



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

OCT 19 2018

Mr. Richard C. Chism  
Director, Monitoring Division (MC 165)  
Texas Commission on Environmental Quality  
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) 2018 Annual Monitoring Network Plan (2018 Plan) for ambient air. The U.S. Environmental Protection Agency (EPA) has completed its review of the 2018 Plan to ensure it meets the requirements of 40 Code of Federal Regulations (CFR) Part 58 and its appendices.

We appreciate your cooperation and work to submit your 2018 Plan, which we received on July 3, 2018. We applaud the efforts of the TCEQ to manage and maintain the ambient air monitoring network in Texas.

The network review process presents an opportunity for the EPA and the TCEQ to collaborate on air monitoring network design. *See* 40 CFR Part 58, Appendix D, Section 1.1.2. The EPA has conducted its review of the 2018 Plan and proposed network modifications to ensure the air quality surveillance system continues to meet applicable requirements.

I am pleased to inform you that your 2018 Plan is approved with comments in accordance with 40 CFR §58.10. We note that, at the time the 2018 Plan was submitted, the Austin Audubon Society and the Midlothian DFW sites were no longer meeting the siting criteria in 40 CFR Part 58 Appendix E. We appreciate the additional information provided by the TCEQ on September 26, 2018 identifying the steps being taken to restore these sites to compliance with regulatory siting criteria. Please continue to keep us informed regarding the progress at these sites. We request that an update be provided every 60 days until the siting issues at these sites are resolved.

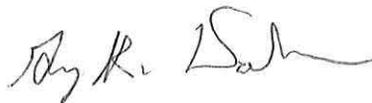
Also, in accordance with 40 CFR §58.14, many of the proposed system modifications in the 2018 Plan are approved; however, the following proposed system modifications are not approved with the 2018 Plan:

- the TCEQ recommendation to discontinue the submission of ozone data to the EPA Air Quality System (AQS) database effective August 31, 2018, for the Southeast Texas Regional Planning Commission (SETRPC) Sabine Pass (AQS ID 48-245-0101) and Jefferson County Airport (AQS ID 48-245-0102) sites in the Beaumont, Texas area; and
- the TCEQ request to relocate the two PM<sub>2.5</sub> Continuous FEM 209 monitors at the Corpus Christi Huisache (AQS ID 48-355-0032).

Details of our review are enclosed. We intend to set up a telephone conference to discuss our comments with you. By this letter we also acknowledge receipt of the SO<sub>2</sub> annual report required under §51.1205(b) which was received with the 2018 network plan.

We look forward to our continued partnership with the TCEQ on our common goals to establish and maintain a successful monitoring network for the state of Texas. If you have any questions, please contact me at (214) 665-7242, or your staff may contact Ms. Frances Verhalen, Air Monitoring and Grants Section Chief, at (214) 665-2172.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Guy R. Donaldson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Guy R. Donaldson  
Associate Director for  
Air, Multimedia Division

Enclosure

Texas Commission on Environmental Quality  
2018 Annual Ambient Air Monitoring Network Plan  
Technical Comments

Texas' 2018 Annual Monitoring Network Plan (ANP), dated June 29, 2018, was received on July 3, 2018. This plan will be referred to as the "2018 Plan" throughout the remainder of this document. In accordance with the requirements of 40 Code of Federal Regulations (CFR) Part 58 and its appendices, the U.S. Environmental Protection Agency (EPA) has reviewed the 2018 Plan and our comments are provided below. The comments below reflect the EPA's efforts in collaboration with the Texas Commission on Environmental Quality (TCEQ) to maintain an accurate and efficient ambient air monitoring network.

**General Comments**

We appreciate the TCEQ's submittal of the 2018 Plan in accordance with 40 CFR §58.10.

