

Air Monitoring: U.S. EPA Office of Inspector General Addresses Region 6 Network



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The United States Environmental Protection Agency (“EPA”) Office of Inspector General (“OIG”) issued a December 17th report titled *EPA Can Strengthen Its Reviews of Small Particle Monitoring in Region 6 To Better Ensure Effectiveness of Air Monitoring Network* (“Report”). See Report No. 16-P-0079.

OIG states it conducted an evaluation to determine whether:

“... The U.S. Environmental Protection Agency (EPA) used annual network reviews and assessments to provide reasonable assurance that Region 6’s air monitoring network for fine particulate matter (PM2.5) is achieving EPA monitoring objectives.”

The review specifically included a determination of the extent which Region 6’s annual network reviews and assessments were complete and met requirements (including oversight of state and local agency network reviews and assessments).

EPA Region 6 includes the state of Arkansas.

The sampling of ambient air conditions is an important part of the process for determining whether an area is/or will remain in compliance with Clean Air Act National Ambient Air Quality Standards.

Particulates designated PM2.5 consists of sulfates, nitrates, elemental carbon, organic carbon, compounds, and metals. They are formed by chemical reactions, condensation, coagulation, and nucleation processes of gases. Because of their small size, such particulates can remain in the air for significant periods of time facilitating transport over longer distances.

EPA utilizes Clean Air Act authorities to require state and local monitoring agencies to establish a network of air monitoring stations utilizing siting and operational criteria established by the agency to determine compliance with National Ambient Air Quality Standards. EPA requires state and local agencies to conduct an assessment of their monitoring network every five years.

The OIG report reviewed 2010 and 2013 annual plans, and 2010 network assessments for all six state and local monitoring agencies in Region 6. The review included annual plans and network assessments prepared by the Arkansas Department of Environmental Quality (“ADEQ”).

OIG concluded that state and local air monitor network plans in Region 6 included most information required by the agency for PM2.5 monitoring. It did note, however:

- The annual plans did not provide evidence each monitoring site met regulatory siting criteria.

- An annual plan prepared by Texas CEQ did not include a plan to establish required near-road PM2.5 monitoring sites for the regulatory deadline.
- Some annual plans contained errors or mischaracterizations in how they described the PM2.5 monitoring networks.

OIG noted that neither EPA regulations nor guidance defined what constitutes sufficient evidence in annual plans to demonstrate compliance with monitoring siting requirements and suggested clarification by the federal agency.

The OIG report also opined that network assessments in Region 6 could be improved to better address the intent of the assessment process. It's stated that the assessments reviewed did not address several elements required by EPA.

Table 1 of the report addressed the five Region 6 agencies (including ADEQ) and the City of Albuquerque. The table assesses questions such as whether the agencies network meets the monitoring objectives and new sites are needed along with others.

[A copy of the OIG report can be downloaded below.](#)