

SCOTT A. THOMPSON **Executive Director** 

### OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

**KEVIN STITT** Governor

June 26, 2018

### CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Jeff Robinson, Mail Code ARP **EPA Region 6** 1201 Elm Street, Suite 500 Dallas, Texas 75270-2102

Re:

2019 Annual Network Review

Mr. Robinson:

Please find enclosed the 2019 Annual Network Plan (ANP) from the Oklahoma Department of Environmental Quality (DEQ). This document posted on our website for the required 30-day public comment period and is now ready for submittal to your office. No comments or inquiries were received from the public.

The SO<sub>2</sub> Annual Report requested by EPA and required under 40 CFR §51.1205 will be a separate submission from the Oklahoma DEQ 2019 ANP. Should staff find that further changes are necessary, please address those in the official response to our submittal.

We look forward to EPA's response and working with your staff to ensure that our network continues to be the best possible in order to better protect the environment and the health of Oklahoma's citizens. Should you have any questions regarding this submittal, feel free to contact Kent Stafford at 405.702.4139 or Curt Goeller at 405.702.4126.

Sincerely,

ly Borchlet-Smith Chervl E. Bradlev

**Environmental Programs Manager** 

**Data and Planning Section** 

Cc:

Fran Verhalen

Ellen Belk

**Enclosure** 

### Oklahoma Department of Environmental Quality Air Quality Division 2019 Air Monitoring Network Plan



Oklahoma Department of Environmental Quality 707 N. Robinson P.O. Box 1677 Oklahoma City, OK 73101-1677



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### Introduction

This report documents the annual review of the air monitoring network operated by the Oklahoma Department of Environmental Quality's Air Quality Division (AQD). When finalized as the Annual Monitoring Network Plan, it will be submitted by July 1, 2019 to the U.S. Environmental Protection Agency (EPA) as required by 40 CFR 58.10 and provide the framework for establishing and maintaining Oklahoma's air quality surveillance system. AQD uses data collected by this network for comparison to the National Ambient Air Quality Standards (NAAQS). AQD maintains its ambient air monitoring network in accordance with the quality assurance requirements of 40 CFR Part 58, Appendix A; performs within specifications in accordance with 40 CFR Part 58, Appendix B; follows procedures outlined within 40 CFR Part 58, Appendix C; designs its network in accordance with 40 CFR Part 58, Appendix D; and locates its sites to meet all requirements of 40 CFR Part 58, Appendix E.

Below is a summary of changes that have been approved by Region 6 EPA, and implemented since the last Annual Network Plan:

- 40-109-0033: N.E. 10th and Stonewall, OKC ozone and NOx site shut down on 12/31/2018.
- 40-109-0035: PM2.5 (Sequential FRM) collocated monitor operating schedule change from 1 in 3 to 1 in 6.
- 40-109-0035: PM10 (Sequential FRM) collocated monitor operating schedule change from 1 in 6 to 1 in 12.
- 40-019-0297: API T640 technology replaced Thermo SHARP technology, establishing collection of non-NAAQS PM10 data collection beginning November 2018.
- 40-085-0300: Burneyville Red River site shut down on 12/04/2018.
  - o 40-019-0297: Burneyville's Ozone moved to Healdton site. Ozone collection started on 03/01/2019.
- 40-013-0380: Durant Red River site shut down on 12/13/2018.
  - o 40-069-0324: Durant's Ozone moved to Tishomingo site. Ozone collection pending start upon completion of legal agreement.
- 40-079-0467: Bokoshe site established. PM2.5 and PM10 began collection on 9/14/2018.
- 40-071-0604: API T640 technology replaced Thermo SHARP technology, establishing collection of non-NAAQS PM10 data collection beginning October 2018.
- 40-031-0651: API T640 technology replaced Thermo SHARP technology, establishing collection of non-NAAQS PM10 data collection beginning October 2018.
- 40-067-0671: Waurika Red River site shut down on 11/27/2018.
- 40-109-1037: PM10 (Sequential FRM) will be removed from service 5/10/2019 upon completion of collection cycle.
  - o Approved by EPA per 2018 ANP Response dated 10/15/2018.
- 40-109-1037: PM Coarse (calculated) will be discontinued with removal of PM10 (Sequential FRM).
- 40-109-1037: NO<sub>x</sub> Analyzer placed in service, began collection on 01/18/2019.
  - Verbal approval by EPA during conference call on 12/13/2018.
- 40-087-1073: 310 E. Burr Oak, Goldsby site shut down on 12/05/2018.

### Verbal Approval by Region 6 Analysis Section staff.

Table 1 is a list of all currently existing ambient air monitoring sites that AQD operates and maintains as of May 1, 2019. Table 2 is a list of proposed changes. "Air Quality System (AQS) Site ID#" in column one is a unique identification number assigned to each monitoring site in the state network. AQS is a national air monitoring database maintained by the EPA.

AQD made the ANP available for public inspection and comment from May 24, 2019 through June 24, 2019 by posting the ANP on its website (40 CFR 58.10(a)(1)). An image of this posting is included in Appendix F of this document.

### **Contact Information**

### East Region Manager

Name: Curt Goeller Phone: (405)702-4126

Email: Curt.Goeller@deq.ok.gov

### West Region Manager

Name: Kent Stafford Phone: (405)702-4139

Email: Kent.Stafford@deq.ok.gov

Table 1. Air Monitoring Site Information:

MSA/ CBSA		OKC MSA			()	MSA		OKC MSA		-	OKC MSA		
NAAQS Comparable	Yes	Yes	Yes	No	Yes	Yes	No	Yes	Yes	Yes	No	Yes	No
Spatial Scale	Neighborhood	Neighborhood	Neighborhood	Neighborhood	Urban	Urban	Urban	Urban	Micro	Micro	Micro	Micro	Micro
Monitoring Objective	Population Exposure	Population Exposure	Quality Assurance	Population Exposure	Population Exposure	Population Exposure	Population Exposure	Population Exposure	Highest Concentration/ Near Road	Population Exposure	Population Exposure	Population Exposure	Population Exposure
Operating Schedule	(1 in 6)	(1 in 6)	(1 in 12) Collocated	(1 in 6)	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous
Station Type	SLAMS	SLAMS	SLAMS	SPM	SLAMS	SPM³	SPM³	SLAMS	SLAMS	SLAMS	SPM	SLAMS	SLAMS
Sampling/ Analysis Method/ Method #	Sequential FRM/ Micro-gravimetric filter weighing Sequential FRM/ Micro-gravimetric filter weighing Sequential FRM/ Micro-gravimetric filter weighing				U.V. Absorption	Broadband Spectroscopy	Broadband Spectroscopy	U.V. Absorption	Chemiluminescence	Broadband Spectroscopy	Broadband Spectroscopy	Gas Filter Correlation	Optical Absorption
Pollutants Measured	PM 2.5	7				PM 2.5	PM 10	Ozone	NO2	PM 2.5	PM 10	00	Black Carbon
Longitude	-97.527090					-97.484099		-97.303044			-97.577981		
Latitude	35.472920					35.320105		35.477801			35.503070		
Address/ Location	N.W. 5th and Shartel, OKC				S.E. 19th	Water Tower	Moore	12880 A N.E. 10th, Choctaw		312 N.	Grand BLVD,	OKC	
AQS Site #		40-	0035		4	027-	0043	40- 109- 0096			40- 109-		

