UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

MAY 2 8 2014

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 your correspondence submitting the Texas Commission on Environmental Quality's (TCEQ) 2013 Annual Monitoring Network Plan. The U.S. Environmental Protection Agency (EPA) has completed its analysis of the TCEQ's 2013 Annual Monitoring Network Plan to ensure it meets those requirements of 40 CFR Part 58 and its appendices that confer approval authority on the Regional Administrator, now delegated to the Associate Director for Air.

We appreciate your cooperation and work to submit your 2013 network plan. The network assessment process presents an opportunity for the EPA and the TCEQ to collaborate on the air monitoring network design. *See* 40 CFR Part 58 App. D, 1.1.2. The EPA has reviewed your plan, including the information for nitrogen dioxide and lead monitoring waiver for the TCEQ Ambient Air Monitoring Network.

I am pleased to inform you that your 2013 ambient air monitoring network plan and lead monitoring waiver request are approved. Details of our review of your air monitoring network are provided in the enclosure.

We look forward to our continued collaborative work with the TCEQ on your 2014 ambient air monitoring network plan. If you have any questions, please contact me at (214) 665-7548, or your staff may contact Ms. Maria Martinez, Air Quality Analysis Section Chief, of my staff at (214) 665-2230.

Sincerely yours,

Mark Hansen
Acting Associate Director for Air Programs

Enclosure

Texas Commission on Environmental Quality (TCEQ)
2013 Annual Ambient Air Monitoring Network Plan (ANP) Technical Comments

The Environmental Protection Agency (EPA) has reviewed your 2013 Annual Ambient Air Monitoring Network Plan, and our comments are provided below.

Nitrogen Dioxide (NO_2)

Area-wide NO_2 Monitors

The EPA Region 6 approves the NO_2 monitors at the Houston Clinton site (Air Quality System [AQS] #48-201-1035), at the Dallas Hinton site (AQS #48-113-0069), at the San Antonio Northwest site (AQS #48-029-0032) and at the Austin Northwest site (AQS #48-453-0014) to meet area-wide NO_2 monitoring requirements for the Houston, Dallas-Fort Worth, San Antonio and Austin core-based statistical areas (CBSAs), as required by 40 CFR Part 58, App. D, 4.3.3.

RA40

We note in the 2013 ANP the TCEQ's plans to use the NO_2 monitors at the Ascarate Park SE site in El Paso (AQS #48-141-0055), the Clinton site in Houston (AQS #48-201-1035), the Arlington Municipal Airport site in Dallas-Fort Worth (AQS #48-439-3011) and the Nederland High School site in Beaumont-Port Arthur (AQS #48-245-1035) to help protect susceptible and vulnerable populations under the "RA40" national requirement. The EPA Region 6 approves the NO_2 monitors at the Ascarate Park SE, Clinton, Arlington Municipal Airport, and Nederland High School sites to meet the requirements for NO_2 monitoring for susceptible and vulnerable populations, as required by 40 CFR Part 58, App. D, 4.3.4.

Near-Road Monitoring Sites

We acknowledge the TCEQ's work in securing the required near-road NO_2 sites for the Houston, Dallas-Fort Worth, San Antonio and Austin CBSAs. The EPA Region 6 approves the NO_2 near-road monitoring site on Interstate 35 between Rundberg Lane and Barwood Park (AQS #48-453-1068) to meet the requirements for near-road NO_2 monitoring for the Austin CBSA, as required by 40 CFR Part 58, App. D, 4.3.2.

For the remaining three near-road sites in Houston (AQS #48-201-1066), Dallas (AQS #48-113-1067), and San Antonio (AQS #48-029-1069), we understand the TCEQ had to secure different sites than those described in the 2013 ANP. Please provide the final AADT/FE-AADT rankings, latitude/longitude coordinates, locations, distances to nearest traffic lane, and probe height information for these three sites with the upcoming 2014 ANP.

