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

OCT 29 2019

Dr. Ranyee Chiang
Director of Meteorology and Measurements
Bay Area Air Quality Management District
375 Beale Street
San Francisco, California 94105

Dear Dr. Chiang:

Thank you for your submission of the Bay Area Air Quality Management District (BAAQMD) *2018 Air Monitoring Network Plan* on July 2, 2019. We have reviewed the submitted document based on the requirements set forth in 40 CFR Part 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 provided 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. Enclosure A (*A. Annual Monitoring Network Plan Checklist*) is the checklist EPA used to review your plan for 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. Items highlighted in yellow are those EPA Region 9 is not acting on, as we either lack the authority to approve the specific item, or we have determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met. Items highlighted in green in Enclosure A require attention in order to improve next year's plan.

All comments conveyed via this letter and enclosure should be addressed prior to submittal of next year's annual monitoring network plan to EPA.

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, Manager
Air Quality Analysis Office

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Enclosure:

A. Annual Monitoring Network Plan Checklist

cc (via email): Charles Knoderer, BAAQMD
Kate Hoag, BAAQMD
Jin Xu, California Air Resources Board (CARB)

A. ANNUAL MONITORING NETWORK PLAN CHECKLIST
(Updated July 10, 2018)

Year: 2019
Agency: Bay Area Air Quality Management District (BAAQMD)

40 CFR 58.10(a)(1) requires that each Annual Network Plan (ANP) shall provide for the documentation of the establishment and maintenance of an air quality surveillance system that consists of a network of SLAMS monitoring stations that can include FRM, FEM, and ARM monitors that are part of SLAMS, NCore, CSN, PAMS, and SPM stations.

40 CFR 58.10(a)(1) further directs that, "The plan shall include a statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E of this part, where applicable. The Regional Administrator may require additional information in support of this statement." 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: 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.
Green	item requires attention in order to improve next year's plan.

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, section or page #s.	Does the information provided[3] meet the requirement?[4]	Notes
GENERAL PLAN REQUIREMENTS					
1.	Submit plan by July 1st	58.10 (a)(1)	Y, cover letter, submittal email	N	Plan was submitted July 2, 2019.
2.	30-day public comment / inspection period	58.10 (a)(1); 58.10 (c)	Y, cover letter, submittal email	Y	One comment was received.
3.	Statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E, where applicable	58.10 (a)(1)	Y, p. 18	Y	
4.	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	NA	NA	
5.	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	
6.	Does plan include documentation (e.g., attached approval letter) for system modifications that have been approved since last ANP approval?		NA	NA	No system modifications have been approved since the last ANP approval. BAAQMD included documentation for relocation of the Napa site, which was approved by EPA in June 2015 and was completed in April 2018. BAAQMD also included documentation of EPA's approval to discontinue Pb monitoring at San Jose-Jackson and approval to discontinue NO_y monitoring at the San Jose NCore site to place the monitor at Livermore for PAMS, which were approved in previous years. See Appendices E-H of BAAQMD's plan.

[1] Unless otherwise noted.
[2] Response options: NA (Not Applicable), Yes, No, or Incomplete.
[3] Assuming the information is correct.
[4] Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge, or Incorrect

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, section or page #s.	Does the information provided[3] meet the requirement?[4]	Notes
7.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)	Y, p. 50-52, Detailed Station Info	Y	
8.	Precision/Accuracy reports submitted to AQS	58.16 (a)	Y, no changes noted	Y, no changes noted	
9.	Annual data certification submitted	58.15	Y, no changes noted	Y, no changes noted	
10.	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.[5]	58.11 (a)(2)	Y, p. 18, Detailed Station Info	Y	The general statement provided includes SPM monitors.
11.	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.[6]	58.20 (c)	Y, Detailed Station Info	Y	The San Ramon NO_2 monitor meets requirements in Appendices A, C, and E; however, BAAQMD operates these SPMs seasonally, and as a result they are unable to meet completeness requirements for any NO_2 NAAQS. Therefore it is appropriate that these monitors are not listed as comparable to the NAAQS.
12.	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)	Y, p. 19-20	Y	Based on changes in minimum monitoring requirements for PM_{10} in the Santa Rosa MSA due to recent data affected by wildfires, BAAQMD may need additional monitoring agreements with other agencies, including Northern Sonoma APCD. BAAQMD indicates in the plan that they will further assess minimum monitoring requirements in the next five-year network assessment, due in 2020. Please work with EPA to ensure that monitoring agreements are developed as appropriate.