MSA/ CBSA <sup>1</sup>	OKC MSA	Tulsa MSA	Tulsa	MSA	Muskogee CBSA	Muskogee CBSA		Tulsa		Tulsa MSA	Tulsa MSA
NAAQS Comparable	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
Spatial Scale	Urban	Urban	Neighborhood	Neighborhood	Middle	Neighborhood	Urban	Urban	Urban	Neighborhood	Urban
Monitoring Objective	Population Exposure	Population Exposure	Source Oriented	Quality Assurance	Source Oriented	Source Oriented	Upwind Background	Population Exposure	Population Exposure	Source Oriented	Population Exposure
Operating Schedule	Continuous	Continuous	(1 in 6)	(1 in 12) Collocated	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous
Station Type	SLAMS	SLAMS	SLAMS	SLAMS	SLAMS	SLAMS	SLAMS	SPM³	MdS	SLAMS	SLAMS
Sampling/ Analysis Method/ Method #	U.V. Absorption	U.V. Absorption	Hi-Volume	Hi-Volume	TEOM Gravimetric	U.V. Fluorescence	U.V. Absorption	Broadband Spectroscopy	Broadband Spectroscopy	U.V. Fluorescence	U.V. Absorption
Pollutants Measured	Ozone	Ozone	Lead	Lead	PM 10	802⁴	Ozone	PM 2.5	PM 10	\$02⁴	Ozone
Longitude	-97.751503	-96.361196	77 000 70	-90.099144	-95.302235	-95.287067		-96.004975		-96.011664	-95.764537
Latitude	35.479215	36.105481	27361076	30.01330 <i>/</i>	35.793134	35.775813		35.953708		36.149877	36.133802
Address/ Location	12575 NW 10 <sup>th</sup> , Water Tower, Yukon	City Water Plant, Mannford	10375 N.	rrankoma Rd., Sapulpa	3500 Port Place, Muskogee	108 North 55th St. East, Fort Gibson		502 E. 144th Pl., Tulsa South,	ı uısa	1710 W. Charles Page Blvd. Tulsa	18707 E. 21st St., Tulsa East, Tulsa
AQS Site#	40- 017- 0101	40- 037- 0144	40-	03/- 0146	40- 101- 0167	40- 101- 0170		40- 143- 0174		40- 143- 0175	40- 143- 0178

MSA/ CBSA <sup>1</sup>	Tulsa	MSA	Not in MSA/ CBSA	Barlesville	CBSA	Tulsa MSA	Tu!sa	MSA		Ardmore CBSA		Not in MSA/ CBSA
NAAQS Comparable	Yes	No	Yes	No	No	Yes	Yes	o Z	No	Yes	oN O	No
Spatial Scale	Neighborhood	Neighborhood	Neighborhood	Regional	Regional	Urban	Middle	Middle	Regional	Regional	Regional	Regional
Monitoring Objective	Source Oriented	Source Oriented	Source Oriented	Regional Transport	Regional Transport	Population Exposure	Source Oriented	Source Oriented	Regional Transport	Regional Transport	Regional Transport	Regional Transport
Operating Schedule	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous
Station Type	SLAMS	SPM <sup>5</sup>	SLAMS	MdS	SPM³	SLAMS	SLAMS	SPM	SPM	SPM³	SPM	SPM
Sampling/ Analysis Method/ Method #	U.V. Fluorescence	U.V. Fluorescence	U.V. Fluorescence	U.V. Absorption	Beta Attenuation	U.V. Absorption	U.V. Fluorescence	U.V. Fluorescence	U.V. Absorption	Broadband Spectroscopy	Broadband Spectroscopy	U.V. Absorption
Pollutants Measured	SO2 <sup>4</sup>	H2S	SO2⁴	Ozone	PM 2.5	Ozone	SO2⁴	H2S	Ozone	PM 2.5	PM 10	Ozone
Longitude	2001000	-90.013643	-95.269196		-95.632286	-96.012430	170800 50	11.000.00		-97.462931		-96.676936
Latitude	36 154020	30.134030	36.228993		36.918410	36.355860	36 126945			34.244189		34.214818
Address/ Location	124 N. Riverside	Dr. West, Tulsa	470 13th St., MAIP, Pryor	OK 10 and US 169, Oklahoma	Union School, Lenapah	1521 S. Lombard, Skiatook	2443 S. Tackson	Ave., Tulsa	Memorial	Dr., Healdton	Healdton	Murray State College, Tishomingo
AQS Site#	40-	0179	40- 097- 0188	40-	105- 0207	40- 113- 0226	40-	0235		40-	7670	40- 069- 0324

MSA/ CBSA <sup>1</sup>		McAlester CBSA		McAlester CBSA	Fort	MSA	Enid MSA	Conce	City			Lawton MSA	
NAAQS Comparable (	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	N 0	Yes	Yes	o <sub>N</sub>
Spatial Scale	Regional	Regional	Regional	Neighborhood	Neighborhood	Neighborhood	Neighborhood	Neighborhood	Neighborhood	Neighborhood	Urban	Urban	Urban
Monitoring Objective	Regional Transport	Population Exposure	Quality Assurance	Source Oriented	Source Oriented	Source Oriented	Source Oriented	Population Exposure/ Source Oriented	Population Exposure	Population Exposure	Population Exposure	Population Exposure	Population Exposure
Operating Schedule	Continuous	Continuous Primary	(1 in 6) Collocated	(1 in 6)	(1 in 3)	(1 in 3)	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous
Station Type	SLAMS	SLAMS	SLAMS	SLAMS	SPM	SPM	SLAMS	SLAMS	SLAMS	SPM	SLAMS	SPM³	SPM
Sampling/ Analysis Method/ Method #	U.V. Absorption	Beta Attenuation	Sequential FRM/ Micro-gravimetric Filter Weighing	Hi-Volume	Sequential FRM/ Micro-gravimetric Filter Weighing	Sequential FRM/ Micro-gravimetric Filter Weighing	U.V. Fluorescence	U.V. Fluorescence	Broadband Spectroscopy	Broadband Spectroscopy	U.V. Absorption	Broadband Spectroscopy	Broadband Spectroscopy
Pollutants Measured	Ozone	PM 2.5	PM 2.5	Lead	PM2.5	PM10	\$02⁴	802⁴	PM 2.5	PM 10	Ozone	PM 2.5	PM 10
Longitude		-95.784410		-95.843642	004782400	-54.780409	-97.845959		-97.081350			-98.428790	
Latitude		34.885608		34.829396	12170136	55:1001/4	36.512363		36.697186			34.632980	
Address/ Location	104 Airport	Rd., McAlester	Airport, McAlester	108 N Main St., Savanna	29903 Main	St., Bokoshe	11826 N 30th St, Kremlin		306 E Otoe, Ponca City			2211 NW 25 <sup>th</sup> , Lawton	
AQS Site#		40- 121-	0415	40- 121- 0416	40-	0467	40- 047- 0555	40-	071- 0604			40- 031- 0651	