Sulfur Dioxide (SO_2)

In AQS, we note that the TCEQ began operations at the Amarillo 24th Street site (AQS #48-375-1025) for SO_2 monitoring by October 16, 2013. Please update this site in the TCEQ 2014 ANP Network Table.

We also note that in AQS and the 2013 ANP, the required SO_2 monitors was deployed at the Austin Northwest site (AQS #48-453-0014) as of November 2012 and at the Calaveras Lake site (AQS #48-029-0059), as of December 2012.

Lead (Pb)

The EPA Region 6 approves the requests for discontinuation of the Pb monitors located at the Houston East site (AQS #48-201-1034) and the Skyline Park site (AQS #48-141-0058). These approvals are

based upon 40 CFR §58.14(c)(1). The maximum total Pb concentrations for both Pb monitoring sites are well below 50% of the Pb National Ambient Air Quality Standards (NAAQS), which is 0.15 $\mu g/m^3$, therefore meeting the requirements for the monitoring discontinuations. The 2012 DVs for the Houston East and Skyline Pb monitors are 0.01 $\mu g/m^3$ (6.7% of the NAAQS) and 0.02 $\mu g/m^3$ (13.3% of the NAAQS), respectively. Please reflect these changes in the TCEQ 2014 ANP.

Lower Colorado River Authority Fayette Power Plant in Fayette County, Texas (TX) Waiver Request.

The TCEQ submitted a request (with supporting documentation) for a waiver of Pb source-oriented monitoring at the Lower Colorado River Authority Fayette Power Plant in Fayette County, Texas. In accordance with 40 CFR Part 58, App. D, 4.5(a)(ii), the EPA approves your source-oriented Pb monitoring waiver request for this facility.

The Pb monitoring waiver approval is based on modeling data provided by the TCEQ. The approval is based, in part, on the Pb source emissions of 0.62 tons per year (tpy) and the computed Pb emissions of 0.14 pounds/hour (lbs/hr) based upon the TCEQ 2010 State Emissions Inventory (SEI). The highest modeled concentration, which represents the highest rolling three month average, was 0.00145 $\mu g/m^3$, or 1% of the Pb NAAQS.

Approved lead 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) and as part of the network assessment required under 40 CFR §58.10(d). Please note that if any of the currently approved Pb waiver circumstances significantly change, as might follow from a facility Pb emissions increase, the Pb monitoring waiver requests must be resubmitted sooner. *See* 40 CFR §58.10(b)(10) and App. D, 4.5(a)(ii). Also, please note that if Pb emissions increase to 0.5 tpy or more for a Pb facility source without a current waiver it must be addressed in your next SEI and the National Emissions Inventory (NEI).

Stinson Municipal Airport in Bexar County, TX, Monitoring

The TCEQ has successfully completed the National Pb airport study conducted at the Stinson Municipal Airport site (AQS #48-029-1052), also known as the San Antonio 99th Street site, in compliance with 40 CFR Part 58, App. D, 4.5(a)(iii). The EPA Region 6 agreed to the discontinuation of this site in a letter dated December 18, 2013, addressed to the TCEQ Director of the Air Monitoring Division. The Pb monitor at the Stinson airport was subsequently discontinued on December 19, 2013.

Ozone (O_3)

As of October 4, 2013, we note in AQS that the TCEQ has installed the second O_3 site, Temple Georgia (AQS #48-027-1045), in the Killeen-Temple-Fort Hood MSA as required by the 40 CFR Part 58, App. D, 4.1. Please update the TCEQ 2014 ANP Network Table to include this site.

Carbon Monoxide (CO)

The EPA Region 6 approves the request to discontinue the CO monitors at the following sites since they meet the requirements for discontinuation under 40 CFR §58.14(c)(1). The 2012 DVs for each CO monitor are identified below. The current CO 8-hr NAAQS is 9 ppm.

