

## **MEETING NOTICE & AGENDA**

### **AIR QUALITY FORUM**

**January 14, 2025**

**10:00 – 11:30 a.m.**

**Zoom**

#### **Members Present:**

Rollin Sachs, Johnson County DHE (Co-Chair)  
Andy Savastino, Kansas City, Mo. (Co-Chair)  
Kelly Gilbert, Metro Energy Center  
Danny Williams, City of Kansas City, Mo.  
Josh Wood, City of Olathe, Ks.  
Richard Rocha, Bayer  
Juan Yin, MoDOT  
Carol Adams,  
Allison Smith, KDOT  
Jennifer Stewart, Unified Government  
Michael Park, Lee's Summit  
Sarah Monson, Wyandotte County  
Doug Watson, KDHE  
Brian Alferman, Johnson County, KS  
Jon Neuberger, Sierra Club

#### **Other Attendees:**

Chris Brame, Weather or Not  
Sullivan Brown, Weather or Not  
Leena Divakar, Kansas State PPI  
Tiffany Le, KCBPU  
Jim Starcev, KC Digital Drive  
Blake Butler, City of Kansas City, Mo.  
Adel Alsharafi – MoDNR  
Bethany Olson, EPA Region 7  
Garrett Garrison. Unified Government  
Kurt Heine, MoDNR  
Mark Leath, MoDNR  
Nicole Weidenbrenner, MoDNR

#### **MARC Staff:**

Karen Clawson  
Doug Norsby  
Ron Achelpohl  
Tom Jacobs  
Kate Ludwig  
Faith Eberhart  
Bridget Koan  
Rachel Krause

- **Introductions and Determination of Quorum**

- **Approval of December Meeting Summary\***

The meeting minutes were APPROVED.

- **Discussion and Approval of Public Comments: Draft 2024 Primary Annual Fine Particulate Matter (PM2.5) National Ambient Air Quality Standard Designation Recommendations**

Karen Clawson, Mid-America Regional Council, introduced the discussion of the designation recommendations for fine particulate matter (PM2.5) within the region on both the Kansas and Missouri side. Clawson discussed the PM2.5 designations for the region and asked members to try to come to a consensus on the forum's position to express in a letter of comment for the states of Kansas and Missouri.

- a. [Kansas recommendations](#)

- Doug Watson, KDHE, introduced the Kansas designation recommendations. Watson recalls last February 2024 when the EPA lowered the annual PM2.5 standard from 12 micrograms to 9 micrograms per cubic meter. Kansas was allowed a year to provide recommendations while EPA will provide the final determinations this time next year (2026) for areas that are in attainment or nonattainment for the new standard. Kansas argues that there is known positive bias with T640/T640X monitors. EPA applied Network Data Alignment equations to correct the monitors biases. However, Kansas suggests that the equations did not correct known smoke bias in T640X monitors. For the monitors that endure these known biases, Kansas recommends these areas to be Unclassifiable. Watson states the Governor and Secretary of Kansas agree with the recommendations of the unclassifiable areas. The state also proposes to purchase two FRM monitors to install at the unclassifiable locations, to help fix the data alignment algorithm for the T640X monitors, to achieve a clearer data reading.

# Kansas Recommendation

- **JFK - 9.6  $\mu\text{g}/\text{m}^3$  (Unclassifiable)**
- **Heritage Park - 8.3  $\mu\text{g}/\text{m}^3$  (Attainment)**

- Known positive bias with T640/T640X relative to collocated FRM monitors (~20% higher)
- EPA retroactively applied Network Data Alignment equations to correct bias
  - Corrected based on temperature and concentration
  - Did not correct of known smoke bias in T640X
- "The State of Kansas recommends that the three monitors (T640Xs) located in Neosho County (Chanute), Sedgwick County (Wichita HD) and Wyandotte County (JFK) that currently do not meet the new primary annual standard of 9.0  $\mu\text{g}/\text{m}^3$  be designated "Unclassifiable" for the new standard, based on the continued concerns by many states over the data being produced by the T640(X) and the analysis provided in this document. It would be improper to penalize a state, its citizens and businesses based on a flawed monitor.

The State would also propose that it is currently moving forward with purchasing two FRM monitors to install at the Chanute and Wichita HD monitor sites to collocate next to the existing T640X monitors. These installations will allow the State to run these monitors side by side to determine what the proper design value is for each location, and work to develop what a data alignment algorithm for the State of Kansas should be for the T640X."

- Kansas' Recommendations Document is available now for public comment. Watson states that the Missouri recommendations align with the Kansas recommendations specifically at the JFK site.