MSA/ CBSA <sup>1</sup>	Weatherford CBSA		Not in MSA/					OKC MSA					
NAAQS Comparable	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	N <sub>O</sub>	Yes	Yes	Yes	No
Spatial Scale	Regional	Regional	Regional	Regional	Urban	Urban	Urban	Urban	Urban	Urban	Urban	Urban	Urban
Monitoring Objective	Population Exposure	General Background	General Background	General Background	Population Exposure	Highest Concentration	General Background	Max Precursor Emissions Impact/ Area- wise NO2 and RA40 NO2 for OKC CBSA	Population Exposure	Population Exposure	Population Exposure	Population Exposure	Population Exposure
Operating Schedule	Continuous	Continuous	Continuous	Continuous	Continuous	Continuous Primary	Continuous	Continuous	(1 in 6)	Continuous	(1 in 3) Collocated	Continuous Primary	Continuous
Station Type	SPM	SLAMS	SPM <sup>3</sup>	SPM	SLAMS	SLAMS	SLAMS	SLAMS	SLAMS	SPM	SLAMS	SPM <sup>3</sup>	SPM
Sampling/ Analysis Method/ Method #	TEOM Gravimetric	U.V. Absorption	Broadband Spectroscopy	Broadband Spectroscopy	U.V. Fluorescence	U.V. Absorption	Gas Filter Correlation	Chemiluminescence	Low Volume Gravimetric/ Microgravimetric filter weighing	TEOM Gravimetric	Sequential FRM/ Micro-gravimetric filter weighing	Broadband Spectroscopy	Broadband Spectroscopy
Pollutants Measured	PM 10	Ozone	PM 2.5	PM 10	SO24	Ozone	00	NO2	Chemical Speciation	01 Md	PM 2.5	PM 2.5	PM 10
Longitude	-98.683490		-98.931973					-97.475083					
Latitude	35.560280		36.158414					35.614131					
Address/ Location	Rader Park, Weatherford	:	Selling Municipal Airport,	Seiling				2501 E. Memorial Rd., Oklahoma	Christian University, OKC				
AQS Site#	40- 039- 0856		40- 043- 0860					40- 109-	1037		• •		

MSA/ CBSA <sup>1</sup>					Tulsa							
NAAQS Comparable	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	Yes	No	No
Spatial Scale	Urban	Urban	Urban	Urban	Urban	Urban	Urban	Urban	Urban	Urban	Urban	Urban
Monitoring Objective	Maximum Precursor Emissions Impact	Maximum Precursor Emissions Impact/ Vulnerable and Susceptible Population	Maximum Precursor Emissions Impact	Population Exposure	Population Exposure	Population Exposure	Quality Assurance	Population Exposure	Population Exposure	Population Exposure	Population Exposure	Population Exposure
Operating Schedule	Continuous	Continuous	Continuous	Continuous	Continuous	(1 in 3) Primary	(1 in 6) Collocated	Continuous	Continuous	(1 in 3)	(1 in 3)	(1 in 3)
Station Type	NCore/ SLAMS	NCore/ SLAMS	NCore/ SLAMS	NCore/ SLAMS	NCore/ SLAMS	NCore/ SLAMS	NCore/ SLAMS	NCore/ SPM <sup>3</sup>	NCore/ SPM <sup>3</sup>	NCore/ SLAMS	NCore/ SPM	NCore/ SLAMS
Sampling/ Analysis Method/ Method #	U.V. Absorption  Chemiluminescence  Gas Filter  Correlation  U.V. Fluorescence  Micro-gravimetric filter weighing  Sequential FRM/ Micro-gravimetric filter weighing  Broadband Spectroscopy  Broadband Spectroscopy  Spectroscopy  Correlation  Low Volume  Low Volume  Correlation  Gravimetric filter weighing  Broadband Spectroscopy  Correlation  Sequential FRM/ Micro-gravimetric filter weighing  Paired Gravimetric filter weighing  Paired Gravimetric filter weighing  Paired Gravimetric filter weighing  Paired Gravimetric filter weighing											
Pollutants Measured	Ozone	Trace Level NO2	Trace level NOy	Trace level CO	Trace level SO2 <sup>4</sup>	PM 2.5	PM 2.5	PM 2.5	PM 10	PM 10	PM 10 - PM 2.5	Chemical Speciation
Longitude		T T T 1-95.976537										
Latitude	36.204902											
Address/ Location					Peoria, North Tulsa-	Fire Station #24, Tulsa						
AQS Site#					40-	1127						

- <sup>1</sup> Both Metropolitan Statistical Area and Core-Based Statistical Area abbreviated to MSA and CBSA respectively for all tables.
  - <sup>2</sup> Oklahoma City has been abbreviated to OKC for all tables.
- <sup>3</sup> PM<sub>2.5</sub> SPM monitors are used to support the state Health Advisory Program and will remain SPMs.
  - <sup>4</sup> AQS shows two SO<sub>2</sub> monitors due to reports being entered for both hourly and 5-minute data.
- <sup>5</sup> H<sub>2</sub>S SPMs are used to monitor major sources in the Tulsa area in response to the state implemented H<sub>2</sub>S ambient standard and will remain SPMs. Appendices D & E (see photos located at http://www.deq.state.ok.us/AQDnew/monitoring/cpdata.htm by clicking on desired location of the site All AQD sites and monitors conform to 40 CFR, Subchapter C, Part 58 Appendix A, Appendix C (see methods in column 6 of table 2), and
- <sup>5</sup> 40-105-0207 will contain less than 3 years of complete data by design negating the ability to compare to NAAQS values for purposes of attainment/non-attainment evaluation.

