



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

Mr. Richard C. Chism  
Director, Air Monitoring Division  
Texas Commission on Environmental  
Quality, MC 165  
Post Office Box 13087  
Austin, TX 78711-3087

Dear Mr. Chism:

Thank you for providing your correspondence for the Texas Commission on Environmental Quality's (TCEQ) 2011 Annual Monitoring Network Plan. The U.S. Environmental Protection Agency (EPA) has completed its analysis of the TCEQ's 2011 Annual Air Monitoring Network Plan to ensure it meets those requirements of 40 CFR Part 58 and its appendices. The network assessment process presents an opportunity for the EPA and the TCEQ to collaborate on air monitoring network design. *See* 40 CFR Part 58 App. D, 1.1.2.

We appreciate your cooperation and work to submit your 2011 network plan for our review and consideration for approval. The EPA has reviewed your proposed changes for lead, ozone, nitrogen dioxide, carbon monoxide, sulfur dioxide and particulate matter monitors for the air monitoring network, and I am pleased to inform you that your 2011 network plan is approved in accordance with 40 CFR §58.10 and §58.14. Details of our review of your air monitoring network are provided in the enclosure.

Also, thank you for providing the waiver request and documentation for lead source-oriented monitoring at the Coletto Creek Power LP and San Miguel Electric Cooperative, Incorporated facilities. In accordance with 40 CFR Part 58 App. D, 4.5(a)(ii), the EPA approves your source-oriented lead monitoring requirement waiver requests for both facilities. Approved lead monitoring waivers are required to be renewed once every five years as part of the network assessment required under 40 CFR § 58.10(d). If the approved Pb waiver circumstances significantly change, as might follow from a facility Pb emissions increase, the waiver requests must be resubmitted sooner. Details of our review are provided in the enclosure.

We look forward to our continued collaborations with the TCEQ. If you have any questions, please contact me at (214) 665-2100, or your staff may contact Ms. Maria Martinez of my staff at (214) 665-2230.

Sincerely yours,

A handwritten signature in black ink that reads "Thomas H. Diggs".

Thomas H. Diggs  
Associate Director for Air

Enclosure

**Texas Commission on Environmental Quality (TCEQ)**  
**2011 Annual Air Monitoring Network Plan Comments**

The Environmental Protection Agency (EPA) has reviewed your 2011 Annual Ambient Air Network Plan and comments are provided below.

**1. Lead (Pb) Monitor Sites**

The TCEQ's Pb monitoring waiver for the Coletto Creek Power LP in Goliad County and San Miguel Electric Cooperative, Incorporated in Atascosa County is approved. *See 40 CFR Part 58, App. D, 4.5(a)*. The Pb monitoring waiver approval for the Coletto Creek Power LP and San Miguel Electric Cooperative, Incorporated is based on modeling data conducted by the TCEQ. The modeled emissions were 0.0683827 pounds/hour (lbs/hr) for Coletto Creek Power LP and 0.22 lbs/hr for San Miguel Electric Cooperative, Incorporated. The highest modeled concentration representing the highest rolling three month average was 0.000117 ug/m<sup>3</sup> for Coletto Creek LP, approximately 0.1% of the Pb National Ambient Air Quality Standards (NAAQS). The highest modeled concentration representing the highest rolling three month average was 0.00091 ug/m<sup>3</sup> for the San Miguel Electric Cooperative, Incorporated, approximately 1% of the Pb NAAQS. The EPA's decision to approve these Pb waivers is based, in part, on the Pb source emissions of 0.6456 tpy for Coletto Creek Power Station and 0.7080 tpy for the San Miguel Electric Cooperative taken from the latest TCEQ 2009 State inventory. If Pb emissions change for a waived monitor source, they must be addressed in your next State Emissions Inventory (EI) and the National Emissions Inventory (NEI). Consequently, TCEQ's maintenance of the State EI is critical to support the review for Pb monitoring waivers and future Pb monitoring decisions. *See 40 CFR § 51 et seq.* Approved Pb monitoring waivers are required to be renewed once every five years in compliance with 40 CFR § 58.10(b)(10) and 40 CFR § 58.10(b)(11). If the approved Pb waiver circumstances significantly change, as might follow from a facility Pb emissions increase, the waiver requests must be resubmitted sooner. *See 40 CFR § 58.10(b)(10) and App. D, 4.5(a)(ii)*.

