UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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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

JAN 14 2015

Dear Mr. Chism:

Thank you for your correspondence submitting the Texas Commission on Environmental Quality's (TCEQ) 2014 Annual Monitoring Network Plan. The U.S. Environmental Protection Agency (EPA) Region 6 has completed its analysis of the TCEQ's 2014 Annual Monitoring Network Plan to ensure it meets the 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 2014 network plan. The network assessment process presents an opportunity for EPA Region 6 and the TCEQ to collaborate on the air monitoring network design. *See* 40 CFR Part 58 Appendix D, Section 1.1.2. EPA has reviewed your plan, including the information for near-road monitoring and the status of changes for the TCEQ Ambient Air Monitoring Network.

I am pleased to inform you that your 2014 ambient air monitoring network plan is approved in accordance with 40 CFR §58.10. 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 2015 ambient air monitoring network plan and the 2015 five year network assessment. 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

Commission on Environmental Quality (TCEQ)
2014 Annual Ambient Air Monitoring Network Plan (ANP) Technical Comments

The Environmental Protection Agency (EPA) Region 6 has reviewed your 2014 ANP, and our comments are provided below. In addition to the network plan, EPA Region 6's review includes additional information provided by the TCEQ as identified below.

Nitrogen Dioxide (NO_2)

Area-wide NO_2 Monitors

The NO_2 area-wide monitors for the Houston-Sugarland-Baytown, Dallas-Fort Worth-Arlington, San Antonio-New Braunfels, and Austin-Round Rock core-based statistical areas (CBSAs), as required by the 40 CFR, Part 58, Appendix D, Section 4.3.3 were approved in the 2013 ANP response letter from EPA Region 6 dated May 28, 2014.

Regional Administrator Required Monitoring (RA40) Monitors

The NO_2 monitors for use to help protect susceptible and vulnerable populations under the "RA40" national requirement (40 CFR Part 58, Appendix D, Section 4.3.4) were approved in the 2013 ANP response letter from EPA Region 6 dated May 28, 2014.

Near-Road Monitoring Sites

In an email dated January 9, 2014, the TCEQ provided siting information for the NO_2 near-road monitors in the Houston-Sugarland-Baytown, Dallas-Fort Worth-Arlington, and San Antonio-New Braunfels CBSAs which were approved through separate discussions. EPA Region 6 acknowledges the NO_2 near-road monitoring sites at the Houston Southwest Freeway (EPA Air Quality System database (AQS) #48-201-1066), the Dallas LBJ Freeway (AQS #48-113-1067) and the San Antonio Interstate 35 (AQS #48-029-1069) have been established to meet the requirements for the near-road NO_2 monitoring for the Houston-Sugarland-Baytown, Dallas-Fort Worth-Arlington, and San Antonio-New Braunfels CBSAs, respectively, as required by 40 CFR Part 58, Appendix D, Section 4.3.2. The Austin NO_2 near-road monitoring site was approved in the 2013 ANP response letter from EPA Region 6 dated May 28, 2014.

In addition, we acknowledge the TCEQ's current efforts in securing the second required near-road NO_2 sites for the Houston-Sugarland-Baytown and Dallas-Fort Worth-Arlington CBSAs, due to be deployed by January 1, 2015 as required by 40 CFR Part 58, Appendix D, Section 4.3.2 and 40 CFR §58.13. Further discussion will be needed for the following:

- The second near-road NO_2 sites in both the Houston-Sugarland-Baytown and Dallas-Fort Worth-Arlington CBSAs.
- The required near-road $PM_{2.5}$ monitors and CO monitors that will need to be deployed at one of the two near-road sites by January 1, 2015 as required by 40 CFR §58.13, 40 CFR Part 58, Appendix D, Section 4.7 and 40 CFR Part 58, Appendix D, Section 4.2.1 in both the Houston-Sugarland-Baytown and Dallas-Fort Worth-Arlington CBSAs.

We look forward to continuing to work with the TCEQ on the second near-road sites in these CBSAs.

Sulfur Dioxide (SO_2)

According to AQS, the TCEQ began monitoring for SO_2 at the Amarillo 24th Avenue site (AQS #48-375-1025) as of October 16, 2013.

At this time, we do not recommend any changes to the TCEQ SO_2 network until the Data Requirements Rule for the 1-Hour SO_2 Primary National Ambient Air Quality Standards (NAAQS) has been finalized. However, in anticipation of the finalized rule, we look forward to the TCEQ's re-evaluation of the SO_2 network throughout Texas.