Note - All PM2.5/10 (2 parameters/1 monitor) listed as "broadband spectroscopy" are API Model T640 instruments designated NAAQS comparable for PM2.5 and non-NAAQS comparable for PM10.

Table 2. AQD Network Proposed Changes

# Monitoring Sites to be Removed:

AQS Site#	Address/ Location	Latitude	Longitude	Pollutants Measured	Sampling/ Analysis Method/ Method #	Station (	Operating Schedule	Monitoring Objective	Spatial Scale	NAAQS Comparable	MSA
40- 101- 0167	3500 Port Place, Muskogee	35.793134	-95.302235	PM 10	TEOM Gravimetric	SLAMS	SLAMS Continuous	Source Oriented	Middle	Yes	Muskogee CBSA

Letter sent to EPA on 4/17/19 (see appendix E) requesting to discontinue site due to the site no longer meeting siting criteria as set by 40 CFR Part 58 Appendix E §3(a). 40-101-0167 is not required to meet minimum requirements of 40 CFR part 58 Table D-4 of Appendix D and site measurements collected indicate PM10 levels have not exceeded 80% of the NAAQS in the last 5 years per requirements of 40 CFR Part 58 \$14(c)(1).

# Monitoring Sites to be Added:

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MSA	OKC MSA	Not in CBSA/ MSA
NAAQS Comparable	Yes	No
Spatial Scale	Regional	Regional
Operating Monitoring Schedule Objective	Background	Background/ Transport
Operating Schedule	SLAMS Continuous	Continuous
Station Type	SLAMS	SPM
Sampling/ Analysis Method/ Method #	U.V. Absorption	U.V. Absorption
Pollutants Measured	Ozone	Ozone
Longitude	TBD	TBD
Latitude	ТВD	TBD
Address/ Location	Kessler	Great Plains State Park
AQS Site#	40- 087- 1074	40- 075- 0711

- information regarding the monitors at this point in time as the sites have not been chosen. When ODEQ has found an appropriate site meeting 40-087-1074: The site addition would cover the loss of the Goldby site (40-087-1073) which was discontinued due continuous problems with construction at the water plant location. ODEQ is unable to provide street address, coordinates, pictures of site location, or any further all 40 CFR Part 58 requirements, the information needed for approval will be passed on to EPA region 6 for approval.
  - 40-075-0711: ODEQ will be setting up a site in the vicinity of the Great Plains State Park to further document background/transport of ozone further information regarding the monitors at this point in time as the sites have not been chosen. When ODEQ has found an appropriate site further west than the current site network allows. ODEQ is unable to provide street address, coordinates, pictures of site location, or any neeting all 40 CFR Part 58 requirements, the information needed for approval will be passed on to EPA region 6 for approval.

# Monitoring Sites to be Relocated:

MSA		Tulsa MSA	
NAAQS Comparable	Yes	Yes	οN
Spatial Scale	Urban	Urban	Urban
Monitoring Objective	Upwind Background	Population Exposure	Population Exposure
Operating Schedule	Continuous	Continuous	Continuous
Station Type	SLAMS	$SPM^3$	SPM
Sampling/ Analysis Method/ Method #	U.V. Absorption	Broadband Spectroscopy	Broadband Spectroscopy
Pollutants Measured	Ozone	PM 2.5	PM 10
Longitude		-96.004975	
Latitude		35.953708	
Address/ Location	502 E. 144th	Pl., Tulsa South,	Tulsa
AQS Site #		143-	+/10

\$5.a. The site will be moved approximately one mile south to the Glenpool water tower pending contract with the City of Glenpool. EPA will be provided with specifics of the location including Latitude, Longitude, and pictures of the proposed site upon completion of a contract with ODEQ is in talks with the City of Glenpool to relocate 40-143-0174 due to not meeting requirement laid out by 40 CFR Part 58 Appendix E the city.

## Monitors to be Added:

AQS Site#	Address/ Location	Latitude	Longitude	Pollutants Measured	Sampling/ Analysis Station Operating Monitoring Method/ Method # Type Schedule Objective	Station Type	Operating Schedule	Monitoring Objective	Spatial Scale	NAAQS Comparable	MSA
40- 121- 0415	104 Airport Rd., McAlester Municipal Airport, McAlester	34.885608	-95.784410	PM10	Broadband Spectroscopy	SPM	Continuous	General Background	Regional	No	McAlester CBSA

The Thermo SHARP technology will be replaced with an API T640. PM2.5 method code will change (see bullet 2 under "Methods to be changed) and PM10 non-NAAQS data will be added.

## Methods to be Changed:

Oklahoma DEQ is transitioning from the TEOM and Thermo SHARP technology to the API T640 and API T640x.

- At 40-109-1037, an API T640x will replace the current TEOM for PM10 and API T640 for PM2.5.
- This T640x will be collocated with the Thermo 2025i FRM.
- Both PM10 and PM2.5 NAAQS data will continue to be reported from site utilizing the T640x technology after removal of the TEOM and T640. The installation of the T640x will discontinue the reporting of non-NAAQS PM10 data.
- At 40-121-0415, an API T640 will replace the Thermo 5030i SHARP.
- This T640 will be collocated with the Thermo 2025i FRM.
- PM2.5 NAAQS data will continue to be reported from this site and PM10 non-NAAQS data will begin reporting from this site utilizing the T640 technology after removal of the SHARP.
- At 40-143-1127, an API T640x will replace the API T640.
- installation of the T640x will discontinue the reporting of non-NAAQS PM10 data and begin reporting if NAAQS PM10 data. PM2.5 NAAQS data will continue to be reported from the site utilizing the T640x technology after removal of the T640. The
- At 40-105-0207, an API T640 will replace the Thermo 5030i SHARP.

### **Appendix A: Network Requirements**

Parameter	Number of Sites Required in Part 58 App D	Reason(s) for Requirement Part 58 App D	Number of Other Non- Required SLAMS/SPM Sites Currently in Operation	Reason(s) for Optional Site	Total Sites Operated	Total Monitors Operated including Collocated
	2	OKC MSA/Population	3		5	5
	2	Tulsa CBSA/Population	2		4	4
Ozone	1	Lawton CBSA			1	1
	1	NCore			1	1
, P			4	SPM	4	4
			2	AQI/Advisories	2	2
Total	6		12		17	17
G 1	1	Near-road			1	1
Carbon Monoxide	1	NCore			1	1
1,1011011144			1	Background	1	1
Total	2		1		3	3
NU	1	Near-road			1	1
Nitrogen Dioxide	1	NCore			1	1
Dioxido	1	Area-wide			1	1
Total	3				3	3
NOy	1	NCore			1	1
Total	1				1	1
	1	NCore			1	1
	3	SO2 DRR			3	3
Sulfur Dioxide			4	Major Source	4	4
Dioxido			1	OKC Area Background	1	1
Total	4		5		9	9

Parameter	Number of Sites Required in Part 58 App D	Reason for Requirement Part 58 App D	Number of Other Non- Required SLAMS/SPM Sites Currently in Operation	Reason for Optional Site	Total of All Sites Operated	Total Monitors Operated including Collocated
Lead	2	Sources > .5 tons/year			2	3
Total	2	Part of the second		THE REPORT OF	2	3
PM2.5 <sup>2</sup>	2	OKC CBSA/Population	1	AQI/Advisories	3	4
	1	Tulsa CBSA - Population/NCore	Ī	AQI/Advisories	2	4
			3	AQI/Advisories	3	4
			1	Union SPM/ Transport	1	1
			1	Bokoshe SPM	1	1
	1	Background			1	1
	1	Transport			1	1
	1	Near-road			1	1
Total	6		7		13	17
PM10 <sup>13</sup>			1	Muskogee Source	1	1
			1	AQI/Advisories	1	1
	2	OKC CBSA/Population/ Low Conc./ AQI/ Advisories			2	3
	1	Tulsa CBSA/Population/ Low Conc.			1	1
Total	3		3	NEWS PROPERTY.	6	7
PM10 - 2.5	1	NCore			1	1
(Coarse)			1	Supplemental	1	1
Total	1		1		2	2

<sup>&</sup>lt;sup>1</sup>API T640 PM10 is not included in this chart due to the monitoring method not being acceptable by EPA standards for comparison to the NAAQS. There are 9 sites utilizing the T640 technology, currently collecting non-NAAQS PM10 data.

<sup>&</sup>lt;sup>2</sup> Per 40 CFR Part 58 Table D-5 of Appendix D, while the Enid MSA has a population of >50,000, due to the statewide PM2.5 being <85% of NAAQS, Oklahoma DEQ has met the minimum monitoring requirements.

<sup>&</sup>lt;sup>3</sup>Per 40 CFR Part 58 Table D-4 of Appendix D, while the Lawton MSA has a population of >100,000, due to statewide PM10 being <80% PM10 NAAQS, Oklahoma DEQ has met the minimum monitoring requirements.

Note – This chart reflects existing network conditions.

Appendix B: PWEI<sup>1</sup> Numbers for Determination of Minimum SO<sub>2</sub> Sites

MSA/CBSA	Counties	2017 SO2	Total Emissions <sup>2</sup>	Population <sup>3</sup>	PWEI <sup>2</sup>	
MISA/CBSA		Emissions <sup>2</sup> (tons)	(tons)	(people)	(tons/million people)	
	Oklahoma County	157		1,383,249		
	Cleveland County	4				
0111	Canadian County	177	200		528	
Oklahoma City	Grady County	24	382			
	Logan County	1				
	McClain County	18				
	Lincoln Couinty 1 Tulsa County 334					
	Tulsa County					
	Rogers County	3,933				
	Wagoner County 10 Creek County 238 Osage County 7		4,677	991,610	4,638	
Tulsa						
	Okmulgee County	155				
	Pawnee County	0				
Lawton	Comanche County	6	6	127,589	1	
Lawton	Cotton County	0	0	127,309	1	
Stillwater	Payne County	3	3	81,867	0	
Shawnee	Pottawatomie County	3	3	72,248	0	
Muskogee	Muskogee County	20,177	20,177	68,959	1,391	
Enid	Garfield County	16,687	16,687	61,492	1,026	
Bartlesville	Washington County	2	2	52,016	0	
Tahlequah	Cherokee County	5	5	48,925	0	
Ardmore	Carter County	317	321	48,295	16	
Atumore	Love County	4	321	40,293	10	
Ponca City	Kay County	2,690	2,690	44,522	120	
McAlester	Pittsburg County	22	22	44,145	1	
Duncan	Stephens County	37	37	43,411	2	
Durant	Bryan County	144	144	46,460	7	
Ada	Pontotoc County	85	85	38,354	3	
Miami	Ottowa County	2	2	31,325	0	
Weatherford	Custer County	14	14	28,942	0	
Altus	Jackson County	1	1	25,213	0	
Elk City	Beckham County	© 11	11	21,804	0	
Guymon	Texas County	71	71	20,856	1	
Woodward	Woodward County	33	33	20,497	1	

<sup>1</sup>40 CFR Appendix D to Part 58 §4.4.2 Requirement for Monitoring by the Population Weighted Emissions Index. (a) The population weighted emissions index (PWEI) shall be calculated by States for each core based statistical area (CBSA) they contain or share with another State or States for use in the implementation of or adjustment to the SO2 monitoring network. The PWEI shall be calculated by multiplying the population of each CBSA, using the most current census data or estimates, and the total amount of SO2 in tons per year emitted within the CBSA area, using an aggregate of the most recent county level emissions data available in the National Emissions Inventory for each county in each CBSA. The resulting product shall be divided by one million, providing a PWEI value, the units of which are million persons-tons per year. For any CBSA with a calculated PWEI value equal to or greater than 1,000,000, a minimum of three SO2 monitors are required within that CBSA. For any CBSA with a calculated PWEI value equal to or greater than 100,000, but less than 1,000,000, a minimum of two SO2 monitors are required within that CBSA. For any CBSA with a calculated PWEI value equal to or greater than 5,000, but less than 100,000, a minimum of one SO2 monitor is required within that CBSA.

<sup>2</sup>Values truncated to whole tons or whole tons/million people.

<sup>&</sup>lt;sup>3</sup>All population estimates based off of 2017 Census estimations found at the following link: https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=PEP 2018 PEPANNRES&prodType=table

### **Appendix C: Further Comments**

### **Near Road Addition to Tulsa:**

EPA's current regulatory requirements from 40 CFR Appendix D to Part 58 § 4.3.2(a) states as follows:

Within the NO<sub>2</sub> network, there must be one microscale near-road NO<sub>2</sub> monitoring station in each CBSA with a population of 1,000,000 or more persons to monitor a location of expected maximum hourly concentrations sited near a major road with high AADT counts as specified in paragraph 4.3.2(a)(1) of this appendix. An additional near-road NO<sub>2</sub>monitoring station is required for any CBSA with a population of 2,500,000 persons or more, or in any CBSA with a population of 1,000,000 or more persons that has one or more roadway segments with 250,000 or greater AADT counts to monitor a second location of expected maximum hourly concentrations. CBSA populations shall be based on the latest available census figures.