- El Paso UTEP site (AQS #48-141-0037): DV 1.2 ppm (13.3% of the NAAQS);
- El Paso Skyline Park site (AQS #48-141-0058): DV 0.9 ppm (10% of the NAAQS);
- Houston Aldine site (AQS #48-201-0024): DV 1.5 ppm (16.7% of the NAAQS);
- Houston Lang site (AQS #48-201-0047): DV 1.9 ppm (21.1% of the NAAQS);
- Houston Texas Avenue site (AQS #48-201-0075): DV 1.0 ppm (11.1% of the NAAQS);
- Houston Park Place site (AQS #48-201-0416): DV 1.4 ppm (15.6% of the NAAQS);

- Fort Worth Northwest site (AQS #48-439-1002): DV 1.2 ppm (13.3% of the NAAQS);
- Arlington Municipal Airport site (AQS #48-439-3011): DV 1.0 ppm (11.1% of the NAAQS);
- Austin Northwest site (AQS #48-453-0014): DV 0.3 ppm (3.3% of the NAAQS).

Particulate Matter of 10 Microns or Less (PM_{10})

PM_{10} Collocation (Quality Control [QC]) Network

The EPA Region 6 notes that according to both AQS and the 2013 ANP Network Table, the TCEQ currently operates a total of twenty-six PM_{10} FRM sites, nine of which also have collocated monitors. Table 1 (below) identifies the number of required collocated monitors and the actual number of collocated monitors for QC.

Table 1: PM_{10} Network Collocation Summary

Method	# Sites	# Req'd QC Monitors	# of QC Monitors	Collocated Sites	Primary Method	QC Method	Notes
141	8	1	2	Convention Center (48-113-0050)	141	141	
				Deer Park (48-201-1039)	141	141	PM_{10} also required for NATTS.
062	11	2	3	Ojo de Agua (48-141-1021)	062	062	
				Socorro Hueco (48-141-0057)	062	063	The QC monitor counts towards collocation of primary method.
				Laredo Vidaurri (48-479-0016)	062	062	
063	2	1	2	Texas City Fire Station (48-167-0004)	063	063	
				Dona Park (48-355-0034)	063	063	
064	5	1	2	Clinton (48-201-1035)	064	064	
				Stage Coach (48-439-3010)	064	064	

Please note this table includes the Socorro Hueco site (AQS #48-141-0057), where the sampling method of the PM_{10} QC monitor is different than that of the primary PM_{10} monitor. Although the TCEQ has proposed to replace any collocated monitors that have different sampling methods than the primary monitors, this is not required. Under 40 CFR Part 58 App. A, 3.3.1, PM_{10} collocated monitors are not required to use the same method.

Based on our review of AQS and TCEQ's 2013 ANP, the EPA Region 6 considers the TCEQ PM_{10} network to meet or exceed the minimum requirements per 40 CFR Part 58 Appendix D, Table D-4. However, the following are some items regarding the TCEQ PM_{10} network that need clarification.

According to the 2013 TCEQ ANP narrative, a PM_{10} collocated monitor was deployed at the Laredo Vidaurri site (AQS #48-479-0016) in 2012. However, the TCEQ 2013 ANP Network Table does not identify a PM_{10} collocated monitor at this site. Further discussion is needed regarding the PM_{10} collocation at the Laredo Vidaurri site. Please ensure that the PM_{10} monitoring at this site is properly addressed in the TCEQ 2014 ANP.

The TCEQ 2013 ANP stated that PM_{10} collocation would continue at the Tillman site (AQS #48-141-0002). However, based on the EPA Region 6 understanding, this site was discontinued as of April 11, 2013, and all monitors at this site were relocated to the Ojo de Agua site (AQS #48-141-1021). Further discussion is needed regarding the PM_{10} sampling methods being used at the Ojo de Agua site. Also, please ensure that the Tillman discontinuation and the Ojo de Agua sites are properly addressed in the TCEQ 2014 ANP.

