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

OCT 31 2016

Mr. Eric Stevenson
Director of Technical Services
Bay Area Air Quality Management District
375 Beale Street
Suite 600
San Francisco, California 94105

Dear Mr. Stevenson:

Thank you for your submission of the Bay Area Air Quality Management District's (BAAQMD's) 2015 Air Monitoring Network Plan on June 27, 2016. We have reviewed the submitted document based on the requirements set forth under 40 CFR 58. Based on the information provided in the plan, the U.S. Environmental Protection Agency (EPA) approves all portions of the network plan except those specifically identified below.

Please note that we cannot approve portions of the annual network plan for which the information in the plan is insufficient to judge whether the requirement has been met, or for which the information, as described, does not meet the requirements as specified in 40 CFR 58.10 and the associated appendices. EPA Region 9 also cannot approve portions of the plan for which the EPA Administrator has not delegated approval authority to the regional offices. Accordingly, the first enclosure (*A. Annual Monitoring Network Plan Items where EPA is Not Taking Action*) provides a listing of specific items of your agency's annual monitoring network plan where EPA is not taking action. The second enclosure (*B. Additional Items Requiring Attention*) is a listing of additional items in the plan that EPA wishes to bring to your agency's attention.

The third enclosure (*C. Annual Monitoring Network Plan Checklist*) is the checklist EPA used to review your plan for overall items that are required to be included in the annual network plan along with our assessment of whether the plan submitted by your agency addresses those requirements.

The first two enclosures highlight a subset of the more extensive list of items reviewed in the third enclosure. All comments conveyed via this letter (and enclosures) should be addressed (through corrections within the plan, additional information being included, or discussion) in next year's annual monitoring network plan.

If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 947-4134 or Anna Mebust at (415) 972-3265.

Sincerely,

Gwen Yoshimura, Acting Manager
Air Quality Analysis Office

Enclosures:

A. Annual Monitoring Network Plan Items where EPA is Not Taking Action
B. Additional Items Requiring Attention
C. Annual Monitoring Network Plan Checklist

cc (via email): Steven Randall, BAAQMD
Rebekka Fine, California Air Resources Board

A. Annual Monitoring Network Plan Items where EPA is Not Taking Action

We are not acting on the portions of annual network plans where either EPA Region 9 lacks the authority to approve specific items of the plan, or EPA has determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met.

- Per 40 CFR 58.11(c), NCore, PAMS, and STN network design and changes are subject to approval of the EPA Administrator. Therefore, we are not acting on these items.
    - Request to discontinue NO_y monitoring at the San Jose NCore site
- EPA identified items in your agency's annual monitoring network plan where a requirement was not being met or information in the plan was insufficient to judge whether the requirement was being met based on 40 CFR 58.10 and the associated appendices. Therefore, we are not acting on the following items:

Item	Checklist Row	Issue
Modifications to SLAMS network	3	Insufficient information to judge
Minimum # of monitors for non-NCore Pb	43	Not meeting requirement
$PM_{2.5}$ monitor in an area of expected maximum concentration	29	Insufficient information to judge
Dates of semi-annual flow audits	36	Not meeting requirement in some instances
Identification of maximum concentration O3 site(s)	54	Insufficient information to judge in one instance
Distance from supporting structure	81	Insufficient information to judge in one instance
Distance from drip line of closest tree(s)	84	Not meeting requirement in one instance
SPMs operating an FRM/FEM/ARM meeting Appendix E and Appendix A	14	Insufficient information to judge in some instances

Additional information for each of these items may be found for the row listed in column 2, in the third enclosure (*C. Annual Monitoring Network Plan Checklist)*.

B. Additional Items Requiring Attention

- [Item 15] The Patterson Pass O_3 monitor has been in operation for fewer than 24 months; however, the contradicting statement "[i]n operation for more than 24 months, these monitors are eligible for NAAQS comparison" is included in the site description for Patterson Pass. Please clarify this in next year's plan, and if appropriate, add "NAAQS Comparison" as a monitoring objective for the Patterson Pass NO_2 monitor table.

