



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

JUL 15 2016

Mr. Richard C. Chism, Director  
Monitoring Division  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

Dear Mr. Chism:

Thank you for your submittal of the Texas Commission on Environmental Quality's (TCEQ) Five-Year Ambient Air Monitoring Network Assessment as required by 40 Code of Federal Regulations (CFR) §58.10(d). The U.S. Environmental Protection Agency (EPA) Region 6 has evaluated your Assessment and has the enclosed feedback for your consideration.

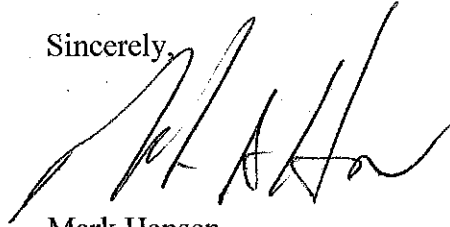
To the extent that you will use SO<sub>2</sub> monitors to meet the requirements of the Data Requirements Rule (80 FR 51052, August 21, 2015), we note that the rule calls for inclusion of relevant planning information for those monitors in the Annual Monitoring Network Plan due July 1, 2016. The Data Requirements Rule further states that the air agency shall consult with the appropriate EPA Regional Office in the development of plans to install, supplement, or maintain an appropriate ambient SO<sub>2</sub> monitoring network pursuant to the requirements of 40 CFR part 58 and subpart BB of 40 CFR Part 51. These monitors must be operational by January 1, 2017.

Also, the EPA published final Revisions to Ambient [Air] Monitoring Quality Assurance and Other Requirements in the Federal Register on March 28, 2016 (81 FR 17247). These revisions include monitoring requirements for photochemical assessment monitoring stations (PAMS), National Core multipollutant monitoring stations (NCore) lead monitors and near-road monitors, as well as other procedural changes to 40 CFR Part 58.

Future network assessments can successfully build upon this 2015 five-year monitoring network assessment. Any future network modifications must be approved, as appropriate, pursuant to 40 CFR §§58.14 or 58.10. We appreciate the 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) 665-7548, or your staff may contact Ms. Frances Verhalen, Air Monitoring/Grants Section Chief, at (214) 665-2172.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Hansen', written in a cursive style.

Mark Hansen  
Associate Director for Air,  
Multimedia Division

Enclosure

Texas Commission on Environmental Quality  
2015 Five-Year Ambient Air Monitoring Network Assessment  
Technical Comments

### General Comments

We appreciate the information provided in the 2015 five-year network assessment in accordance with 40 CFR Part §58.10(d).

For future five-year monitoring network assessments, please provide additional information regarding the requirement to “. . . consider the ability of existing/proposed sites to support air quality characterization for areas with relatively high populations of susceptible individuals (e.g., children with asthma).” See §58.10(d).

### Specific Comments

#### **PM Monitoring**

Within the discussion on population required monitoring (page 22), the TCEQ states that for the Houston-The Woodlands-Sugar Land MSA “four PM<sub>2.5</sub> monitors” are required. However, regulatory requirements for MSAs with populations greater than 1,000,000 only require 3 PM<sub>2.5</sub> monitors; this was correctly noted on page 57.

We appreciate the efforts of the TCEQ to site near-road monitors in the Houston and Dallas/Fort Worth MSAs. We encourage the TCEQ to continue to investigate new technologies within its network, especially FEM monitors for PM<sub>2.5</sub> and PM<sub>10</sub>.

For the Northeast Texas Area, at the time of the submittal a continuous monitor for Texarkana was planned. According to the TCEQ website, a continuous monitor was deployed at the Texarkana New Boston Site in early 2016. Please ensure this information is updated in AQS.

For the Central Texas Area, based on population projections, a PM<sub>2.5</sub> monitor may be needed in the Killeen-Temple MSA by 2020. Additionally, 1 - 2 PM<sub>10</sub> monitors may be needed in the Killeen-Temple MSA by 2020. Further, by 2020, the College Station-Bryan MSA may be required to have a PM<sub>10</sub> monitor due to population growth in the area; the 2015 population estimate for this area is above the threshold for requiring 0 - 1 PM<sub>10</sub> monitor.

For the Panhandle and West Texas Area, we support the deployment of the continuous non-FEM monitors as a cost effective option to collect air quality data for this area that is usable by regulators (to assess potential future needs of regulatory monitors), researchers, and the general public. We would support the redeployment of a PM<sub>2.5</sub> monitor in Lubbock. We encourage the TCEQ to continue to evaluate the Odessa monitoring sites. Due to the closeness of these monitors, decommissioning or relocation of one of the monitors (potentially to Wichita Falls or to Killeen-Temple) may be more appropriate than the continued operation of both monitors in Odessa.

