

1     **AMBIENT AIR MONITORING FOR A NEW SECONDARY NAAQS FOR**  
2                   **OXIDES OF NITROGEN AND SULFUR**  
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4             The NO<sub>x</sub>/SO<sub>x</sub> welfare panel has advised EPA that ambient air measurements of nitrogen  
5 and sulfur species support implementation of this proposed NAAQS secondary standard and  
6 improve the information basis for subsequent reviews. These uses extend beyond the basic  
7 need to measure the proposed NAAQS indicators, NO<sub>y</sub>, SO<sub>2</sub> and SO<sub>4</sub>, in approximate priority  
8 order:

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- 10           • Direct NAAQS comparisons.
  - 11           • Reduced nitrogen, NH<sub>3</sub> and NH<sub>4</sub>, to evaluate CMAQ and other air quality models  
12 ability to characterize NH<sub>x</sub> deposition, a component of the AAPI expression.
  - 13           • Model and process improvement - In combination with NAAQS indicators and NH<sub>x</sub>,  
14 additional speciated NO<sub>y</sub> components including HNO<sub>3</sub>, PAN, NO<sub>2</sub>, and NO to  
15 continually assess air quality model behavior and associated deposition processes.
  - 16           • Subsequent NAAQS reviews of the secondary NO<sub>x</sub>/SO<sub>x</sub> standard as well as related  
17 primary and secondary standards reviews (ozone, NO<sub>2</sub>, SO<sub>2</sub> and PM).
  - 18           • Accountability – Assessing the effectiveness of implemented programs addressing  
19 emission strategies to meet attainment of the proposed NAAQS using all noted  
20 measurements.

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22     **8.1     What Are The Appropriate Ambient Air Indicators To Consider In Developing The**  
23             **Standards?**  
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25             The recommendation of NO<sub>y</sub>, SO<sub>2</sub> and SO<sub>4</sub> as the ambient air indicators for the proposed  
26 NO<sub>x</sub>/SO<sub>x</sub> standard was introduced in the first draft of the PAD and endorsed by CASAC  
27 (CASAC, 2010). Essentially, NO<sub>y</sub>, which is an aggregate of all reactive oxidized nitrogen  
28 compounds and the two sulfur species represent the oxidized ambient air species of relevance to  
29 the criteria pollutants NO<sub>x</sub> and SO<sub>x</sub> with potential to adversely affect acid-base balance in  
30 aquatic systems. Contributions of reduced nitrogen, which would not be part of the indicator for  
31 the standard under the approach suggested in this PAD, are provided by CMAQ.

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***Why not use each individual species as indicators?***

One could consider using all NO<sub>y</sub> species as NAAQS indicators, requiring, for example, measurements of the dominant species: HNO<sub>3</sub>, particulate nitrate, NO<sub>2</sub>, NO, and PAN. Conceptually, each species would be paired with a species - specific deposition velocity in the AAI expression to transfer individual deposition values to ambient values. The attraction of using individual species would be the reliance on actual deposition velocities that have more physical meaning in comparison to model constructed transference ratios which aggregate dry and wet deposition and all nitrogen species. The transference ratio approach does retain the necessary conservation of mass which underlies virtually all parameterization schemes, but loses some degree of physical relevance due to use of modeled outputs – an admittedly unique construct. The major drawback of using individual species as NAAQS indicators is the lack of routinely available measurement techniques and an associated resource burden even if adequate techniques were available. Currently, technology for measuring true NO<sub>2</sub>, HNO<sub>3</sub>, and PAN generally is not available for routine network applications. In addition to this practical consideration, there is another important reason for using the aggregated transference ratios. Because the standard, and the explicit Clean Air Act authority, is based on ambient air there must be an effective link connecting deposition and concentrations of the criteria pollutants in the ambient air. The use of individual species conceptually allows for a more physically meaningful approach to characterize and calculate deposition. However, the transference ratios also enable incorporation of the contributions of wet precipitation in the ambient air indicators. There is no practical alternative that allows for the disentangling of wet deposition as a function of ambient air concentrations as that relationship is best addressed through the coupling of numerous meteorological and chemical processes imbedded in the air quality modeling platform. One could consider wet precipitation as a separate parameter and isolate dry precipitation in the AAI equation. But doing so would lose the important connection between wet precipitation of nitrogen and the same emission sources responsible for dry deposition.

Another way of addressing the relative benefit of using part of the NO<sub>y</sub> mix relative to total NO<sub>y</sub> in regard to deposition is to probe the dynamic response of changes in oxidized nitrogen deposition to changes in ambient concentrations NO<sub>y</sub> and nitric acid. Dynamic

1 response refers to sensitivity of the ambient to deposition response with respect to changes in  
2 NO<sub>x</sub> emissions, which is relevant to air quality management as ambient indicators are used to  
3 assess if an area meets or exceeds a target value in current and future time frames. While such a  
4 response to emission changes may be linear or non-linear, the details of which are encoded in  
5 chemical transport air quality models like CMAQ, typically there is a directional relationship  
6 between the change in the precursor emissions and the target species of interest. By extension,  
7 one would expect that a significant change in emissions of NO<sub>x</sub> would lead to a change both in  
8 the ambient and deposition fields of NO<sub>y</sub> species, recognizing that NO<sub>y</sub> species all evolve from  
9 NO<sub>x</sub> emissions, which is dominated by nitrogen oxide, NO. We can apply this reasoning to the  
10 consideration of using HNO<sub>3</sub> as a more narrowly defined indicator, relative to NO<sub>y</sub>. A 2005  
11 base case and projected 2030 CMAQ simulation, with roughly 50% NO<sub>x</sub> and SO<sub>x</sub> reductions,  
12 respectively, are used to illustrate the relationship of HNO<sub>3</sub> and NO<sub>y</sub> concentration changes to  
13 changes in NO<sub>y</sub> deposition (wet and dry) which address the question: Does the indicator  
14 respond in a manner directionally similar to deposition over periods of significant emissions  
15 reductions? Based on this paired set of current and future projection scenarios, ambient NO<sub>y</sub>  
16 more closely captures the change in NO<sub>y</sub> deposition, compared to using ambient HNO<sub>3</sub> as an  
17 indicator (figure 8-7 ).

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20 Finally, one might advocate for direct measurements of dry deposition of individual NO<sub>y</sub>  
21 species. Again, technologies simply are not ready for consideration in routine network  
22 applications. And, it is arguably practical to model dry deposition even if direct dry deposition  
23 measurement technologies were available. One reason for this is that there is significant spatial  
24 heterogeneity in the factors (vegetation and surface type, micrometeorology) that define  
25 deposition velocity. Consequently, direct dry deposition measurements would have limited  
26 spatial representativeness in comparison to ambient air observations. The model conceptually  
27 accounts for the spatial variance, at the level of horizontal grid cell resolution, of the factors  
28 defining deposition velocity on a species by species basis. However, one also could reason that a  
29 well placed direct measurement of dry deposition is more realistic than a modeled result that  
30 relies on numerous assumptions. The development of technologies to measure direct dry  
31 deposition will benefit the diagnosis and improvement of process formulations in models.

