



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

Mr. David Bower, Director
Field Operations Support Division
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Dear Mr. Bower:

Thank you for your submittal of Texas Commission on Environmental Quality's (TCEQ) 5 Year Ambient Air Monitoring Network Assessment (Assessment) as required by 40 CFR 58.10. Region 6, Environmental Protection Agency (EPA) has evaluated your Assessment. Based on our review, EPA is approving TCEQ's Assessment.

We would like to note some items in our enclosure that deal with: (1) Ozone monitoring in the Dallas-Fort Worth area (DFW), (2) the level of assessment conducted for the PM_{2.5} network, (3) the assessment submitted for TCEQ's auto gas chromatograph (auto-GC) network, (4) timeframe used for the assessment submitted for lead (Pb), and (5) overall consistency of language used throughout the Assessment. Please see the enclosure for detailed comments.

For future planning, please note that source-based sulfur dioxide (SO₂) monitoring is no longer required per the revised monitoring rule promulgated June 22, 2010. However, state and applicable local agencies are strongly encouraged to monitor above the minimum requirements for population exposure or near sources in areas that are not conducive to modeling. Also, the updates to the 2010 Census and 2008 National Emissions Inventory (NEI) may adjust SO₂ monitoring requirements.

EPA appreciates TCEQ's partnership on the continued work and planning for their carbon monoxide (CO), nitrogen oxide (NO_x), and particulate matter (PM₁₀ and PM_{2.5}) monitoring networks and looks forward to continuing to work with TCEQ on the implementation of their ozone (O₃) network and the new O₃ NAAQS and O₃ monitoring rules, which should both be released in 2011. We also look forward to working with TCEQ on the implementation of the upcoming air monitoring requirements for Pb.

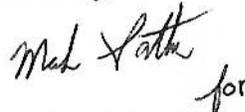
The Assessment recommends the decommissioning of the Greenville (48-231-1006) ozone site in the DFW area. With a current 2007-2009 8-hour ozone design value of 66 ppb we could concur that the Greenville site could be decommissioned in the future. EPA is in agreement that the Greenville O₃ site is currently not necessary for the adequacy of the DFW O₃ monitoring network. Therefore, EPA is in agreement with the termination of the O₃ site at Greenville. Also, review of the O₃ isopleth analyses in the Assessment supports the

importance of the Wallisville, Jefferson County Airport, and Sabine Pass O₃ sites run by industry.

Future network assessments can successfully build upon this 2010 network assessment by providing a 5 year plan that includes all desired components for TCEQ's ambient monitoring network while also allowing the flexibility to be scaled to accommodate any potential changes to monitoring requirements. EPA appreciates TCEQ's partnership in conducting ambient air monitoring. We look forward to working with you to continuously improve the quality of ambient air in Texas.

If you have any questions or comments regarding this network assessment, please contact me at 214-665-2230 or have your staff contact Regina Krystyn, of my staff, at (214) 665-7128.

Sincerely,

Handwritten signature of Maria L. Martinez in cursive script.

for
Maria L. Martinez
Chief, Air Quality Analysis Section

Enclosure

cc: Matthew Baker, Assistant Division Director (TCEQ)
Daphne McMurrer, Special Assistant (TCEQ)

Enclosure

- (1) The 5 Year Ambient Air Monitoring Network Assessment (Assessment) recommends the decommissioning of the Pilot Point (48-AQS Site ID #121-1032) ozone site in the Dallas-Fort Worth area (DFW). The Pilot Point site is still recording high 8-hour ozone concentrations with a 2007-2009 8-hour ozone design value of 77 ppb (over the 2008 National Ambient Air Quality Standards (NAAQS) and also over a probable lower 2010 NAAQS), and the Pilot Point site also sits in an important location as the most northern site in the DFW ozone network where there are no other nearby TCEQ ozone monitors. TCEQ's isopleths support continuing the ozone site at Pilot Point. Therefore, EPA disagrees with the proposal to terminate this site.
- (2) The assessment provided for PM_{2.5} is not robust enough. In the future, an assessment of the PM_{2.5} network similar to that for ozone is desired with a less time intensive than isopleths analysis. A more robust assessment would help both TCEQ and EPA better anticipate future resource needs for TCEQ's PM_{2.5} network.
- (3) An assessment reflecting the 18 auto gas chromatographs (auto-GC) listed on TCEQ's website, including the Eagle Mountain Lake and DISH monitors, would have been preferred. It is EPA's understanding that more auto-GC in DFW are anticipated.
- (4) The TCEQ Assessment for lead (Pb) monitoring is good, addressing all potential Pb monitoring possibilities, including Pb monitoring of 0.5 tons per year sources at airports. However, a 5-year projection would have been desired.

- (5) The language should be consistent among all sections (i.e. the language for nitrogen dioxide, sulfur dioxide, and carbon dioxide could be similar but currently is not).