*Operation of monitoring network in accordance with 40 CFR Part 58 and Appendices A, B, C, D and E*  
We appreciate the TCEQ's operation of the ambient air monitoring network in accordance with federal requirements. We note that, at the time the 2018 Plan was submitted, the Austin Audubon Society and the Midlothian DFW sites [Air Quality System (AQS) Site Identification Numbers 48-453-0020 and 48-039-0016, respectively] were no longer meeting the siting criteria in 40 CFR Part 58 Appendix E due to the distance between the monitoring probes and tree drip lines. We appreciate the additional information provided by the TCEQ on September 26, 2018, both by telephone and email, identifying the steps being taken to restore these sites to compliance with regulatory siting criteria. Please continue to keep us informed regarding the progress at these sites, including any site relocation. We request that an update be provided every 60 days until the siting issues at these sites are resolved.

Thank you for your efforts to ensure that the information in the ANP and the Air Quality System (AQS) database is complete and consistent. Please continue to update the AQS database, and to correlate the AQS with the ANP.

*Cross State Metropolitan Statistical Area (MSA) / Core-Based Statistical Area (CBSA) monitoring network responsibilities*

The EPA recognizes that state or local agencies must consider MSA/CBSA boundaries and their own political boundaries and geographical characteristics in designing their air monitoring networks. There may be situations where there may be a need to augment or to divide the overall MSA/CBSA monitoring responsibilities and requirements among various agencies to achieve an effective network design. In next year's ANP, for each area in which your agency is relying on another agency to fulfill a monitoring requirement, please provide the following:

- a) a copy of the agreement between the affected agencies, and
- b) an explanation of the division of responsibilities of the agencies with respect to ambient air monitoring requirements, as related to the ANP.

**Ozone (O<sub>3</sub>) Monitoring** (40 CFR Part 58, Appendix D Section 4.1)

The TCEQ is currently meeting and exceeding the network design requirements for ambient air quality monitoring for O<sub>3</sub>. See 40 CFR Part 58, Appendix D Section 4.1.

The EPA acknowledges the relocation of the Lynchburg Ferry site (AQS ID 48-201-1015), including the ozone monitor, approximately 0.22 miles to the southeast, which was approved in a letter dated March 9, 2017.

The EPA acknowledges the previous approval of the decommissioning of the ozone monitor at the Brownsville site (AQS ID 48-061-0006) since it is not required by 40 CFR 58, Appendix D Section 4.1 and since ozone monitoring will continue at the nearby Harlingen Teege site (AQS ID 48-061-1023). The decommissioning of the Brownsville ozone monitor was effective December 31, 2017.

The EPA does not approve the TCEQ recommendation to discontinue the submission of ozone data to the EPA Air Quality System (AQS) database effective August 31, 2018, for the Southeast Texas Regional Planning Commission (SETRPC) Sabine Pass (AQS ID 48-245-0101) and Jefferson County Airport (AQS ID 48-245-0102) sites in the Beaumont, Texas area. New ambient ozone air monitoring measurements from 2018 show the Sabine Pass ozone site with the highest preliminary 2016-2018 8-hour ozone design value in the Beaumont area (68 ppb), and the preliminary 2018 4<sup>th</sup> highest 8-hour ozone daily maxima at the Sabine Pass and Jefferson County Airport sites are 71 ppb and 72 ppb, respectively, both exceedances of the 2015 8-hour ozone standard of 70 ppb. Ozone monitoring networks for cities are required to spatially cover areas with the highest ambient concentrations (40 CFR 58 Appendix D section 1.1.1).

**Carbon Monoxide (CO) Monitoring** (40 CFR Part 58, Appendix D Section 4.2)

The TCEQ is currently meeting and exceeding the network design requirements for ambient air quality monitoring for CO. See 40 CFR Part 58, Appendix D Section 4.2.

The EPA acknowledges the previous approval of the decommissioning of the carbon monoxide monitor at the Brownsville site (AQS ID 48-061-0006) since it is not required by 40 CFR 58, Appendix D Section 4.2 and since the current design value is low at 10% of the standard. The decommissioning of the Brownsville CO monitor was effective December 31, 2017.