For the Lower Rio Grande Valley Area, the deployments of FRM monitors in Brownsville and Edinburg were required to meet regulatory requirements. These monitors were deployed in mid-2015. Based on

population projections an additional PM<sub>2.5</sub> monitor may be needed in the McAllen-Mission-Edinburg MSA by 2020. As noted, the McAllen-Mission-Edinburg MSA was required to have an additional PM<sub>10</sub> monitor, which was made operational on July 16, 2015. Additional PM<sub>10</sub> monitors may be needed in the Brownsville-Harlingen MSA (one) and the McAllen-Mission-Edinburg MSA by 2020 (two) due to population growth in the area.

For the Far West Texas Area, we previously approved the PM<sub>2.5</sub> network modifications. We encourage the TCEQ to continue the evaluation of FEM monitors for application in the Far West Texas area for both PM<sub>2.5</sub> and PM<sub>10</sub>. The use of a regulatory continuous monitor at El Paso Chamizal captured elevated PM<sub>2.5</sub> data that TCEQ believes were previously missed by the filter-based sampler; awareness of such elevated data is important for public health programs and planning.

### **CO Monitoring**

We note the anticipated deployment of the required CO monitors at the existing near-road NO<sub>2</sub> sites in Austin and San Antonio by January 1, 2017. Also, because of low 2015 CO design values, the following four CO monitors could be considered by the TCEQ for future decommissioning:

1. Waco #48-309-1037: 2% of the 8-hour CO National Ambient Air Quality Standard (NAAQS)
2. Brownsville #48-061-0006: 11% of the 8-hour CO NAAQS
3. Laredo Vidaurri #48-479-0016: 23% of the 8-hour CO NAAQS
4. Laredo Bridge #48-479-0017: 13% of the 8-hour CO NAAQS

We also note that the TCEQ plans to further evaluate the CO monitors at the El Paso Ascarate site (#48-141-0055) and Ojo de Aqua site (#48-141-1021) after the end of the CO maintenance period in El Paso.

### **NO<sub>x</sub> Monitoring**

Although the EPA's current regulatory requirements include the establishment of an NO<sub>2</sub> near-road site in Core Based Statistical Areas with populations between 500,000 and 1,000,000 by January 1, 2017, the EPA has proposed to remove this requirement in a recent revision to the near-road NO<sub>2</sub> regulations. See 81 FR 30224 (May 16, 2016). If the EPA finalizes these changes to the near-road NO<sub>2</sub> monitoring requirements, the associated rulemaking is scheduled to be completed before the January 1, 2017, deadline.

There is one NO<sub>x</sub> monitor in DFW and two NO<sub>x</sub> monitors in Houston that can be considered for decommissioning in the future. The Executive NO<sub>x</sub> monitor (AQS #48-113-0087) tracks very closely to the Arlington NO<sub>x</sub> monitor, which is the closest monitor to Executive in the network. For Houston, the Park Place NO<sub>x</sub> monitor (AQS #48-201-0416) consistently tracks lower than the Clinton Drive NO<sub>x</sub> monitor. In addition, the Bayland Park NO<sub>x</sub> monitor (AQS #48-201-0055) is located near the new required near-road NO<sub>x</sub> monitor at I-69 which consistently records higher concentrations than Bayland Park. Finally, the Waco NO<sub>x</sub> monitor (AQS #48-309-1037) and the Tyler NO<sub>x</sub> monitor (AQS #48-423-0007) could be reassessed in the future due to very low 2013-2015 1-hour NO<sub>2</sub> design values, 24 ppb and 15 ppb, respectively.

### **Ozone Monitoring**

The ozone monitor at the Brownsville site (AQS #48-061-0006) could be considered for decommissioning because its 2013-2015 8-hour ozone design value is now less than 85% of the NAAQS at 59 ppb. Similarly, the Laredo Vidaurri site (AQS #48-479-0016) ozone monitor could be

considered for decommissioning because its 2013-2015 8-hour ozone design value is now less than 85% of the NAAQS at 59 ppb.

Within the section "Central Texas Area Evaluation" on p. 130, second paragraph, there appears to be a misstatement: the TCEQ is required to maintain two ozone monitors in the Killeen-Temple area, not one as mentioned in the discussion. The two monitors are correctly listed in Appendix C.

### **Lead (Pb) Monitoring**

The TCEQ request to renew lead waivers for the Lower Colorado River Authority Fayette Power Plant in Fayette County and the United States Department of the Army Fort Hood facility near Killeen were previously approved in our response to the TCEQ's 2015 Annual Monitoring Network Plan.