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2 Consideration has been given to change the atmospheric indicator from  $\text{NO}_Y$  to total  
3 nitrate (the sum of nitric acid and particulate nitrate). The rationale for that approach is that a  
4 larger fraction of the deposited  $\text{NO}_Y$  is accounted for by total nitrate, which currently is  
5 measured in CASTNET with high confidence. One can reason adequately that nitrate may  
6 correlate well with total oxidized nitrogen deposition relative to  $\text{NO}_Y$ , given the inherent noise  
7 associated with variable contributions of low deposition velocity species of ambient level  
8 significance (e.g.,  $\text{NO}_2$ ). The disadvantages of using total nitrate as an indicator are that  
9 significant ambient mass with the potential for deposition is not captured, and  $\text{NO}_Y$  is a preferred  
10 measurement for model evaluation and accountability purposes. Accountability refers to  
11 assessing if emissions reductions have the intended consequences on ambient air and deposition  
12 levels in the context of, “Aare our emissions reductions strategies working as planned?” All three  
13 of these concerns relate to the benefit of closing mass balances in whatever environmental  
14 medium is being characterized. In addition, the use of nitrate alone would create an increased  
15 distancing from the listed criteria pollutant oxides of nitrogen as  $\text{NO}_Y$  does include  $\text{NO}$  and  $\text{NO}_2$ .

## 16 17 **8.2 Reactive Oxidized Nitrogen and Sulfur Species.**

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19  *$\text{NO}_Y$  species.* Air quality models and deposition models that use direct observations calculate  
20 ‘deposition on a species by species basis to account for differences in deposition velocities.  
21 Consequently, the relative fractional contributions of individual  $\text{NO}_Y$  or  $\text{SO}_X$  species to  
22 deposition or concentration is influenced by the differences in species deposition velocities. For  
23 example, nitric acid with a high deposition velocity would exhibit a larger relative contribution  
24 to overall deposition compared to ambient concentrations in a particular area (Figure 8-1). The  
25 dominant ambient air  $\text{NO}_Y$  species are  $\text{NO}$ ,  $\text{NO}_2$ ,  $\text{HNO}_3$ ,  $\text{P-NO}_3$  and PAN. Near source urban  
26 environments typically have a relatively higher fraction of  $\text{NO}_X$  compared to the products of  
27  $\text{NO}_X$  reactions, nitrates and PAN, which are relatively more dominant in rural locations (Figures  
28 8-2 – 8-5).

29  
30 The differences in the relative patterns between ambient air and deposition on a species  
31 by species basis illustrate a number of challenges and considerations in developing a monitoring

1 strategy. It is clear in the Adirondacks and Shenandoah areas that nitric acid is the most  
2 dominant contributing species from a deposition perspective (Figure 8-1), with significant  
3 contributions from particulate nitrate, PAN and NO<sub>2</sub>. The original source of emissions (NO  
4 accounts for 90-95% of all emitted NO<sub>x</sub>) provides very small (< 5%) contributions to ambient air  
5 and virtually nothing to deposition. The combination of nitric acid and particulate nitrate  
6 consistently contribute greater than 50% of the oxidized nitrogen dry deposition load, whereas  
7 PAN and NO<sub>2</sub> contribute roughly 15-25% of the deposition load. These broad summary  
8 statements speak to some of the monitoring considerations addressed earlier, particularly the case  
9 for monitoring for total nitrate. However, caution should be exercised when considering not  
10 measuring a considerable fraction of the ambient NO<sub>y</sub> burden reflected in NO<sub>2</sub> and PAN.  
11 Characterization of NO<sub>2</sub> deposition is an area requiring further refinement especially considering  
12 that NO<sub>2</sub> is a significant component of total oxidized nitrogen. Zhang et al. (2005) suggest that  
13 NO<sub>2</sub> contributes up to 36% of dry NO<sub>y</sub> deposition in rural Eastern Canadian locations, and  
14 suggest, based on observational evidence (Figure 8-2), that in some locations NO<sub>2</sub> deposition  
15 may be similar to nitric acid contributions.

16

17 A sampling of co-located NO<sub>y</sub> species observations in rural Eastern Canada (Figure 8-2),  
18 particularly in Egbert, Ontario, illustrates the concern of the general assumption that NO<sub>2</sub> may  
19 not contribute significantly to NO<sub>y</sub> deposition in rural locations. While it may be true that in  
20 general NO<sub>2</sub> is of less of concern in rural areas relative to urban areas, that does not dismiss the  
21 potential for significant misrepresentation of total nitrogen budget in certain rural locations.

22

23 The results also raise the question of potential efficiencies gained from not cycling  
24 between NO and NO<sub>y</sub> analyses, which is the standard configuration in commercial NO<sub>y</sub>  
25 instruments, acknowledging the limited use of NO data in rural, acid sensitive environments  
26 (note that NO present in the air would still be captured in the NO<sub>y</sub> measurement).

27

28 These examples are used to support the rationalization of using NO<sub>y</sub> as an appropriate  
29 atmospheric indicator in applying the AAPI. However, while it may be required to measure  
30 NO<sub>y</sub> for explicit AAPI calculations to determine compliance with a NO<sub>x</sub>/SO<sub>x</sub> standard, there  
31 should be additional measurements of true NO<sub>2</sub>, HNO<sub>3</sub>, p-NO<sub>3</sub> and PAN to allow for diagnostic

1 evaluations of both air quality models and the NO<sub>Y</sub> measurement itself. This recommendation  
2 would leverage existing CASTNET filter pack (FP) observations necessary to capture particulate  
3 sulfate (discussed below) and therefore require the addition of NO<sub>2</sub> measurements and periodic  
4 sampling for PAN.

5  
6 ***Sulfur Species.*** Although sulfur dioxide and particulate sulfate contribute approximately 60 and  
7 40 %, respectively, to ambient SO<sub>x</sub> concentrations, sulfur dioxide is the dominant contributor to  
8 SO<sub>x</sub> deposition (Figure 8-6), which is consistent with CASTNET observational studies (Sickles  
9 and Shadwick, 2007). Measurement technology issues are not as complex for SO<sub>x</sub> as they are  
10 for NO<sub>Y</sub> and individual NO<sub>Y</sub> species. Issues related to particle size fraction and averaging  
11 period for SO<sub>x</sub> are discussed below.

### 12 13 ***Reduced Nitrogen.***

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15 The AAPI does not include reduced nitrogen (ammonia gas and ammonium ion) as an  
16 ambient air indicator. However, reduced nitrogen deposition is an explicit AAPI component  
17 which is estimated through air quality modeling. As discussed in the Chapter 7, characterization  
18 of reduced nitrogen deposition processes is an active developmental area which would benefit  
19 markedly from NH<sub>x</sub> measurements in order to assess modeled predictions of ambient patterns of  
20 ammonia and ammonium. This need for monitoring ammonia in rural environments is further  
21 supported by emerging evidence that ammonia acts as a regionally dispersed species based on  
22 the inclusion of ammonia bi-directional flux in CMAQ simulations. (Dennis et al., 2010).  
23 Monitoring method approaches under consideration for routine application typically are limited  
24 to time averaged filter and denuder technologies, including passive sampling approaches.

