UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270 – 2102

October 22, 2020

Mr. Richard C. Chism
Director, Monitoring Division (MC 165)
Texas Commission on Environmental Quality
Post Office Box 13087
Austin, Texas 78711-3087

Dear Mr. Chism:

Thank you for your correspondence from the Texas Commission on Environmental Quality (TCEQ) submitting the Texas 2020 Annual Monitoring Network Plan (2020 Plan) for ambient air. The U.S. Environmental Protection Agency (EPA) has completed its review of the 2020 Plan to ensure it meets the requirements of 40 Code of Federal Regulations (CFR) Part 58 and its appendices.

We appreciate your efforts in submitting a timely 2020 Plan, which we received on July 1, 2020. We applaud the efforts of the TCEQ to manage and maintain the ambient air monitoring network in Texas in compliance with the Clean Air Act.

The network review process presents an opportunity for the EPA and the TCEQ to collaborate on the air monitoring network design. *See* 40 CFR Part 58, Appendix D, Section 1.1.2. The EPA has conducted its review of the 2020 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 2020 Plan is approved with comments in accordance with 40 CFR Part 58 and Appendices, including Section 58.10 and Section 58.14. We acknowledge that, at the time the 2020 Plan was submitted, the Midlothian Old Fort Worth Road, and Austin Webberville sites were not meeting the siting criteria in 40 CFR Part 58 Appendix E, and that network probe placement was being assessed to ensure compliance with 40 CFR Part 58, Appendix E, Section 2.0. For the Austin Webberville site, the waiver requested under 40 CFR Part 58, Appendix E, Section 10.1.1, is approved. For Midlothian, please continue to keep us informed regarding the progress, with a written update every 90 days until the situation is resolved. We appreciate the TCEQ's review of network air monitoring probe placement and the conclusion on October 12, 2020, of compliance with 40 CFR Part 58, Appendix E, Section 2.0.

Also, in accordance with 40 CFR §58.14, many of the proposed system modifications in the 2020 Plan are approved. However, the following proposed system modification is not approved with the 2020 Plan: discontinuation of the $PM_{2.5}$ non-NAAQS comparable TEOM monitor at the Ascarate Park site (AQS ID 48-141-0055). Details of our review are enclosed. We are available to discuss our review with you if you have any questions.

By this letter we also acknowledge receipt from the TCEQ on July 1, 2020, of the Texas 5-Year Network Assessment pursuant to 40 CFR Part 58.10(d). We appreciate the effort to conduct and develop this assessment.

In addition, we acknowledge receipt of the SO_2 annual report received as an attachment to the 2020 Plan. The annual report is required under 40 CFR 51.1205(b) from the State for seven modeled SO_2 sources whose air quality was characterized by modeling instead of monitoring. I am pleased to inform you that we agree with the State's conclusion that no additional SO_2 modeling is needed for any of these seven sources to determine compliance and that Lamb, Limestone, Robertson, Atascosa, Fort Bend, Goliad, and Wilbarger Counties remain "Attainment/Unclassifiable" for the 2010 one-hour SO_2 primary National Ambient Air Quality Standards (NAAQS). Details of our review of the State's assessment and recommendations for these modeled sources are enclosed.

We look forward to our continued partnership with the TCEQ on our common goals to establish and maintain a successful monitoring network as well as maintenance of the 2010 one-hour SO_2 primary NAAQS for area designations based on modeling for the state of Texas. If you have any questions, please contact me at (214) 665-7593, or your staff may contact Ms. Frances Verhalen, Air Monitoring and Grants Section Chief, at (214) 665-2172. For questions specific to the SO_2 annual report, please call Michael Feldman, Regional Haze and SO_2 Section Chief, at (214) 665-9793.