  "NAAQS Comparison" should also be added as a monitoring objective for the San Ramon NO_2 monitor, if appropriate.

- [Item 19] The speciated $PM_{2.5}$ sampler at Livermore is listed as "N/A" for this requirement. The same instrument at other sites is listed as "No" for this requirement. Please update this in next year's plan.

- [Item 23] Note: According to 2015 population estimates the Sonoma MSA will be 502,146. In future plans, please note that this requirement will be affected by this population change.

- [Item 24] Some columns of Table 2-5 in BAAQMD's plan are partially or almost entirely not visible, due to a table display issue. While the visible information is sufficient to determine that requirements are being met, please fix this display issue in next year's plan.

- [Item 37] Note: According to 2015 population estimates the Sonoma MSA will be 502,146. In future plans, please note that this requirement will be affected by this population change.

- [Item 48] While BAAQMD is meeting this requirement, please update the "required sampling frequency" table entries for lead monitors from "N/A" to reflect the sampling frequency requirements for lead monitors.

- [Item 66] Several of the longitude GPS coordinates are missing a negative sign. Please update this in next year's plan.

C. ANNUAL MONITORING NETWORK PLAN CHECKLIST

(Updated February 10, 2016)

Year: 2016
Agency: Bay Area Air Quality Management District

40 CFR 58.10(a)(1) requires that each Annual Network Plan (ANP) include information regarding the following types of monitors: SLAMS monitoring stations including FRM, FEM, and ARM monitors that are part of SLAMS, NCore stations, STN stations, State speciation stations, SPM stations, and/or, in serious, severe and extreme ozone nonattainment areas, and PAMS stations.

40 CFR 58.10(a)(1) further directs that, "The plan shall include a statement of purposes for each monitor and evidence that siting and operation of each monitor meets the requirements of appendices A, C, D, and E of this part, where applicable." On this basis, review of the ANPs is based on the requirements listed in 58.10 along with those in Appendices A, C, D, and E.

EPA Region 9 will not take action to approve or disapprove any item for which Part 58 grants approval authority to the Administrator rather than the Regional Administrators, but we will do a check to see if the required information is included and correct. The items requiring approval by the Administrator are: PAMS, NCore, and Speciation (STN/CSN).

Please note that this checklist summarizes many of the requirements of 40 CFR Part 58, but does not substitute for those requirements, nor do its contents provide a binding determination of compliance with those requirements. The checklist is subject to revision in the future and we welcome comments on its contents and structure.

Key:

White	meets the requirement
Yellow	requirement is not met, or information is insufficient to make a determination. Action requested in next year's plan or outside the ANP process (items listed in Enclosure A).
Green	item requires attention in order to improve next year's plan (items listed in Enclosure B).

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, page #s. Flag if incorrect[3]?	Does the information provided[4] meet the requirement?[5]	Notes
GENERAL PLAN REQUIREMENTS					
1.	Submit plan by July 1st	58.10 (a)(1)	Yes, email transmittal	Yes	Plan was submitted June 27, 2016.
2.	30-day public comment / inspection period[6]	58.10 (a)(1), 58.10 (a)(2)	Yes, email transmittal	Yes	No comments were received.
3.	Modifications to SLAMS network – case when we are not approving system modifications	58.10 (a)(2) 58.10 (b)(5) 58.10(e) 58.14	Yes, p. 52, p. 122, p. 157, App F	Insufficient to judge	Request to discontinue NO_y monitoring at the San Jose NCore site – requires approval from HQ
4.	Modifications to SLAMS network – case when we are approving system modifications per 58.14	58.10 (a)(2) 58.10 (b)(5) 58.10(e) 58.14	NA	NA	
5.	Does plan include documentation (e.g., attached approval letter) for system modifications that have been approved since last ANP approval?		NA	NA	No site modifications have been approved since the last ANP approval. BAAQMD included documentation for relocation of the Napa site, which was approved by EPA prior to the last ANP review and approval, and has not yet been completed. In last year's ANP review, we requested inclusion of this documentation in this year's plan. See Appendix G.
6.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)	Yes, page 51-52, Detailed Station Info	Yes	
7.	A plan for establishing a near-road $PM_{2.5}$ monitor (in CBSAs $\geq$ 2.5 million) by 1/1/2015 **(plan was due July 1, 2014)**	58.10(a)(8)(i)	Yes, pages 28-29	Yes	Submitted and approved in a previous plan. This requirement is met by the operating near-road $PM_{2.5}$ monitor at Laney College.