[5] 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.
[6] 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, section or page #s.	Does the information provided[3] meet the requirement?[4]	Notes
GENERAL PARTICULATE MONITORING REQUIREMENTS (PM_{10}, $PM_{2.5}$, Pb-TSP, Pb-PM_{10})					
13.	Designation of a primary monitor if there is more than one monitor for a pollutant at a site.	App. A 3.2.3	Y, Detailed Station Info	Y	
14.	Distance between QA collocated monitors. For low volume PM instruments (flow rate < 200 liters/minute) > 1 m. For high volume PM instruments (flow rate > 200 liters/minute) > 2m. [Note: waiver request or the date of previous waiver approval must be included if the distance deviates from requirement.]	App. A 3.2.3.4 (c) and 3.3.4.2 (c)	Y, no changes noted	Y, no changes noted	
$PM_{2.5}$ –SPECIFIC MONITORING REQUIREMENTS					
15.	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)	Y, no changes noted	Y, no changes noted	
16.	Identification of any $PM_{2.5}$ FEMs and/or ARMs not eligible to be compared to the NAAQS due to poor 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.]	58.10 (b)(13) 58.11 (e)	NA	NA	
17.	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	Y, p. 28	Y	While BAAQMD is meeting the requirement, please note that the number of required SLAMS sites for some of the MSAs are incorrect, based on design values provided in the plan. Please ensure next year's plan includes updated information on the number of required sites. Also, BAAQMD has listed $PM_{2.5}$ minimum monitoring requirements in Table 2-5 based on 2010 census data. Some recent Santa Rosa MSA population estimates have been over 500,000, which would affect the

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, section or page #s.	Does the information provided[3] meet the requirement?[4]	Notes
					number of required sites for the MSA. BAAQMD states that the population values used are "based on MSA populations from the latest available census figures" and that population estimates are considered in long term network planning, including the five-year network assessments.
18.	Requirements for continuous $PM_{2.5}$ monitoring (number of monitors and collocation)	App. D 4.7.2	Y, p. 25	Y	
19.	FRM/FEM/ARM $PM_{2.5}$ QA collocation	App. A 3.2.3	Y, p. 30-31	N	BAAQMD triggered the requirement for an additional collocated FRM monitor in 2018. This monitor was not installed until February 8, 2019, and therefore BAAQMD was not meeting this requirement in 2018.
20.	$PM_{2.5}$ Chemical Speciation requirements for official STN sites	App. D 4.7.4	Y, no changes noted	Y, no changes noted	
21.	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)	Y, no changes noted	Y, no changes noted	
22.	Required $PM_{2.5}$ sites represent area-wide air quality	App. D 4.7.1(b)	Y, no changes noted	Y, no changes noted	
23.	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)	Y, no changes noted	Y, no changes noted	
24.	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)	Y, no changes noted	Y, no changes noted	
25.	States must have at least one $PM_{2.5}$ regional background and one $PM_{2.5}$ regional transport site.	App. D 4.7.3	Y, no changes noted	NA	While this is a State requirement, BAAQMD indicates transport $PM_{2.5}$ sites within their PQAO. BAAQMD does not have a regional background site.
26.	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	Y, Detailed Station Info	Y	BAAQMD's $PM_{2.5}$ monitors are continuously operating, with the exception of the QA collocated FRM at San Jose-Jackson. The FRM samples at 1:3 frequency, meeting the requirement for manual samplers at NCore sites. The STN-affiliated

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, section or page #s.	Does the information provided[3] meet the requirement?[4]	Notes
					speciation sampler at San Jose-Jackson also samples at the required 1:3 frequency.
27.	Frequency of flow rate verification for automated and manual $PM_{2.5}$ monitors	App. A 3.2.1	Y, Detailed Station Info	Y	
28.	Dates of two semi-annual flow rate audits conducted in **CY2018** for $PM_{2.5}$ monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App. A 3.2.2	Y, Detailed Station Info	N in one instance	No semi-annual flow audit was performed on the Pleasanton near-road $PM_{2.5}$ monitor in CY 2018. The first semi-annual flow rate audit was performed on January 29, 2019. This monitor began operating in April 2018; therefore at least one flow rate audit should have been performed in CY2018. This monitor is an SPM; however, it is required to meet 40 CFR 58 Appendix A requirements, which include semi-annual flow rate audits.
PM_{10} –SPECIFIC MONITORING REQUIREMENTS					
29.	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	Y, p. 31-36	Y	BAAQMD's discussion notes that certain sites were impacted by wildfire smoke in 2017 and 2018 and this affects minimum monitoring requirements in these MSAs. Please work with EPA to ensure that minimum monitoring requirements continue to be met in the future. Also, please note that the concentrations used to determine the number of required SLAMS sites in Table 2-8 should be the highest concentration over the most recent 3-year period (e.g., 2016-2018). Please update this information in next year's plan. Also, BAAQMD has listed PM_{10} minimum monitoring requirements in Table 2-8 based on 2010 census data. Some recent Santa Rosa MSA population estimates have been over 500,000, which would affect the