Sincerely,

10/22/2020

X

David F. Garcia

Signed by: DAVID GARCIA

Texas Commission on Environmental Quality
2020 Annual Ambient Air Monitoring Network Plan
Technical Comments

The Texas 2020 Annual Monitoring Network Plan (ANP) was received on July 1, 2020 (2020 Plan). 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 2020 Plan and our comments are provided below. These comments 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 2020 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, with the following exceptions:

- We acknowledge that the Midlothian Old Fort Worth Road was not meeting the siting criteria in 40 CFR Part 58 Appendix E. We understand that significant progress has been made toward relocating the Midlothian OFW site. Please continue to keep us informed regarding Midlothian OFW, with a written update every 90 days until the situation is resolved.
- We acknowledge that Austin Webberville site was not meeting the siting criteria in 40 CFR Part 58 Appendix E; for this site, the waiver requested under 40 CFR Part 58, Appendix E, Section 10.1.1, is approved.

We appreciate the TCEQ's review of network air monitoring probe placement and the conclusion on October 12, 2020, of compliance with 40 CFR Part 58, Appendix E, Section 2.0.

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

Nederland Site. We appreciate the update about plans to relocate the Nederland High School site due to property owner construction. The EPA looks forward to reviewing the upcoming information from the TCEQ regarding an alternate location.

Ozone (O_3) 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 ozone. See 40 CFR Part 58, Appendix D Section 4.1.

The EPA acknowledges the previous approval by letter dated November 4, 2019, of the deployment of an ozone federal Special Purpose Monitor (SPM) to the El Paso Ojo de Agua site (AQS ID 48-141-1021) by March 31, 2020 for improved spatial coverage of ozone concentrations in the El Paso area.

The EPA acknowledges the previous approval by letter dated November 4, 2019, of the changing of network designations from State or Local Air Monitoring Stations (SLAMS) to Photochemical

Assessment Monitoring Stations (PAMS) for three Dallas-Fort Worth (DFW)-area ozone monitors: Dallas North (AQS ID 48-113-0075), Keller (AQS 48-439-2003) and Cleburne (AQS ID 48-251-0003), effective January 1, 2020, to satisfy a part of the TCEQ's Enhanced Monitoring Plan (EMP) for ozone, ozone precursors and meteorology.

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 by letter dated November 4, 2019, of the replacement of the San Antonio I-35 site (AQS ID 48-029-1069) regular CO monitor with a high-sensitivity CO monitor for higher resolution CO measurements.

Nitrogen Dioxide (NO_2) 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_2. See 40 CFR Part 58, Appendix D Section 4.3.

The EPA acknowledges the previous approval by letter dated November 4, 2019, of the change in network designation for NO_x at the San Antonio Camp Bullis site (AQS ID 48-029-0052) and at the DFW Eagle Mountain Lake site (AQS ID 48-439-0075) from state initiative to federal SPM beginning January 1, 2020, to support modeling and regional data analyses.

The EPA acknowledges the previous approval by letter dated November 4, 2019, of the change of network designations from SLAMS to PAMS for the Houston Conroe NO_x monitor (AQS ID 48-339-0078) and for the DFW Dallas North NO_x monitor (AQS ID 48-113-0075), effective January 1, 2020, to satisfy a part of the TCEQ's EMP for ozone, ozone precursors and meteorology.

The EPA acknowledges the previous approval by letter dated November 4, 2019, of the change in network designation from state initiative to PAMS for the DFW Keller NO_x monitor (AQS ID 48-439-2003), and the addition of the NO_x data to the EPA AQS database, effective January 1, 2020, to satisfy a part of the TCEQ's EMP for ozone, ozone precursors and meteorology.

The EPA acknowledges the previous approval by letter dated November 4, 2019, of the change in network designations from state initiative to federal SPM for the Corsicana NO_x and ozone monitors (AQS ID 48-349-1051), effective January 1, 2020, to support modeling and regional data analyses.

