UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUN 05 2017

Mr. Ronald W. Gore
Chief
Alabama Department of Environmental
Management, Air Division
1400 Coliseum Boulevard
Montgomery, Alabama 36130

Dear Mr. Gore:

Thank you submitting the addendum dated April 7, 2017, to Alabama's annual ambient air network plan (Network Plan Addendum). The Network Plan Addendum proposes changes to the ambient air monitoring networks for both the Alabama Department of Environmental Management (ADEM) and the Jefferson County Department of Health (JCDH). We understand the public comment period ended on March 20, 2017. No comments were received on the proposed relocation of the Wetumpka and Phenix City monitoring sites. However, comments were received on the proposed changes for the JCDH network.

Changes to ADEM's Network

The ADEM requested to relocate an ozone (O_3) site in the Montgomery metropolitan statistical area (MSA) and to combine the O_3 and particulate matter less than 2.5 microns ($PM_{2.5}$) sites into one site in the Phenix City MSA. The ADEM lost its lease for the Dewberry Trail O_3 site (Air Quality System (AQS) # 01-051-0001) in the Montgomery MSA. According to 40 CFR Part 58, Appendix D, Table D-2, the ADEM is required to operate and maintain two O_3 monitoring sites in this MSA. The ADEM proposes to establish a new site at 206 Queen Ann Road, Wetumpka, Alabama. The EPA Region 4 staff visited this location on August 30, 2016, and gave verbal approval to Mike Malaier and Gina Curvin to use it as an O_3 monitoring site. The U.S. Environmental Protection Agency Region 4 staff understand that the ADEM began operating this site (new AQS # 01-051-0002) on March 17, 2017. The EPA formally approves this location to be the second O_3 site in the Montgomery MSA. The site will begin operating in the 2017 O_3 season.

The ADEM is also proposing to combine its O_3 and $PM_{2.5}$ sites in the Phenix City MSA into one single multipollutant monitoring site to be located at the Phenix City-South Girard School (AQS # 01-113-0003). The ADEM lost its lease to the $PM_{2.5}$ site (AQS # 01-113-0001) in September 2016. That site houses collocated $PM_{2.5}$ federal reference method (FRM) samplers, two chemical speciation network samplers, and a continuous $PM_{2.5}$ non-federal equivalent method (FEM) sampler. The ADEM has already moved the collocated $PM_{2.5}$ FRM samplers to the new location (as of January 18, 2017) while the O_3 monitor continues to operate at its original site (AQS # 01-113-0002). The ADEM plans to operate the O_3 monitor at the original site for the full 2017 ozone monitoring season ending October 31, 2017, at which time the site will be shut down and the equipment will be relocated to the Phenix City-South Girard School site.

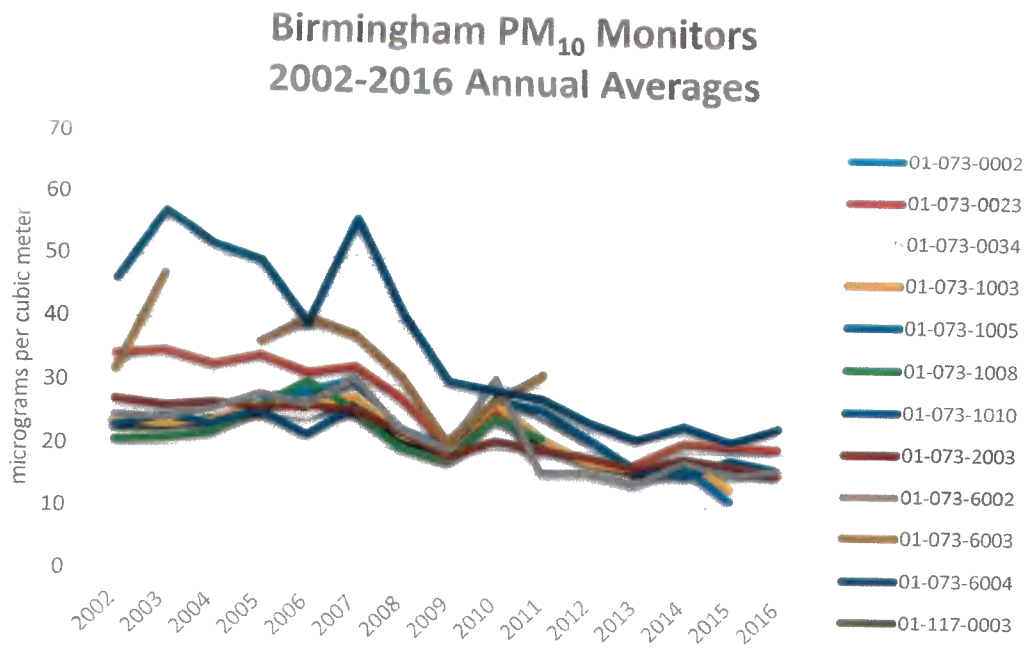
O_3 monitoring will resume at the newly combined site on or by March 1, 2018. The EPA approves this plan. For each of these new sites, please be sure to update the network plan with photos and evidence the site meets siting criteria found in 40 CFR Part 58, Appendix E. Also, all of the criteria pollutant monitors should be designated as State or Local Air Monitoring Stations (SLAMS) in EPA's Air Quality System since they are required.