### 25 26 **8.3 What measurements would be used to characterize NO<sub>y</sub> and SO<sub>x</sub> ambient air 27 concentrations for the purposes of the AAPI based standard?**

28  
29 Ambient NO<sub>y</sub>, SO<sub>2</sub> and particulate sulfate (SO<sub>4</sub>) concentrations would be used as the  
30 indicators in determining compliance with the standard. All of these indicators are measured in  
31 different places within the current routine monitoring networks (section 3.2). However, there are

1 issues requiring resolution associated with Federal Reference or Equivalency Measurement  
2 (FRM/FEM) status of measurement techniques that to date have served as supplemental  
3 information, which will require resolution. A FRM for SO<sub>2</sub> exists, but not for NO<sub>y</sub> or SO<sub>4</sub>. Only  
4 recently have NO<sub>y</sub> measurements, which historically were viewed as research venue  
5 measurements, been incorporated as “routine” observations, partly as a result of the NCore  
6 program. Acquiring FRM status may require better characterization of the conversion  
7 efficiencies, mass loss and clear guidance on operating and siting procedures. Particulate sulfate  
8 has been measured for several years in the IMPROVE, CASTNET and EPA CSN networks. The  
9 nation has over 500 24-hour average, every third day sulfate measurements produced by the  
10 PM<sub>2.5</sub> speciation networks (IMPROVE and EPA CSN) and nearly 80 CASTNET sites that  
11 provide continuous weekly average samples of sulfate with an open inlet accommodating all  
12 particle sizes. With minor exceptions, the PM<sub>2.5</sub> fraction generally accounts for over 80% of the  
13 ambient sulfate mass. Unfortunately, as particle size diameters increase beyond 2.5 μ,  
14 gravitational settling imparts greater influence resulting in substantially enhanced deposition  
15 velocities. Consequently, the sulfate mass in size fractions greater than 2.5 μ potentially  
16 provides correspondingly greater contribution to as much as 50% of dry sulfate deposition in  
17 certain locations (Grantz et al., 2003).

18  
19 Sample collection period is not an issue for gaseous measurements of NO<sub>y</sub> and SO<sub>2</sub> that  
20 operate continuously. However, consideration should be given to using the CASTNET FP for  
21 SO<sub>2</sub> measurements as a resource saving option, assuming the FPs will be used for particulate  
22 sulfate. However, the availability of highly time resolved data will support the continual  
23 evaluation of SO<sub>2</sub> and sulfate balance in air quality modeling systems which is a critical  
24 underpinning for both human and ecosystem health assessments. Some concerns have been  
25 raised about the possibility of exclusion of coarse particles from NO<sub>y</sub> samplers operating at low  
26 flow conditions as well as potential difficulties of reducing organically bound and mineralized  
27 nitrate. Insight into conversion and capture efficiency characteristics will be advanced both by  
28 research catalyzed by the need to support this standard and through ongoing and future network  
29 operations.

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#### 31 **8.4 What additional complementary measurements are recommended?**

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2 We recommend that there be 3-4 locations nationally, in airsheds with different  
3 atmospheric chemistries, that sample not only for the NAAQS indicator NO<sub>Y</sub> but for the suite of  
4 major NO<sub>Y</sub> species as well; HNO<sub>3</sub>, p-NO<sub>3</sub>, PAN, true NO<sub>2</sub>, and NO as discussed earlier. Not  
5 only is this important from a modeling and process diagnosis perspective, but it is especially  
6 useful in the introduction of new measurements that have a limited track record to provide  
7 insight into instrument performance. In the case of NO<sub>Y</sub>, it is even more relevant since there  
8 effectively are no standards that explicitly challenge instrument accuracy given the highly  
9 variable nature of NO<sub>Y</sub> species distribution and the instability associated with mixing NO<sub>Y</sub> gases.  
10 This quality assurance issue is analogous to PM<sub>2.5</sub> where aerosol standards are not available and  
11 measurement accuracy is judged against periodic challenges relative to a “gold standard”  
12 instrument. Reduced nitrogen measurements of ammonia and ammonium ion are recommended  
13 at all locations with FRM/FEM instruments based on the need to support the AAPI as discussed  
14 above.

## 15 16 **8.5 What sampling frequency would be required?**

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18 The averaging time for the standard is likely to be an annual average, perhaps based on 3-  
19 5 years of data collection to minimize the influence of interannual variability in meteorology,  
20 especially precipitation.. Conceptually, extended sampling periods no longer than one year  
21 would be adequate for the specific purposes of comparison to a standard. However, there are  
22 significant peripheral benefits relevant to improving the scientific foundation for subsequent  
23 reviews and a variety of related air quality and deposition assessments to be gleaned from more  
24 highly time resolved data. In particular, the critical role of air quality models in deposition  
25 assessments implies value to be derived from measurements that support model evaluation and  
26 improvement. Many of the monitoring approaches that are used throughout the nation sample  
27 (or at least report out) on daily (PM<sub>2.5</sub> chemical speciation), weekly (CASTNET) and hourly (all  
28 inorganic gases) periods. There is a tradeoff to consider in sampling period design. For  
29 example, the weekly CASTNET collection scheme covers all time periods throughout a year, but  
30 only provides weekly resolution that misses key temporal and episodic features valuable for  
31 diagnosing model behavior. The every third day, 24-hour sampling scheme used in IMPROVE

1 and EPA speciation monitoring does provide more information for a specific day of interest yet  
2 misses 2/3 of all sampling periods. The missing sampling period generally is not a concern when  
3 aggregating upward to a longer term average value as the sample number adequately represents  
4 an aggregated mean value. Additionally, there is a benefit to leveraging existing networks which  
5 should be considered in sampling frequency recommendations. A possible starting point would  
6 be to assume gaseous oxidized species,  $\text{NO}_Y$  and  $\text{SO}_2$ , are run continually all year reporting  
7 values every hour, consistent with current routine network operations. Sulfate sampling periods  
8 should coincide with either the chemical speciation network schedules or with CASTNET.  
9 There are advantages to coordinating with either network. Ammonia gas and ammonium ion  
10 present challenges in that they are not routinely sampled and analyzed for, and the combined  
11 quantity,  $\text{NH}_X$  is of interest. Because  $\text{NH}_X$  is of interest, some of the problems of volatile  
12 ammonia loss from filters may be mitigated. However, for model diagnostic purposes,  
13 delineation of both species at the highest temporal resolution is preferred.

