability needs at national, regional, and local levels. For example, EPA headquarters representatives could join a Region 9 technical air toxics committee meeting to discuss national needs for data comparability and how these may differ from the needs of some SLTs. This dialogue could help EPA and SLTs understand objectives and priorities at varying levels and identify priority data comparability challenges to address. While data quality issues are of great importance to both EPA and SLTs, EPA should remain sensitive to the fact that data comparability across districts is generally a higher priority to EPA than

SLTs. The following three options for national data comparability were identified during the January 31 meeting:

1. Find consensus from all agencies on a consistent set of national standards for air toxics monitoring and implement these standards at all agencies;
2. Rely solely on NATTS data for establishing national trends; or
3. Conduct in-depth data analysis that assesses data quality and comparability of each site prior to inclusion in trends analyses.

SLTs in EPA Region 9 expressed an interest in working towards uniform monitoring methods but cannot currently commit to following national standards at non-NATTS sites; therefore, option 1 should be considered a potential goal that cannot yet be implemented. In the meantime, options 2 and 3 remain viable alternatives that have little direct impact on SLTs. This dialogue between EPA and SLTs on data comparability could also provide an opportunity to discuss methods requirements for major air toxics programs, such as NATTS, PAMS, and PM speciation studies. Considering these programs together could provide opportunities for resource savings.

In addition, EPA and Region 9 SLTs could discuss needs for an air toxics laboratory certification program. At the January 31, 2008 meeting, SLT officials in EPA Region 9 suggested that all laboratories should meet EPA's National Environmental Laboratory Accreditation Program standards, and expressed a desire to open a conversation with EPA on extending this accreditation standard as a national air toxics grant requirement.

EPA could support Region 9's efforts to address common data comparability challenges by continuing to support national air toxics data analysis and providing SLTs with tools to assist in data comparability challenges. For example, EPA could consider the following ideas:

- Enhance efforts to further analyze the national air toxics datasets and share this information with SLTs (e.g., via teleconference or webcast). This analysis could be conducted and documented in a method similar to the analysis conducted by EPA contractors on the UATMP data.
- Develop and provide access to user-friendly tools that enable SLTs to benchmark their air toxics monitoring data against annual averages from other SLTs. For example, provide training on AQS Discoverer specifically tailored for air toxics staff or user-friendly spreadsheet tools.
- Expand the availability of online training resources.

- Assist SLTs with accessing NIST standards and/or develop a national stockpile of these standards.

Recommendation 5: Explore Methods for Using Air Toxics Monitoring Data to Evaluate Programs and Their Ability to Address Monitoring Objectives.

Data analysis and use could be highlighted during Region 9 technical air toxics committee discussions. In particular, EPA and Region 9 SLTs could discuss how each agency currently uses air toxics data, how they would like to use data in the future, how data is being used by other SLTs across the nation, best practices for data analysis, common QA/QC challenges associated with data analysis, best practices for benchmarking and comparing datasets, and potential changes to current practices or mechanisms that could facilitate further data analysis and use in the future. The SLTs in EPA Region 9 could use these meetings to highlight analysis of compounds prevalent in the region, and could web broadcast their discussions to assist other SLTs nationwide. In addition, regional SLTs could work with EPA to identify important national data analysis efforts and provide web broadcasts on these topics.

EPA could also support broader use of air toxics data on a national level by continuing to explore approaches for using air toxics monitoring data to evaluate national air toxics programs and their results, and to respond to the 2004 air toxics program PART assessment. For example, EPA could enhance efforts to fully implement the Measure Implementation Plan for using air toxics monitoring data to develop a risk-weighted performance measure. EPA could also use the annual goal-setting and performance measure process that is part of EPA's Annual Commitment System to support a more collaborative process of tracking and communicating air toxics monitoring program implementation. EPA's Air Toxics Monitoring Program Logic Model could be used to inform the development of program implementation performance measures.