The Tulsa MSA has the second largest population in Oklahoma behind the Oklahoma City MSA with an estimated population of 993,797 based on the 2018 Census Data Estimates found on the US Census Bureau website:

 https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=PEP\_2018\_PEPANN RES&prodType=table

As per 40 CFR Appendix D to Part 58 § 4.3.2(a), the Tulsa MSA will not require a near-road NO2 monitoring site at this time due to the population remaining under 1,000,000 persons.

### Prevention of Significant Deterioration Air Monitoring:

The Oklahoma DEQ monitoring network meets all requirements found in 40 CFR Part 58, Appendix B. PSD monitoring is currently not necessary for the Oklahoma DEQ.

### Maintenance Plans for Discontinuation of SLAMS Monitors:

Oklahoma currently is in attainment with all NAAQS and is not under a SIP Maintenance Plan.

### Division of MSA/CBSA Monitoring Responsibilities with other Agencies:

While Oklahoma DEQ understands part of the Fort Smith MSA includes two Oklahoma counties, Oklahoma DEQ has no agreements with Tribal Nations or Arkansas DEQ for the division of monitoring responsibilities to fulfill monitoring requirements at this time. Oklahoma DEQ will seek contact with Arkansas DEQ to develop a plan for current and future monitoring.

### **Review of Site Conditions**

No site conditions have changed or need to be addressed by ODEQ at this time.

### Appendix D: EPA Response to ODEQ 2018 ANP



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS TX 75202-2733

OCT 1 5 2018

Ms. Cheryl E. Bradley
Environmental Programs Manager
Data and Planning Section
Oklahoma Department of
Environmental Quality
Post Office Box 1677
Oklahoma City, Oklahoma 73101-1677

Dear Ms. Bradley:

Thank you for your correspondence submitting the Oklahoma Department of Environmental Quality's (ODEQ) 2018 Annual Monitoring Network Plan (2018 Plan) for ambient air. The U.S. Environmental Protection Agency (EPA) has completed its review of the 2018 Plan to ensure it meets the requirements of 40 Code of Federal Regulations (CFR) Part 58 and its appendices.

We appreciate your cooperation and work to submit your 2018 Plan dated June 15, 2018, which we received on June 18, 2018. We applied the efforts of the ODEQ to manage and maintain the ambient air monitoring network in Oklahoma.

The network review process presents an opportunity for the EPA and the ODEQ to collaborate on air monitoring network design. See 40 CFR Part 58 Appendix D, Section 1.1.2. The EPA has conducted its review of the 2018 Plan and proposed network modifications to ensure the air quality surveillance system continues to meet applicable requirements.

l am pleased to inform you that your 2018 plan is approved with only one minor comment in accordance with 40 CFR §58.10. Details of our review are enclosed. We can discuss our review with you if you would like. Additionally, separate from the 2018 Plan review, we acknowledge receipt on July 3, 2018, of the July 2, 2018, ODEQ 2018 SO<sub>2</sub> annual report required under §51.1205(b).

We look forward to continued partnership with the ODEQ on our common goals to establish and maintain a successful monitoring network in the state of Oklahoma. If you have any questions, please contact me at (214) 665-7242, or your staff may contact Ms. Frances Verhalen, Air Monitoring and Grants Section Chief, at (214) 665-2172.

Sincerely yours,

By Du

Guy Donaldson

Associate Director for

Air, Multimedia Division

Enclosure

### Oklahoma Department of Environmental Quality Air Quality Division (AQD) 2018 Annual Ambient Air Monitoring Network Plan Technical Comments

The 2018 (FY2019) Oklahoma Annual Monitoring Network Plan (ANP), dated June 15, 2018, was received on June 18, 2018. Because this ANP addresses requirements for July 1 of 2018, this plan will be referred to as the "2018 Plan" throughout the remainder of this document. In accordance with the requirements of 40 Code of Federal Regulations (CFR) Part 58 and its appendices, the U.S. Environmental Protection Agency (EPA) has reviewed the 2018 Plan and our comments are provided below. The comments below reflect the EPA's efforts in collaboration with the Oklahoma Department of Environmental Quality (ODEQ) to maintain an accurate and efficient ambient air monitoring network.

### General Comments

We appreciate the ODEQ's submittal of the 2018 Plan in accordance with 40 CFR §58.10.

Operation of monitoring network in accordance with 40 CFR Part 58 and Appendices A, B, C, D, and E We appreciate the ODEQ's operation of the ambient air monitoring network in accordance with federal requirements defined in 40 CFR Part 58 Appendices A, B, C, D, and E (2018 Plan, p. 3).

Thank you for your efforts to ensure that the information in the ANP and the  $\Lambda$ ir Quality System (AQS) database is complete and consistent. Please continue to update the AQS database, and to correlate the  $\Lambda$ QS with the ANP...

Cross State Metropolitan Statistical Area (MSA)/Core-Based Statistical Area (CBSA) monitoring network responsibilities.

The EPA recognizes that state or local agencies must consider the MSA/CBSA boundaries and their own political boundaries and geographical characteristics in designing their air monitoring networks. There may be situations where there may be a need to augment or to divide the overall MSA/CBSA monitoring responsibilities and requirements among various agencies to achieve an effective network design. In next year's ANP, for each area in which your agency is relying on another agency to fulfill a monitoring requirement, please provide the following:

- a) a copy of the agreement between the affected agencies; and
- b) an explanation of the division of responsibilities of the agencies with respect to ambient air monitoring requirements, as related to the ANP.

### Ozone (O<sub>3</sub>) Monitoring (40 CFR Part 58, Appendix D Section 4.1)

The ODEQ is meeting the minimum requirements for its Ozone monitoring network design. See 40 CFR 58 Appendix D Section 4.1. The EPA acknowledges that no changes were made to the Oklahoma Ozone network in the 2018 Plan.

### Carbon Monoxide (CO) Monitoring (40 CFR Part 58, Appendix D Section 4.2)

The ODEQ is meeting the minimum requirements for its CO monitoring network design. See 40 CFR 58 Appendix D Section 4.2. The EPA acknowledges that no changes were made to the Oklahoma CO network in the 2018 Plan.

### Nitrogen Dioxide (NO2) Monitoring (40 CFR Part 58, Appendix D Section 4.3)

The ODEQ is meeting the minimum requirements for its NO<sub>2</sub> monitoring network design. See 40 CFR 58 Appendix D Section 4.3. The EPA acknowledges that no changes were made to the Oklahoma NO<sub>2</sub> network in the 2018 Plan.