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15 **8.6 What are the spatial scale issues associated with monitoring for compliance, and**  
16 **how should these be addressed?**

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18 The current observation network for  $\text{NO}_Y$ ,  $\text{NH}_X$  and  $\text{SO}_X$  is very modest and includes a  
19 monitoring network infrastructure that is largely population oriented with the exception of  
20 CASTNET and IMPROVE. While there is platform and access infrastructure support provided  
21 by CASTNET, NADP and IMPROVE, those locations by themselves are not likely to provide  
22 the needed spatial coverage to address acid sensitive watersheds across the United States.  
23 Ambient monitoring at every watershed will not be required given the reality of resource  
24 constraints and the relative spatial homogeneity of air concentrations that are averaged over  
25 annual time periods and within ‘acid sensitive’ areas. The spatial monitoring requirements will  
26 be associated with the determination of acid sensitive areas, which is discussed at length in  
27 Chapter 5. The number of sites per area will be addressed in rule development and general  
28 guidance based on an understanding of the spatial variability of  $\text{NO}_Y$ ,  $\text{NH}_X$ , sulfate and  $\text{SO}_2$   
29 combined with resource allocations will help inform those decisions.

30

1 Critical load models applied for the purposes of this standard would be based on annual  
2 averages, which effectively serves to dampen much of the spatial variability. Furthermore, the  
3 development of an area-wide depositional load tradeoff curve implies focus on region wide  
4 characterization. Toward that end, CMAQ concentration fields will provide insight into the  
5 likely spatial representativeness of monitors leading to efficient application of monitoring  
6 resources. For example, the CMAQ based spatial coefficient of variation (standard  
7 deviation/mean) of oxidized nitrogen in the Adirondacks was 1.46%. Improved dry deposition  
8 estimates will result from enhancements of ambient monitoring addressing the N/S secondary  
9 standards as each additional location could serve a similar role that existing CASTNET sites  
10 provide in estimating dry deposition.

11

## 12 **8.7 What specific monitoring methods would be used?**

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14 Federal reference and/or equivalent methods (FRM/FEM) are presently available only for  
15 SO<sub>2</sub>. Particulate SO<sub>4</sub> is measured at over 500 sites nationally, and there is a general consensus  
16 that methods available are reliable and provide consistent data. NO<sub>Y</sub> measurement is in a  
17 transition period from largely being viewed as a research level measurement to now being  
18 deployed as a routine measurement in EPA's national 75 site N CORE network. The general  
19 consensus on NO<sub>Y</sub> measurement is that the methodology is sound and applicable for  
20 routine/regulatory use, but there does not exist a well defined understanding of the quality of  
21 NO<sub>Y</sub> data. Inorganic dry nitrate (nitric acid and particulate nitrate) is measured routinely in the  
22 CASTNET network with filter packs (FP).

23

24 One of the challenges associated with specifying performance attributes for p-SO<sub>4</sub> and  
25 NO<sub>Y</sub> is the lack of specific challenge standards. For example, instruments measuring discrete  
26 gases such as ozone or nitrogen oxide can be challenged by comparing an instrument's reading  
27 when measuring known concentrations of gases which are readily provided for single gas  
28 concentrations. Particle standards are not available. NO<sub>Y</sub> performance typically is challenged by  
29 known mixtures of NO<sub>2</sub>, and occasionally with N-propyl nitrate, which only addresses part of the  
30 spectrum of nitrogen species in an NO<sub>Y</sub> mix. Consequently, instrument performance in EPA's  
31 national networks for aerosol mass is quantified in terms of bias and precision relative to a co-

1 located “performance evaluation” instrument. There is no comparable program in place for p-  
2 SO<sub>4</sub> or NO<sub>y</sub>.

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4 **p-SO<sub>4</sub>**. The routinely operating methodology for particulate sulfate (p-SO<sub>4</sub>) is based on  
5 an integrated (i.e., time averaged over several hours or days) sample collection on a Teflon filter  
6 followed by ion chromatography (IC) detection in the laboratory. Two major variations of this  
7 approach are applied in the PM<sub>2.5</sub> speciation (exclusion of particles larger than 2.5 μ and 24-hour  
8 collection typically every third day) and CASTNET (weekly average integrated sampling all year  
9 with an open inlet to include all size fractions). There are additional variations related to inlet  
10 design and flow characteristics of PM<sub>2.5</sub> speciation samplers in which two designs are prevalent  
11 in the networks: (IMPROVE and EPA CSN SASS samplers). These variations are considered  
12 minor as sulfate species (dominated by ammonium sulfate) typically are not subject to major  
13 sampling artifacts associated with volatilization or condensation. The difference in inlets (open  
14 vs. 2.5 μ) is perceived by some as not an issue of concern as 80 - 90 % of the PM sulfate mass is  
15 distributed in size fractions less than 2.5 μ. However, the higher deposition velocities associated  
16 with larger diameter particles argue for including all size fractions as discussed above.  
17 Continuously operating in-situ sulfate instruments that allow for hourly, or less, data reporting  
18 are available. However, the limited deployment (less than 20 sites nationally) of these  
19 instruments combined with the 2.5 μ inlet cutoff configuration preclude consideration at this  
20 time.

21  
22 The CASTNET FP offers three important attributes: a history of high quality data,  
23 existing infrastructure and network to build on and an open inlet to capture the full range of  
24 particle diameters. EPA intends to develop FRM status for this method. A significant  
25 additional advantages of using the FP method will be the availability of important co-measured  
26 species (e.g., SO<sub>2</sub>, total nitrate, ammonium). While EPA will expedite the certification process  
27 for the CASTNET FP, in the future consideration should be given to other available methods to  
28 more efficiently leverage network assets. For example, the SASS sampler potentially would  
29 accommodate ammonia gas and ammonium ion measurements, as well as other standard  
30 chemical speciation parameters depending on the configuration of this multi channel system.  
31 Continuous sulfate measurements would be extremely useful for model evaluation, especially