The EPA acknowledges the previous approval of the relocation of the CO monitor from the El Paso Ascarate site (AQS ID 48-141-0055) to the El Paso UTEP (University of Texas at El Paso) site (AQS ID 48-141-0037) for use in evaluating potential ozone exceptional events related to wildfires. The CO monitor was shut down at the Ascarate site December 31, 2017, and began measurements at the UTEP site on January 17, 2018.

The EPA acknowledges the previous approval of the decommissioning of the carbon monoxide monitor at the Laredo Bridge site (AQS ID 48-479-0017) since it is not required by 40 CFR 58, Appendix D Section 4.2 and since carbon monoxide monitoring will continue at the nearby Laredo Vidaurri site (AQS ID 48-479-0016). The decommissioning of the Laredo Bridge CO monitor was effective December 31, 2017.

The EPA approves the decommissioning of the carbon monoxide monitor at the Beaumont Nederland site (AQS ID 48-245-1035) by December 31, 2018, since it is not required by 40 CFR 58, Appendix D Section 4.2, and since the current design value is low at 6% of the standard.

The EPA approves the designation of the CO monitor at the Houston Clinton site (AQS ID 48-201-1035) from PAMS/SLAMS to SPM by December 31, 2018, since it is not required by 40 CFR 58,

Appendix D Section 4.2, and since carbon monoxide monitoring will continue at the nearby Houston Deer Park (AQS ID 48-201-1039) and Houston North Loop near-road (AQS 48-201-1052) sites.

**Nitrogen Dioxide (NO<sub>2</sub>) Monitoring** (40 CFR Part 58, Appendix D Section 4.3)

The TCEQ is currently meeting and exceeding the network design requirements for ambient air quality monitoring for NO<sub>2</sub>. See 40 CFR Part 58, Appendix D Section 4.3.

The EPA acknowledges the relocation of the Lynchburg Ferry site (AQS ID 48-201-1015), including the NO<sub>2</sub> monitor, approximately 0.22 miles to the southeast, which was approved in a letter dated March 9, 2017.

The EPA acknowledges the previous approval of the relocation of the NO<sub>2</sub> monitor from the Waco Mazanec site (AQS ID 48-309-1037) to the Killeen Skylark Field site (AQS ID 48-027-1047) for better prediction and documentation of ozone formation in the Killeen-Temple CBSA. The NO<sub>2</sub> monitor was shut down at the Waco Mazanec site December 31, 2017 and began measurements at the Killeen Skylark Field site on April 3, 2018.

The EPA approves the startup of true, direct-measured NO<sub>2</sub> sampling at the Dallas Hinton (AQS ID 48-113-0069) and Houston Deer Park (AQS ID 48-201-1039) PAMS sites beginning no later than June 1, 2019, using the direct Teledyne T500U cavity attenuated phase shift NO<sub>2</sub> analyzers (EQNA-0514-212).

**Sulfur Dioxide (SO<sub>2</sub>) Monitoring** (40 CFR Part 58, Appendix D Section 4.4)

The TCEQ is currently meeting and exceeding the network design requirements for ambient air quality monitoring for SO<sub>2</sub>. See 40 CFR Part 58, Appendix D Section 4.4.

**SO<sub>2</sub> Annual Report**

We acknowledge receipt of the SO<sub>2</sub> annual report required under §51.1205, which was received with the 2018 Plan.

**Lead (Pb) Monitoring** (40 CFR Part 58, Appendix D Section 4.5)

The TCEQ is currently meeting and exceeding the network design requirements for ambient air quality monitoring for Pb. See 40 CFR Part 58, Appendix D Section 4.5.

The TCEQ is currently operating eight Pb monitoring sites: six source-oriented/population exposure sites and two population exposure sites. Three Pb monitoring sites have collocation, and the network is exceeding federal monitoring requirements.