### Near-Road (NO2) Monitoring Sites

The EPA agrees that the Tulsa MSA does not require a near-road NO<sub>2</sub> monitoring site at this time due to the current population estimate for the area remaining under 1,000,000 persons.

### Sulfur Dioxide (SO2) Monitoring (40 CFR Part 58, Appendix D Section 4.4)

The ODEQ is meeting and exceeding the minimum requirements for its SO<sub>2</sub> monitoring network design. See 40 CFR Part 58, Appendix D Section 4.4. The EPA acknowledges that there were no changes to the SO<sub>2</sub> network in the 2018 Plan.

### SO<sub>2</sub> Annual Report

Additionally, separate from the ANP review, we acknowledge receipt on July 3, 2018 of the ODEQ 2018 SO<sub>2</sub> annual report dated July 2, 2018, required under §51.1205(b). The EPA also notes that further annual reports are not required for the PSO Northeastern Power Station pursuant to §51.1205(c), which states: "Any air agency that demonstrates that an area would meet the 2010 SO<sub>2</sub> National Ambient Air Quality Standards with allowable emissions is not required pursuant to paragraph (b) of this section to submit future annual reports for the area."

### Lead (Pb) Monitoring (40 CFR Part 58, Appendix D Section 4.5)

The ODEQ is meeting the network design requirements for ambient air quality monitoring for Pb. See 40 CFR Part 58, Appendix D Section 4.5. We note that with the EPA approval, the ODEQ has discontinued monitoring for Pb at the National Core (NCore) Multi-pollutant Monitoring site in Tulsa.

### Particulate Matter (PM) Monitoring

The ODEQ is currently meeting the network design requirements for ambient air quality monitoring for PM. See 40 CFR Part 58, Appendix D, Sections 4.6 and 4.7.

### Particulate Matter of 10 Microns or Less (PM<sub>10</sub>) (40 CFR Part 58, Appendix D Section 4.6)

The plan to discontinue the PM<sub>10</sub> monitor (POC1) at the Oklahoma City North site (AQS ID 40-109-1037) is approved. The plan to discontinue the reporting of PM Coarse data from the Oklahoma City North site is approved.

The plan to change the PM<sub>10</sub> QA Collocated monitor (POC 2) at the Central Fire Station site (AQS ID 40-109-0035) operating schedule from 1-in-6 day to 1-in-12 day is approved.

The EPA appreciates the update about the discontinuation of the PM<sub>10</sub> monitor located at the Turner site (AQS IS 40-143-1110). Please update AQS with this change.

### Particulate Matter of 2.5 Microns or Less (PM2.5) (40 CFR Part 58, Appendix D Section 4.7)

The plan to change the PM<sub>2.5</sub> monitor (POC 1) at the Central Fire Station site (AQS ID 40-109-0035) operating schedule from 1-in-3 day to 1-in-6 day is approved.

The EPA appreciates the updates about the installation of the new 'T640' PM<sub>2.5</sub> monitor at the Near Road site (AQS ID 40-109-0097).

### PM<sub>2.5</sub> Quality Assurance Collocation

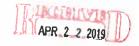
For the PM<sub>2.5</sub> monitors which the ODEQ operates using Federal Reference Method (FRM) number 145, collocation is met at the N. Tulsa site (AQS ID 40-143-1127).

For the PM<sub>2.5</sub> monitors which the ODEQ operates using Federal Equivalent Method (FEM) number 184, collocation is met at the McAlester site (AQS ID 40-121-0415).

For the PM<sub>2.5</sub> monitors which the ODEQ operates using Federal Equivalent Method (FEM) number 236, collocation is met at the Oklahoma City North site (AQS ID 40-109-1037).

### Appendix E: ODEQ Request to EPA for Discontinuance of 40-101-0167





SCOTT A. THOMPSON Executive Director

### OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT Governor

April 17, 2019

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Jeffrey J. Robinson Branch Chief Air Permits Monitoring & Grants Branch US EPA Region 6 (ARP) 1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

Subject: Site 40-101-0167, PM-10 Monitor Muskogee OK

Dear Mr. Robinson:

The Department of Environmental Quality (DEQ) operates a continuous PM-10 monitor at Site 40-101-0167 in Muskogee, Oklahoma and recently evaluated the site to determine if it continues to meet monitoring objectives. During the evaluation, Curt Goeller, Monitoring Section East Manager, consulted with Dorothy Crawford, EPA Region 6 Air Monitoring Section. A copy of Ms. Crawford's February 6, 2019, email which summarizes her evaluation, is enclosed and corroborates DEQ's findings. We greatly appreciate her assistance.

When the site was established in the 1980s, there were numerous homes located in the industrial park. At that time, the monitor was a non-continuous filter based PM-10 high volumetric sampler. The continuous sampler was later installed to give us more data. The monitor was necessary to monitor PM levels in the neighborhood. Over the years, all residents moved from the area and the area became entirely industrial.

DEQ has operated the Muskogee continuous PM-10 SLAMS monitor since 2002. It is not a 'minimally required' monitor in DEQs monitoring network (40 CFR 58, Appendix D, Table D-4). The site is located near local PM-10 emission sources and unpaved areas. EPA regulations in 40 CFR Part 58, Appendix E, 3(a) indicate that the Muskogee PM-10 data patterns are somewhat analogous to those in the Tulsa area in that there are infrequent exceedances with the majority of the measurements below the PM-10 NAAQS level. However, while still below NAAQS, Muskogee PM-10 data trends higher than the Oklahoma City and Tulsa urban areas. This is likely the result of impacts from nearby local PM sources.

Federal regulation 40 CFR Part 58, Appendix E 3(a) indicates that DEQ should avoid placing a monitor near local sources unless the objective is to investigate source emissions. The regulation also states that PM monitors should not be located in an unpaved area. While strong winds can carry PM-10 long

Jeffrey Robinson April 17, 2019 Page 2

distances, PM-10 emissions tend to impact nearby areas. The Muskogee PM-10 monitor is located at the water treatment plant facility, which includes various unpaved roads, drives, parking and layout areas. There are also uncovered miscellaneous material stockpiles at the water treatment plant. Based on prevailing winds, areas at the water treatment facility are within 1000 feet of the monitor. Additional unpaved drives and miscellaneous storage areas exist to the north. Southeast of the water treatment plant main activity area, between the Vallourec Star east storage yard and the Arkansas River, is what appears to be a disturbed, unpaved area with a sand/soil excavation or processing operation. The Vallourec Star industrial site itself and its east storage yard appear to be paved. DEQ is not aware of any citizen concerns with PM levels in the ambient air. The nearest residence appears to be about 1 mile to the southwest, generally upwind of the monitor location.