The EPA acknowledges the previous approval by letter dated April 10, 2020, of the following network system modifications:

- Austin Northwest site (AQS ID 48-453-0014): relocating this site to Austin North Hills Drive approximately 0.1 miles away by June, 2020, with new name (Austin North Hills Drive) but same AQS ID, including monitors for ozone (O_3), nitrogen oxides (NO_x), sulfur dioxide (SO_2), particulate matter less than or equal to 2.5 micrometers ($PM_{2.5}$) Federal Equivalent Method (FEM) continuous, wind speed, wind direction, and outdoor temperature;

- New Houston Harvard Street site: adding this new site with installation of monitors for O_3 and NO_x by December 2020 (this site is within two miles of the Central Business District and about three miles northwest of the previous Texas Avenue Site, located at the Houston Health Department's West End Multi Service Center); and

- Floresville Hospital Boulevard (AQS ID 48-493-1038) and Karnes County (AQS ID 48-255-1070) sites: changing the network designation from state initiative to special purpose monitors (SPM) for the NO_x monitors, effective January 1, 2020 and with the NO_x data entered into AQS beginning with January 1, 2020 data.

For the Austin North Hills Drive site, please provide the beginning date of operation by email to Ms. Ellen Belk, Environmental Engineer, at belk.ellen@epa.gov. Also, for the Houston Harvard Street site, please provide the new AQS number for before site startup by email to Ms. Ellen Belk at belk.ellen@epa.gov.

The EPA looks forward to reviewing the upcoming information from the TCEQ regarding the second near-road monitoring station in the San Antonio Metropolitan Statistical Area (MSA) to meet the near-road requirement in CBSAs with 2,500,000 or more persons based on the latest available census figures. The EPA understands that the TCEQ will explore possible new sites and propose a viable location adjacent to the highest possible ranked road segment by December 31, 2020, and will deploy the site by December 31, 2021. This second near-road site for the San Antonio MSA will measure $NO/NO_2/NO_x$.

Sulfur Dioxide (SO_2) Monitoring (40 CFR Part 58, Appendix D Section 4.4)

The TCEQ is currently meeting the network design requirements for ambient air quality monitoring for SO_2. See 40 CFR Part 58, Appendix D Section 4.4.

The EPA acknowledges the previous approval by letter dated August 23, 2019, of the relocation of the Port Arthur 7th Street SO_2 monitor (AQS ID 48-245-1071) with the new name, Port Arthur West 7th Street Gate 2.

The EPA acknowledges the previous approval by letter dated May 29, 2020, of the decommissioning of the Rockdale John D. Harper SO_2 monitor (AQS ID 48-331-1075).

The EPA approves the decommissioning of the Baytown Garth SO_2 monitor (AQS ID 48-201-1017) due to the low design value and to TCEQ still meeting network design requirements with the remaining SO_2 monitors in Houston.

The EPA approves the change in designation of the Houston Croquet SO_2 monitor (AQS ID 48-201-0051) from SPM to SLAMS to meet Population Weighted Emission Index (PEWI) requirements, effective by the shutdown date of the Baytown Garth SO_2 monitor.

The EPA approves the changing of network designation from state initiative to federal SPM for the Corsicana Airport SO_2 monitor (AQS ID 48-349-1051), effective January 1, 2021, to support modeling and regional data analyses.

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 EPA approves decommissioning the TSP Pb monitors at El Paso UTEP (AQS ID 48-141-0037) and Ojo de Agua (AQS ID 48-141-1021) due to very low design values, and no source in the area meeting the emission threshold of 0.50 tpy that would require monitoring.

Pb Collocation

The TCEQ is currently meeting and exceeding the required number of collocated Pb monitors as detailed in 40 CFR Part 58, Appendix A, Section 3.3.4.3.

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_{10}) (40 CFR Part 58, Appendix D Section 4.6)

The TCEQ request to install a Continuous PM_{10} monitor at the Houston North Wayside site (AQS ID 48-201-0046) is approved.

The TCEQ request to decommission the PM_{10} sampler at Edinburg East Freddy Gonzales (AQS ID 48-215-1046) is approved. Analysis of 5 years of previous data shows that the annual average concentration is <60% of the National Ambient Air Quality Standard (NAAQS). The area will continue to have PM_{10} spatial coverage from the monitor at Mission.