## Questions:

- Andy Sarvastino, City of Kansas City, MO, asked Watson what other options were there for monitors, as he is not very familiar with the T640X monitors.
- Watson explained that there are not many options for continuous monitoring. Missouri runs a continuous monitor at the Troost site that is not a T640X. There are some alternatives, and Kansas does not plan to purchase anymore T640X monitors, as they are not performing like other filter-based monitors within the high-biased areas. Kansas plans to put filter-based monitors back into the unclassifiable areas until the T640X monitors are enhanced to provide clearer results.
- Doug Norsby, Mid-America Regional Council, asked for some definitions of the monitors (FRM, FEM, etc.) and how do they differ regarding measuring PM<sub>2.5</sub>.
- Watson states the FRM is a standard monitoring method and is a filter-based method. It collects particles on a filter that you can send to a lab. Watson explained he is not an expert, but the FEM monitors are an equivalent monitor and there are several different versions of these monitors and how they determine the concentrations of fine particulate matter.
- Kurt Heine, Missouri Department of Natural Resources, added that Missouri has a Thermo Fisher Scientific TEOMs air quality monitor, which collects particulate matter on a filter while using a continuous method. The TEOM has a microbalance so it can tell what the filter loading is and can zero it out every 6 minutes. The T640, however, produces 1 minute resolution data. Both are FEM methods, Federal Equivalent Methods.

a. [Missouri recommendations](#)

- Mark Leath, MoDNR, introduced the Missouri designation recommendations. Missouri's recommendations are currently open for public comment and will be considered before recommendations are submitted to the EPA. When EPA is considering designations, they will also open for public comment. Missouri posted their boundary recommendations for public comment on December 30<sup>th</sup>. There is a public hearing scheduled for January 30<sup>th</sup> in Jefferson City within the Truman Building. The closing of comments will be a week after the public hearing, which is February 6<sup>th</sup>.
- There is one violating monitor within the state which is in the City of St. Louis at the Blair Street monitor. Missouri's recommendations do examine the contributing sources to the violating monitor, but for this forum, Leath focused on the Kansas City region of Missouri.
- Leath states that all the monitors within the Kansas City region were in attainment/unclassifiable and do not violate the new standard the EPA set in place in 2024.

## Missouri Recommendation

- **No Missouri monitors in the Kansas City CBSA violate the standard.**
- **Jackson, Clay, Cass Platte (Attainment/ Unclassifiable)**
- The location and values measured at the Troost and Blue Ridge/I-70 monitoring sites strongly support a determination that sources in Jackson County are not contributing to a violation at the JFK site.
- Leath states that the monitor at Troost, which is the TEOM monitor, strongly suggests that sources within Missouri are not contributing to the violation at JFK, which is the T640 monitor, which may be having trouble accounting for the biases as previously mentioned on the Kansas side. Leath states that Missouri's argument for a non-violation at the JFK monitor is due to the bias and the attainment at the Troost monitor. If the JFK monitor is in violation, they would expect the Troost monitor to also be in violation but that is not the case.
- Leath suggests that the T640X monitors are reading about 2 micrograms higher than the other monitors within the areas. Missouri is agreeing with Kansas' recommendations that these monitors may not be programmed to account for the high biases and therefore should be unclassifiable.
- Leath shares that Missouri will be putting in a new Air Toxics Monitoring site at Troost using funding through the Inflation Reduction Act, which is aimed to be launched this year.

### Questions:

- Tom Jacobs, Mid-America Regional Council, asked Leath about the different levels of bias at different monitors, and asked if there may be a hypothesis for why that might be or if it is a common finding elsewhere.

- Leath responded by stating there are some hypotheses for why this is. When corrections to the algorithm were made, they were mostly geared to correct temperature-based biases. Leath also suggested that any smoke can cause a bias reading, such as wildfire or agricultural smoke. In the St. Louis area, the T640 still experiences a high biased reading but not to the extent as the Springfield or Kansas City region with almost a full two micrograms after the bias correction.
- Jacobs asked Leath and Watson about JFK and Troost monitors and how there wasn't a difference between the two monitors.
- Watson responded stating that Kansas did an analysis of the Troost site and both the FEM TEOM and the T640 monitors and compared Troost to JFK and made the argument that the FEM at Troost was 2 micrograms lower. The collocated T640 monitor had almost the exact same value as the JFK T640 monitor. The main goal was to try and prove the T640 monitor at JFK was not the issue but rather a T640 monitor issue. By doing a comparison to another T640 around 3 miles away (Troost) which experienced the same values as the JFK monitor, lead to the conclusion that the issue revolves around the T640 monitors and not one monitoring site.
- Jacobs asked about the analysis of variations such as with meteorology or emission sources. Jacobs mentioned how the Kansas City region does not have an inventory of particulates. Jacobs asked about these findings and the extent of the data collection for the particulates inventory.
- Leath responded, starting with meteorology. Missouri used National Weather Service data to determine what the meteorology concludes. They also do high split back trajectory, which is an EPA model that can track an air parcels final destination and back track where it originated from. The predominant wind direction within Kansas City primarily comes from the South but does come from all directions. For emissions data, every three years every state is required to produce a National Emissions Inventory. In addition, the EPA works closely with states to develop national modeling platforms to inform national PM2.5 and Ozone modeling platforms that the states and EPA can use for various regulatory actions. These two practices comprised the particulate inventory for the state.
- Rollin Sachs, Johnson County DHE, asked about the additional monitor (Air Toxics Monitor) coming to Troost, which will be temporary. Sachs questioned how long this monitor will be active and will it be available before February 2026, which might help the argument of the unclassifiable monitor recommendations.
- Leath stated they would imagine that if they get the monitor operational as quick as they are hoping, they will have the data before February 2026. Leads asked Kurt how long they will have funding to keep this monitor operational.
- Heine believes the funding will last about 4 years, which will hopefully give some trends on the air toxics. April 1<sup>st</sup> is the projected start date for this program.