The TCEQ has requested to discontinue monitoring at four locations: Frisco 7 (AQS ID 48-085-0007), Frisco 5<sup>th</sup> St. (AQS ID 48-085-0003), Amarillo SH 136 (AQS ID 48-375-0024), and Ojo De Agua (AQS ID 48-141-1021). All four sites Pb monitors have 38 months of data showing them to be well below the National Ambient Air Quality Standards (NAAQS). The EPA previously approved in October of 2017 the TCEQ's recommendation to discontinue monitoring at the Frisco 7 and Frisco 5<sup>th</sup> St. locations. The EPA approves the TCEQ's recommendation to discontinue monitoring at both Ojo De Agua and Amarillo SH 136. A date for shutdown at all four sites was provided in the ANP.

The EPA previously approved the decommissioning of the Laredo Vidaurri (AQS ID 48-479-0016) and Brownsville (AQS ID 48-061-0006) sites last year. Both were shut down on December 31, 2017.

The EPA has been in communication with the TCEQ about several issues with the Terrell Temtex (AQS ID 48-257-0020) site. These issues include, but are not limited to, operator errors, electrical issues at the monitoring site, and improper siting of the collocated monitors. The EPA was informed that the electrical issues have been corrected, as well as the siting of the collocated monitor. The operator errors have been addressed by the TCEQ. The EPA understands that TCEQ plans to recertify several years of data from the site.

### **Pb Collocation**

The TCEQ is currently exceeding the required number of collocated Pb monitors as detailed in 40 CFR Part 58, Appendix A, Section 3.3.4.3. The EPA appreciates your prompt activation of the collocation monitor at the Terrell Temtex site on April 13, 2017.

We note that in Appendix A, for two sites Terrell Temtex (p. A-19) and Frisco Eubanks (p. A-15), the collocated sites indicate monitoring frequency of 1 in 6 days when it should read 1 in 12 days. Please let us know when Appendix A has been updated to resolve this issue.

### **Particulate Matter (PM) Monitoring**

The TCEQ is currently meeting the network design requirements for ambient air quality monitoring for PM. See 40 CFR Part 58, Appendix D, Sections 4.6 and 4.7.

### **Particulate Matter of 10 Microns or Less (PM<sub>10</sub>) (40 CFR Part 58, Appendix D Section 4.6)**

The TCEQ proposes to discontinue the PM<sub>10</sub> NAAQS-comparable monitors at the Dallas North (AQS ID 48-113-0075), Houston Aldine (AQS ID 48-201-0024), Karnack (AQS ID 48-203-0002), and Stage Coach (AQS ID 48-439-3010) sites. The TCEQ also proposes to discontinue the primary and QA Collocated PM<sub>10</sub> NAAQS-comparable monitors at Houston Deer Park (AQS ID 48-201-1039) site. The TCEQ proposals to discontinue a total of 6 PM<sub>10</sub> monitors at 5 sites, including one QA Collocated pair, is approved.

The TCEQ currently operates a total of 31 manual PM<sub>10</sub> NAAQS-comparable monitors (including QA Collocated monitors) at a total of 26 sites, and provides quality assurance collocation at 5 of the sites. When the Dallas North No. 2, Houston Aldine, Houston Deer Park, Karnack, and Stage Coach monitors are discontinued, the TCEQ will be operating 25 PM<sub>10</sub> monitors at 21 sites, with the quality assurance collocation at 4 sites.

In addition, at each of the 3 NCore sites (Dallas Hinton AQS ID 48-113-0069; El Paso Chamizal AQS ID 48-141-0044; Houston Deer Park AQS ID 48-201-1039), the TCEQ will continue to operate a continuous monitor used to report PM<sub>10</sub> non-NAAQS data and PM Coarse.

As stated in the EPA August 1, 2018, letter, the relocation of the PM<sub>10</sub> monitor at the Riverside site (48-141-0038) was approved.