[1] Unless otherwise noted.
[2] Response options: NA (Not Applicable), Yes, No, Incomplete, Incorrect. The responses "Incomplete" and "Incorrect" assume that some information has been provided.
[3] To the best of our knowledge.
[4] Assuming the information is correct
[5] Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge.
[6] The affected state or local agency must document the process for obtaining public comment and include any comments received through the public notification process within their submitted plan.

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, page #s. Flag if incorrect[3]?	Does the information provided[4] meet the requirement?[5]	Notes
8.	A plan for establishing a near-road $PM_{2.5}$ monitor (in CBSAs ≥ 1 million and ≤ 2.5 million) by 1/1/2017 **(plan due July 1, 2016)**	58.10(a)(8)(ii)	Yes, pages 28-29	Yes	Submitted and approved in a previous plan.
9.	A plan for establishing a near-road CO monitor (in CBSAs ≥ 2.5 million) by 1/1/2015 **(plan was due July 1, 2014)**	58.10(a)(7) 58.13(e)(1)	Yes, page 44	Yes	Submitted and approved in a previous plan. This requirement is met by the operating near-road CO monitor at Laney College.
10.	A plan for establishing a near-road CO monitor (in CBSAs ≥ 1 million and ≤ 2.5 million) by 1/1/2017 **(plan due July 1, 2016)**	58.10(a)(7) 58.13(e)(1)	Yes, page 44	Yes	Submitted and approved in a previous plan.
11.	NO_2 plan for establishment of 2nd near-road monitor by 1/1/2015 **(plan was due July 1, 2014)**	58.10 (a)(5)(iv)	Yes, pages 39-42	Yes	Submitted and approved in a previous plan. Operation of the Berkeley Aquatic Park site, which is intended to meet this requirement, began in July 2016.
12.	Precision/Accuracy reports submitted to AQS	58.16(a); App A, 1.3 and 5.1.1	Yes, page 54	Yes	
13.	Annual data certification submitted	58.15 App. A 1.3	Yes, page 54	Yes	
14.	Statement that SPMs operating an FRM/FEM/ARM that meet Appendix E also meet either Appendix A or an approved alternative. Documentation for any Appendix A approved alternative should be included.[7]	58.11 (a) (2)	Incomplete, Detailed Station Info	Insufficient to judge in some instances	A statement clearly indicating whether SPMs meet Appendix E and Appendix A or an approved alternative is required for: Bethel Island PM_{10}, Concord PM_{10}, San Francisco PM_{10}, Oakland O_3, San Pablo O_3, San Rafael O_3, Crockett SO_2.
15.	SPMs operating FRM/FEM/ARM monitors for over 24 months are listed as comparable to the NAAQS or the agency provided documentation that requirements from Appendices A, C, or E were not met.[8]	58.20(c)	Yes, Detailed Station Info	Yes	The Patterson Pass O_3 monitor has been in operation for fewer than 24 months; however, the contradicting statement "[i]n operation for more than 24 months, these monitors are eligible for NAAQS comparison" is included in the site description for Patterson Pass. Please clarify this in next year's plan, and if appropriate, add "NAAQS Comparison" as a monitoring objective for the Patterson Pass NO_2 monitor table.

[7] Alternatives to the requirements of appendix A may be approved for an SPM site as part of the approval of the annual monitoring plan, or separately.

[8] This requirement only applies to monitors that are eligible for comparison to the NAAQS per 40 CFR §§58.11(e) and 58.30.