Lead (Pb)

Regulatory Pb Monitoring Sites

The TCEQ 2014 ANP only lists two sources in Texas with emissions reportedly above the 0.5 ton per year (tpy) threshold, which would require Pb source monitoring per 40 CFR Part 58, Appendix D, Section 4.5(a). Based on the TCEQ's 2011 and 2012 Point Source Database and the EPA Toxic Release Inventory (TRI), there are possible additional stationary sources in Texas with annual Pb emissions above the 0.5 tpy threshold at the following sources:

Site Name, Company	County	Source Emissions (tpy)	Database
Marshall Plant, Norit Americas Inc.	Harrison	1.1024	2012 TCEQ Point Source Database
Ceramic Tile Glazed MFG, American Marazzi Tile Inc.	Dallas	0.5359	2012 TCEQ Point Source Database
Joy Global Longview Operations, Joy Global Longview Operations LLC	Gregg	0.53	2012 TCEQ Point Source Database
Baytown Olefins Plant, ExxonMobil Chemical Co.	Harris	0.5897	2013 EPA TRI

If the above information is accurate, the TCEQ would be required to either monitor or submit a waiver for monitoring for these Pb sources per 40 CFR Part 58, Appendix D, Section 4.5(a)(ii). We request that the TCEQ conduct a further evaluation of the above information and related emission inventory data to determine if required ambient air monitoring for Pb should be considered for these sources.

EPA Region 6 noted that Table 3 in the TCEQ 2014 ANP did not include the American Smelting and Refining Company (ASARCO) copper refinery located in Amarillo, Texas (TX). EPA Region 6 is aware of a TCEQ State and Local Air Monitoring Station (SLAMS) Pb source-oriented monitor at the Amarillo State Highway 136 site (AQS #48-375-0024), which is located near this facility. Currently, a Pb monitor is still required because emissions from this source have fluctuated around the 0.5 tpy Pb threshold in recent years based on the TCEQ Point Source Database and the EPA TRI. Please note that the TCEQ is responsible for monitoring sources whose yearly emissions fluctuate around the Pb 0.5 tpy threshold and determining if monitoring is needed. Please note that a change in the status of this monitor as a required source-oriented Pb monitor has not been approved by EPA Region 6. Before a change to the status of this monitor could be made, further discussions with EPA Region 6 are needed.

The discontinuation of Pb monitors at the Houston East (AQS #48-201-1034) and Skyline Park (AQS #48-141-0058) sites was approved in the 2013 ANP response letter from EPA Region 6 dated May 28, 2014. Please notify EPA Region 6 when these monitors have been discontinued and when end dates have been entered into AQS. Please ensure these changes are reflected in the TCEQ's 2015 ANP. Also, please note that all Pb samples collected at these sites should be analyzed and reported to AQS.

Pb Waivers
The waiver request for the source-oriented Pb monitoring required at the Lower Colorado River Authority Fayette Power Plant in Fayette County, TX was approved in the 2013 ANP response letter from EPA Region 6 dated May 28, 2014.

Please note that according to 40 CFR Part 58, Appendix D, Section 4.5(a)(ii), all Pb monitoring waivers must be renewed once every five years as part of the network assessment required as required by 40 CFR §58.10(d). Please be sure to include the re-application of all Pb monitoring waivers with the 2015 TCEQ Five Year Network Assessment.

Stinson Municipal Airport in Bexar County, TX, Monitoring
EPA Region 6 thanks the TCEQ for successfully completing the ambient air monitoring associated with 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, Appendix D, Section 4.5(a)(iii). EPA Region 6 approved the discontinuation of this site in a letter dated December 18, 2013, addressed to the TCEQ's Director of the Air Monitoring Division. The Pb monitor at the Stinson airport was subsequently discontinued on December 18, 2013, as noted in AQS.

Pb Collocation
The TCEQ is currently operating fifteen Pb monitoring sites, three of which have collocation. The TCEQ's Pb collocation is currently exceeding the required number of collocated monitors as detailed in 40 CFR Part 58, Appendix A, Section 3.3.4.3. However, 40 CFR Part 58, Appendix A, Section 3.3.4.3 requires that the first collocated Pb site must be the site measuring the highest Pb concentration in the network. The Frisco Eubanks site (AQS #48-085-0009), one of the collocated sites, had the highest 2013 design value (DV) of 0.52 micrograms per cubic meter ($\mu g/m^3$) and the highest 2013 three month rolling quarterly average of 0.08 $\mu g/m^3$. However, the Terrell TemTex site (AQS #48-257-0020), currently not collocated, has the highest 2014 three month rolling quarterly average of 0.04 $\mu g/m^3$. Further discussion will be needed to ensure that the TCEQ continues to meet the collocation requirements at the highest Pb monitoring site.