We would like to note that the Stinson Municipal Airport lead (Pb) monitoring site may become a permanent monitoring site in the TCEQ network, in order to meet requirements, if the monitor is above 50% of the NAAQS on a rolling 3-month average. If the monitor becomes classified as a permanent monitor, the lead monitoring will continue unless a lead waiver is granted. All required lead source monitoring requires a lead waiver in order to be discontinued. *See Federal Register Vol. 75, No. 247, December 27, 2010 and 40 CFR Part 58 Appendix D 4.5(a)(ii)*. This airport monitor can be classified as a Special Purpose Monitors (SPMs) during the one year study period. This monitor will be classified as a State and Local Air Monitoring Station (SLAMS) if it is determined that the monitor is above 50% of the NAAQS on a rolling 3-month average.

We approve the lead monitor for your National Core multipollutant monitoring stations (NCore) relocation from the El Paso Chamizal site (Air Quality System (AQS) Site ID: 48-141-0044) to the proposed Ascarate Park SE site (AQS Site ID: 48-141-0055). Please note that the lead sampling at NCore sites should be performed on a 1 in 6 day schedule.

We note the Pb monitoring at your NCore monitoring sites: Dallas Hinton (AQS Site ID: 48-113-0069), Ascarate Park SE (AQS Site ID: 48-141-0055), and Houston Deer Park #2 (AQS Site ID: 48-201-1039). We appreciate your efforts resulting in your NCore Pb monitoring for these sites becoming operational by or before the required date, December 27, 2011.

## **2. Ozone (O<sub>3</sub>) Monitor Sites**

The EPA concurs with the proposal to relocate the Mercedes monitor (AQS Site ID: 48-215-1048) to the Brownsville-Harlingen Metropolitan Statistical Area (MSA). We look forward to continued collaboration with the TCEQ on the new site location.

## **3. Sulfur Dioxide (SO<sub>2</sub>) Monitor Sites**

We appreciate the TCEQ's planning and efforts to have all newly required SO<sub>2</sub> monitors deployed by January 1, 2013. The EPA concurs with the proposal to locate one of the SO<sub>2</sub> monitors at the existing Calaveras Lake site (AQS Site ID: 48-029-0059) in San Antonio and Austin Northwest site (AQS Site ID: 48-453-0014) in Austin. However, we would prefer that the second San Antonio SO<sub>2</sub> monitor be located at either the North or Northeast side of the city, and not at the San Antonio Northwest site (AQS Site ID: 48-029-0032) as proposed. We look forward to continued collaboration on determining the best site location for this SO<sub>2</sub> monitor in the San Antonio area. The EPA also concurs with the new SO<sub>2</sub> monitor in the Amarillo area being located northeast of the urban core as proposed by the TCEQ, as long as the specific site would allow measurement of impacts from the SO<sub>2</sub> sources in the area. We look forward to our joint collaboration on the final site location in Amarillo.

## **4. Particulate Matter (PM) Network**

The EPA suggests that it may be ideal to consider the collocation of a PM coarse monitor (PM<sub>10-2.5</sub>) at one of the sites mentioned in the NCore Monitoring Network. Please refer to the issue paper sent on May 16, 2011 from the EPA's Mike Papp about collocation of PM<sub>10-2.5</sub> at the NCore sites. TCEQ will need to clarify the continuous instruments and exact methods used at the NCore sites to measure PM<sub>10-2.5</sub>.

We understand that at the Dona Park site (AQS Site ID: 48-355-0034) and the Austin Weberville Road site (AQS Site ID: 48-453-0021), the TCEQ will operate PM<sub>2.5</sub> continuous monitors along with PM<sub>2.5</sub> SLAMS monitors to reduce the sampling frequency from a 1-in-3 day frequency to a 1-in-6 day frequency. However, Appendix B shows several other PM<sub>2.5</sub> manual sites operate on a 1-in-6 day schedule. TCEQ will need to clarify if they intend to run PM<sub>2.5</sub> continuous monitors at all other 1-in-6 PM<sub>2.5</sub> SLAMS sites.