## **Particulate Matter of 2.5 Microns or Less (PM<sub>2.5</sub>) (40 CFR Part 58, Appendix D Section 4.7)**

### ***PM<sub>2.5</sub> Network General***

For future plans, please include identification of any monitors that are suitable and monitors that are not suitable for comparison against the annual PM<sub>2.5</sub> NAAQS as described in §58.30.

### ***PM<sub>2.5</sub> Network Updates Since Last Year***

We appreciate the update about the PM<sub>2.5</sub> non-NAAQS comparable TEOM SPM monitor discontinuations at the Austin Audubon and Selma sites.

We appreciate the update about the PM<sub>2.5</sub> TEOM monitor discontinuations and installations of Continuous BAM 1022 monitors at the Port Arthur, SETRPC 42 Mauriceville, Houston East, Mission, and Laredo World Trade Bridge sites, which the EPA approved in the 2017 ANP Response.

We appreciate the updates about the PM<sub>2.5</sub> monitors at the Corpus Christi Huisache site, i.e., discontinuation of two Manual monitors and installation of two Continuous monitors, which the EPA approved in the March 6, 2018, letter.

We appreciate the updates about the PM<sub>2.5</sub> monitors at the National Seashore and Eagle Pass sites, i.e., discontinuation of a Continuous TEOM monitor and installation of a Continuous BAM 1022 monitor at each site, which the EPA approved in the March 6, 2018, letter.

We appreciate the update about the PM<sub>2.5</sub> Manual FRM monitor discontinuation and installation of Continuous BAM 1022 monitors at the Brownsville site, which the EPA approved in the 2017 ANP Response.

### ***PM<sub>2.5</sub> Network Proposed Revisions***

The TCEQ request to change the sampling frequency of the Manual PM<sub>2.5</sub> FRM monitor at the Dallas Hinton site (AQS ID 48-113-0069) from daily to 1-in-3 day, is approved.

The TCEQ request to relocate the two PM<sub>2.5</sub> Continuous FEM 209 monitors at the Corpus Christi Huisache (AQS ID 48-355-0032) is not approved. In support of the basic air monitoring objectives, networks must be designed to provide information about peak air pollution levels in an area. Networks must include monitoring sites located to determine the highest concentration expected to occur in the areas covered by the network, see 40 CFR 58 Appendix D section 1.1.1. The Huisache PM<sub>2.5</sub> monitors have historically reflected the highest concentrations for the Corpus Christi area. The TCEQ requested to move the Huisache PM<sub>2.5</sub> monitors to the West site (AQS ID 48-355-0025). A PM<sub>2.5</sub> monitor was operated at the West site until it was discontinued in 2013. The West site historically measured the lowest PM<sub>2.5</sub> levels in the Corpus Christi area.

The EPA future review of the TCEQ request to relocate the Continuous PM<sub>2.5</sub> TEOM monitor at Palo Alto (AQS ID 48-029-0676) will be contingent on information submittal by the TCEQ about the proposed new location.

The TCEQ request to discontinue the Continuous PM<sub>2.5</sub> Method 702 monitor at the Arlington site (AQS ID 48-439-3011-88502-3) is approved.

The TCEQ request to install two Continuous PM<sub>2.5</sub> FEM 209 monitors at the Fort Worth California Parkway North (AQS ID 48-439-1053) site is approved. The TCEQ request to discontinue the existing Manual FRM 145 PM<sub>2.5</sub> monitor (AQS ID 48-439-1053-88101-1) at this site is approved.

The TCEQ requests to install Continuous PM<sub>2.5</sub> FEM 209 monitors at the Houston Aldine (AQS ID 48-201-0024), San Antonio Northwest (AQS ID 48-029-0032), Amarillo (AQS ID 48-375-0320), Lubbock (AQS ID 48-303-1028), Corsicana (AQS ID 48-349-1051), Denton (AQS ID 48-121-0034), Kaufman (AQS ID 48-257-0005), Odessa (AQS ID 48-135-1014), and Isla Blanca Park (AQS ID 48-061-2004) sites are approved. The TCEQ requests to discontinue the existing Continuous PM<sub>2.5</sub> Method 702 monitors at these sites are approved (AQS IDs 48-201-0024-88502-3, 48-029-0032-88502-3, 48-375-0320-88502-3, 48-303-1028-88502-3, 48-349-1051-88502-3, 48-121-0034-88502-3, 48-257-0005-88502-3, 48-135-1014-88502-3, 48-061-2004-88502-3).