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, section or page #s.	Does the information provided[3] meet the requirement?[4]	Notes
					number of required sites for the MSA. BAAQMD states that the population values used are "based on MSA populations from the latest available census figures" and that population estimates are considered in long term network planning, including the five-year network assessments.
30.	Manual PM_{10} method collocation (note: continuous PM_{10} does not have this requirement)	App. A 3.3.4	Y, p. 35-36	Y	
31.	Sampling schedule for PM_{10}	58.10 (b)(4); 58.12(e); App. D 4.6	Y, p. 33, 36, Detailed Station Info	N in one instance	The PM_{10} SLAMS monitor at Napa Valley College is listed as sampling at 1:12 frequency in the Detailed Station Information table for the site. This SLAMS monitor is required to sample minimally at 1:6 frequency.
32.	Frequency of flow rate verification for automated and manual PM_{10} monitors	App. A 3.3.1 and 3.3.2	Y, Detailed Station Info	Y	
33.	Dates of two semi-annual flow rate audits conducted in **CY2018** for PM_{10} monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App. A 3.3.3	Y, Detailed Station Info	Y	
Pb –SPECIFIC MONITORING REQUIREMENTS					
34.	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	Y, p. 47-49	N	The Palo Alto site was closed on December 23, 2014 due to lease termination. During FAA review it was determined that the Pb sampler did not meet FAA regulations. Monitoring at the airport has not resumed. The San Carlos Airport II site was also discontinued as of April 11, 2017. BAAQMD is no longer allowed to access the site due to an expired lease. BAAQMD indicates they have been unable to renegotiate the lease due to circumstances beyond their control.

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, section or page #s.	Does the information provided[3] meet the requirement?[4]	Notes
					BAAQMD is continuing to work with EPA to find a suitable alternative for both sites.
35.	Pb collocation: for non-NCore sites	App A 3.4.4 and 3.4.5	Y, p. 47-49	N	The QA collocated monitor ended operation with the termination of the San Carlos Airport II site in April 2017. BAAQMD has indicated they are unable to place a QA collocated monitor at the remaining operational Pb-TSP site (Reid Hillview).
36.	Any source-oriented Pb site for which a waiver has been granted by EPA Regional Administrator	58.10 (b)(10)	NA	NA	
37.	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)	NA	NA	
38.	Designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)	Y, no changes noted	Y, no changes noted	
39.	Sampling schedule for Pb	58.10 (b)(4); 58.12(b); App A 3.4.4.2 (c) and 3.4.5.3 (c)	Y, Detailed Station Info	Y	
40.	Frequency of flow rate verification for Pb monitors audit	App A 3.4.1 and 3.4.2	Y, Detailed Station Info	Y	
41.	Dates of two semi-annual flow rate audits conducted in **CY2018** for Pb monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App A 3.4.3	Y, Detailed Station Info	Y	
GENERAL GASEOUS MONITORING REQUIREMENTS					
42.	Frequency of one-point QC check (gaseous)	App. A 3.1.1	Y, Detailed Site Info	Y	
43.	Date of Annual Performance Evaluation (gaseous) conducted in **CY2018**	App. A 3.1.2	Y, Detailed Site Info	Y	Note that CO and NO_2 monitors at Pleasanton did not undergo a performance evaluation in CY2018. However, these monitors, which began operation on April 1, 2018, did undergo a performance evaluation within the first year of operation, on January 29, 2019.

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, section or page #s.	Does the information provided[3] meet the requirement?[4]	Notes
O_3 –SPECIFIC MONITORING REQUIREMENTS					
44.	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	Y, p. 20-21	Y	
45.	Identification of maximum concentration O_3 site(s)	App D 4.1 (b)	Y, no changes noted	Y, no changes noted	
46.	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)	Y, Detailed Site Info	Insufficient to judge in 5 cases	The Detailed Site Information tables indicated a shortened O_3 monitoring season (April through November) for the following O_3 SLAMS monitors: Fairfield, Gilroy, Hayward, Los Gatos, and San Martin. No further information was included in the plan regarding seasonal O_3 sampling and neither an approved waiver nor a waiver request was included. Historically, these monitors have operated seasonally. Please clarify in next year's plan whether these monitors operate seasonally, and if so, submit a request for approval of an O_3 season waiver. Not requiring attention: the San Ramon SPM O_3 monitor is listed and described as operating seasonally; no O_3 season waiver is required for this SPM monitor.
47.	A plan for making Photochemical Assessment Monitoring Stations (PAMS) measurements, if applicable. The plan shall provide for the required PAMS measurements to begin by June 1, 2019.	58.10 (a)(10)	Y, no changes noted	Y, no changes noted	