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, page #s. Flag if incorrect[3]?	Does the information provided[4] meet the requirement?[5]	Notes
					"NAAQS Comparison" should also be added as a monitoring objective for the San Ramon NO_2 monitor, if appropriate.
16.	For agencies that share monitoring responsibilities in an MSA/CSA: this agency meets full monitoring requirements or an agreement between the affected agencies and the EPA Regional Administrator is in place	App D 2(e)	Yes, page 18-19, App. B, App. C, App. D	Yes	
GENERAL PARTICULATE MONITORING REQUIREMENTS (PM_{10}, $PM_{2.5}$, Pb-TSP, Pb-PM_{10})					
17.	Designation of a primary monitor if there is more than one monitor for a pollutant at a site.	Need to determine collocation	Yes, Detailed Station Info	Yes	Napa PM_{10} collocated monitor is slated to move to San Pablo or San Rafael after relocation of other Napa monitors. Collocation requirements for $PM_{2.5}$ will likely shift in next year's plan with the addition of 2 FEM-BAM primary monitors slated for 2016.
18.	Distance between QA collocated monitors (Note: waiver request or the date of previous waiver approval must be included if the distance deviates from requirement.)	App. A 3.2.5.6 and 3.2.6.3	Yes, Detailed Station Info	Yes	
19.	For low volume PM instruments (flow rate < 200 liters/minute), all other PM instruments are > 1 m from the lovol. If no, list distance (meters) and instruments.	App E	Yes, Detailed Station Info	Yes	The speciated $PM_{2.5}$ sampler at Livermore is listed as "N/A" for this requirement. The same instrument at other sites is listed as "No" for this requirement. Please update this in next year's plan.
20.	For high volume PM instruments (flow rate > 200 liters/minute), all other PM instruments are > 2m from the hivol. If no, list distance (meters) and instruments.	App E	Yes, Detailed Station Info	Yes	
$PM_{2.5}$ –SPECIFIC MONITORING REQUIREMENTS					
21.	Document how states and local agencies provide for the review of changes to a $PM_{2.5}$ monitoring network that impact the location of a violating $PM_{2.5}$ monitor.	58.10 (c)	Yes, pages 53-54	Yes	
22.	Identification of any $PM_{2.5}$ FEMs and/or ARMs not eligible to be compared to the NAAQS due to poor	58.10 (b)(13) 58.11 (e)	Yes, Detailed Station Info	Yes	

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, page #s. Flag if incorrect[3]?	Does the information provided[4] meet the requirement?[5]	Notes
	comparability to FRM(s) [Note 1: must include required data assessment.] [Note 2: Required SLAMS must monitor $PM_{2.5}$ with NAAQS-comparable monitor at the required sample frequency.]				
23.	Minimum # of monitoring **sites** for $PM_{2.5}$ [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D, 4.7.1(a) and Table D-5	Yes, page 27	Yes	Note: According to 2015 population estimates the Sonoma MSA will be 502,146. In future plans, please note that this requirement will be affected by this population change.
24.	Requirements for continuous $PM_{2.5}$ monitoring (number of monitors and collocation)	App D 4.7.2	Yes, page 28	Yes	Some columns of Table 2-5 in BAAQMD's plan are partially or almost entirely not visible, due to a table display issue. While the visible information is sufficient to determine that requirements are being met, please fix this display issue in next year's plan.
25.	FRM/FEM/ARM $PM_{2.5}$ QA collocation	App A 3.2.5	Yes, pages 31-32	Yes	BAAQMD notes that collocation requirements for $PM_{2.5}$ will likely shift in next year's plan with the addition of 2 FEM-BAM primary monitors slated for 2016.
26.	$PM_{2.5}$ Chemical Speciation requirements for official STN sites	App D 4.7.4	Yes, pages 164-167	Yes	
27.	Identification of sites suitable and sites not suitable for comparison to the annual $PM_{2.5}$ NAAQS as described in Part 58.30	58.10 (b)(7)	Yes, Detailed Station Info	Yes	
28.	Required $PM_{2.5}$ sites represent area-wide air quality	App D 4.7.1(b)	Yes, Detailed Station Info	Yes	
29.	For $PM_{2.5}$, within each MSA, at least one site at neighborhood or larger scale in an area of expected maximum concentration	App D 4.7.1(b)(1)	Yes, pages 30-31, Detailed Station Info	Insufficient to judge	Oakland West is listed as the design value site for the San Francisco-Oakland-Hayward MSA, but is not listed as a highest concentration site for $PM_{2.5}$. Also, monitoring data from the Forest Knolls SPM BC monitor is now available in AQS. EPA intends to evaluate this data to determine whether BAAQMD is adequately addressing woodsmoke as a source