After careful evaluation, DEQ has determined that the site does not currently meet monitoring objectives in 40 CFR Part 58, Appendix E, 3(a). DEQ respectfully requests approval to discontinue PM-10 monitoring at Site 40-101-0167 in Muskogee, Oklahoma.

We are currently working on our 2019 Annual Network Plan and plan to include the closing of Site 40-101-0167 in the plan. Again, thanks for your assistance in this matter.

Sincerely,

Cheryl E. Bradley, Environmental Programs Manager

Data and Planning Group

cc: Curt Goeller, DEQ

Fran Verhalen, EPA

Ellen Belk, EPA

Dorothy Crawford, EPA

**Attachments** 

From: Curt Goeller < Curt.Goeller @deg.ok.gov>
Sent: Wednesday, February 06, 2019 10:50 AM

To: Crawford, Dorothy < Crawford. Dorothy@epa.gov >; Kent Stafford

<kent.stafford@deq.ok.gov>

Cc: Verhalen, Frances < verhalen.frances@epa.gov>; Belk, Ellen < Belk.Ellen@epa.gov>

Subject: RE: Muskogee PM10 monitor 40-101-0167

### Dorothy,

Thank you for your quick response. This is good news. We will follow up with a request to discontinue the site. We look forward to discussions concerning the remainder of our proposed network changes. We have been discussing those changes and have come up with a plan that we hope will be satisfactory to you.

From: Crawford, Dorothy [mailto:Crawford.Dorothy@epa.gov]

Sent: Wednesday, February 06, 2019 10:30 AM

**To:** Kent Stafford; Curt Goeller **Cc:** Verhalen, Frances; Belk, Ellen

Subject: Muskogee PM10 monitor 40-101-0167

Kent and Curt, This email will be limited to Muskogee PM10 monitor topic. Subsequent email will cover related topics such as grant monitor equipment procurement and possible PM network changes besides Muskogee PM10. Background information is below.

### Summary:

ODEQ has operated the Muskogee Continuous PM10 SLAMS monitor since 2002. The Muskogee PM10 monitor is not a 'minimally required' monitor per federal regulations (40 CFR 58 App D, Table D-4). The Muskogee PM10 data patterns are somewhat analogous to those in the Tulsa area in that there tend to be infrequent exceedances with the majority of the measurements below the PM10 NAAQS level. However, while still below NAAQS, Muskogee PM10 data trends higher than the Oklahoma urban areas of OKC and Tulsa. This may be the result of impacts from nearby local PM sources.

Federal regulations 40 CFR 58 App E sec 3.1 indicates ODEQ should generally avoid placing a monitor near local sources unless the objective is to investigate the source emissions. The regulational also call for PM monitors to not be located in an unpaved area. While strong winds can carry PM10 long distances, PM10 emissions tend to impact nearby

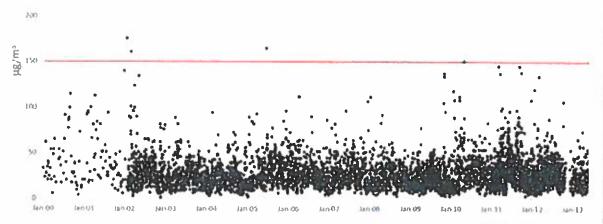
areas. The Muskogee PM10 monitor is located at the Water Treatment plant facility which includes various unpaved roads/drives, parking and/or layout areas. There also appear to be uncovered miscellaneous material stockpiles at the Water Treatment plant. The upwind, based on prevailing, areas at the Water Treatment plan facility are within 1000 feet of the monitor. Even closer but generally downwind of the monitor to the north are more unpaved drives and miscellaneous storage areas. Just beyond the Water Treatment plant main activity area, and upwind to the southeast, between the Vallourec Star east storage yard and the river, is what appears to be a disturbed unpaved area with a sand/soil excavation or processing operation. The Vallourec Star industrial site itself and its east storage yard appears to be paved. I have no information on what the facility building emits.

I am not aware of any citizen concerns with PM levels in the ambient air. The nearest resident appears to be about 1 mile to the south west, generally upwind of the monitor location.

I believe the Muskogee PM10 monitor may be impacted by local sources and not reflective of ambient air in the Muskogee area. The monitor is not required by federal regulations. If ODEQ was to formally request the discontinuation of the Muskogee PM10 monitor, I would recommend EPA management approve the request.

### Background:

### Muskogee PM10 data:



Muskogee PM10 Monitor, 24 Hours measurements

Pic below:

Orange symbol is the Muskogee PM10 monitor site 40-101-0167 located on the northwest corner of the Water Treatment plant;

Blue line in top right corner represents about 500 feet (just to help with scale);

The main part of the industrial facility (Vallourec Star, steel pipe) is located to the west of the Water Treatment plant across the public road, with an extra storage yard located to the east of the public road and south of the Water Treatment plant;

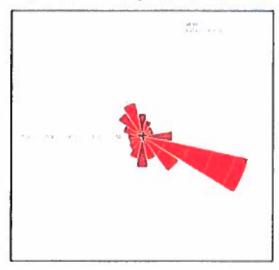
Port of Muskogee further to the southeast, with Paragon Industries (pipe company) and white material stockpiles;



Prevailing winds in the Muskogee area are from the east to southeast (Oklahoma climatological survey, www.ocs.ou.edu).

WINDS

From Webbers Fulls Mesonet Site (WEBB); Jan 1994 – Dec 2001 Latitude: 3547N Longitude: 09513W Elevation: 479 ft



Wind Roses show the prevailing direction from which the wind is blowing. North is up in the image, The circles show the percentage of time from which the wind is blowing in that direction. For example, Webbers Falls records a cast-southeasterly wind about 23 percent of the time, with northerly winds near 5 percent of the time.

The table below shows the percentage of time the wind is blowing from each of the 16-point compass headings, and the percent of time the prevailing wind is recorded in each speed bin.

Maximum Gust: 71.8 mph Maximum Sustained: 40.3 mph Overall Average Speed: 7.1 mph

**Dorothy Crawford** 

U.S. EPA, Region 6, Air Monitoring

(214) 665-2771

### Appendix F: Annual Network Review Posted for Comment on 5/24/2019



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**AQD Site Index** 

Monitoring Network 福田村

Our annual Monitoring Network Review is now available for public comment through June 24, 2019. It contains proposed changes to the Oklahoma Air Monitoring Network for 2019.

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