The TCEQ request to decommission the PM_{10} sampler at Houston Westhollow (AQS ID 48-201-0066) is approved. Analysis of 2017-2019 data shows that the annual average concentration is <85% of the NAAQS. The area will continue to have PM_{10} spatial coverage from the other four PM_{10} monitors in the MSA.

The TCEQ requests to change the sampling frequency of the Manual PM_{10} FRM QA Collocated monitors at the Clinton (AQS ID 48-201-1035), Convention Center (AQS ID 48-113-0050), Ojo de Agua (AQS ID 48-141-1021), Socorro Hueco (AQS ID 48-141-0057) from 1-in-6 days to 1-in-12 days, are approved.

As stated in the EPA August 1, 2018, letter, the relocation of the PM_{10} monitor at the Riverside site (AQS ID 48-141-0038) was approved. We appreciate the update on the monitor being relocated to the El Paso Mimosa site on December 17, 2019.

We appreciate the update on the relocation of the Selma PM_{10} FRM monitor to the new San Antonio Bulverde Parkway site. The site has a start date of 11/19/2019. We understand that the Selma monitor and site were decommissioned on 12/9/2019 and approval for these actions was granted in a letter from EPA dated 03/28/2019.

We appreciate the updates about the discontinuation of PM_{10} monitors at Dallas North (AQS ID 48-113-0075), Houston Aldine (AQS ID 48-113-0024), Houston Deer Park (AQS ID 48-201-1039), Karnack (AQS ID 48-203-0002), and Stage Coach (AQS ID 48-439-3010).

We appreciate the update on the deployment of a PM_{10} FRM sampler to the Dallas County southern sector industrial corridor by 12/31/2020. We request that you update us when the monitor is deployed.

The EPA future review of the TCEQ request to locate a PM_{10} monitor in the Portland-Gregory is contingent on information submittal by the TCEQ about the proposed new location.

Please provide the new AQS number for the new Dallas County southern sector industrial corridor site before site startup by email to Ms. Ellen Belk, Environmental Engineer, at belk.ellen@epa.gov.

Particulate Matter of 2.5 Microns or Less ($PM_{2.5}$) (40 CFR Part 58, Appendix D Section 4.7)

$PM_{2.5}$ 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 $PM_{2.5}$ NAAQS as described in §58.30.

$PM_{2.5}$ Network Updates Since Last Year

We appreciate the update about the $PM_{2.5}$ NAAQS comparable 2025 monitor discontinuations and installations of Continuous BAM 1022 monitors at the Austin North Interstate 35 (AQS ID 48-453-1068), Fort Worth California Parkway North (AQS ID 48-439-1053), Fort Worth Northwest (AQS ID 48-439-1002), and San Antonio Interstate 35 (AQS ID 48-029-1069) sites. The updates were provided in the 2019 Plan and in an August 23, 2019, email. We approved these modifications on October 19, 2018.

We appreciate the update about the plans to discontinue the $PM_{2.5}$ NAAQS comparable 2025 monitors and install Continuous BAM 1022 monitors at the Convention Center (AQS ID 48-113-0050) and Houston North Loop (AQS ID 48-201-1052) sites. We approved these modification plans on October 19, 2018. We request you update us when the monitor replacements are complete.

We appreciate the update about the plans to discontinue the $PM_{2.5}$ non-NAAQS comparable TEOM monitors and install Continuous BAM 1022 monitors at the Houston Aldine (AQS ID 48-201-0024), Corsicana Airport (AQS ID 48-349-1051), and Kaufman (AQS ID 48-257-0005) sites. We approved these modification plans on October 19, 2018. According to AQS, we understand that the Houston Aldine monitor has been replaced with a start date of 05/22/2019. We request you update us when the monitor replacements are complete.

We appreciate the update about the plans to discontinue the $PM_{2.5}$ TEOM and 2025 monitors and install Continuous BAM 1022 monitors at the Haws Athletic Center (AQS ID 58-439-1006) sites. We approved these modification plans on October 19, 2018. According to AQS, we understand that this monitor was activated on 12/04/2019.