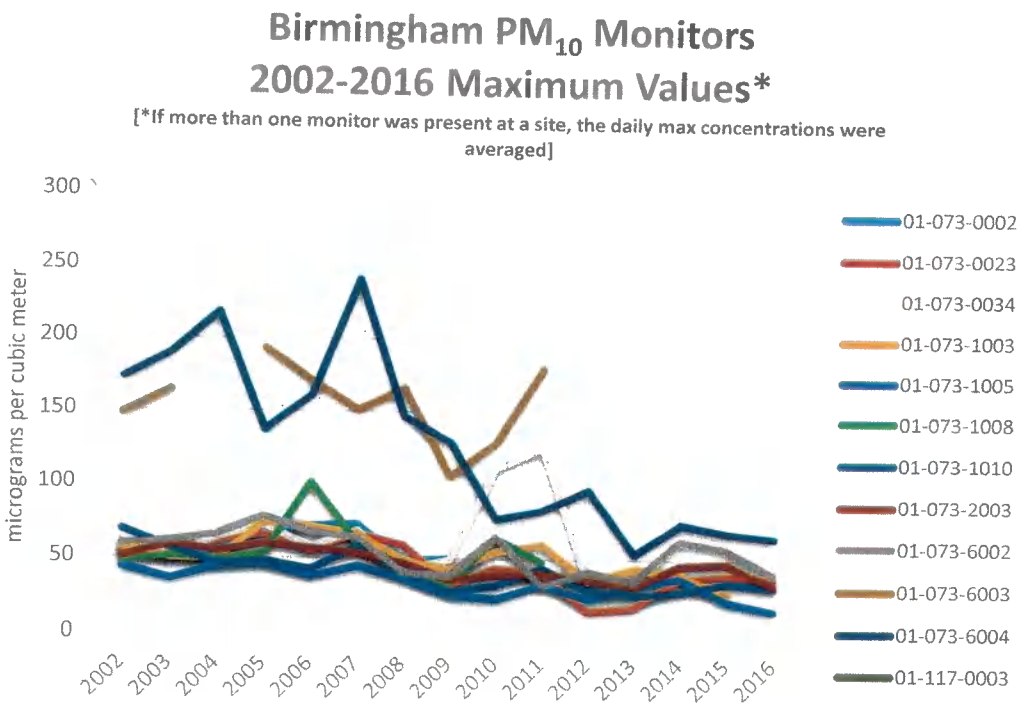
Changes to JCDH's Network

The JCDH is requesting that the $PM_{2.5}$, particulate matter less than 10 microns (PM_{10}), and sulfur dioxide (SO_2) monitors at the Shuttlesworth ambient air monitoring site (AQS #01-073-6004) be redesignated as special purpose monitors (SPMs) rather than SLAMS monitors as listed in the 2016 annual network plan. Forty (40) CFR §58.20 provides flexibility to agencies for conducting short term special purpose monitoring. While these SPMs should be listed in periodic assessments and the annual network plan, they do not count towards meeting any federal minimum requirement. EPA approval is not required for discontinuance of SPMs.

The $PM_{2.5}$ sampler being used is a non-regulatory tapered element oscillating microbalance (TEOM) sampler. The data generated from it is used to inform the JCDH and the public about the general air quality in the vicinity but cannot be used for regulatory decision making purposes (i.e., attainment of air quality standards). The requested change in designation of the $PM_{2.5}$ sampler to an SPM is approved going back to an effective date of January 1, 2017. The EPA encourages the JCDH to continue operating this monitor because it provides valuable hourly data to the EPA's AirNow network.

The PM_{10} sampler is being operated using an approved continuous method and the data generated can be used for regulatory decision making. Historically, ambient PM_{10} concentrations measured at this site are higher than any other site in the county (see graphs below – navy blue line on top represents the data from the PM_{10} monitor(s) at the Shuttlesworth site). The Shuttlesworth site is, in effect, the maximum concentration site for PM_{10} in the Birmingham MSA. Since one site in an area should represent the maximum concentration and be identified as such in the network plan as well as in AQS, the EPA believes this monitor should remain classified as a SLAMS.





The SO_2 analyzer at the Shuttlesworth ambient air monitoring site is a FEM but is not a SLAMS monitor as listed in the 2016 annual network plan. Per an agreement with JCDH, this monitor is being operated for one calendar year unless there are exceedances of any SO_2 NAAQS, upon which time the monitor will be operated for three complete calendar years in order to obtain a design value.

If you have any questions or concerns, please contact Gregg Worley at (404) 562-9141 or Darren Palmer at (404) 562-9052.

Sincerely,

Beverly H. Banister
Director
Air, Pesticides and Toxics Management Division

cc: Mr. Jonathan Stanton
Director, JCDH