From: Martinez, Maria
To: Nally, Bill
Subject: Re: Fw: Exide Update
Date: Friday, February 01, 2013 8:30:06 AM

Bill,

As I mentioned yesterday, the sampling that we are commenting on is the onsite remediation sampling by Exide not the ambient monitoring by TCEQ. I don't think we have a trigger at this time to require TCEQ to do additional sampling.

Maria

From: Bill Nally/R6/USEPA/US

To: Maria Martinez/R6/USEPA/US@EPA

Date: 02/01/2013 08:08 AM

Subject: Re: Fw: Exide Update

Maria:

What do you wish to do?

I thought that I recalled an important RA authority for the Exide situation and checked the 2010 Pb monitoring FRN that contains the following paragraph, and that indicates that the RA can require additional (new) TCEQ monitoring, or even everyday sampling at current monitors, at a closed facility - see the last regional administrator reference of this FRN that follows:

(c) The EPA Regional Administrator may

require additional monitoring beyond the

minimum monitoring requirements

contained in paragraphs 4.5(a) and 4.5(b)

where the likelihood of Pb air quality

violations is significant or where the

emissions density, topography, or population

locations are complex and varied. EPA

Regional Administrators may require

additional monitoring at locations including,

but not limited to, those near existing

additional industrial sources of Pb, recently

closed industrial sources of Pb, airports

where piston-engine aircraft emit Pb, and

other sources of re-entrained Pb dust.

OAQPS often adds these sort of items at the end of a FRN - see the 2008 Pb NAAQS FRN for the following reference from end of the 2008 Pb NAAQS FRN which was subsequently elaborated upon (above):

(c) The EPA Regional Administrator may

require additional monitoring beyond the

minimum monitoring requirements

contained in 4.5(a) and 4.5(b) where the

likelihood of Pb air quality violations is

significant or where the emissions density,

topography, or population locations are

complex and varied.

Be aware that Erik seems to recall a potential new Rodman monitoring site location - see the Mapquest and Google aerial photographs left on your desk!

Mail

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Attention: Bill Nally

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E-Mail: nally.bill@epa.gov

From: Maria Martinez/R6/USEPA/US

To: nally.bill@epa.gov

Date: 01/30/2013 03:18 PM

Subject: Fw: Exide Update

Bill,

Feel free to join the meeting tomorrow if you don't have any other pressing assignments.

Maria

----- Forwarded by Maria Martinez/R6/USEPA/US on 01/30/2013 03:17 PM -----

Exide Update

Thu 01/31/2013 3:00 PM - 3:45 PM

Attendance isfor Maria Martinez

Chair:

David Garcia/R6/USEPA/US

Sent By:

Margaret Oldham/R6/USEPA/US

Location:

6PD conf room

This entry has an alarm. The alarm will go off before the entry starts.

Required:

Gary Miller/R6/USEPA/US@EPA, Guy Donaldson/R6/USEPA/US@EPA, Kishor Fruitwala/R6/USEPA/US@EPA, Maria Martinez/R6/USEPA/US@EPA, Melissa Smith/R6/USEPA/US@EPA, Richard Ehrhart/R6/USEPA/US@EPA, Susan Spalding/R6/USEPA/US@EPA, Terry Johnson/R6/USEPA/US@EPA

Optional:

Thomas Diggs/R6/USEPA/US@EPA, William Luthans/R6/USEPA/US@EPA