

4/3/14 Additional Preliminary Draft Comments for Deliberations of the CASAC Air Monitoring and Methods Subcommittee Subcommittee Review of EPA's Federal Reference Method for Ozone: Nitric Oxide (NO)-Chemiluminescence. Please Do not Cite or Quote. These comments are preliminary and do not represent CASAC consensus comments nor EPA Policy.

Additional Preliminary Comments from George A. Allen
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Review of EPA's Federal Reference Method for Ozone: Nitric Oxide (NO)-Chemiluminescence
Received as of April 3, 2014

Purpose: These are Additional Preliminary Comments from George A. Allen, a member of the CASAC Air Monitoring and Methods Subcommittee (AMMS), related to the AMMS's review of EPA's Ozone National Ambient Air Quality Standard (NAAQS) documentation that focuses on the EPA Office of Research and Development's recommended second Federal Reference Method for Ozone (Recommended Method: NO-Chemiluminescence).

George A. Allen

As noted in my comments that were posted on April 1, 2014 on our AMMS April 3rd teleconference website, the recent precedent for elevating an existing FEM method to FRM status is the April 2012 SO₂ NAAQS revision, the first link at:

<http://www.epa.gov/airquality/sulfurdioxide/actions.html>

The panel might find this useful as an example of what EPA did last time. The section on the new SO₂ FRM starts on page 35593 of the FR notice.

EPA's current list of designated reference and equivalent monitoring methods is at:

<http://www.epa.gov/ttnamt1/files/ambient/criteria/reference-equivalent-methods-list.pdf>

It is interesting to note that even though the Fluorescence SO₂ method is now an FRM (as of April 2012), none of the existing FEM Fluorescence SO₂ Analyzers have been designated as FRM monitors.