Ozone (O_3)
The O_3 monitor at the Temple Georgia (AQS #48-027-1045) site was approved in the 2013 ANP response letter from EPA Region 6 dated May 28, 2014, and a monitoring start date of October 4, 2013 was confirmed in AQS.

O_3 network metropolitan statistical areas (MSAs) evaluations:

- Austin-Round Rock MSA - The siting of the current O_3 monitors is appropriate based on primary wind directions in the area. Although there is not a regulatory monitor in Caldwell County, EPA Region 6 is aware of a non-regulatory O_3 monitor within the county that uses an EPA approved sampling method which provides indicative data. EPA Region 6 periodically reviews this data, which is available online via the TCEQ's website. At this time, we do not believe the TCEQ needs to make adjustments to the siting of the regulatory monitors within the MSA.
- Dallas-Fort Worth-Arlington MSA – EPA Region 6 will continue to work with the TCEQ to better understand, spatially, the ambient O_3 concentrations in this MSA, including Wise County.

Carbon Monoxide (CO)

The TCEQ's request to discontinue nine CO monitors was approved in the 2013 ANP response letter from the EPA Region 6 dated May 28, 2014. According to AQS, the end date was June 30, 2014 for the Houston Aldine site (AQS #48-201-0024), the Houston Texas Avenue site (AQS #48-201-0075), the Arlington Municipal Airport site (AQS #48-439-3011), and the Austin Northwest site (AQS #48-453-0014). The sites listed below do not have end dates in AQS and therefore have not been officially discontinued. Please notify EPA Region 6 when these monitors have been discontinued and when end dates have been entered into AQS. Also, please ensure these changes are reflected in the TCEQ's 2015 ANP.

- El Paso UTEP site (AQS #48-141-0037)
- El Paso Skyline Park site (AQS #48-141-0058)
- Houston Lang site (AQS #48-201-0047)
- Houston Park Place site (AQS #48-201-0416)
- Fort Worth Northwest site (AQS #48-439-1002)

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

EPA Region 6 approves the proposal to deploy the required SLAMS PM_{10} monitor at the new Edinburg site to meet the requirements of 40 CFR Part 58, Appendix D, Section 4.6. Please notify EPA Region 6 which PM_{10} monitoring method will be used at this site, when the monitor has been deployed and is operational, and the AQS ID number for this site. Please ensure this information is reflected in the TCEQ's 2015 ANP.

EPA Region 6 acknowledges that the following PM_{10} monitors were replaced with PM_{10} method 141 monitors as noted in AQS: The Austin Webberville site monitor (AQS #48-453-0021), replaced on August 14, 2013; The Austin Audubon Society site monitor (AQS #48-453-0020), replaced on August 20, 2013; The Dona Park site monitor (AQS #48-355-0034), replaced on November 18, 2013; and, The Karnack site monitor (AQS #48-203-0002), replaced on October 1, 2013.

EPA Region 6 noted that the Morrell site (AQS #48-113-0018) appeared in Appendix A of the 2014 ANP but was not identified in Appendix I. Please clarify why this monitor was not included in Appendix I.

PM_{10} Collocation

EPA Region 6 supports the proposed change of the PM_{10} collocated monitor sampling method to match that of the primary monitor method at the Socorro Hueco site (AQS #48-141-0057). Please notify EPA Region 6 when the collocated monitor's method has been changed and when this change has been entered into AQS. Also according to AQS, the PM_{10} collocated monitor at the Laredo Vidaurri site (AQS #48-479-0016) was replaced with a method 062 monitor on September 7, 2013 so that both the primary and collocated monitors have the same sampling method. Please ensure these changes are reflected in the TCEQ's 2015 ANP. Please note that under 40 CFR Part 58, Appendix A, Section 3.3.1, PM_{10} collocated monitors are not required to operate with the same sampling method as the primary monitors. Also, please be aware that if the same sampling method is utilized for both the primary and collocated monitors, then data from the collocated monitor can be used for substitution of the primary monitor data, if necessary.

Depending on the PM_{10} method used at the new Edinburg site, the number of PM_{10} collocated monitors required may be impacted. We ask that the TCEQ inform us if additional collocation is required and where the TCEQ proposes to deploy any additional collocation monitors.