We appreciate the update about the installation of the $PM_{2.5}$ Continuous BAM 1022 monitor at the Temple Georgia site (AQS ID 48-027-1045). We appreciate the update about the establishment of the

A&M Finfeather site (AQS ID 48-041-1086) and installation of a $PM_{2.5}$ Continuous BAM 1022 monitor. EPA approved the modifications on February 20, 2019.

We appreciate the update about the plans to move the Isla Blanca Park site (AQS ID 48-061-2004) which EPA approved on March 20, 2019. We understand that the monitor was moved less than one mile from the original site and is now the Isla Blanca State Park Road site with a $PM_{2.5}$ FEM continuous monitor with a start date of 10/07/2019.

$PM_{2.5}$ Network Proposed Revisions

The TCEQ request to discontinue the $PM_{2.5}$ non-NAAQS comparable TEOM monitor at the Ascarate Park site (AQS ID 48-141-0055) 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. For the last three years, the Ascarate Park site has reflected the highest $PM_{2.5}$ concentrations for the El Paso area.

The TCEQ requests to install a Continuous $PM_{2.5}$ BAM 1022 monitor at the Ojo de Agua site (AQS ID 48-141-1021) and a $PM_{2.5}$ Continuous $PM_{2.5}$ TEOM monitor at the Houston North Wayside site (AQS ID 48-201-0046) are approved. We request you update us when the monitor replacements are complete.

The TCEQ requests to install Continuous $PM_{2.5}$ BAM 1022 monitors at the Austin Northwest (AQS ID 48-453-0014), Conroe (AQS ID 48-339-0078), Socorro Hueco (AQS ID 48-141-0057), and Seabrook (AQS ID 48-201-1050) sites are approved. The TCEQ requests to discontinue the existing Continuous $PM_{2.5}$ TEOM monitors at these sites are approved (AQS IDs 48-453-0014-88502-3, 48-339-0078-88502-3, 48-141-0057-88502-3, 48-201-1050-88502-3). We request you update us when the monitor replacements are complete.

The TCEQ requests to install Continuous $PM_{2.5}$ BAM 1022 monitor at the Edinburg site (AQS ID 48-215-1046) is approved. The TCEQ request to discontinue the existing Manual $PM_{2.5}$ 2025 monitor at this site is approved (AQS ID 48-215-1046-88101-1). We request you update us when the monitor replacement is complete.

The TCEQ requests to install Continuous $PM_{2.5}$ BAM 1022 monitors at the El Paso UTEP (AQS ID 48-141-0037) and Karnack (AQS ID 48-203-0002) sites are approved. The TCEQ requests to discontinue the existing Manual $PM_{2.5}$ 2025 monitors and the Continuous $PM_{2.5}$ TEOM monitors at each of these sites are approved. We request you update us when the monitor replacements are complete.

Last year, the TCEQ requests to discontinue the $PM_{2.5}$ non-NAAQS comparable TEOM monitor at the Houston Deer Park site (AQS ID 48-201-1039) and the $PM_{2.5}$ NAAQS comparable 2025 QA Collocated monitor at the El Paso Chamizal site (AQS ID 48-141-0044-88101-4) were approved. We understand that these monitors were decommissioned on 12/06/2019 and 12/12/2019, respectively.

Also last year, the TCEQ requests to discontinue the $PM_{2.5}$ 2025 and URG Speciation monitors at the Houston Aldine site (AQS ID 48-201-0024) and install the monitors at the Clinton site (AQS ID 48-201-1035) were approved. We understand that the $PM_{2.5}$ speciation monitor at the Houston Aldine site was discontinued on 12/18/2019. We request that you update us when the monitor placement at the Clinton site is complete.

The TCEQ request to relocate the Palo Alto site (AQS ID 48-029-0676) was approved on 01/15/2020. The $PM_{2.5}$ continuous monitor was decommissioned on 06/11/2020. The site was relocated with a $PM_{2.5}$ FEM continuous monitor to the new Von Ormy Highway 16 site on 05/29/2020.