EPA Region 6 notes that the TCEQ 2013 ANP has requested to discontinue the PM_{10} collocated monitor located at the Fort Worth Stage Coach site (AQS #48-439-3010). For PM_{10} sampling method 064, only one collocated monitor is needed. The PM_{10} collocated monitor located at the Houston Clinton site (AQS #48-201-1035) will meet the collocation requirements for the PM_{10} sampling method 064. Therefore, EPA Region 6 approves the request to discontinue the collocated PM_{10} monitor at the Stage Coach site. This monitor concentration is 71% of the 24-hr NAAQS (150 $\mu g/m^3$) in comparison with the Houston Clinton site which is reporting concentrations at 85% of the 24-hr NAAQS based on 2010 through 2012 data. Discontinuation of the PM_{10} collocated monitor at the Stage Coach site will not compromise the collocation requirements or data quality requirements in accordance with 40 CFR Part 58 App. A and App. D. We request TCEQ provide the end date for the collocated monitor once the monitor has been discontinued. This change should also be reflected in the TCEQ 2014 ANP.

EPA Region 6 notes that the TCEQ has also requested in the 2013 ANP to discontinue the PM_{10} collocated monitor located at the Texas City Fire Station site (AQS #48-167-0034). At this time, the EPA Region 6 cannot approve the discontinuation of the collocated PM_{10} monitor at this site. Further discussion is needed in order to determine what is necessary for the TCEQ PM_{10} collocation network per 40 CFR Part 58 App. A and App. D.

Particulate Matter of 2.5 Microns or Less ($PM_{2.5}$)

The EPA Region 6 understands that as of June 24, 2013, the $PM_{2.5}$ FRM speciation monitor at the Isla Blanca Park site (AQS #48-061-2004) was replaced with a continuous $PM_{2.5}$ TEOM monitor. The 2013 TCEQ ANP Network Plan shows that a $PM_{2.5}$ FRM speciation monitor is still operating at this site. Per 40 CFR Part 58, App. D, 4.7, a State and Local Air Monitoring Station (SLAMS) $PM_{2.5}$ monitor is required for this area that is representative of the Brownsville-Harlingen MSA based on the 2012 U.S. Census and the 2013 preliminary DV of 10.3 $\mu g/m^3$. We request that the TCEQ reflect their proposal for this site location in the 2014 ANP.

In the 2013 ANP, the TCEQ proposed to operate an FRM $PM_{2.5}$ SLAMS monitor at the Austin Northwest site (AQS #48-453-0014). The TCEQ currently operates a SLAMS $PM_{2.5}$ FRM monitor at the Austin Audubon Society site (AQS #48-453-0020) and the Austin Webberville Road site (AQS #48-453-0021). The 2013 preliminary 24-hr DVs for these two monitors are 21 $\mu g/m^3$ and 24 $\mu g/m^3$ and the preliminary 2013 annual DVs are 7.8 $\mu g/m^3$ and 9.6 $\mu g/m^3$, respectively. Based on the DVs and the 2012 population estimate from the U.S. Census, the Austin-Round Rock MSA is not required to have a third SLAMS $PM_{2.5}$ FRM site. Based on discussion with TCEQ we understand that TCEQ no longer plans to deploy the $PM_{2.5}$ monitor at the Austin Northwest site. Please confirm this decision in the 2014 ANP.

Also, in accordance with 40 CFR Part 58, App. D, 4.7, the TCEQ has proposed to establish an additional $PM_{2.5}$ FRM monitoring site within the McAllen-Edinburg-Mission MSA. The TCEQ and the EPA Region 6 are currently in the process of discussing optimal locations for this site. The possibility of monitoring for other pollutants in addition to $PM_{2.5}$ at this site is also being discussed. Please note that the TCEQ is required to ensure the proposed site meets all siting criteria of 40 CFR Part 58 App. E.

The TCEQ has deployed a $PM_{2.5}$ FRM SLAMS monitor with speciation analysis in the Houston-Sugarland-Baytown MSA at the Galveston 99th Street site (AQS #48-167-1034) as of March 5, 2013. We understand this site will sample every sixth day from September through March, and daily from April through August. We also understand that the TCEQ will continue to operate the $PM_{2.5}$ TEOM monitor at this site to support the every–sixth-day sampling schedule required by 40 CFR §58.12.