The TCEQ requests to install Continuous PM<sub>2.5</sub> FEM 209 monitors at the Dallas Convention Center (AQS ID 48-113-0050), Fort Worth Northwest (AQS ID 48-439-1002), Austin North Interstate 35 (AQS ID 48-453-1068), Houston N Loop (AQS ID 48-201-1052), and San Antonio Interstate 35 (AQS ID 48-029-1069) sites are approved. The TCEQ request to discontinue the existing Manual PM<sub>2.5</sub> FRM 145 monitors at these sites are approved (AQS IDs 48-113-0050-88101-5, 48-439-1002-88101-1, 48-453-1068-88101-1, 48-201-1052-88101-1, 48-029-1069-88101-1).

The TCEQ requests to install Continuous PM<sub>2.5</sub> FEM 209 monitors at the Haws Athletic Center (AQS ID 48-439-1006), Texarkana (AQS ID 48-037-1031), Galveston (AQS ID 48-167-1034), and Calaveras Lake (AQS ID 48-029-0059) sites are approved. The TCEQ requests to discontinue the existing Manual PM<sub>2.5</sub> FRM 145 monitors (AQS IDs 48-439-1006-88101-1, 48-037-1031-88101-1, 48-167-1034-88101-1, 48-029-0059-88101-1) and the Continuous PM<sub>2.5</sub> Method 702 monitors (AQS IDs 48-439-1006-88502-3, 48-037-1031-88502-3, 48-167-1034-88502-3, 48-029-0059-88502-3) at these sites is approved.

The TCEQ proposes to discontinue a total of 14 Continuous PM<sub>2.5</sub> Method 702 and 10 Manual PM<sub>2.5</sub> FRM 145 monitors. The TCEQ proposes to install a total of 20 Continuous PM<sub>2.5</sub> Method 209 monitors. After the proposed installations and discontinuations are implemented, the TCEQ will operate a total of 52 PM<sub>2.5</sub> NAAQS-comparable (parameter 88101) monitors, and a total of 18 PM<sub>2.5</sub> non-NAAQS-comparable (parameter 88502) monitors at a total of 50 sites. PM<sub>2.5</sub> NAAQS-comparable data will be provided from 41 of the sites.

40 CFR 58.10(a)(8) requires the TCEQ to provide near-road PM<sub>2.5</sub> sites in areas with populations of 1 million or more persons. The existing TCEQ PM<sub>2.5</sub> near-road designated sites are: Fort Worth California Parkway North (AQS ID 48-439-1053), San Antonio Interstate 35 (AQS ID 48-029-1069), Houston N Loop (AQS ID 48-201-1052), and Austin North Interstate 35 (AQS ID 48-453-1068). The TCEQ proposed changes will result in all four existing PM<sub>2.5</sub> near-road sites providing more robust or daily NAAQS comparable data from Continuous PM<sub>2.5</sub> FEM 209 monitors rather than intermittent NAAQS comparable data from Manual PM<sub>2.5</sub> FRM 145 monitors.

The EPA supports the TCEQ plan to replace existing PM<sub>2.5</sub> monitors with Continuous PM<sub>2.5</sub> FEM 209 monitors that provide measurements which can be directly compared to the NAAQS. This data will meet

the ambient air monitoring objective of supporting compliance with ambient air quality standards and emissions strategy development. The Continuous Method 702 monitors which are being replaced do not meet the objective of supporting compliance with ambient air quality standards and emissions strategy development. Also, while the Manual FRM 145 monitors being replaced provide data which meets this objective, the replacement Continuous FEM 209 monitors meet the objective while providing more robust data. As a result of the TCEQ plan to replace existing PM<sub>2.5</sub> monitors with Continuous PM<sub>2.5</sub> FEM 209 monitors, the proposed network changes will provide some communities, i.e., Amarillo, Lubbock, Corsicana, and Odessa with data which can be formally compared to the national standards which is not the case with the existing network. For other communities, i.e., San Antonio, Dallas Fort Worth, Austin, Texarkana, Houston, and Brownsville, the proposed changes will allow future formal comparisons of the area ambient air to the standards to be performed with more robust data.

In general, Continuous PM<sub>2.5</sub> monitors require less resources to operate than Manual PM<sub>2.5</sub> monitors, while providing data which can be formally compared to the NAAQS. The installation of a Continuous PM<sub>2.5</sub> NAAQS comparable monitor, such as FEM 209, can result in the discontinuation of two existing PM<sub>2.5</sub> monitors when one was operated at the site for the NAAQS comparable data and the other for Air Now data entry. Therefore, the TCEQ's proposed network changes should reduce network operation costs and potentially provide resources for new sites to provide PM<sub>2.5</sub> data for currently unserved communities and evaluating spatial variability of PM<sub>2.5</sub> in other communities.

#### ***PM<sub>2.5</sub> Network Proposed QA Collocation Revisions***

In the 2018 Plan, by December 31, 2019, the TCEQ proposes to provide QA Collocation for FRM 145 Method at 3 sites and QA Collocation for FEM 209 Method at 5 sites. In the 2018 Plan, by December 31, 2019, the TCEQ proposes to provide QA Collocation for FRM 145 Method at 3 sites and QA Collocation for FEM 209 Method at 5 sites. The 2018 Plan does not propose any changes to the 3 sites (Dallas Hinton AQS ID 48-113-0050, El Paso Chamizal AQS ID 48-141-0044, and Clinton AQS ID 48-201-1035) which are providing QA Collocation for FRM 145, except for sampling frequency at the Dallas Hinton site. The QA Collocation revisions proposed in the 2018 Plan relate to that being provided for FEM 209. The PM<sub>2.5</sub> Quality Assurance (QA) Collocation requirements of 40 CFR 58 Appendix A Section 3.2.3 apply to NAAQS monitors (and do not apply to non-NAAQS monitors). The TCEQ operates PM<sub>2.5</sub> NAAQS-comparable monitors using either the FRM 145, FEM 209, or FEM 170 methods. QA Collocation requirements for the PM<sub>2.5</sub> FEM 170 monitors are met nationally under the NCore network.

The existing network has two PM<sub>2.5</sub> FEM 209 QA Collocation sites, i.e., Austin Webberville AQS ID 48-453-0021 and Corpus Christi Huisache AQS ID 48-355-0032. The TCEQ requests to designate three additional existing sites as PM<sub>2.5</sub> FEM 209 QA Collocation sites. The designations will occur sequentially as the total of primary PM<sub>2.5</sub> FEM 209 monitors operating in the network increases (see Table 7 in 2018 ANP). The TCEQ's requests to designate an additional three PM<sub>2.5</sub> FEM 209 QA Collocation sites are approved. During the proposed network changes, the TCEQ is responsible for ensuring that QA Collocation requirements continue to be met for all PM methods. Additional information by site is provided for each location with a proposed QA collocated monitor:

*Houston Aldine (AQS ID 48-201-0024).* The initial PM<sub>2.5</sub> FEM 209 QA Collocation site that TCEQ proposes to designate is Houston Aldine. The TCEQ will install a Continuous PM<sub>2.5</sub> FEM 209 BAM 1022 monitor and designate it as the primary PM<sub>2.5</sub> monitor for the site. The existing

Manual PM<sub>2.5</sub> FRM 145 monitor at the site will no longer be the primary PM<sub>2.5</sub> monitor and instead will be re-designated to serve as the QA Collocation monitor.