The TCEQ request to align the Dona Park $PM_{2.5}$ (AQS ID 48-355-0034) speciation network affiliation from Chemical Speciation Network for Supplemental Speciation Stations to SPM is approved. The TCEQ and the EPA agree that this change will help reduce confusion about the speciated data.

The TCEQ request to reduce the sampling frequency to a 1in 12 day schedule at the Houston Aldine $PM_{2.5}$ QC collocated site (AQS ID 48-201-0024) is approved. Analysis of 2017–2019 data shows that the average annual concentration is <85 % of the NAAQS.

The TCEQ request to replace the Houston Westhollow PM_{10} monitor (AQS ID 48-201-0060) with a $PM_{2.5}$ continuous monitor is approved. We agree with the TCEQ that this will help improve spatial coverage in the west Houston area. We request that the TCEQ notify us when the installation is complete.

We appreciate the update on the TCEQ Austin Northwest $PM_{2.5}$ monitor and air monitoring station relocation to the Austin North Hills Drive site. We request that you update us when the move is complete.

We appreciate the TCEQ's update on the deployment of a $PM_{2.5}$ non-NAAQS comparable monitor to the Dallas County southern sector industrial corridor. We understand that TCEQ has a target start date of 12/31/2020. We request that you update us when the deployment is complete. Approval for this action was dated 04/10/2020.

The EPA appreciates the TCEQ's efforts to continue to replace aging $PM_{2.5}$ non-NAAQS comparable equipment with new FEM monitoring technology. We understand that the Houston Westhollow, Ascarate Park Southeast, Clinton, Dona Park, and Midlothian OFW sites with $PM_{2.5}$ TEOM monitors are to be replaced by new $PM_{2.5}$ FEM continuous monitors by 12/31/2021. We request that you update us as the monitor replacements occur.

$PM_{2.5}$ Network Proposed QA Collocation

The $PM_{2.5}$ Quality Assurance (QA) Collocation requirements of 40 CFR 58 Appendix A Section 3.2.3 apply to monitors that measure NAAQS comparable data (and do not apply to monitors reporting non-NAAQS comparable data). The TCEQ operates primary $PM_{2.5}$ NAAQS-comparable 2025 and BAM 1022 monitors using the FRM 145 and FEM 209 methods, respectively.

With the EPA letter of October 19, 2018, a total of five sites are approved for QA Collocation for the FEM 209 method (Austin Webberville AQS ID 48-453-0021, Corpus Christi Huisache AQS ID 48-355-0032, Houston Aldine AQS ID 48-201-0024, Fort Worth California Parkway AQS ID 48-439-1053, San Antonio Northwest AQS ID 48-029-0032). The installation of the $PM_{2.5}$ Continuous $PM_{2.5}$ BAM 1022 monitors discussed above will require an additional sixth $PM_{2.5}$ QA Collocation site for the FEM 209 Method. Prior to the installation of the thirty seventh primary BAM 1022 monitor in the network, TCEQ and EPA plan to coordinate on the selection of the sixth $PM_{2.5}$ QA Collocation site for the FEM 209 Method.

During the proposed network changes, the TCEQ is responsible for ensuring that QA Collocation requirements continue to be met for all PM methods.

Carbonyl Monitoring

The EPA acknowledges the previous approval by letter dated November 4, 2019, of the changing of network designation from federal SPM to PAMS for the Fort Worth Northwest carbonyl monitor (AQS ID 48-439-1002), effective January 1, 2020, to satisfy a part of the TCEQ's EMP for ozone, ozone precursors and meteorology.

The EPA acknowledges that no additional changes were made to the TCEQ carbonyl monitoring network.

Volatile Organic Compounds (VOC) Monitoring

The EPA acknowledges that no additional changes were made to the TCEQ VOC monitoring network.