In accordance with 40 CFR Part 58, App. D, 4.7, the TCEQ will retain the $PM_{2.5}$ FRM monitors at the Texarkana site (AQS #48-037-0004) and the Corpus Christi Huisache site (AQS #48-355-0032). We do not approve the proposal to operate the $PM_{2.5}$ FRM monitor at the Texarkana site on a 1-in-6 day schedule based on the 2012 DV of 11.1 $\mu g/m^3$ which is 93% of the annual NAAQS (15 $\mu g/m^3$). However, we can revisit this request during the TCEQ 2014 ANP review. We also approve the TCEQ to retain the $PM_{2.5}$ collocated monitor at the Corpus Christi Huisache site.

The EPA Region 6 understands that the TCEQ is currently operating the Baytown (AQS #48-201-0058) $PM_{2.5}$ FRM monitor on a 1-in-6 day sampling frequency since a $PM_{2.5}$ TEOM was relocated to this site from the Channelview site (AQS #48-201-0026). The EPA Region 6 notes that the 2013 ANP Network Table does not reflect the $PM_{2.5}$ TEOM TCEQ is operating at the Baytown site. Please include the $PM_{2.5}$ TEOM and the new monitoring frequency of the FRM in 2014 ANP Network Table.

The TCEQ has stated in the 2013 ANP that the following were completed, and the EPA Region 6 has confirmed these changes in AQS:

- As of June 11, 2013 the $PM_{2.5}$ TEOM was moved from the Corpus Christi West site (AQS #48-355-0025) to the Dona Park site (AQS #48-355-0034). The $PM_{2.5}$ FRM at the Dona Park site is now operating on 1-in-6 day sampling schedule.
- As of May 2013 the Austin Audubon Society site (AQS #48-453-0020) discontinued the speciated $PM_{2.5}$ analysis but is still operating the $PM_{2.5}$ FRM.
- As of October 2012, a $PM_{2.5}$ TEOM was deployed at the Austin Webberville Road site (AQS #48-453-0021) to operate in conjunction to the $PM_{2.5}$ FRM, which will now operate on a 1-in-6 day sampling frequency.

$PM_{2.5}$ Collocation

The TCEQ currently operates a total of 22 $PM_{2.5}$ FRM sites, including the new Galveston 99th Street (AQS Site ID: 48-167-1034), using sampling method 145. Three collocated monitors are required to meet the $PM_{2.5}$ collocation requirements. The TCEQ is currently meeting the 15% collocation requirements per method per 40 CFR Part 58, App. A, 3.2.5 at the following sites: the Dallas Hinton site (AQS #48-113-0069), the Houston Clinton site (AQS #48-201-1035) and the Corpus Christi Huisache site (AQS #48-355-0032). However, the addition of the two $PM_{2.5}$ FRM sites proposed for deployment in the Brownville-Harlingen and the McAllen-Edinburg-Mission MSAs will require the TCEQ to have 4 collocated monitoring sites based on the method. Further discussion is needed in order to determine the optimal site to meet the $PM_{2.5}$ collocation requirement.

$PM_{2.5}$ Continuous Network

According to 40 CFR Part 58, App. D, 4.7.2, the TCEQ is required to operate continuous $PM_{2.5}$ monitors equal to at least one-half the minimum required sites listed in Table D-5 of 40 CFR Part 58, App. D. The TCEQ is also required to operate $PM_{2.5}$ monitors for the Air Quality Index (AQI) system according to 40 CFR §58.50(b). The current TCEQ continuous $PM_{2.5}$ network is currently exceeding these requirements. We request the TCEQ reassess their continuous $PM_{2.5}$ network. Further discussion is needed in order to optimize the TCEQ continuous $PM_{2.5}$ network.

