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March 14, 2024

Michael S. Regan, Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.O 20460  
Email To: [Regan.Michael@epa.gov](mailto:Regan.Michael@epa.gov)

Submitted To: Docket No. EPA–HQ–OAR–2023–0642

**Re: Notice of Opportunity To Comment on Proposed Update of PM2.5 Data From T640/T640X PM Mass Monitors**

Dear Administrator Regan:

The Midwest Ozone Group ("MOG")<sup>1</sup> is pleased to offer these comments on the February 15, 2024, proposal (89 Fed. Reg. 11,831) by the U.S. Environmental Protection Agency ("EPA") to "...retroactively apply the approved modification of the Federal Equivalent Method (FEM) designation for the Teledyne Advanced Pollution Instrumentation Model T640 particulate matter (PM) mass monitor including the 640X option (hereafter T640 and T640X) to all of the PM with a diameter 2.5 micrometers or smaller (PM2.5) concentration data from the T640 and T640X monitors in the EPA's Air Quality System (AQS) that was reported prior to the modification." The deadline for the submission of comments on this proposal is March 15, 2024.

MOG is an affiliation of companies and associations that draws upon its collective resources to seek solutions to the development of legally and technically sound air quality programs that may impact on their facilities, their employees, their communities, their contractors, and the consumers of their products. MOG's primary efforts are to work with policy makers in evaluating air quality policies by encouraging the use of sound science. MOG has been actively engaged in a variety of issues and initiatives related to the development and implementation of air quality policy, including the revision of the ozone and particulate matter NAAQS, development of transport rules (including the Revised CSAPR Update and the 2015 ozone NAAQS federal implementation plan), nonattainment and attainment designations, petitions under Sections 126, 176A and 184(c) of the Clean Air Act, NAAQS implementation guidance, the development of Good Neighbor State Implementation Plans, exceptional events, and related regional haze and climate change and environmental justice issues. MOG Members and Participants own and operate numerous stationary sources that are affected by numerous air quality requirements.

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<sup>1</sup> The members of and participants in the Midwest Ozone Group include: Alcoa, Ameren, American Electric Power, American Forest & Paper Association, American Iron and Steel Institute, American Wood Council, Appalachian Region Independent Power Producers Association, Associated Electric Cooperative, Berkshire Hathaway Energy, Big Rivers Electric Corp., Buckeye Power, Inc., Citizens Energy Group, City Water, Light & Power (Springfield IL), Cleveland Cliffs, Council of Industrial Boiler Owners, Duke Energy Corp., East Kentucky Power Cooperative, ExxonMobil, FirstEnergy Corp., Indiana Energy Association, Indiana-Kentucky Electric Corporation, Indiana Municipal Power Agency, Indiana Utility Group, Hoosier Energy REC, inc., LGE/ KU, Marathon Petroleum Company, National Lime Association, North American Stainless, Nucor Corporation, Ohio Utility Group, Ohio Valley Electric Corporation, Olympus Power, Steel Manufacturers Association, and Wabash Valley Power Alliance.

Significantly, EPA notes in its proposal that “[t]his update, which will be applied to the unmodified hourly PM<sub>2.5</sub> concentration data in AQS using collocated ambient temperature when available, is expected to result in a much higher number of PM<sub>2.5</sub> monitoring sites using the T640 and T640X FEM methods meeting the bias measurement quality objectives (MQOs).”

Given EPA’s effort to correct historical data for the many Teledyne PM monitors because of their demonstrated bias, and especially because that bias is likely to be more pronounced for wildfire smoke events, MOG is supportive of EPA’s proposal. The use of continuous monitors enables states to acquire data that is beneficial in developing and implementing air quality management policy. The hourly data gathered using continuous monitors greatly assists in establishing the spatial and temporal air quality patterns within a state. However, it has been demonstrated that results of PM air quality measured by the Teledyne monitors are not comparable with the result of PM air quality measured by Federal Reference Method (FRM) monitors, possibly resulting in both an inaccurate calculation of PM design values and erroneous designation of PM nonattainment areas.

These adjustments may also be significant to implementation of other air quality management rules. If nonattainment designations are based on data that could be positively biased by 20% or more, there may be areas that are subject to nonattainment controls that would not be if appropriate data adjustments were in place. In addition, if background calculations needed for PSD permitting are biased high, there may be projects that cannot get permitted when the elevated background combined with the modeled emissions from the project exceed the recently lowered PM NAAQS.

Because of these possibilities and, given the recent revisions to the PM<sub>2.5</sub> NAAQS, MOG urges EPA to adopt the proposed update expeditiously so that states using the Teledyne monitors will be able to accurately and timely evaluate, propose, and possibly revise nonattainment boundaries. MOG also urges that, given the issues with the monitors and the resultant impacts, EPA delay the effective date of the new PM NAAQS and extend by one year the deadline for states to propose nonattainment designations.

Very truly yours,

*/s/ Edward “Skipp” Kropp*

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