Lance R. LeFleur
Director

Robert J. Bentley
Governor

Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

April 7, 2017

Ms. Beverly H. Banister, Director
Air, Pesticides & Toxics Management Division
US EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth St., SW
Atlanta, GA 30303

Subject: Alabama 2016 Ambient Air Monitoring Network Plan

Dear Ms. Banister:

On February 18, 2017, ADEM provided the public an opportunity to submit comments related to proposed modifications to the 2016 Ambient Air Monitoring Network Plan. The proposed modifications included the relocation of monitoring sites in Phenix City and Wetumpka along with the Jefferson County Department of Health's (JCDH) response to previous EPA comments on the 2016 plan.

Descriptions of the proposed modifications were made available for public review on the ADEM website for thirty (30) days with the comment period ending on March 20, 2017. In addition, ADEM sent you a letter on February 22, 2017, informing you that the information was available for EPA review.

There were no comments regarding the relocation of the monitoring sites in Phenix City and Wetumpka. Thus, ADEM is requesting EPA concurrence on these new monitoring sites.

I am enclosing a copy of the comment letter submitted to ADEM along with copies of responses from ADEM and JCDH.

If I can provide further information please contact me at 334-271-7868.

Sincerely,

Ronald W. Gore, Chief
Air Division

RWG/DH/bdc

Enclosures

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
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April 7, 2017

Mr. Michael Hansen, Executive Director
GASP
2320 Highland Ave. S., Suite 270
Birmingham, AL 35205

Re: Response to Comments on the Modification for the Ambient Monitoring Network for 2016

Dear Mr. Hansen:

I am writing in response to your letter dated March 20, 2017. In this letter, you offered comments pertaining to the State's Ambient Air Monitoring Network Plan for 2016. Specifically, you requested information concerning monitors located at the Shuttlesworth monitoring site located in Jefferson County, and also information concerning air quality near the Port of Mobile. We appreciate your comments.

As required by the Clean Air Act, the Alabama Department of Environmental Management (ADEM) develops and submits to EPA an ambient air monitoring network plan each year. As part of this plan, ADEM includes plan updates submitted by both the Jefferson County Department of Health (JCDH) and the City of Huntsville, as both agencies operate their own monitoring networks.

JCDH has prepared a response to your comments concerning the Shuttlesworth monitoring site. Although you may have received it directly from JCDH, attached is a copy.

The air quality issue near the Port of Mobile that you reference in your letter was not relevant to this request for comments. However, we are including as a courtesy a table of PM10 monitoring data from monitoring in a populated area in 2004 – 2006.

If you have any questions, please call me at 334-271-7868.

Sincerely,

Ronald W. Gore, Chief
Air Division

RWG/DH/bdc

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Summary of Particulate Data From Mobile special PM10 monitor

Red Cross Building

	2004	2005	2006	2007	
		(from 7/12)		(Thru 9/21)	
4th Max	n/a				
3rd Max	n/a				
2nd Max	n/a				3-year avg.
1st Max	n/a	71	55	70	(05-07 partial)
Annual Average	n/a	25	25.4	26.1	25.5
# of exceedances	n/a	0	0	0	0

The annual average NAAQS for PM10 was revoked last year.
The former NAAQS annual average was set at 50 ug/m3 based on a 3 year average

There is currently a NAAQS for a daily standard set at 150 ug/m3
The 24-hour primary and secondary standards are attained
when the expected number of exceedances per year at each monitoring site is less than or equal to one. In the simplest case, the number of expected exceedances at a site is determined by recording the number of exceedances in each calendar year and then averaging them over the past 3 calendar years.

JEFFERSON COUNTY DEPARTMENT OF HEALTH
1400 SIXTH AVENUE, SOUTH • P.O. BOX 2648 • BIRMINGHAM, AL 35202-2648 • 205.933.9110 • WWW.JCDH.ORG

Environmental Health Services
Jonathan Stanton, P.E., Director

March 30, 2017

Michael Hansen, Executive Director
GASP
2320 Highland Ave. South
Suite 270
Birmingham, Alabama 35205

Re: Response to Comments on Modifications to the State Network Plan for 2016

Dr. Mr. Hansen:

The Jefferson County Department of Health (Department) appreciates your comments on the Modifications of the Ambient Monitoring Network for 2016 (Modifications) received by the Department on March 27, 2017. The Department submits the following responses to your comments.

1) Planned SO_2 DRR Monitoring at Shuttlesworth for One Year

The Department understands the confusion in the Modifications and will attempt to clarify what has been discussed with EPA Region IV. When EPA responded on November 4, 2017, on the 2016 Ambient Air Monitoring Network Plan, it contained some language which, due to an unintended error by EPA, mischaracterized the monitoring of SO_2 at the Shuttlesworth site. The Department and EPA previously agreed to run the monitor contingent upon the following conditions:

- The Department will establish an SO2 analyzer at the Shuttlesworth monitoring site.
- EPA will provide the SO2 analyzer (The Department has provided this).
- If the Department has an extra calibrator and data logger, it will provide that equipment. If not, EPA will look into providing that equipment (The Department has provided this equipment as well).
- The Department would operate the analyzer and upload the collected data to AQS.
- The analyzer will be operated for one (1) year, after which time the data will be reviewed. If the data show consistent exceedances of the SO2 standards, the analyzer would be operated a full three (3) years to obtain a design value.

The Department nor EPA discussed running the site as a SLAMS but rather as a SPM site. However, again, as a result of an editing/designation error (of unknown origin) when the Department's contribution to the ADEM's network plan was merged with the full ADEM State Network Plan, which was submitted to EPA, it still contained the improper pollutant monitoring site designation.

To re-emphasize this incorrect designation and in accordance with ADEM instructions, the Department submitted an addendum to the State Network Plan to correct this error for the SO_2 monitor.

In response to your inquiry regarding recordation of the SO2 data into the AirNow system, as a result of the Department's determination of the misclassification of the designation of the monitoring site for SO2, the Department does not intend to submit such data into the AirNow system.

2) $PM_{2.5}$ Continuous Monitoring at Shuttlesworth and Designation of Monitoring Site

The Department explained in its response to your comments on Alabama's 2016 Ambient Air Monitoring Network Plan: "***As noted last year at the public involvement meeting, the Department chose to put in a continuous PM2.5 monitor (February 2016) based on the public's concern over air pollution concerns in the North Birmingham area, specifically in the neighborhoods near the Shuttlesworth site, in lieu of the previous monitoring data showing no significant air quality issues from the 2013-2014 monitoring campaign and with the previous monitoring data being comparable and representative of the concentrations measured at the North Birmingham monitoring site, a NAAQS compliance monitor.***

The data that is collected at this site is not eligible for NAAQS compliance purposes, because it is considered a special purpose monitor and the data collected by this monitor type is not a Federal Reference Method or Federal Equivalent Method (FRM or FEM), but it does allow the Department to determine if there are any localized issues.

Accordingly, since this data is not utilized for compliance purposes, it is not required to be reported in EPA's AirData website. However, should concentrations rise or elevate, the Department will take proactive measures to mitigate including, at a minimum, providing proper notification to the public."

Finally, with respect to the categorization of the $PM_{2.5}$ monitor as a SLAMS instead of a SPM, again, it appears this was a result of an editing error when the Department's part of the State Network Plan was merged with full State Network Plan. The Department submitted the Modification to address this error as the monitor does not meet regulatory requirements and the Department operates it as a SPM for public data access purposes by way of EPA's AirNow system.

3) Non-Inclusion of Tables to summarize the Addendum Changes in the Addendum Public Notice

The Department submitted the modified tables to ADEM as part of the Modification. The Department was not aware or sure why the tables were not included.

Please see the attached tables indicating the proposed modifications to/of the State Network Plan due to, again, unknown pollutant-specific monitoring site designations.

Please advise should you have any addition comments/questions.

The Department appreciates your comments.

Sincerely,

Corey Masuca, PE, PhD
Principal Air Pollution Control Engineer
Air and Radiation Protection Program

Proposed Shuttlesworth Monitoring Site Types												
Pollutant	AQS Site ID	Address	Latitude Longitude	SCALE	Type	Monitoring Objective	Began Sampling	Ended Sampling	METHOD	SCHEDULE	NAAQS	Comment
Cont PM10	01-073-6004	4113 Shuttlesworth Drive	33.565278 -86.796389	M	SPM	Source Impact	01/25/96	Active	T	C	Y	
Cont PM2.5	01-073-6004	4113 Shuttlesworth Drive	33.565278 -86.796389	M	SPM	Source Impact	02/01/2016		T	C	N	
SO_2	01-073-6004	4113 Shuttlesworth Drive	33.565278 -86.796389	M	SPM	Source Impact		Active	T	C	Y	