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, page #s. Flag if incorrect[3]?	Does the information provided[4] meet the requirement?[5]	Notes
					category and the Appendix D "expected maximum concentration" requirement.
30.	Minimum monitoring requirement for near-road $PM_{2.5}$ monitor (in CBSA ≥ 2.5 million) by 1/1/2015	58.13(f)(1) App D 4.7.1(b)(2)	Yes, pages 28-29	Yes	
31.	If additional SLAMS $PM_{2.5}$ is required, there is a site in an area of poor air quality	App D 4.7.1(b)(3)	NA	NA	
32.	States must have at least one $PM_{2.5}$ regional background and one $PM_{2.5}$ regional transport site.	App D 4.7.3	Yes, page 31	Yes	While this is a state requirement, BAAQMD does indicate transport $PM_{2.5}$ sites within their PQAO. BAAQMD does not have a regional background site.
33.	Sampling schedule for $PM_{2.5}$ - applies to year-round and seasonal sampling schedules (note: date of waiver approval must be included if the sampling season deviates from requirement)	58.10 (b)(4) 58.12(d) App D 4.7 EPA flowchart	Yes, Detailed Station Info	Yes	BAAQMD's $PM_{2.5}$ monitors are continuously operating, with the exception of the QA collocated FRM at San Jose-Jackson. This site meets the requirement for manual samplers at NCore sites to sample at 1:3 frequency. The STN-affiliated speciation sampler at San Jose-Jackson also samples at the required 1:3 frequency.
34.	Frequency of flow rate verification for manual $PM_{2.5}$ monitors audit	App A 3.3.2	Yes, Detailed Station Info	Yes	
35.	Frequency of flow rate verification for automated $PM_{2.5}$ monitors audit	App A 3.2.3	Yes, Detailed Station Info	Yes	
36.	Dates of two semi-annual flow rate audits conducted in **CY2015** for $PM_{2.5}$ monitors	App A, 3.2.4 and 3.3.3	Yes, Detailed Station Info	Not meeting requirement in some instances	Audit dates are not between 5 and 7 months apart in some cases. Dates for Oakland West are over 7 months apart and dates for San Jose – Knox are less than 5 months apart.
PM_{10} –SPECIFIC MONITORING REQUIREMENTS					
37.	Minimum # of monitoring sites for PM_{10} [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D, 4.6 (a) and Table D-4	Yes, page 33	Yes	Note: According to 2015 population estimates the Sonoma MSA will be 502,146. In future plans, please note that this requirement will be affected by this population change.
38.	Manual PM_{10} method collocation (note: continuous PM_{10} does not have this requirement)	App A 3.3.1	Yes, page 35	Yes	Napa PM_{10} collocated monitor is slated to move to San Pablo or San Rafael after relocation of other Napa monitors (approved outside of network plan).
39.	Sampling schedule for PM_{10}	58.10 (b)(4) 58.12(e)	Yes, Detailed Station Info	Yes	