# Comments

Missouri Comment Letter:

- Concurrence with the recommendations
- Analysis supports likely

• Kansas Comment Letter:

- KDHE made a case that there continues to be bias in the monitors despite EPA-approved adjustments (based only on temperature and concentration)
- Monitors not corrected for smoke bias
- This known bias is a concern among other agencies (North Dakota, AAPCA, Georgia)
- Concurrence with the recommendation:
  - Wyandotte County (Unclassifiable)
  - Johnson (Attainment)
  - Add Federal Reference Monitors (Neosho and Sedgwick)
  - Supportive of state algorithm to correct bias

- These comment letters will be presented to the MARC Board of Directors for approval.
- The comment recommendations were APPROVED.
- Abstained: Kansas, Missouri, KDOT, and EPA.

- **Other Business**

- a. [EPA Thriving Community Grantmaker Program](#)

- Clawson presented this funding opportunity from the EPA. EPA Thriving Communities Grantmaking program is eligible to organizations that meet the criteria:
      - Community-based nonprofit organizations, local governments
      - Native American/Indigenous organizations
      - Tribal Governments and Intertribal Consortia
    - This is a grant program that is supposed to be highly accessible to many different organizations within region 7 and reduce the barrier in applying for grants.
    - EPA has set up a new distribution method for these grants. They designated different Grantmakers and the Grantmaker for our region is the Research Triangle Institute. They have opened the application process mostly for community driven projects.

## Types of Funding Opportunities

Non-Competitive	Competitive		
Foundational Support Projects	Tier 1: Assessment Projects	Tier 2: Planning Projects	Tier 3: Development Projects
These grants are non-competitive, meaning they will be awarded directly to organizations that need them. The funding will help organizations build a foundation that will allow them to apply for future grant opportunities.	Competitive funding for community-based organizations to do assessments in their community to better understand local environmental and public health concerns.	Competitive funding for community-based organizations to plan on how to address local environmental and public health issues.	Competitive funding for community-based organizations to carry out projects that address local environmental and public health issues.
<b>\$75,000 for 1 year</b>	<b>Up to \$150,000 for 1 year</b>	<b>Up to \$250,000 for 1-2 years</b>	<b>Up to \$350,000 for 2 years</b>

- The above image displays the different levels of support offered through this program. Organizations are urged to apply. The deadline for these applications is January 31<sup>st</sup>.

## Public Health and Environmental Issues

TCGM Region 7 funding opportunities can help community-based organizations evaluate, plan, and address a wide range of environmental and public health issues.



### Air & Water Quality

Air quality & asthma  
Fenceline air monitoring  
Water quality & sampling  
Waste discharge from industrial facilities  
Small cleanup project



### Healthy Housing & Food Systems

Healthy homes  
Home energy & water efficiency  
Better access to local food  
Green infrastructure



### Environmental Contaminants

Stormwater issues  
Lead and asbestos contamination  
Pesticides and other toxic substances  
Illegal dumping activities  
Education and outreach



### Emergency Preparedness & Training

Emergency preparedness  
Disaster resiliency  
Environmental job training  
Environmental justice training for youth

- The above image displays the different issues that projects are urged to tackle.
- Tom Jacobs adds that MARC is committed to assisting in the development of these applications to bring in as much funding as possible for the Kansas City region.

### Questions:

- Brian Alferman, Johnson County, asked Jacobs about the eligibility for these funds for local governments, as it is specified this program is eligible for community-based initiatives. Alferman asked if this program is preferable towards CBOs (Community-based organizations).
- Jacobs states the program was designed for CBOs. He adds that this program emphasizes addressing community-based environmental justice issues.

- Clawson adds that they have looked at the applications, and it is a streamlined application process. Jacobs and Clawson are working to communicate with other organizations to get eyes on this program.
- Leena Divakar, Kansas State University, attended a Heartland Environmental Justice Center Webinar out of Wichita State University. In this webinar, Divakar asked about the Universities eligibility, and they stated that as long as these funds do not go into the University directly and are going into the community. They also encouraged applicants to use an AI grant writing tool, GrantGenie.
- **Next Meeting – Tuesday, February 11, 2025 at 10:00 a.m.**
- **Adjourn**

*\*Action item*