

Sunil Kumar

From: Chow, Alice <chow.alice@epa.gov>
Sent: Wednesday, April 06, 2016 2:28 PM
To: Sunil Kumar
Cc: doris.mcleod@deq.virginia.gov; Ballou, Thomas (DEQ); rama.tangirala@dc.gov; Daniels, Jessica (DDOE); Molly Berger; Turner, Charles (DEQ); Hyden, Loretta; Velez-Rosa, Emlyn
Subject: RE: CO monitoring requirements after completion of 20 years following redesignation as a Maintenance Area (Washington, DC-MD-VA CO Maintenance Area)

Sunil: Sorry for the delay, but I wanted to respond with the following:

- Yes, you are correct the DC area would only be required to follow the CO monitoring network design criteria stipulated in Appendix D of 40 C.F.R. Part 58 (see Section 4.2). That means, CO monitoring would be required in the 2 NCore stations in the nonattainment area (one in DC, one in MD) and in addition, CO monitoring would be required at only one of the near road NO2 stations. As of now, our understanding is DC has a near road station currently running CO. In the future, when VADEQ installs a near road NO2 station in northern VA, it would not be necessary to run CO at that station.

If you have additional questions, feel free to contact me or Lori Hyden (215-814-2113) of my staff.

Alice

Alice H. Chow

Associate Director
Office of Air Monitoring and Analysis
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103

Phone: 215-814-2144
Email: chow.alice@epa.gov

From: Sunil Kumar [mailto:skumar@mwcog.org]
Sent: Friday, March 11, 2016 10:50 AM
To: Chow, Alice <chow.alice@epa.gov>
Cc: doris.mcleod@deq.virginia.gov; Ballou, Thomas (DEQ) <Thomas.Ballou@deq.virginia.gov>; rama.tangirala@dc.gov; Daniels, Jessica (DDOE) <jessica.daniels@dc.gov>; Molly Berger <molly.berger@maryland.gov>; Turner, Charles (DEQ) <Charles.Turner@deq.virginia.gov>
Subject: CO monitoring requirements after completion of 20 years following redesignation as a Maintenance Area (Washington, DC-MD-VA CO Maintenance Area)
Importance: High

Hi Alice:

We have a question regarding CO monitoring requirements as the Washington region completes twenty years since it was redesignated as a Maintenance Area for the 1971 carbon monoxide (CO) national ambient air quality standard (NAAQS).

The Washington, DC-MD-VA 1971 CO NAAQS nonattainment area was redesignated as a maintenance area effective March 15, 1996 (61 FR 2931) following the approval of the area's redesignation request and maintenance plan, which was submitted in October 1995. In accordance with the CAA Section 175A(b), the area submitted its second maintenance plan in March 2004, which demonstrated the maintenance with the above NAAQS until March 16, 2016. The second maintenance plan was approved effective June 3, 2005 (70 FR 16958). On March 16, 2016, the Washington, DC-MD-VA 1971 CO NAAQS maintenance area will complete the requirements to demonstrate maintenance of the CO NAAQS for twenty years after its redesignation as a maintenance area on March 15, 1996.

In light of the above facts, going forward, would the Washington, DC-MD-VA area be required to maintain as many as eight CO monitors, as mapped in the maintenance plan that concluded on March 16, 2016 (see Section 2.3 of the plan), or at least the number of monitors in place as of March 16, 2016? Or, is it permissible to reduce the number of monitors in the region to one or two, in accordance with the most up-to-date CO monitoring network design criteria stipulated in Appendix D of 40 C.F.R. Part 58 (see Section 4.2)? Our understanding is that the design criteria in Appendix D outlines the most current requirements, which are based on the rule that retained the primary CO NAAQS and became effective on October 31, 2011 (76 FR 54294).

Thank you for the clarification,

Sunil Kumar

Principal Environmental Engineer
Metropolitan Washington Council of Governments
777 North Capital St., NE
Washington, D.C. 20002-4239
Email: skumar@mwcog.org
Tel: 202-962-3244
Fax: 202-962-3203