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, page #s. Flag if incorrect[3]?	Does the information provided[4] meet the requirement?[5]	Notes
		App D 4.6			
40.	Frequency of flow rate verification for manual PM_{10} monitors audit	App A 3.3.2	Yes, Detailed Station Info	Yes	
41.	Frequency of flow rate verification for automated PM_{10} monitors audit	App A 3.2.3	NA	NA	No automated PM_{10} monitors
42.	Dates of two semi-annual flow rate audits conducted in **CY2015** for PM_{10} monitors	App A, 3.2.4 and 3.3.3	Yes, Detailed Station Info	Yes	
Pb –SPECIFIC MONITORING REQUIREMENTS					
43.	Minimum # of monitors for non-NCore Pb [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.5 58.13(a)	Yes, pages 47-49	No	The Palo Alto site was closed on December 23, 2014 due to lease termination. During FAA review it was determined that the lead sampler location did not meet FAA regulations. Monitoring at the airport has not resumed. BAAQMD indicates they are continuing to work with EPA to find a suitable alternative.
44.	Pb collocation: for non-NCore sites	App A 3.3.4.3	Yes, pages 47-49	Yes	Note: the San Carlos Airport collocated lead monitors had to be moved to a new site. Data collection resumed at the new location on March 25, 2015.
45.	Any source-oriented Pb site for which a waiver has been granted by EPA Regional Administrator	58.10 (b)(10)	NA	NA	No waivers for required source-oriented monitors have been requested or granted
46.	Any Pb monitor for which a waiver has been requested or granted by EPA Regional Administrator for use of Pb-PM_{10} in lieu of Pb-TSP	58.10 (b)(11)	Yes, page 47	Yes	
47.	Designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)	Yes, Detailed Station Info	Yes	
48.	Sampling schedule for Pb	58.10 (b)(4) 58.12(b) App D 4.5	Yes, Detailed Station Info	Yes	While BAAQMD is meeting this requirement, please update the "required sampling frequency" table entries for lead monitors from "N/A" to reflect the sampling frequency requirements for lead monitors.
49.	Frequency of flow rate verification for Pb monitors audit	App A 3.3.4.1	Yes, Detailed Station Info	Yes	
50.	Dates of two semi-annual flow rate audits conducted in **CY2015** for Pb monitors	App A 3.3.4.1	Yes, Detailed Station Info	Yes	
GENERAL GASEOUS MONITORING REQUIREMENTS					

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, page #s. Flag if incorrect[3]?	Does the information provided[4] meet the requirement?[5]	Notes
51.	Frequency of one-point QC check (gaseous)	App. A 3.2.1	Yes, Detailed Station Info	Yes	
52.	Date of Annual Performance Evaluation (gaseous) conducted in **CY2015**	App. A 3.2.2	Yes, Detailed Station Info	Yes	
O_3 –SPECIFIC MONITORING REQUIREMENTS					
53.	Minimum # of monitoring sites for O_3 [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.] [Note 3: monitors that do not meet traffic count/distance requirements to be neighborhood or urban scale (40 CFR Appendix E, Table E-1) cannot be counted towards meeting minimum monitoring requirements]	App D, 4.1(a) and Table D-2	Yes, page 20	Yes	Note: the 2015 O_3 NAAQS became effective at the end of 2015. This changes the minimum number of monitors required for the Napa MSA from 0 to 1. BAAQMD included a footnote in their minimum monitoring requirements table to indicate that they are aware of this change.
54.	Identification of maximum concentration O_3 site(s)	App D 4.1 (b)	Yes, Detailed Station Info	Insufficient to judge in one instance.	A maximum ozone site is not provided for the Santa Rosa MSA.
55.	Sampling season for O_3 (Note: Waivers must be renewed annually. EPA expects agencies to submit re-evaluations of the relevant data each year with the ANP. EPA will then respond as part of the ANP response.)	58.10 (b)(4) App D, 4.1(i)	Yes, pages 21-22,	Yes	The EPA previously approved a shorted ozone monitoring season in 2015 for Fairfield, Gilroy, Hayward, Los Gatos, and San Martin. BAAQMD also previously requested and the EPA approved a waiver for shorter ozone season monitoring at Fairfield, Gilroy, Hayward, San Martin, and Los Gatos in 2016 and 2017. All waivers and EPA approvals can be found in Appendix E of BAAQMD's plan.
NO_2 –SPECIFIC MONITORING REQUIREMENTS					
56.	Minimum monitoring requirement for single near-road NO_2 monitor (in CBSA $\geq$ 1 million) by 1/1/2014Note: Only monitors considered to be	58.13(c)(3) App D 4.3.2	Yes, pages 39-43	Yes	Operation of the Laney College site began in February 2014. Operation of the San Jose – Knox site began in September 2014.