Meteorology Monitoring

The EPA acknowledges the previous approval by letter dated November 4, 2019, of the changing of network designations from federal SPM to PAMS for the DFW Dallas North (AQS ID 48-113-0075) and for the DFW Keller (AQS ID 48-439-2003) wind speed, wind direction, outdoor temperature, and solar radiation monitors, effective January 1, 2020, to satisfy a part of the TCEQ's EMP for ozone, ozone precursors and meteorology.

The EPA acknowledges the previous approval by letter dated November 4, 2019, of the deployment of a ceilometer to the San Antonio Northwest site (AQS ID 49-029-0032) by December 31, 2020 to provide upper air data to better evaluate ozone formation in the San Antonio MSA.

The EPA acknowledges the previous approval by letter dated November 4, 2019, of the changing of network designations from state initiative to federal SPM for the Corsicana site (AQS ID 48-349-1051) wind speed, wind direction, outdoor temperature, relative humidity and dew point monitors, effective January 1, 2020.

The EPA approves the deployment of wind speed, wind direction and outdoor temperature measurement equipment to the second near-road monitoring station in the San Antonio MSA to meet the near-road requirement in CBSAs with 2,500,000 or more persons based on the latest available census figures by December 31, 2021.

Non-Regulatory Network Review

Semi-Volatile Organic Compounds

The EPA approves the removal of the non-regulatory SPM semi-volatile organic compound (SVOC) monitoring samplers at the Socorro Hueco (AQS ID 48-141-0057), Brownsville (AQS ID 48-061-0006) and Mission (AQS ID 48-215-0043) air monitoring sites by September 1, 2019.

Data Requirements Rule Provisions
2020 SO_2 Annual Report
Technical Comments

As required under 40 CFR 51.1205(b), the SO_2 annual report provides the TCEQ's annual assessment of SO_2 emissions changes for areas designated attainment/unclassifiable for the 2010 SO_2 NAAQS where the designations were based on modeling actual SO_2 emissions. Seven Texas Counties were designated based on modeled actual SO_2 emissions: Lamb, Limestone, Robertson, Atascosa, Fort Bend, Goliad, and Wilbarger Counties.

The State notes in the report that annual SO_2 emissions for Lamb, Limestone, and Robertson Counties all decreased from 2017 to 2018. Since the emissions decreased for these locations, the original designation modeling provides reasonable assurance that these three areas continue to meet the 2010 one-hour SO_2 primary NAAQS.

The relevant sources in Atascosa, Fort Bend, Goliad, and Wilbarger Counties had annual emissions increases from 2017 to 2018 due to increased operations. The State provided average annual SO_2 emissions from 2016 to 2018 to compare to the 2012 to 2014 average emissions from the designations modeling. Comparison of these datasets showed that the 2016 to 2018 average annual SO_2 emissions were lower than the original designation modeling for Fort Bend, Goliad, and Wilbarger Counties. The decreases in emissions compared to the original modeling provides reasonable assurance that Fort Bend, Goliad, and Wilbarger Counties continue to meet the 2010 one-hour SO_2 primary NAAQS. For Atascosa County, however, the 2016 to 2018 average emissions exceed the average emissions data used for designation modeling by 151 tpy. The State mentioned that this small increase of approximately 1.7 percent of SO_2 emissions would not be expected to change the attainment/unclassifiable designation determined from the original modeling. When considering how the design value (111.5 $\mu g/m^3$) could be adjusted to account for the emission increase, a conservative assumption (ignoring background concentration) would be a slight increase of 1.7 percent to 113.4 $\mu g/m^3$. This is sufficiently low compared to the NAAQS (196.4 $\mu g/m^3$). The increase in emissions is, therefore, negligible compared to the concentration headroom.

The EPA, therefore, agrees with the State's conclusion that no additional SO_2 modeling is needed for any of these seven sources to determine compliance. Lamb, Limestone, Robertson, Atascosa, Fort Bend, Goliad, and Wilbarger Counties remain "Attainment/Unclassifiable" for the 2010 one-hour SO_2 primary NAAQS.