We note in the 2013 ANP that the $PM_{2.5}$ TEOM that was meant to be relocated to the Austin Webberville Road site (AQS #48-453-0021) will remain at the Austin Northwest site (AQS #48-453-0014).

Volatile Organic Compounds (VOCs)

Since the analysis of Chromium VI is no longer required for the National Air Toxics Trends Station (NATTS) program and is not included in the TCEQ NATTS grant work plan for the Houston Deer Park site (AQS #48-201-1039) and the Karnack site (AQS #48-203-0002), please reflect the removal of this analysis at these sites in the 2014 ANP Network Table.

Canister Samplers

The EPA Region 6 approved the discontinuation of the VOC canister samplers in the TCEQ 2012 ANP at the following sites:

- El Paso Ascarate Park SE site (AQS #48-141-0055)
- Houston Galveston 99th Street site (AQS #48-167-1034)
- Dallas Kaufman site (AQS #48-257-0005)
- Houston Conroe site (AQS #48-339-0078)

According to AQS, the VOC canister samplers at the sites identified above have been discontinued as of May 31, 2013.

Two other VOC canister samplers in the TCEQ 2012 ANP were approved by the EPA Region 6 for discontinuation at the following sites: the Houston Aldine site (AQS #48-201-0024) and the Houston NW Harris County (AQS #48-201-0029). However, according to AQS these monitors are still operating. Please enter end dates for these monitors in AQS.

We agree with the continuing operation of the VOC canister sampler at the Italy site (AQS #48-139-1044) because of the useful VOC upwind data information it provides for the Dallas-Fort Worth area.

Multi-pollutant Monitoring Sites

The TCEQ has stated in the 2013 ANP that the following were completed and the EPA Region 6 has confirmed these changes in AQS:

- The Laredo Border site (AQS #48-479-0016) was relocated, as of August 2012, to the Laredo Vidaurri site and the Port Arthur West site (AQS #48-245-0011) was relocated as of July 2012. Due to the close proximity of these sites to their previous locations, both retained the same AQS IDs.
- As of December 2012 the Sun Metro site (AQS #48-141-0053) was discontinued, including the CO, SO_2, and meteorological (met) monitors. The $PM_{2.5}$ TEOM, SVOC monitor, and canister samplers were relocated to the Socorro Hueco site (AQS #48-141-0057).
- As of October 2010, the San Antonio site (AQS #48-029-0046) was discontinued, which included NO2 and CO monitors.
- The Mercedes site (AQS #48-215-1048) was relocated to the Harlingen Teege site (AQS #48-061-1023), which included O_3 and met monitors. The SVOC monitor, canister samplers and solar radiation monitors were all discontinued as of October 2012.
- As of December 5, 2012 the O_3, PM_{10}, and met monitors at the Socorro site (AQS #48-141-0057) were relocated to the new Socorro Hueco site, which retained the same AQS ID due to the close proximity to the previous site. The CO monitor was discontinued. A PM_{10} collocated QC monitor was also added to this site December 2012.

Near-road monitoring sites
Further discussions will be needed for the 2nd near-road NO_2 sites in both the Houston and Dallas-Fort Worth MSAs, which are required to be deployed by January 1, 2015. Further discussions will also be needed for the required near-road $PM_{2.5}$ monitors and near-road CO monitors that will need to be deployed at one of the two near-road sites in the both the Houston and Dallas-Fort Worth MSAs.

TCEQ Network Table (Appendix A of the TCEQ 2013 Annual Network Plan)
According to the AQS database an NO_2 special purpose monitor (SPM), SO_2 SPM, and O_3 SPM are currently being operated at the Corsicana site (AQS #48-349-1051) by TCEQ. However, we note in the TCEQ 2013 ANP Network Table that these monitors were not included. We recommend that the TCEQ ANP Network Table and AQS monitor listings be aligned regarding these three monitors.

The Corpus Christi Huisache site (AQS #48-355-0032) 1-hr SO_2 monitor is designated as a SLAMS in AQS as of January 1, 2009 and the 5-min SO_2 monitor is also designated as a SLAMS in AQS as of August 23, 2010. The TCEQ 2013 ANP Network Table currently identifies these monitors as SPM. Please update the monitor type to SLAMS in the TCEQ 2014 ANP Network Table.

The Longview site (AQS # 48-183-0001) 1-hr SO_2 monitor is designated as SLAMS in AQS as of January 1, 2013. The 5-min SO_2 monitor is designated as an SPM. Since the 1-hr SO_2 monitor is a SLAMS the 5-min SO_2 monitor also needs to be identified in AQS as a SLAMS. Please revise the monitor designation in AQS to reflect that the 5-minute SO_2 monitor is SLAMS. Also, the TCEQ 2013 ANP Network Table currently identifies these monitors as SPM. Please update the monitor type to SLAMS for these monitors in the TCEQ 2014 ANP Network Table.

The TCEQ 2013 ANP Network Table lists an SPM PM_{10} FRM monitor at the Morrell site (AQS #48-113-0018). According to AQS, a SLAMS FRM PM_{10} (sampling method 064) was terminated on March 27, 2003, but PM_{10} speciation samples are still being collected. Please clarify the purpose of the monitoring at this site. Please update the TCEQ 2014 ANP Network Table to accurately reflect the monitoring being performed at this site.

According to AQS, the $PM_{2.5}$ FRM monitor at the El Paso Chamizal site (AQS #48-141-0044) has been operating on a 1-in-3-day sampling schedule as of July 2013. The TCEQ 2013 ANP Network Table identifies the monitor as operating on a 1-in-6 day schedule. Since the $PM_{2.5}$ FRM monitor is part of the National Core (NCore) Multi-pollutant Monitoring Stations program, it needs to operate on at least a 1-in-3-day sampling schedule with or without a collocated continuous monitor present per 40 CFR §58.12. Please reflect this in the 2014 ANP Network Table.

According to AQS, as of August 10, 2013 a $PM_{2.5}$ FRM SLAMS monitor has been operating at the Houston Deer Park #2 site (AQS #48-201-1039). However, this sampler was not included in the TCEQ 2013 ANP Network Plan. Please update the TCEQ 2014 ANP Network Table to accurately reflect the monitoring being performed at this site.

Per 40 CFR Part 58 App. D, Table D-2, please note that the EPA Region 6 does not consider the Karnack site (AQS #48-203-0002) to be within an MSA. Please revise the TCEQ 2014 ANP Network Table to reflect "none" as the MSA for all monitors at this site. In the comments section of the Network Table, for each Karnack monitor, please include the statement that the monitor is located within the Marshall Micropolitan Statistical Area.

According to the 2013 U.S. Census, the Granbury site (AQS #48-221-0001) is within the Dallas-Fort Worth MSA. Please revise the 2014 ANP Network Table to reflect this MSAs for this site's monitors.

The TCEQ operated an AutoGC for the special project at the El Paso Delta site (AQS #48-141-1011) and was discontinued as of August 13, 2013. Since this monitor has been discontinued, it will need to be removed from the TCEQ 2014 ANP Network Table.

The 2013 ANP Network Table shows two Pb monitors at the Ojo De Agua site (AQS #48-141-1021). The primary monitor is identified as an SPM, but the collocated monitor is identified as a SLAMS. Further discussion is needed to identify the correct monitor designations for these Pb monitors.

General Comments/Additional Changes

We agree with the re-designation of the dew point monitors to SPM as these are not required per the PAMS program (which requires humidity measurements instead).

The EPA Region 6 understands that as of 2012 all reactive nitrogen compound (NO_y) converters were raised to the regulatory 10 meters.

Please provide timelines of the approved changes for sites and monitors in the TCEQ network to the EPA Region 6 Air Quality Analysis Section Chief, Maria Martinez, within 30 days of the receipt of this letter.