1 considering the availability of continuous SO<sub>2</sub> data that would be required as part of the NAAQS  
2 indicators. A performance based approach to meet equivalency requirements, given the variety  
3 of sulfate measurement approaches and well vetted and accurate analytical procedures.  
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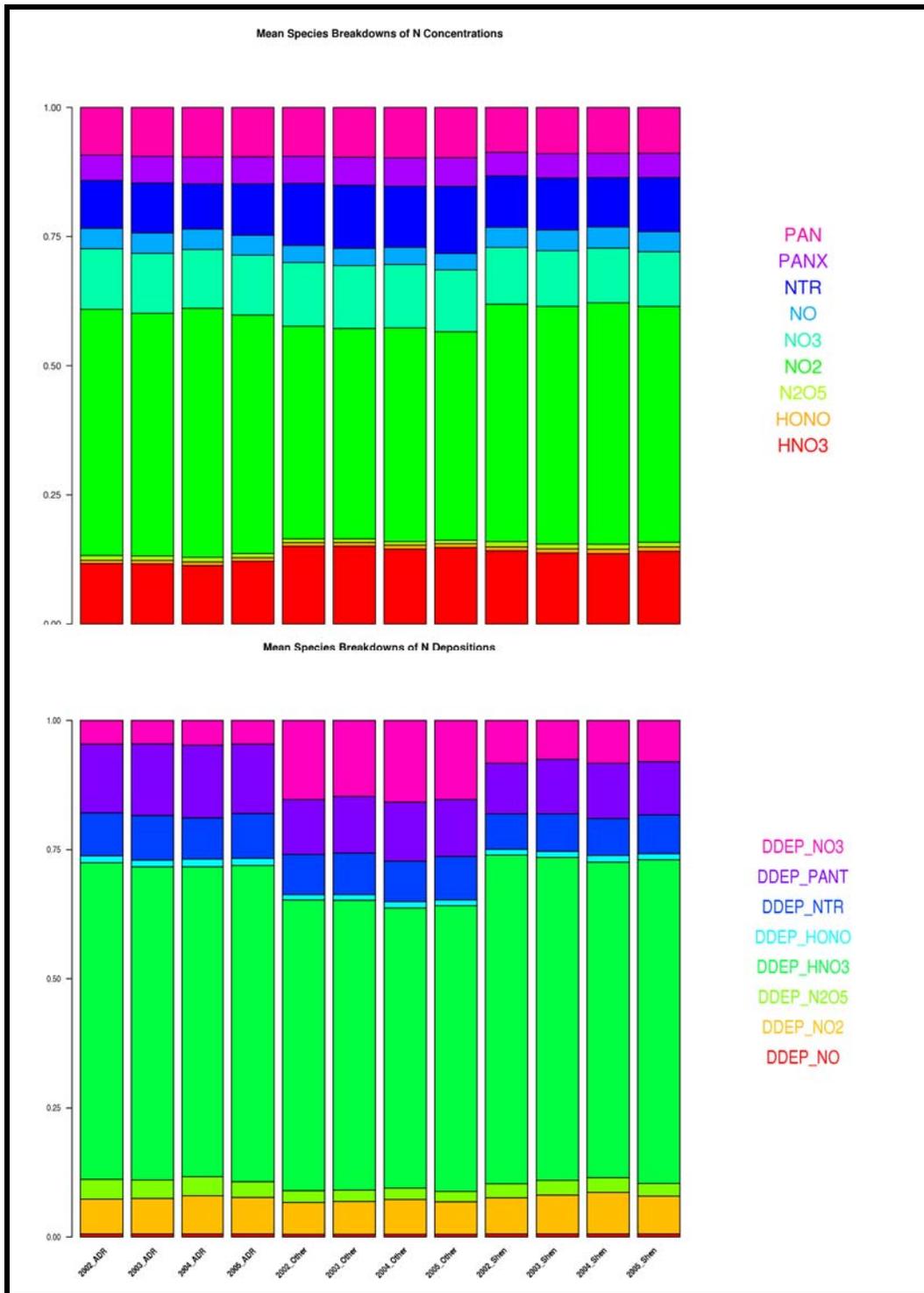
5 **SO<sub>2</sub>.** Sulfur dioxide is a NAAQS pollutant and a FRM is available. See 75 FR at 35554-  
6 56 and 35593-95 (June 22, 2010) (adopting a second FRM for SO<sub>2</sub>). As part of the NCore  
7 network development effort, trace gas SO<sub>2</sub> analyzers capable of sub ppb resolution became  
8 commercially available and are the preferred instruments for implementation in rural locations.  
9 As discussed above, the near continuous data output of gaseous analyzers is desired for  
10 peripheral support of model evaluation. Nevertheless, the convenience and resource savings  
11 associated with the CASTNET FP suggest that Federal Equivalency Method (FEM) status should  
12 be incorporated in concert with the sulfate certification process.  
13

14 **NO<sub>Y</sub>.** In principle, measured NO<sub>Y</sub> is based on catalytic conversion of all oxidized  
15 species to NO followed by chemiluminescence NO detection. While there are caveats associated  
16 with instrument conversion efficiency and possible inlet losses, the technique is considered  
17 adequate and routinely operational. Approximately 25 sites (out of a planned 75) in EPA's  
18 NCore network are operating NO<sub>Y</sub> instruments, and an additional 5-10 sites are operated in  
19 SEARCH, CASTNET and other programs. NO<sub>Y</sub> measurements are nearly continuous, reporting  
20 at hourly intervals providing far greater temporal information compared to filter or denuder  
21 based methods. FRM certification for NO<sub>Y</sub> presents more considerable challenges given the  
22 limited history of routinely operating instruments.  
23

## 24 **8.8 REFERENCES**

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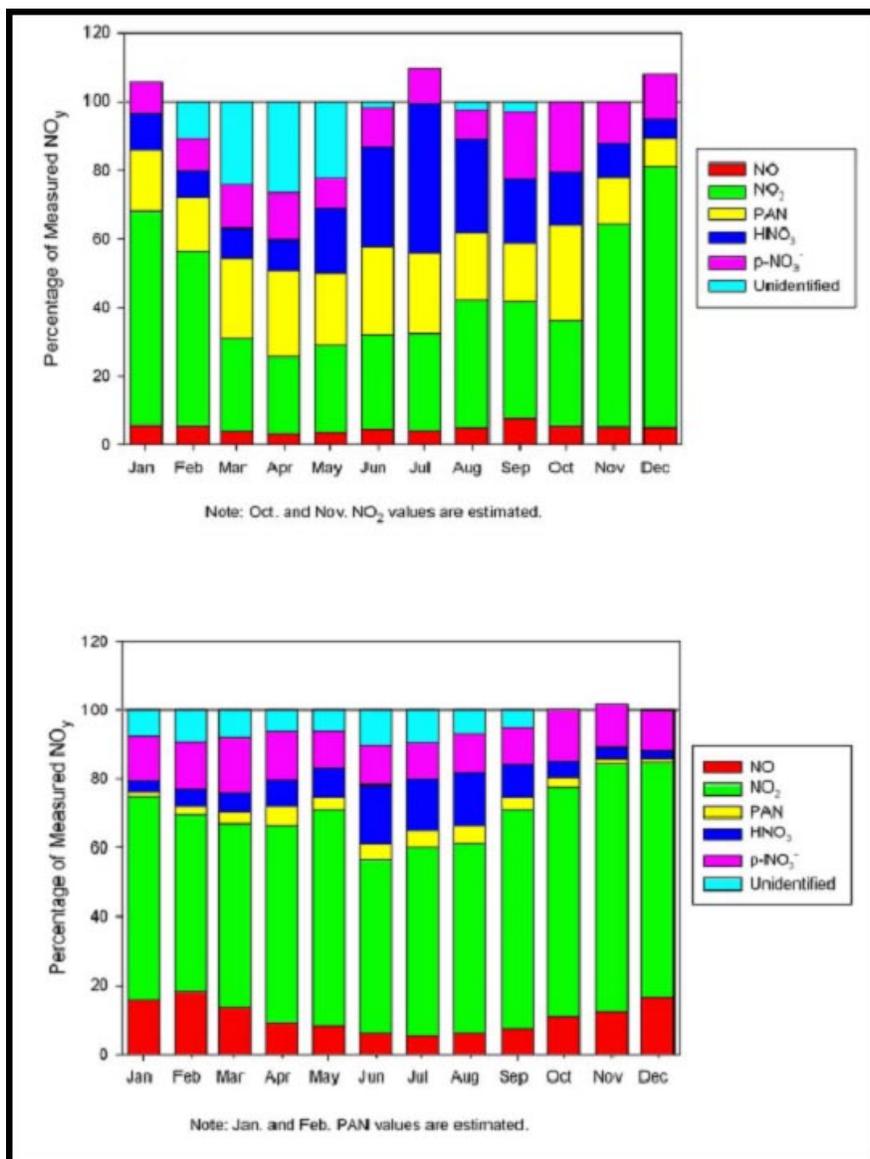
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3 across Eastern Canada. *Atmospheric Environment* 39 (2005) 7030-7043.  
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**Figure 8-1** Annual 2002 – 2004 CMAQ derived annual average fraction of ambient concentrations (above ) and deposition (below) of individual NO<sub>y</sub> species delineated by the Adirondack and Shenandoah case study areas and the remainder of the Eastern U.S. domain.

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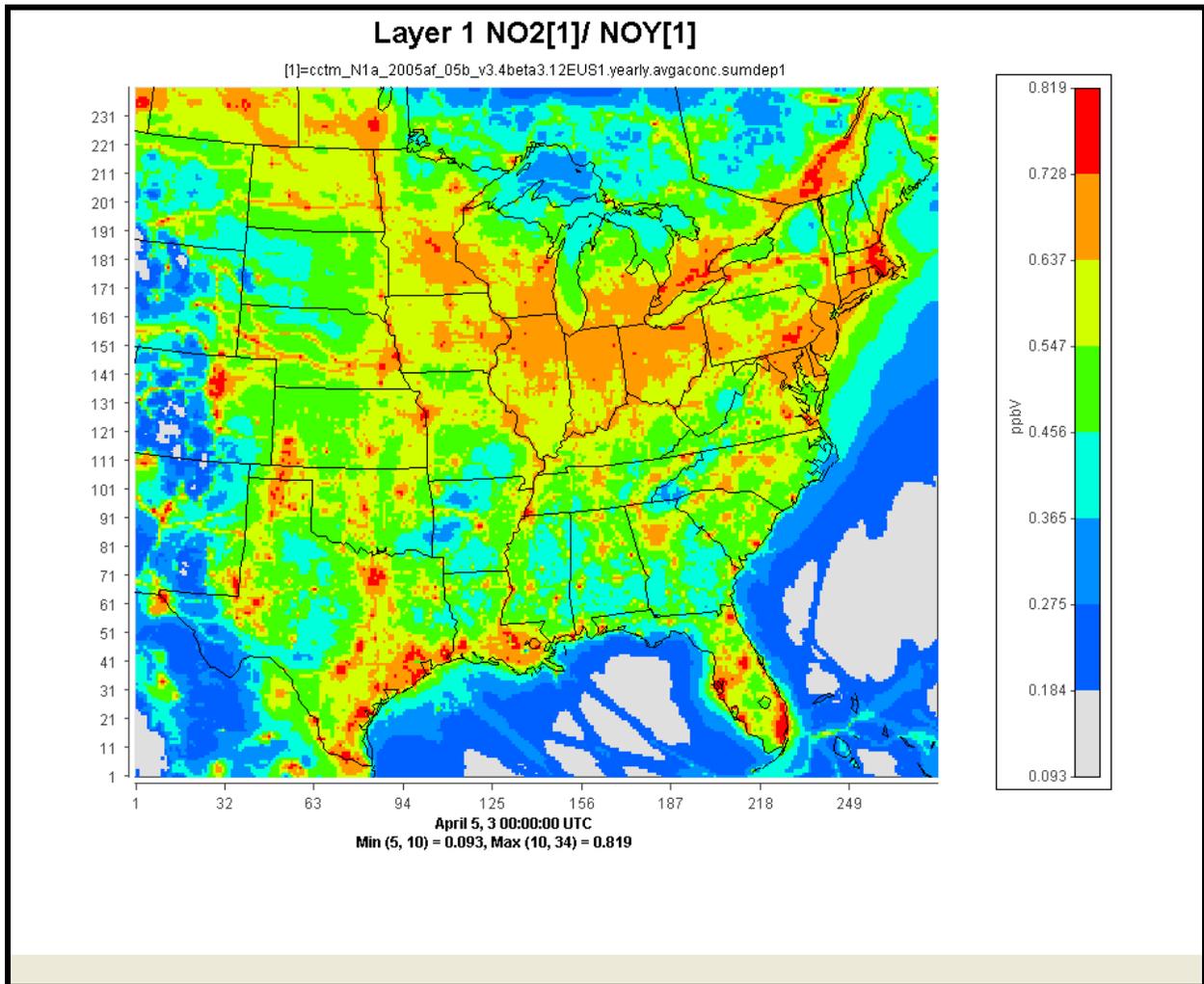


2

3 **Figure 8-2** Examples of the Relative Abundance of Several NO<sub>y</sub> Species Measured at Two  
4 Rural Southeastern Canadian Sites as a Fraction of the Total Measured NO<sub>y</sub>  
5 Concentration -- Kejimkujik, NS, (top) and Egbert, ON, (bottom) during 2003.  
6 Although both sites are in rural locations, the Kejimkujik, NS site represents more  
7 aged air masses as it lies considerably further downwind from major sources of  
8 NO<sub>x</sub> relative to the Egbert site. (Source: NARSTO, 2010)

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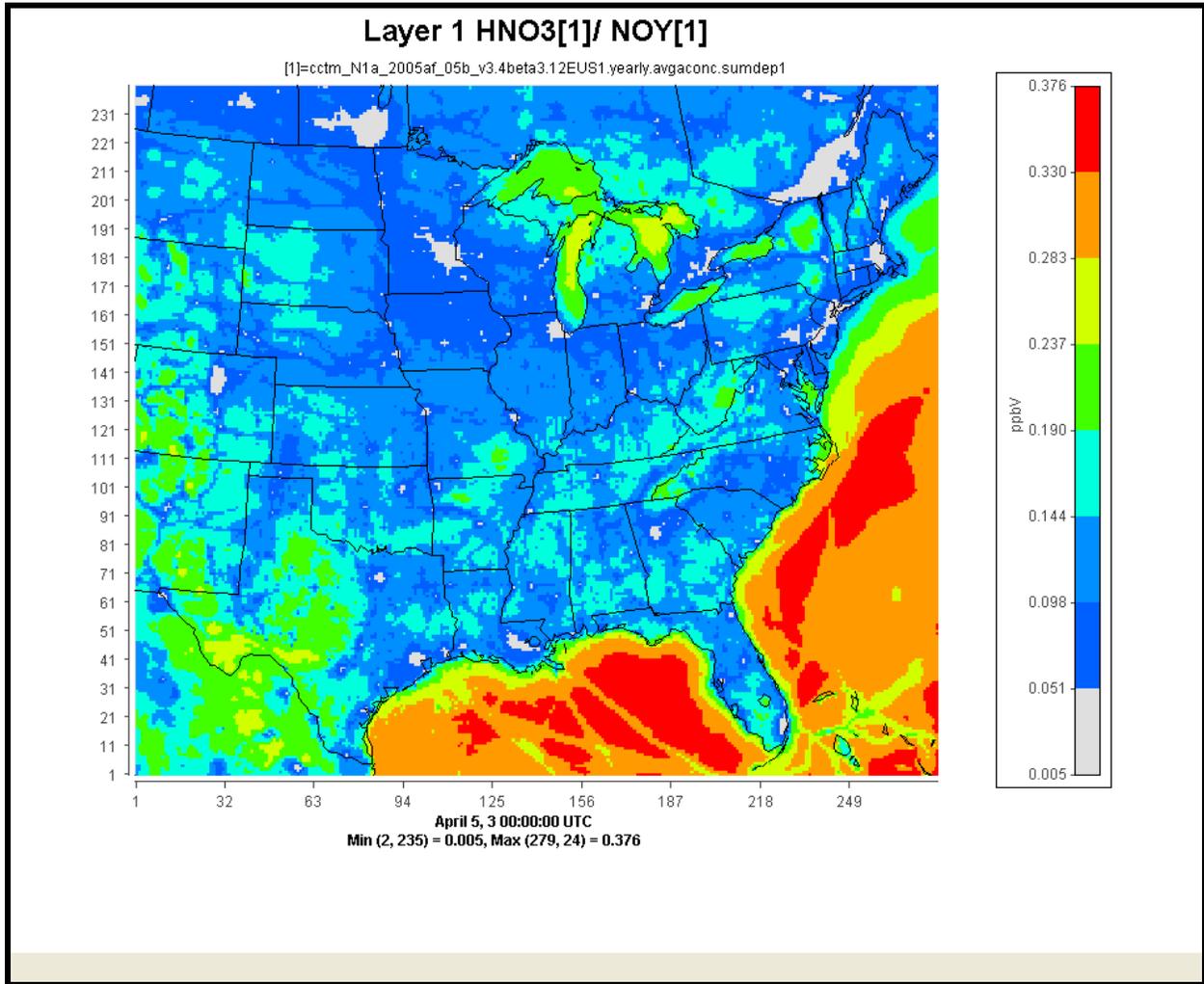


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3 **Figure 8-3 Annual average fraction of NO<sub>y</sub> ambient air contributed by NO<sub>2</sub> based on**  
4 **2005 CMAQ Eastern U.S. simulation at 12 km grid cell resolution.**

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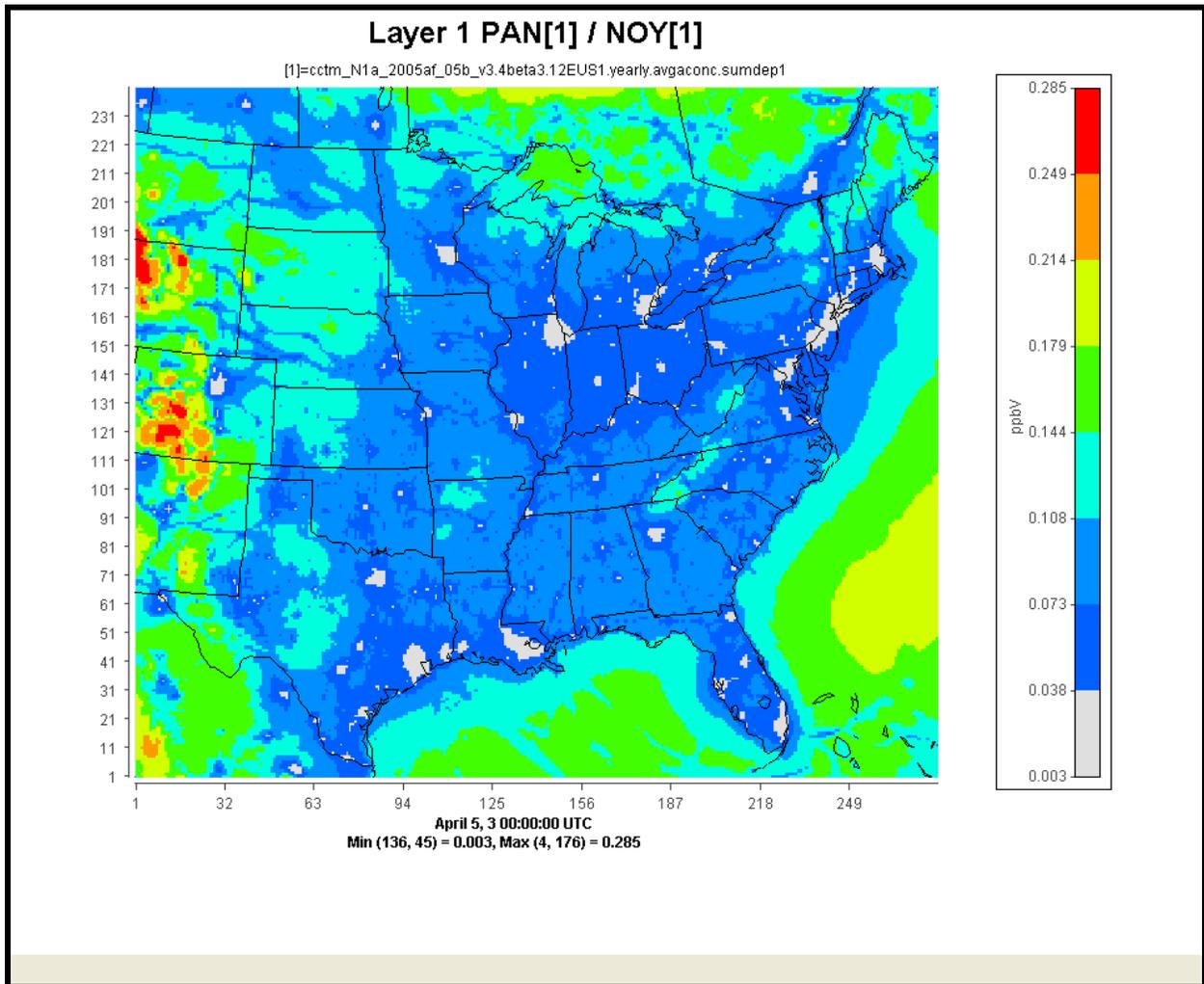


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3 **Figure 8-4 Annual average fraction of NO<sub>y</sub> ambient air contributed by HNO<sub>3</sub> based on**  
4 **2005 CMAQ Eastern U.S. simulation at 12 km grid cell resolution.**