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, section or page #s.	Does the information provided[3] meet the requirement?[4]	Notes
NO_2 –SPECIFIC MONITORING REQUIREMENTS					
48.	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 1/1/13)	App D 4.3.3	Y, p. 43	Y	
49.	Minimum monitoring requirements for susceptible and vulnerable populations monitoring (aka RA40) NO_2 (operation required by January 1, 2013)	App D 4.3.4	Y, no changes noted	Y, no changes noted	
50.	Identification of required NO_2 monitors as either near-road, area-wide, or vulnerable and susceptible population (aka RA40)	58.10 (b)(12)	Y, no changes noted	Y, no changes noted	
NEAR ROADWAY – SPECIFIC MONITORING REQUIREMENTS					
In CBSAs ≥ 2.5 million, the following near-roadway minimum monitoring requirements apply:					
51.	Two NO_2 monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	Y, p. 43	Y	BAAQMD is meeting the requirement, but please note that Pleasanton is included in the number of active near-road NO_2, CO, and $PM_{2.5}$ monitors for the San Francisco-Oakland-Hayward MSA provided in Tables 2-6, 2-12, and 2-13. These monitors are SPMs and cannot be used to meet minimum monitoring requirements, and therefore the number of active near-road monitors for this MSA should be 2, not 3. Please update this in future plans.
52.	One CO monitor	App. D 4.2.1(a); 58.13(e)(2)	Y, p. 45	Y	
53.	One $PM_{2.5}$ monitor	App. D 4.7.1(b)(2); 58.13(f)(2)	Y, p. 29	Y	
In CBSAs ≥ 1 million and AADT ≥ 250K, the following near-roadway minimum monitoring requirements apply:					
54.	Two NO_2 monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	Y, p. 43	Y	BAAQMD currently operates one near-road site with NO_2, CO, and $PM_{2.5}$ monitors in the San Jose-Sunnyvale-Santa Clara MSA at San Jose-Knox. This MSA recently

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, section or page #s.	Does the information provided[3] meet the requirement?[4]	Notes
					surpassed the AADT requirement for a second near-road NO_2 monitor. BAAQMD has indicated that they will include a plan for this monitor with their next five-year network assessment.
55.	One CO monitor (by 1/1/2017)	App. D 4.2.1(a); 58.13(e)(2)	Y, p. 45	Y	
56.	One $PM_{2.5}$ monitor (by 1/1/2017)	App. D 4.7.1(b)(2); 58.13(f)(2)	Y, p. 29	Y	
In CBSAs ≥ 1 million and ≤ 2.5 million **AND** AADT < 250K, the following near-roadway minimum monitoring requirements apply:					
57.	One NO_2 monitors	App. D 4.3.2(a); 58.13(c)(3)	NA	NA	
58.	One CO monitor (by 1/1/2017)	App. D 4.2.1(a); 58.13(e)(2)	NA	NA	
59.	One $PM_{2.5}$ monitor (by 1/1/2017)	App. D 4.7.1(b)(2); 58.13(f)(2)	NA	NA	
SO_2 –SPECIFIC MONITORING REQUIREMENTS					
60.	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	Y, no changes noted	Y, no changes noted	
61.	Monitors used to meet Data Requirements Rule (operational no later than January 1, 2017.)	51.1203(c)	Y, no changes noted	Y, no changes noted	EPA approved the existing Martinez SLAMS SO_2 monitor to meet BAAQMD's requirement for monitoring under the Data Requirements Rule on December 6, 2016.