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, page #s. Flag if incorrect[3]?	Does the information provided[4] meet the requirement?[5]	Notes
	required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]				
57.	Minimum monitoring requirement for second near-road NO_2 monitor (in CBSA ≥ 2.5 million) by 1/1/2015 [9] [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	58.13(c)(4) App D 4.3.2	Yes, pages 39-43	Yes	Operation of the Berkeley Aquatic Park site began in July 2016.
58.	Minimum monitoring requirements for area-wide NO_2 monitor in location of expected highest NO_2 concentrations representing neighborhood or larger scale (operation required by January 1, 2013) [9]	App D 4.3.3	Yes, pages 39-43	Yes	
59.	Minimum monitoring requirements for susceptible and vulnerable populations monitoring (aka RA40) NO_2 (operation required by January 1, 2013) [9]	App D 4.3.4	Yes, pages 39-43	Yes	
60.	Identification of required NO_2 monitors as either near-road, area-wide, or vulnerable and susceptible population (aka RA40)	58.10 (b)(12)	Yes, pages 39-43	Yes	
CO –SPECIFIC MONITORING REQUIREMENTS					
61.	Minimum monitoring requirement for near-road CO monitor (in CBSA ≥ 2.5 million) by 1/1/2015 [9]	58.13(e)(1) App D 4.2.1	Yes, pages 44-45	Yes	
SO_2 –SPECIFIC MONITORING REQUIREMENTS					
62.	Minimum monitoring requirements for SO_2 based on PWEI and/or RA required monitors under Appendix D 4.4.3 [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.4	Yes, pages 36-38	Yes	
63.	Monitors used to meet Data Requirements Rule included in July 1, 2016 ANP (to be installed no later than January 1, 2017).	40 CFR 51.1203(c)	Yes, pages 36-38	Yes	Approval of this checklist item does not constitute approval of existing monitoring to meet DRR requirements. BAAQMD and EPA are currently evaluating whether existing SO_2 monitoring is adequate to meet the requirements of DRR.

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, page #s. Flag if incorrect[3]?	Does the information provided[4] meet the requirement?[5]	Notes
NCORE –SPECIFIC MONITORING REQUIREMENTS					
64.	NCore site and all required parameters operational: year-round O_3, trace SO_2, trace CO, NO_y, NO, $PM_{2.5}$ mass, $PM_{2.5}$ continuous, $PM_{2.5}$ speciation, $PM_{10-2.5}$ mass, resultant wind speed at 10m, resultant wind direction at 10m, ambient temperature, relative humidity, and Pb at CBSAs ≥ 500,000.	58.10 (a)(3); Pb collocation App. A 3.3.4.3; $PM_{10-2.5}$ minimum monitoring App. D 4.8; $PM_{10-2.5}$ sampling schedule 58.10 (b)(4) 58.12(f) App D 4.8; $PM_{10-2.5}$ collocation App. A 3.3.6	Yes, pages 122-126, pages 154-158	Yes	EPA approved a waiver to use meteorological data from the San Jose Airport as official data for the NCore site.
SITE OR MONITOR - SPECIFIC REQUIREMENTS (OFTEN INCLUDED IN DETAILED SITE INFORMATION TABLES)					
65.	AQS site identification number for each site	58.10 (b)(1)	Yes, Detailed Station Info	Yes	
66.	Location of each site: street address and geographic coordinates	58.10 (b)(2)	Yes, Detailed Station Info	Yes	Several of the longitude GPS coordinates are missing a negative sign. Please update this in next year's plan.
67.	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)	Yes, Detailed Station Info	Yes	
68.	Parameter occurrence code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, Detailed Station Info	Yes	