*Fort Worth California Parkway (AQS ID 48-439-1053).* Subsequently, Fort Worth California Parkway will be designated as a PM<sub>2.5</sub> FEM 209 QA Collocation site. The TCEQ will install two Continuous PM<sub>2.5</sub> FEM 209 BAM 1022 monitors at the site. One will be designated as the primary PM<sub>2.5</sub> monitor at the site and the other as the QA Collocation monitor. The existing Manual PM<sub>2.5</sub> FRM 145 monitor at the site will be discontinued. (See the section above, *PM<sub>2.5</sub> Network Proposed Revisions*, paragraph 5.)

*San Antonio Northwest (AQS ID 48-029-0032).* The next PM<sub>2.5</sub> FEM 209 QA Collocation site will be designated at San Antonio Northwest (AQS ID 48-029-0032). The TCEQ will install a Continuous PM<sub>2.5</sub> FEM 209 BAM 1022 monitor and designate it as the primary PM<sub>2.5</sub> monitor at the site. The existing Manual PM<sub>2.5</sub> FRM 145 monitor at the site will no longer be the primary PM<sub>2.5</sub> monitor and instead will be re-designated to serve as the QA Collocation monitor.

### **Carbonyls Monitoring**

The EPA approves the sampling of three 8-hour carbonyl samples on a 1-in-3-day schedule at the Houston Deer Park site (AQS ID 48-201-1039) and at the Dallas Hinton site (AQS ID 48-113-0069) for June-August in accordance with 40 CFR Part 58, Appendix D, Section 5.

The EPA also approves 24-hour carbonyl sampling once every 6 days at the Houston Deer Park (AQS ID 48-201-1039) and Dallas Hinton (AQS ID 48-113-0069) sites for the months of April, May, September, and October for useful supplemental carbonyl sampling at those sites.

Finally, the EPA also approves the decommissioning of carbonyl sampling at the El Paso Ascarate site (AQS ID 48-141-0055) by October 31, 2018, because it is not required, and the reduction of carbonyl sampling to one 24-hour sample every 6 days during the ozone season, April through October, at the Fort Worth Northwest (AQS ID 48-439-1002) and Houston Clinton (AQS ID 48-201-1035) sites beginning October 31, 2018, again because carbonyl sampling is not required by regulation at those sites.

### **Volatile Organic Compounds (VOC) Monitoring**

The EPA approves the removal of the PAMS/SLAMS/SPM federal network designations and data submittal to AQS for the VOC canisters at the Johnson County Luisa (AQS ID 48-251-1008), Fort Worth Northwest (AQS ID 48-439-1002) and Dallas Hinton (AQS ID 48-113-0069) sites effective December 31, 2018, since VOC canister sampling is not required by regulation at those sites.

### **National Air Toxics Trends Station (NATTS)**

The EPA recognizes that as of July 1, 2018, the TCEQ will no longer participate in the National Air Toxics Trends Station (NATTS) program. As such, the EPA acknowledges that all activities associated with the NATTS program has ceased at the Karnack and Houston Deer Park #2 sites. The EPA appreciates the work that the TCEQ has provided to the NATTS program over the years and looks forward to continuing to work with the TCEQ on other programs.

## **Meteorology Monitoring**

The EPA approves the deployment of new ceilometers to the La Porte Airport (AQS ID 48-201-1043) and Dallas Hinton (AQS ID 48-113-0069) sites by June 1, 2019, to meet new PAMS requirements according to 40 CFR Part 58, Appendix D, Section 5.

The EPA also approves the addition of barometric pressure, precipitation, and UV radiation sensors to the Houston Deer Park (AQS ID 48-201-1039) and Dallas Hinton (AQS ID 48-113-0069) sites by June 1, 2019, to meet new PAMS requirements according to 40 CFR Part 58, Appendix D, Section 5.

