

05-05-11 Preliminary Draft Comments from Clean Air Scientific Advisory Committee (CASAC) Lead Review Panel. These preliminary pre-meeting comments are from individual members of the Panel and do not represent CASAC consensus comments nor EPA policy. Do not cite or quote.

Preliminary Comments from Dr. Philip Hopke

There are several aspects of the ambient monitoring and related choice of indicators that needs to be addressed to the extent it can. We need to have as much understanding as possible of the relationship between Pb in TSP and Pb in PM10 and the variation of these values as a function of location across the US. If lead is primarily from aviation gas, then the lead in PM10 and TSP will be essentially identical whereas sources like secondary lead smelters my produce significant quantities of coarse particle lead. In that case, the variation is size distributions may make it difficult to ensure that a PM10 standard provides the same level of protection as a Pb in TSP standard.

There is also a significant need to move away from low precision high volume samplers. It is quite possible to design high volume samplers with adequate precision in their flow control to match that of low volume samplers. It is also possible to provide TSP heads for low volume samplers (several are commercially available, but have not been well characterized). It would not take an enormous amount of time or resources to substantially improve the options for ambient monitoring and the ISA that is to be prepared needs to adequately address these issues.