

New York State Department of Environmental Conservation

Division of Air Resources, 9th Floor

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Joe Martens
Commissioner

JUL - 7 2014

Mr. Richard Ruvo, Chief
Air Programs Branch
Environmental Protection Agency, Region 2 Office
290 Broadway, 25th Floor
New York, New York 10007-1866

Dear Mr. Ruvo:

In 2012 DEC undertook a limited air quality study in the Buffalo West Side Neighborhood surrounding the Peace Bridge Plaza to establish baseline conditions related to construction in the area. Community members in the Peace Bridge area have expressed concern that ultrafine particles are impacting their health and may be contributing to high rates of asthma in these communities. Our ambient air monitoring network and the data collected in the first phase of our air quality study of the impact of the Peace Bridge Plaza on the surrounding neighborhood have not indicated any levels of fine Particulate Matter (PM_{2.5}) that exceed National Ambient Air Quality Standards (NAAQS).

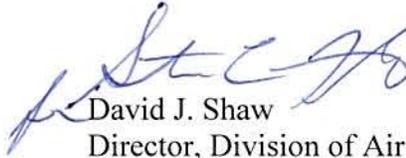
In the last review of the PM NAAQS, the Administrator concluded that “there was insufficient scientific information to support considering a separate indicator for ultrafine particles.” The Administrator determined that the summary of health outcomes was only suggestive and did not indicate the causal connection required before EPA sets a NAAQS. DEC is developing, in conjunction with residents of the Peace Bridge area, the next phase of air quality monitoring in this area. As DEC plans and then implements this next phase of monitoring, we ask that EPA consider supporting a pilot study of ultrafine particle data collection for the residents in the neighborhood near the Peace Bridge.

DEC staff have worked with researchers for more than a decade to learn about ultrafine particles in the ambient air and those emitted from mobile sources. We understand that studies have shown linkages between ultrafine particles and health effects but that it is difficult to separate these effects from the well documented effects of PM_{2.5} exposure. With EPA’s support, DEC would like to work with area residents, local community groups and State and local health departments to design an ultrafine particle monitoring study. The primary objective of the study should be to provide additional information necessary for the EPA to establish a NAAQS for ultrafine particles.

We look forward to your support of this pilot study. Please call me at (518) 402-8452 if you have any questions.

MOS 7 - JUL

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Shaw", is written over the printed name.

David J. Shaw
Director, Division of Air Resources

c: H. Zucker, M.D., J.D., NYSDOH