The following changes were documented in the 2013 ANP response letter from EPA Region 6 dated May 28, 2014.

- EPA Region 6 concurred with the TCEQ's retention of the PM_{10} collocated monitor at the Texas City Fire Station site (AQS #48-167-0004).
- The PM_{10} collocated monitor at the Fort Worth Stage Coach site (AQS #48-439-3010) was approved for discontinuation. According to AQS, the end date of the collocated monitor was June 30, 2014. Please ensure that this change is reflected in the TCEQ's 2015 ANP.

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

EPA Region 6 approves the request to place a SLAMS $PM_{2.5}$ Federal Reference Method (FRM) monitor at the Brownsville site (AQS #48-061-0006) and at the new proposed Edinburg site to meet the $PM_{2.5}$ monitoring requirements for both the Brownsville-Harlingen and the McAllen-Edinburg-Mission MSAs per 40 CFR Part 58, Appendix D, Section 4.7.1. Please notify EPA Region 6 which $PM_{2.5}$ method the TCEQ is planning to use at the sites and when the monitor has been deployed and is operational. Please provide the AQS ID No. for the new Edinburg SLAMS site. Also, please ensure these changes are reflected in the TCEQ's 2015 ANP.

The TCEQ has proposed to simultaneously operate a $PM_{2.5}$ tapered element oscillating microbalance (TEOM) monitor with the $PM_{2.5}$ FRMs at the Brownsville site, the new Edinburg site, the Fort Worth Haws Athletic Center site (AQS # 48-439-1006) and two of the near-road monitoring sites in order to operate the FRM monitors on an every sixth day schedule.

- Since there is no current $PM_{2.5}$ data to be compared with the requirements of 40 CFR §58.12(d)(1)(ii) for the Brownsville-Harlingen MSA and the new $PM_{2.5}$ SLAMS monitor will be the determining monitor for this MSA, EPA Region 6 does not recommend approval of an every sixth day sampling schedule at this time.
- Currently, the existing $PM_{2.5}$ SLAMS monitor located at the Mission site (AQS #48-215-0043) is the determining monitor for the McAllen-Edinburg-Mission MSA and meets the requirements of 40 CFR §58.12(d)(1)(ii). Since the new $PM_{2.5}$ SLAMS could potentially be the determining monitor, EPA Region 6 does not recommend approval of an every sixth day sampling schedule at this time.
- The TCEQ currently operates a $PM_{2.5}$ FRM monitor on an every third day sampling frequency and a $PM_{2.5}$ TEOM at the Fort Worth Haws Athletic Center site (AQS #48-439-1006). At this time, EPA Region 6 does not approve the change in sampling frequency.
- For the $PM_{2.5}$ near-road monitoring sites in the Houston-Sugarland-Baytown and Dallas-Fort Worth-Arlington CBSAs, EPA Region 6 does not recommend an every sixth day sampling frequency until there is sufficient ambient air data to evaluate against the requirements of 40 CFR §58.12(d)(1)(ii), and especially since these sites have the potential to be determining monitors within the CBSAs.
- After TCEQ has submitted their $PM_{2.5}$ network evaluation, including the $PM_{2.5}$ TEOM network, as part of the 2015 TCEQ Five Year Network Assessment, changes in the sampling schedule of these monitors can be requested after consideration of factors including, but not limited to, the historical $PM_{2.5}$ data quality assessments, the location of current $PM_{2.5}$ DV sites, and their regulatory data needs per 40 CFR §58.12(d)(1)(ii).

During our evaluation of the $PM_{2.5}$ network, we noted that Harris County currently operates three $PM_{2.5}$ regulatory monitors that are considered to represent area-wide monitoring in the Houston-Sugarland-Baytown MSA. Based on the spatial scales identified in AQS, the area-wide monitors in this MSA are located at the Houston Aldine (AQS #48-201-0024), Clinton Drive (AQS #48-201-1035), and Houston

Deer Park (AQS #48-201-1039) sites, pursuant to 40 CFR §58.1 and 40 CFR Part 58, Appendix D, Section 4.7.1(b). We look forward to reviewing the 2015 TCEQ Five Year Network Assessment evaluation of the $PM_{2.5}$ network in the Houston-Sugarland-Baytown MSA.

Finally, EPA Region 6 concurs that an additional $PM_{2.5}$ FRM SLAMS monitor within the Austin-Round Rock MSA is not needed at this time as documented in EPA Region 6's May 28, 2014 response to the TCEQ's 2013 ANP submittal.

