

Conclusions

Overall, the existing TCEQ monitoring network is sufficient to adequately characterize and evaluate air quality under current standards. With the additional monitors that the TCEQ has committed to deploy in the El Paso and McAllen-Mission-Edinburg areas, Texas complies with all current regulatory monitoring requirements. The analysis presented in this review indicates that monitors originally sited to evaluate ambient concentrations in populated areas are still located in areas of dense population. A summary of factors considered in this evaluation is provided in Appendix C. Additionally, the current monitor locations are well suited to evaluate the largest pollutant sources.

The TCEQ continues to evaluate the need for additional monitoring as pending federal monitoring requirements are finalized, and further air quality evaluations are conducted. A detailed impact review of the current proposed rules is provided below. The TCEQ may consider additional network changes for lower valued monitors to absorb the costs associated with meeting these rules if they are implemented as proposed.

Anticipated Changes Based on Monitoring Regulations

Potential Changes Due to Current Regulatory Requirements

The TCEQ is planning to deploy monitors to meet currently effective particulate matter and NO₂ monitoring requirements. As described in the Lower Rio Grande Valley section, the TCEQ will deploy a new monitoring site in Edinburg on East Freddy Gonzales Drive in summer 2015 as discussed in the *2014 Annual Monitoring Network Plan*. The new site will include one PM_{2.5} FRM monitor, one PM₁₀ FRM monitor, and one continuous PM_{2.5} monitor to meet requirements based on the MSA's increased population. In addition, by January 2017, the TCEQ will deploy near-road NO₂ monitors in the El Paso and McAllen-Mission-Edinburg areas in accordance with 40 CFR Part 58, Appendix D, Section 4.3.2. Proposed locations for the near-road sites will be provided in the *2016 Annual Monitoring Network Plan*.

In the next five years, conservative population projections predict three MSAs likely to have population growth that will trigger additional monitoring requirements under 40 CFR Part 58: McAllen-Mission-Edinburg, Killeen-Temple, and College Station-Bryan. The McAllen-Mission-Edinburg MSA population may exceed 1 million in 2020. If this projection is correct, the TCEQ would be required to deploy one near-road CO monitor, one area-wide NO₂ monitor, one PM_{2.5} monitor, and possibly two additional PM₁₀ monitors in this MSA, depending on the design values measured at that time. The Killeen-Temple MSA population may exceed 500,000 in 2020, requiring the TCEQ to deploy one PM_{2.5} monitor and at least one PM₁₀ monitor. Although the College Station-

Bryan MSA population may exceed 250,000 in 2015, the area would still comply with the PM₁₀ monitoring requirements in the current rule (between zero and one PM₁₀ monitor). The TCEQ will continue to evaluate population changes annually based on the most recent United States Census Bureau population estimates. Any deployments as a result of population changes will be detailed in the associated Annual Monitoring Network Plans.

As discussed in the area reviews, no additional changes to the monitoring network are necessary under existing regulatory requirements. Design values either meet the level of the current standards or are consistent. Further, there are no anticipated monitoring changes due to the Texas SIP or maintenance plan. The TCEQ will continue to assess compliance with all federal monitoring requirements on an annual basis and will recommend changes through the associated Annual Monitoring Network Plans.

Potential Changes Due to Future Regulatory Actions

Sulfur Dioxide

On April 17, 2014, the EPA proposed the Data Requirements Rule to establish emission thresholds and deployment deadlines for source-oriented monitoring and/or modeling to characterize ambient air quality impacts from larger SO₂ sources. The proposed rule provided three options for emission threshold levels based on actual SO₂ emissions from sources in areas with a population of 1 million or more and in less populated areas. By January 1, 2017, states would need to submit to the EPA either modeled or monitored off-site SO₂ concentrations downwind of large SO₂ sources.

In addition, on March 2, 2015, the District Court for the Northern District of California entered a consent decree between EPA and environmental groups related to litigation over EPA's failure to designate all areas for the 2010 SO₂ NAAQS. Under the consent decree, the EPA must complete designations by July 2, 2016, for areas that have monitored violations of the NAAQS or contain sources that have not been announced for retirement and that emitted greater than 16,000 tons of SO₂ in 2012 or that had more than 2,600 tons of SO₂ and an annual average emission rate of greater than or equal to 0.45 pounds SO₂ per million British thermal units in 2012.