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, section or page #s.	Does the information provided[3] meet the requirement?[4]	Notes
NCORE –SPECIFIC MONITORING REQUIREMENTS					
62.	NCore site and all required parameters operational: year-round O_3, SO_2, 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. NOy waiver, if applicable.	App. D 3(b)	Y, no changes noted	Y, no changes noted	EPA previously approved a waiver to use meteorological data from the San Jose Airport as official data for the NCore site. EPA has also previously approved BAAQMD's request for a waiver to measure NO_y at Livermore instead of at the NCore site when required PAMS measurements begin at Livermore.
SITE OR MONITOR - SPECIFIC REQUIREMENTS (OFTEN INCLUDED IN DETAILED SITE INFORMATION TABLES)					
63.	AQS site identification number for each site	58.10 (b)(1)	Y, no changes noted	Y, no changes noted	
64.	Location of each site: street address and geographic coordinates	58.10 (b)(2)	Y, no changes noted	Y, no changes noted	
65.	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)	Y, no changes noted	Y, no changes noted	
66.	Parameter occurrence code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, no changes noted	Y, no changes noted	
67.	Basic monitoring objective for each monitor	App D 1.1; 58.10 (b)(6)	Y, no changes noted	Y, no changes noted	
68.	Site type for each monitor	App D 1.1.1	Y, no changes noted	Y, no changes noted	
69.	Monitor type for each monitor, and Network Affiliation(s) as appropriate	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, no changes noted	Y, no changes noted	

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, section or page #s.	Does the information provided[3] meet the requirement?[4]	Notes
70.	Scale of representativeness for each monitor as defined in Appendix D	58.10(b)(6); App D	Y, no changes noted	Y, no changes noted	
71.	Parameter code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, no changes noted	Y, no changes noted	
72.	Method code and description (e.g., manufacturer & model) for each monitor	58.10 (b)(3); App C 2.4.1.2	Y, no changes noted	Y, no changes noted	
73.	Sampling start date for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, no changes noted	Y, no changes noted	The sampling start date for the PM_{10} SLAMS at Napa Valley College is provided as 09/23/2002. Please update this to 04/01/2018, similar to the other monitors for this new site.
74.	Distance of monitor from nearest road	App E 6	Y, no changes noted	Y, no changes noted	
75.	Traffic count of nearest road	App E	Y, no changes noted	Y, no changes noted	
76.	Groundcover	App E 3(a)	Y, no changes noted	Y, no changes noted	
77.	Probe height	App E 2	Y, no changes noted	Y, no changes noted	
78.	Distance from supporting structure (vertical and horizontal, if applicable, should be provided)	App E 2	Y, no changes noted	Y, no changes noted	
79.	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)	Y, no changes noted	Y, no changes noted	
80.	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)	Y, no changes noted	Y, no changes noted	
81.	Distance from the drip line of closest tree(s)	App E 5	Y, no changes noted	Y, no changes noted	The plan states that the San Jose-Knox near-road site monitors are 8m from the drip line of the closest tree. EPA verified during a Technical Systems Audit that the tree in question is located on the opposite side of the monitoring station from the road, and therefore the proximity is acceptable for this

	ANP requirement	Citation within 40 CFR 58[1]	Was the information submitted?[2] If yes, section or page #s.	Does the information provided[3] meet the requirement?[4]	Notes
					near-road site. The Crockett SO_2 SPM monitor is also <10m from the drip line; however, this SPM is not required to meet Appendix E.
82.	Distance to furnace or incinerator flue	App E 3(b)	Y, no changes noted	Y, no changes noted	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.
83.	Unrestricted airflow (expressed as degrees around probe/inlet or percentage of monitoring path)	App E, 4(a) and 4(b)	Y, no changes noted	Y, no changes noted	
84.	Probe material ($NO/NO_2/NO_y$, SO_2, O_3; For PAMS: VOCs, Carbonyls)	App E 9	Y, no changes noted	Y, no changes noted	
85.	Residence time ($NO/NO_2/NO_y$, SO_2, O_3; For PAMS: VOCs, Carbonyls)	App E 9	Y, no changes noted	Y, no changes noted	

Public Comments on Annual Network Plan

Were comments submitted to the S/L/T agency during the public comment period?	**Yes**
Were comments included in ANP submittal?	**Yes**
Were any of the comments substantive? If yes, which ones? If comments were not substantive provide rationale.	**No. Commenter noted that not all pollutants in the plan were being monitored at the Sebastopol station, and requested a hard copy of the plan. BAAQMD's response included a clarification that not all stations monitor for all pollutants, identified where in the plan information for a specific monitoring site could be found, as well as information on how to obtain a hard copy of the plan through a records request.**
Were S/L/T responses to substantive comments included in ANP submittal?	**NA**
Were the S/L/T responses to substantive comments adequate?	**NA**
Do the substantive comments require separate EPA response (i.e., agency response wasn't adequate)?	**NA**
Are the sections of the annual network plan that received substantive comments approvable after consideration of comments? If yes, provide rationale	**NA**