$PM_{2.5}$ Speciation

EPA Region 6 concurs with the TCEQ's proposal to discontinue the $PM_{2.5}$ speciation sampling at the Dallas Convention Center (AQS #48-113-0050) with the understanding that the $PM_{2.5}$ FRM gravimetric monitor will continue operating. The 24-hr and annual 2013 $PM_{2.5}$ DVs for the FRM gravimetric monitor at this site are 23 $\mu g/m^3$ (66% of the 24-hr NAAQS) and 10.8 $\mu g/m^3$ (90% of the annual NAAQS), respectively. Speciation monitoring at this site can be discontinued because it is within five miles of the Dallas Hinton NCore site (AQS #48-113-0069), which provides similar speciation data. Please ensure these changes are reflected in the TCEQ's 2015 ANP.

We appreciate the TCEQ informing us about their intended special purpose PM speciation study. We will discuss specifics about this study with the TCEQ outside of the ANP since it is beyond the scope and requirements of the network plan.

$PM_{2.5}$ Collocation

The TCEQ currently operates a total of twenty-one $PM_{2.5}$ FRM sites, including the new Galveston 99th Street (AQS #48-167-1034) site, use sampling method 145. According to 40 CFR Part 58, Appendix A, Section 3.2.5, 15% of the primary monitors for each sampling method is required to be collocated. The TCEQ currently has three collocated monitors which meet the 15% collocation requirements for method 145 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 $PM_{2.5}$ FRM sites proposed for deployment in the Brownville-Harlingen and the McAllen-Edinburg-Mission MSAs and the two near-road $PM_{2.5}$ monitors may require the TCEQ to have additional collocated monitoring, depending on the monitoring methods used. The TCEQ is responsible for ensuring that $PM_{2.5}$ collocation will continue to be met after the new monitors are operational. If additional collocation is needed, the TCEQ must propose sites to deploy the collocated monitors. Further discussion is needed in order to determine the optimal sites for any additional $PM_{2.5}$ collocation.

EPA Region 6 notes that AQS, Appendix A of this ANP, and the TCEQ's data certifications do not identify any collocated monitors for $PM_{2.5}$ sampling method 170 as required by 40 CFR Part 58, Appendix A, Section 3.2.5. Please review these documents and provide a list of proposed changes needed to either AQS, the ANP, and/or other documents in order to identify the collocated monitor for this method. If collocation is not identified for this method it may impact the certification flags and the approval of the TCEQ 2015 ANP. Further discussion will be needed in order to determine the best course of action and ensure that collocation continues to be met.

$PM_{2.5}$ Continuous Network

According to 40 CFR Part 58, Appendix D, Section 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, Appendix D. Since the TCEQ operates a SLAMS $PM_{2.5}$ FRM at the Texarkana site (AQS #48-037-0004), the TCEQ is also required to operate a continuous monitor within the Texarkana MSA. We

understand that the TCEQ was unable to deploy a TEOM monitor at the Texarkana site (AQS #48-037-0004) due to logistical issues. In accordance with 40 CFR Part 58, Appendix D, Section 4.7, the TCEQ will retain the $PM_{2.5}$ FRM monitor at the Texarkana site (AQS #48-037-0004) which will continue to sample once every third day. Please notify EPA Region 6 where the TCEQ is planning to locate the $PM_{2.5}$ continuous monitor and which method will be used. Once EPA Region 6 has approved the site location and method, the TCEQ will need to notify EPA Region 6 when the monitor is deployed and operational. Please ensure that this changes is reflected in the TCEQ's 2015 ANP.

The TCEQ is also required to operate $PM_{2.5}$ monitors for the Air Quality Index (AQI) system for any MSA with a population exceeding 350,000. *See* 40 CFR §58.50(b). The TCEQ's continuous $PM_{2.5}$ network currently meets, and in some cases exceeds this requirement. We recommend the TCEQ reassess their continuous $PM_{2.5}$ network for efficiency and coverage. Further discussion will be needed before changes are made to the TCEQ continuous $PM_{2.5}$ network.

Based on information in AQS and Appendix A of this ANP, it appears that the TCEQ is currently operating two continuous monitors at both the Dallas Hinton (AQS #48-113-0069) and Houston Deer Park (AQS #48-201-1039) NCore sites. However, EPA Region 6 notes that only one continuous monitor is required to operate at each of these sites. *See* 40 CFR Part 58, Appendix D, Section 3(b). Further discussion is needed to determine if both a Beta Attenuation Mass (BAM) federal equivalent method (FEM) monitor and a TEOM monitor is needed at these sites.