Appendix B lists a 1-in-6 day sampling frequency for PM<sub>2.5</sub> SLAMS monitors at the El Paso Chamizal NCore site (AQS Site ID: 48-141-0044). Please refer to 40 CFR Part 58.12 which states that manual PM<sub>2.5</sub> samplers at NCore stations must operate on at least a 1-in-3 day sampling frequency. A 1-in-3 day sampling is also applied to all PM<sub>2.5</sub> manual monitors used for required regional background and regional transport sites. We understand you have identified the Bravo Big Bend site (AQS Site ID: 48-043-0101) and the Isla Blanca Park site (AQS Site ID: 48-061-2004) as your PM<sub>2.5</sub> regional transport sites. The PM<sub>2.5</sub> sites you plan to operate as regional background sites need to be clearly labeled. In addition, PM<sub>2.5</sub> monitors cannot be operated as Special Purpose Monitors (SPMs) if they are classified as NCore sites, regional transport sites, or background sites but rather should be classified as SLAMS sites.

## **5. Photochemical Assessment Program**

We request that the new PAMS carbonyl requirement for the Dallas Hinton site (AQS Site ID: 48-113-0069) be added to Appendix B. This new carbonyl requirement consists of 8 3-hour carbonyl samplers taken every 3 days in June, July, and August.

## **6. Appendix B**

We note clarification is needed in regards to which sites in the El Paso area belong solely to the TCEQ and which belong to the City of El Paso. If any sites are shared, they need to be specified as to which monitors belong to which agency.

Several PM<sub>2.5</sub> and PM<sub>10</sub> sites are labeled as SPMs in your Appendix B. We ask that the TCEQ verify that all monitors classified as SPMs in the Network Plan are in addition to the required SLAMS sites.

The extra "carbonyl\*" line item for the Houston Clinton site (AQS Site ID: 48-201-1035) regarding 24 1-hr samples, daily, can be removed from Appendix B. We understand TCEQ uses a "\*" to indicate this PAMS monitoring is beyond the minimum requirements of 40 CFR Part 58, Appendix D.

Relative Humidity (PAMS) for the Sabine Pass site (AQS Site ID: 48-245-0101) should be included in Appendix B.

For the Skyline Park site (AQS Site ID: 48-141-0058) we acknowledge the change of the site classification from SPM to SLAMS, but do not understand the "changed spatial scale" comment for Pb(TSP) & SO<sub>2</sub>. It is noted that the same spatial scale was used in the 2010 Network Plan.

## **7. Future Discussions**

In past discussions the EPA has been led to believe that the Tillman site (AQS Site ID:48-141-0002) was to be relocated. TCEQ will need to discuss the status of these plans with us.

The Beaumont Mary (AQS Site ID: 48-245-1050) site could not be located by either AQS Site ID: 48-245-1050 or AQS Site ID: 48-245-0020 in the previous Annual Network Plan. We believe this monitor may have been the Beaumont Carroll Street Park site (AQS Site ID: 48-245-0020) which was proposed for relocation in 2008. TCEQ will need to clarify this inconsistency.

Under the section labeled "Completed," it was noticed that some of the PM monitors proposed for decommissioning in the 2010 Annual Network Plan were not included (e.g. Lubbock (AQS Site ID:48-303-0325) and Texarkana (AQS Site ID:48-037-0004)). Also, some sites have been removed from Appendix B and others were not. TCEQ will need to clarify the status of these sites.

Also under the section labeled "Completed," the EPA requests clarification regarding the Fort Worth Northwest site (AQS Site ID:48-439-1002). According to the EPA's December 23, 2010 Annual Network Plan Response Letter, we did not concur with the PM monitor termination. The EPA understood that this monitor was to continue all normal operations, especially since it is still currently listed in Appendix B. TCEQ will need to clarify this inconsistency.

The following lead monitors were listed in your Quality Assurance Project Plan (QAPP) but were not identified in Appendix B: Hinton (AQS Site ID:48-113-0069), Ascarate Park SE (AQS Site ID:48-141-0055), Deer Park #2 (AQS Site ID:48-201-1039), and Stinson (AQS Site ID:48-029-1052). Also, we understand that the Tillman lead monitor (AQS Site ID:48-141-0002) will now be classified as a SLAMS monitor instead of an SPM. TCEQ will need to clarify these differences.