Appendix C

Ambient Ozone Monitoring Supplement

St. Mary Parish Sec. 110(a)(1) Maintenance Plan

Jeri

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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LA Dept. of Environmental Quality
Office of Env. Assessment/Exec.

James H. Brent, Ph.D.
Assistant Secretary
Louisiana Department of Environmental Quality
P. O. Box 82178
Baton Rouge, LA 70884-2178

Dear Dr. Brent:

This is in response to your December 12, 2002 letter proposing changes to the Louisiana Ambient Air Monitoring Network. As you know, the purpose of the network assessment was to evaluate your existing monitoring network and determine if any modifications are needed, consistent with the goals of the recently completed national assessment. We have completed our review and our comments are listed below by pollutant. The site name or parish is followed by the EPA Air Quality System (AQS) site identification number.

Ozone

1. We agree with your proposal to discontinue the ozone sensors in Grant Parish (22-043-0001) and Beauregard Parish (22-011-0002) since these sites consistently have met both the 1-hour and 8-hour ozone National Ambient Air Quality Standards (NAAQS). These ozone sensors can be discontinued when your revised maintenance plans have been submitted to the EPA Region 6 office.

2. Upon consideration of LDEQ's request to discontinue the ozone sensor in St. Mary Parish (22-101-0003) and the Vinton ozone sensor in Calcasieu Parish (22-019-0009), we recommend that the monitors continue operation through at least 2003. This was discussed in a conference call held with Manop Vanichchagorn on April 29, 2003. Even though 2000-2002 data shows compliance with the ozone NAAQS, ozone concentrations at the St. Mary Parish site have shown an upward trend since 1995 and just two years ago (1998-2000) the sensor recorded an 8-hour ozone design value over the standard at 86 ppb. The Vinton site ozone concentrations traditionally have been the highest in Calcasieu Parish and the concentrations are not trending downward long-term. Like St. Mary Parish even though 2000-2002 data shows compliance with the ozone NAAQS, just one year ago (1999-2001) design values for both 1-hour and 8-hour concentrations exceeded the standards (127 ppb for the 1-hour NAAQS and 86 ppb for the 8-hour NAAQS) at the Vinton site.

3. During the April 29, 2003 conference call with Manop Vanichchagorn, EPA emphasized that the Baker (22-033-1001), Capitol (22-033-0009), and LSU (22-033-0003) sites in East Baton Rouge Parish should not be relocated at this time since all three sites still meet siting criteria as specified in 40 CFR Part 58, and all three sites currently exceed either the 1-hour or 8-hour ozone NAAQS. The 2000-2002 8-hour ozone design values for Baker and LSU are 85 ppb and 86 ppb, respectively, and the 2000-2002 1-hour ozone design values for LSU and Capitol are 135 ppb and 130 ppb, respectively.

NOx

1. We agree with your proposal to operate NOx sensors from May-October at the Baker site (22-033-1001), the Carville site (22-047-0012), the LSU site (22-033-0003), the French Settlement site (22-063-0002), and the Grosse Tete site (22-047-0007).

2. Based upon the April 29, 2003 conference call with Manop Vanichchagorn, it was agreed that the NOx sensor at the Port Allen site (22-121-0001) would continue to operate year round. This site is one of two sites recording the highest NOx concentrations in the area and data from both of these sites are used to track trends of the annual standard in the Baton Rouge area.

3. We agree with the discontinuation of NOx monitoring at the Kenner site in Jefferson Parish (22-051-1001) due to low recorded concentrations.

4. We agree with the relocation of the NOx sensor from the Vinton site (22-019-0009) to the Westlake site (22-019-0008) in Calcasieu Parish. The Vinton site is more of a rural site than an urban site and the Westlake site is more influenced by mobile and stationary source emissions.

SO2

We agree with the discontinuation of the SO2 sensors at the Arabi site in St. Bernard Parish (22-087-0002) and at the Monroe site in Ouachita Parish (22-073-0004) due to very low recorded concentrations. However, we strongly recommend that you evaluate both areas for possible sensor relocation to areas of SO2 stationary source concern.

Pb

We agree with the discontinuation of the Pb sensor at the LaPlace site in St. John the Baptist Parish (22-095-0003) due to very low recorded concentrations. However, we recommend consideration of reinstatement of the sensor if the local facility experiences any operational changes in the future.

PM-10

We agree with the discontinuation of PM10 monitoring at the Evangeline Fire Station in Baton Rouge (22-033-0002) and the Water Purification Plant site in New Orleans (22-071-0010). As these sites are National Air Monitoring Stations (NAMS), we will consult our Headquarters office on the acceptability of discontinuing these sites.

PM2.5

1. We agree with the discontinuation of the PM2.5 Federal Reference Method (FRM) monitors at the Vinton site (22-019-0009), the U.S. Army Corps of Engineers site in Vidalia (22-029-0003), and the continuous monitor in Houma (22-109-0001). We agree that $PM_{2.5}$ data for the year 2003 be collected so that the status of the Evangeline Fire Station site in Baton Rouge (22-033-0002) and the Water Purification Plant site in New Orleans (22-071-0010) can be reviewed for possible relocation due to safety concerns.

2. We agree with the replacement of PM2.5 FRM monitors with continuous monitors at the Bayou Plaquemine site in Iberville Parish (22-047-0009) and the USL Lafayette site (22-055-0005). We also agree with the installation of PM2.5 continuous monitors at the Capitol site in Baton Rouge (22-033-0009), West Temple Place in Kenner (22-051-1001), and City Park in New Orleans (22-071-0012). The deployment of continuous PM2.5 monitors in the New Orleans area will facilitate the reporting of the Air Quality Index in that area.

TSP

We agree with the discontinuation of the special purpose Total Suspended Particulates (TSP) monitor in LaPlace (22-095-0003).

We appreciate your staff's efforts in working with us to reach a mutually agreeable resolution on this matter. Should you have any questions or concerns, please feel free to contact me at 214 665-2290.

Sincerely yours,

for

Donna M. Ascenzi, Chief
Air Quality Analysis Section

cc: Manop Vanichchagorn