The $PM_{2.5}$ TEOM at the Wichita Falls site (AQS #48-485-0315) was approved for discontinuation in an email to the TCEQ on March 31, 2014. According to AQS, the monitor does not have an end date, and therefore, has not been officially discontinued. Please provide an anticipated date of discontinuation for this monitor and notify EPA Region 6 when the monitor has been discontinued and an end date has been entered into AQS.

Volatile Organic Compounds (VOCs)

EPA Region 6 acknowledges that the TCEQ operated an Automated Gas Chromatograph (Auto-GC) for a special project at the El Paso Delta site (AQS #48-141-1011). The Auto-GC was discontinued as of August 13, 2013 as confirmed in AQS.

Canister Samplers

VOC canisters at the following sites were discontinued as of May 31, 2013 as confirmed in AQS:

- El Paso Ascarate Park SE site (AQS #48-141-0055)
- Houston Galveston 99th Street site (AQS #48-167-1034)
- Houston Aldine site (AQS #48-201-0024)
- Houston Northwest Harris County (AQS #48-201-0029)
- Dallas Kaufman site (AQS #48-257-0005)
- Houston Conroe Relocated site (AQS #48-339-0078)

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

Multi-pollutant Monitoring Sites

Baytown Eastpoint site (AQS #48-201-1017)

EPA Region 6 has confirmed in AQS that the Baytown Eastpoint site was discontinued on September 24, 2013. The site was re-deployed as of February 19, 2014 at the new Baytown Garth site, within one mile of Baytown Eastpoint site, so the AQS Site ID number has remained the same.

Corsicana Airport site (AQS #48-349-1051)
We recommend the TCEQ continue reporting the NO_2 special purpose monitor (SPM), SO_2 SPM, and O_3 SPM data from the Corsicana Airport site to AQS. We believe this site will be important in the upcoming O_3 and SO_2 data review.

Photochemical Assessment Monitoring Stations (PAMS)
Ultraviolet Radiation monitors at the PAMS sites were not identified in Appendix A of this ANP. Please ensure they are included in the TCEQ's 2015 ANP as they are required SLAMS monitors.

Since changes to the PAMS network require EPA Administrator approval, we have forwarded the requested changes, identified below, to EPA Headquarters. The TCEQ will receive a response from EPA regarding these requests.

- The TCEQ's proposal to discontinue the Nitrogen Oxides (NO_y) monitor at the SETRPC 40 Sabine Pass site (AQS #48-245-0101) since the Beaumont-Port Arthur area was re-designated as a maintenance area and the NO_y monitor is beyond minimum PAMS requirements.
- The TCEQ's proposal to re-designate the carbonyl monitor at the Fort Worth Northwest site (AQS #48-439-1002) from PAMS to SPM since the PAMS requirement for carbonyls is being met at the Dallas Hinton site (AQS #48-113-0069).
- The TCEQ's proposal to re-designate the carbonyl monitor at the Ascarate Park SE site (AQS #48-141-0055) from PAMS to SPM since the El Paso area was re-designated as a maintenance area and the carbonyl monitor is beyond minimum PAMS requirements.
- The TCEQ's proposal to re-designate the radar profiler at the El Paso UTEP site (AQS #48-141-0037) from PAMS to SPM since the El Paso area was re-designated as a maintenance area and the radar profiler is beyond minimum PAMS requirements.

EPA Region 6 concurred with the re-designation of the dew point monitors to SPMs in the 2013 ANP response letter from EPA Region 6 dated May 28, 2014.

General Comments/Additional Changes
We look forward to working with the TCEQ on their 2015 Network Plan and 2015 TCEQ Five Year Network Assessment to address specific areas of concern:

- North/Northeast El Paso
- West/Northwest Harris County
- East/Southeast Baytown
- San Antonio to Austin I35 Corridor

EPA Region 6 notes that there are multiple discrepancies between this ANP, AQS, and the TCEQ's data certification packages (i.e. monitor types, network affiliations, sampling frequencies, monitoring objectives, etc.). Please review these documents and provide a list of proposed changes needed to either AQS, the ANP, and/or other documents in order to resolve these discrepancies and potential inaccuracies. Further discussion will be needed in order to determine the best course of action to resolve any discrepancies and ensure that future discrepancies do not occur.

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