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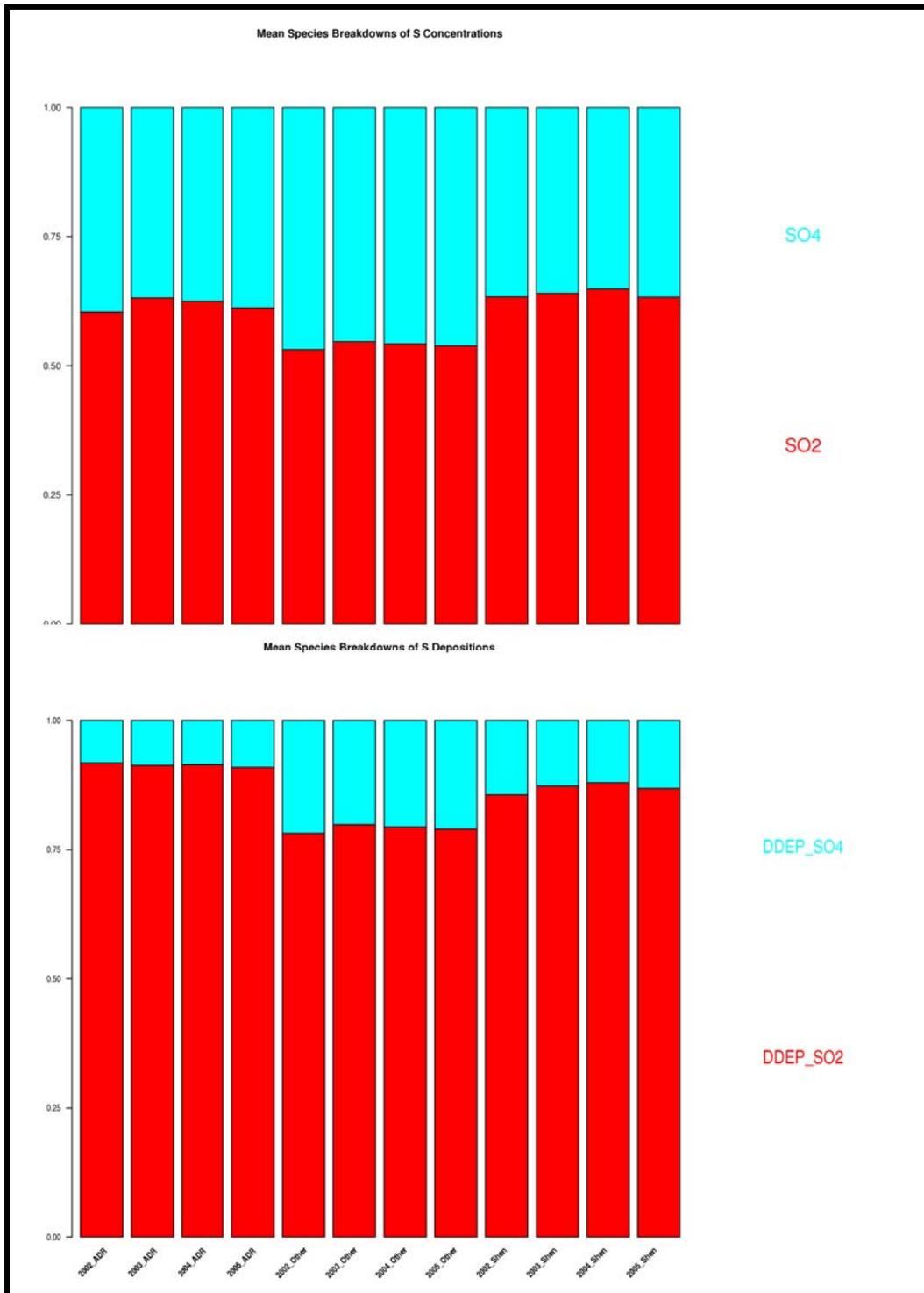
2

3 **Figure 8-5 Annual average fraction of NO<sub>y</sub> ambient air contributed by PAN based on**  
4 **2005 CMAQ Eastern U.S. simulation at 12 km grid cell resolution.**

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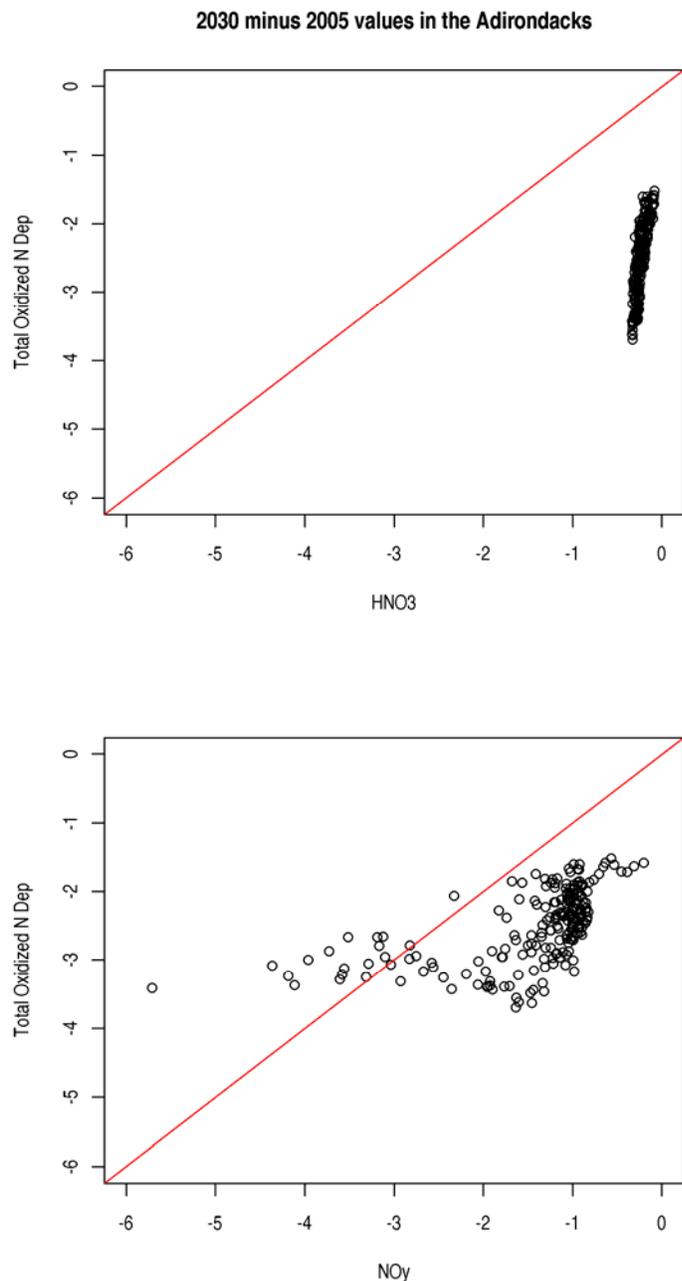
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**Figure 8-6** Annual 2002 – 2004 CMAQ derived annual average fraction of ambient concentrations (above ) and deposition (below) of individual SO<sub>x</sub> species delineated by the Adirondack and Shenandoah case study areas and the remainder of the Eastern U.S. domain.



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 2 **Figure 7.** Relationship of the change in total oxidized nitrogen deposition to change in ambient nitric acid (top)  
 3 and ambient NO<sub>y</sub> (bottom) based on changes in concentration and deposition fields associated with current (2005)  
 4 and reduced emission CMAQ simulations. The values are based on the changes imparted for each 12 km grid cell  
 5 within the Adirondack region. The emissions NO<sub>x</sub> and SO<sub>x</sub> emissions reductions of 50% and 42%, respectively  
 6 across the entire Eastern U.S.

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