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, page #s. Flag if incorrect[3]?	Does the information provided[4] meet the requirement?[5]	Notes
69.	Statement of purpose for each monitor	58.10 (a)(1)	Yes, Detailed Station Info	Yes	
70.	Basic monitoring objective for each monitor	App D 1.1 58.10 (b)(6)	Yes, Detailed Station Info	Yes	
71.	Site type for each monitor	App D 1.1.1	Yes, Detailed Station Info	Yes	
72.	Monitor type for each monitor, and Network Affiliation(s) as appropriate	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, Detailed Station Info	Yes	
73.	Scale of representativeness for each monitor as defined in Appendix D	58.10(b)(6); App D	Yes, page 22, Detailed Station Info	Yes	Note that the waiver for O_3 scale at the Napa site is automatically extended with the demonstration that the design value is not within 5ppb of any applicable NAAQS.
74.	Parameter code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, Detailed Station Info	Yes	
75.	Method code and description (e.g., manufacturer & model) for each monitor	58.10 (b)(3); App C 2.4.1.2	Yes, Detailed Station Info	Yes	
76.	Sampling start date for each monitor	Needed to determine if other requirements (e.g., min # and	Yes, Detailed Station Info	Yes	

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, page #s. Flag if incorrect[3]?	Does the information provided[4] meet the requirement?[5]	Notes
		collocation) are met			
77.	Distance of monitor from nearest road	App E 6	Yes, Detailed Station Info	Yes	BAAQMD's request for a spacing from roadway siting waiver for Napa's ozone monitor is approved within this year's ANP.
78.	Traffic count of nearest road	App E	Yes, Detailed Station Info	Yes	
79.	Groundcover	App E 3(a)	Yes, Detailed Station Info	Yes	
80.	Probe height	App E 2	Yes, Detailed Station Info	Yes	
81.	Distance from supporting structure	App E 2	Yes, Detailed Station Info	Insufficient to judge in one instance	The $PM_{2.5}$ monitor at San Jose – Knox is listed as >1m from supporting structure, but the requirement is for >2m.
82.	Distance from obstructions on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(b)	Yes, Detailed Station Info	Yes	
83.	Distance from obstructions not on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(a)	Yes, Detailed Station Info	Yes	
84.	Distance from the drip line of closest tree(s)	App E 5	Yes, Detailed Station Info	Not meeting requirement in one instance	Monitors at San Jose – Knox are listed as 8m from the drip line of the closest trees, which does not meet the requirement of at least 10m from the drip line. Crockett SO_2 SPM monitor is <10m from the drip line.
85.	Distance to furnace or incinerator flue	App E 3(b)	Yes, Detailed Station Info	Yes	Distances from flues are included in the plan. Without any indication in the plan otherwise, EPA assumes that the distance to the flue and fuel burned does not constitute an inappropriate source at these sites.
86.	Unrestricted airflow (expressed as degrees around probe/inlet or percentage of monitoring path)	App E, 4(a) and 4(b)	Yes, Detailed Station Info	Yes	
87.	Probe material ($NO/NO_2/NO_y$, SO_2, O_3; For PAMS: VOCs, Carbonyls)	App E 9	Yes, Detailed Station Info	Yes	

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, page #s. Flag if incorrect[3]?	Does the information provided[4] meet the requirement?[5]	Notes
88.	Residence time ($NO/NO_2/NO_y$, SO_2, O_3; For PAMS: VOCs, Carbonyls)	App E 9	Yes, Detailed Station Info	Yes	

Public Comments on Annual Network Plan
Were comments submitted to the S/L/T agency during the public comment period? '

No

If no, skip the remaining questions.
If yes:

- Were any of the comments substantive?
  - If yes, which ones?
  - Explain basis for determination if any comments were considered not substantive:
- Did the agency respond to the substantive comments?
  - If yes, was the response adequate?
- Do the substantive comments require separate EPA response (i.e., agency response wasn't adequate)?
- Are the sections of the annual network plan that received substantive comments approvable after consideration of comments?
  - If yes, provide rationale: