

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 16, 2010

Air Docket

Docket No. EPA-HQ-OAR-2009-0443
U.S. Environmental Protection Agency
Mail Code 6102T
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: *Federal Register*, Vol. 75, No. 130, July 8, 2010, EPA Responses to State and Tribal 2008 Lead Designation Recommendations; Notice of Availability and Public Comment Period

Dear Sir or Madam:

The Texas Commission on Environmental Quality (TCEQ) appreciates the opportunity to comment on the United States Environmental Protection Agency's (EPA) proposed lead designations and boundary recommendations regarding the 2008 lead National Ambient Air Quality Standard (NAAQS).

The TCEQ agrees with the EPA's proposed 2008 lead NAAQS designations for Collin County. The work contained in the Technical Support Document to the EPA's designation proposal is thorough and appropriate.

The data extracted from Air Quality System (AQS) was done properly; however, at the time the extraction was done, the status of the data from the lead monitor at site 480850009 did not have the correct monitor type flag associated with it. The monitor at site number 480850009 was located on the Exide Technologies (Exide) company property, behind an effective security fence, and inaccessible to the public. The data from the monitor at this site was incorrectly listed in the AQS as being representative of ambient concentrations. The metadata in AQS for this monitor have now been updated to reflect that the data that are in AQS from this monitor are non-regulatory.

Because the data in AQS from this monitor are non-ambient, it is not appropriate to compare these data to the 2008 lead NAAQS. The data in AQS from the two other monitors at sites at Exide (480850003, on the east side of Exide west of 5th Street in Frisco, Texas, and 480850007 at 6913 Ash Street, Frisco, Texas) represent ambient air and provide adequate data to support the EPA's proposed 2008 lead nonattainment designation for the indicated portion of Collin County, Texas.

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The purpose of the 480850009 monitor was to fulfill a request by EPA Region VI that this monitor, along with the two others located nearby the plant, be used to determine whether contingency measures contained in the 1999 Collin County Redesignation and Maintenance Plan for Lead were triggered. The monitored lead values did not trigger the contingency measures.

For the reasons described above, the TCEQ recommends that reference to the 480850009 monitor be removed from the EPA's Technical Support Document that is included as part of the EPA's preliminary designation determination for Collin County for the 2008 lead NAAQS.

For your information, the 480850009 monitor was moved outside the Exide property line and began sampling July 19, 2010. Data collected from this monitor now represents ambient air and will be loaded into AQS as being comparable to the lead NAAQS. This monitor move is with the agreement of EPA Region VI, the TCEQ, and the City of Frisco. At the request of EPA Region VI the monitoring site will retain the same nine-digit AQS number.

Thank you for your consideration of these comments. If you have questions concerning our comments, please contact Mr. David Brymer, Director, Air Quality Division, at (512) 239-1725.

Sincerely,



Mark R. Vickery, P.G., Executive Director
Texas Commission on Environmental Quality

cc: Mr. Al Armendariz, Ph.D., Regional Administrator, EPA Region 6
Mr. Emad Shahin, Air Planning Section, EPA Region 6
Ms. Maria Martinez, Air Quality Analysis Section Chief, EPA Region 6