UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

DEC 01 2009

Ted Schade
Air Pollution Control Officer
Great Basin Unified Air Pollution Control District
157 Short Street
Bishop, California 93514

Dear Mr. Schade:

Thank you for submitting the Great Basin Unified Air Pollution Control District's 2009 Ambient Air Quality Monitoring Network Plan. We have reviewed the submitted document and have found that it meets the minimum requirements set forth under 40 CFR Part 58.10. The comments enclosed with this letter identify several areas in the Plan where additional information is requested in order to complete the document and fully satisfy the requirements of 40 CFR Part 58.10. Rather than attempt to resolve these data gaps in this document, we request that GBUAPCD address the enclosed comments in next year's annual network plan which is due on July 1, 2010.

If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 947-4226 or Michael Flagg at (415) 972-3372.

Sincerely,

Joseph Lapka
Acting Manager
Air Quality Analysis Office

cc: Christopher Lanane
Michael Flagg

Printed on Recycled Paper

EPA Comments on the 2009 Ambient Air Quality Monitoring Network Plan

40 CFR 58.10(a)(1) states that monitors must meet Appendix A, C, D, and E. The following information from these appendices should be included in the plan.

Appendix A:

- Frequency of flow rate verification for manual PM samplers audit (App A, 3.3.2)
- Frequency of flow rate verification for automated PM analyzers audit (App A, 3.2.3)
- Last two semi-annual flow rate audits for PM monitors (App A, 3.2.4 and 3.3.3)
- PEP audit dates

Appendix D:

- To ensure network meets minimum monitoring requirements, the MSA population, and design value should be included for each pollutant.

Appendix E:

- For each site:
  - Distance from nearest road
  - Traffic count of nearest road
  - Surrounding groundcover (e.g. paved, vegetated, etc.)

- For each monitor:
  - Probe height
  - Distance from structure
  - Distance from obstructions on roof
  - Distance from obstruction not on roof
  - Distance from trees
  - Distance to furnace or flue
  - Distance between collocated monitors
  - Unrestricted airflow in degrees

40 CFR 58.10 (b)

- Location of each site: street address and geographic coordinates
- Identification of sites suitable and sites not suitable for comparison to the annual PM2.5 NAAQS as described in 40 CFR 58.30

The "Detailed Site Information" table shown below is an example of how site information can be organized to ensure that each site and monitor meet the necessary regulatory requirements.

Detailed Site Information

Site Name				
AQS ID				
GIS coordinates				
Location	In shed, on school, etc.			
Address				
County				
Dist. to road	meters			
Traffic count	#			
Groundcover	Paved, vegetated, etc.			
Representative Area	List MSA or CSA (indicate which)			
Pollutant	O3	PM2.5		
Monitor obj	List objective	List objective		
Spatial scale	List scale	List scale		
Sampling method	List instrument	Sampling instrument		
Analysis method	N/A	e.g., weighed by X lab		
Start date	Date when operation began	Date when operation began		
Operation schedule	e.g., 1:1	e.g., 1:3		
Sampling season	e.g., May-Nov.	e.g., all year		
Probe height	meters	meters		
Distance from supporting structure	meters	meters		
Distance from obstructions on roof	meters	meters		
Distance from obstructions not on roof	meters	meters		
Distance from trees	meters	meters		
Distance to furnace or incinerator flue	N/A	meters		
Distance between collocated monitors	N/A	meters		
Unrestricted airflow	degrees	degrees		
Probe material	e.g., Teflon	N/A		
Residence time	X seconds	N/A		
Will there be changes within the next 18 months?	Y/N	Y/N		
Is it suitable for comparison against the annual PM2.5?	N/A	Yes for all current sites in Region 9.		
Frequency of flow	N/A	weekly, bi-weekly,		

rate verification for manual PM samplers audit		monthly, quarterly (high vol)		
Frequency of flow rate verification for automated PM analyzers audit	N/A	weekly, bi-weekly, monthly, quarterly (high vol)?		
Frequency of one-point QC check (gaseous)	daily, weekly, bi-weekly?	N/A		
Last Annual Performance Evaluation (gaseous)	date	N/A		
Last two semi-annual flow rate audits for PM monitors	N/A	dates		