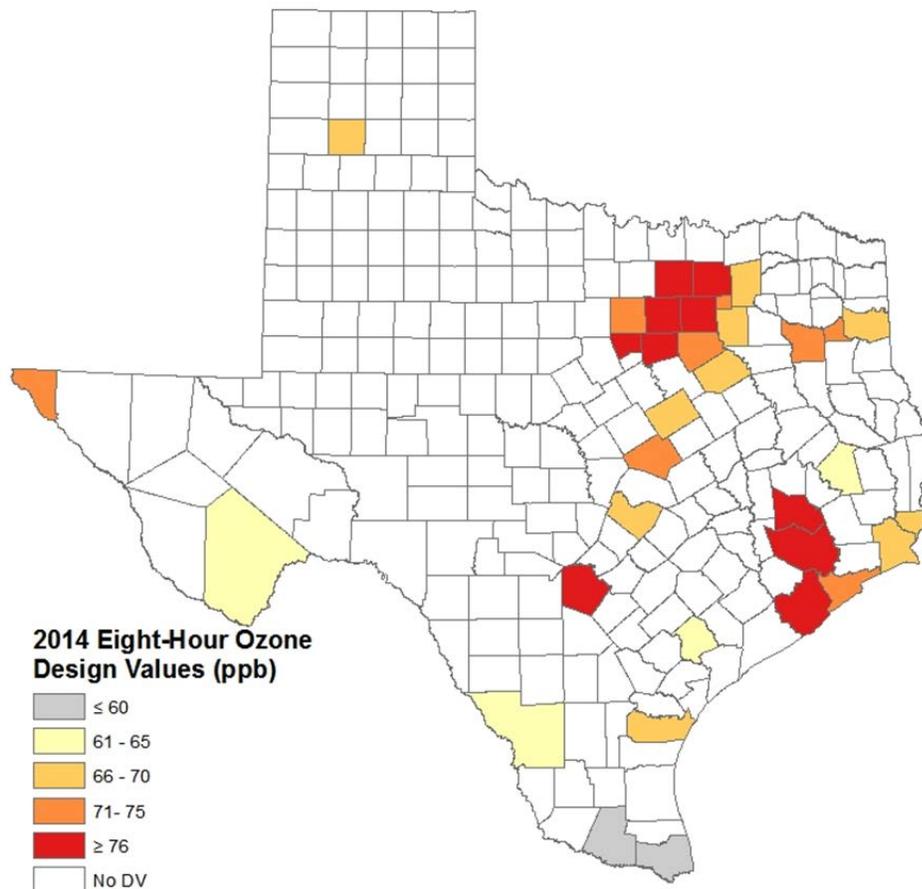
Based on the 2013 point source EI data and the proposed Data Requirements Rule, Texas may need to monitor or model emissions near 31 point sources across Texas. Twelve of these sources fall under the consent decree and may require monitors based on the EPA's final designation. The TCEQ will further evaluate the need for SO₂ monitors once the final Data Requirements Rule is promulgated, both in terms of monitors required under the final rule and the potential reallocation of monitors in areas where monitors are no longer required. The spring 2015 edition of the *Unified Agenda of Federal Regulatory and Deregulatory Actions* estimates final rule publication for the Data Requirements Rule in October 2015.

Ozone

On December 17, 2014, the EPA published a notice of proposed rulemaking regarding the NAAQS for ozone in the *Federal Register*. (79 FR 75234) The EPA accepted public comments on the proposed rule until March 17, 2015. The two main points of this

proposed rule that affect the TCEQ monitoring network are the range of potential standards and the redesign of the ozone and PAMS networks.

The EPA accepted comments on a proposed standard in the range of 0.065 to 0.070 ppm. If the EPA finalizes a standard below 0.075 ppm, several additional areas could be designated nonattainment. Figure 119 highlights Texas counties with 2014 ozone monitoring data at or near the levels of the proposed standard.



ppb – parts per billion

*2014 design values are calculated as of 4/1/2015. The monitors in Polk and Webb county do not have enough complete data under the 2008 National Ambient Air Quality Standard (NAAQS); however, the design values at those monitors could become valid depending on the level of the new NAAQS.

Figure 119: Texas Counties with Ozone Monitoring Data at or Near the Levels of the Proposed Ozone Standard

In addition to lowering the NAAQS, the EPA is taking comment on redesigning the ozone and PAMS monitoring requirements. The proposed rule would only require PAMS monitoring at existing NCore sites in nonattainment areas. The rule would likely impact the 22 PAMS stations operating under current requirements. If the proposed rule was implemented as written, all PAMS monitoring conducted at sites other than Dallas Hinton, Houston Deer Park #2, and El Paso Chamizal would no longer be required.

The EPA is under a consent decree obligation to publish the final rule by October 2015. Once the rule is final, the TCEQ will reevaluate the network of ozone and ozone precursor monitors throughout the state as part of the proposed enhanced monitoring plan. Adjustments in monitoring conducted beyond minimum requirements may be necessary depending on the level of the standard and the extent of revisions to the monitoring network design rules. Any changes would be proposed through the Annual Monitoring Network Plan.

Lead

On September 11, 2014, the EPA proposed revisions to ambient monitoring quality assurance requirements for Pb. (79 FR 54356) As part of this proposed rule, the EPA proposed removing the requirement for Pb monitoring at NCore sites. If the final rule includes this removal, Pb monitors at Dallas Hinton, Houston Deer Park #2, and Ascarate Park SE will no longer be required. The TCEQ will reevaluate the need for these monitors when the final rule is published. The spring 2015 edition of the *Unified Agenda of Federal Regulatory and Deregulatory Actions* estimated final rule publication in April 2016.

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