

July 10, 2018

Ms. Beverly Banister Director, APTMD, U.S. EPA, Region 4 Sam Nunn Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-8960

RE: Annual Air Monitoring Network Plan for 2019

Dear Ms. Banister:

In accordance with the requirements of 40 Code of Federal Regulations Part 58, Subpart B, the South Carolina Department of Health and Environmental Control (DHEC) respectfully submits the Annual Air Monitoring Network Plan for calendar year 2019. The DHEC is required by 40 CFR 58.10 to adopt and submit to the Regional Administrator an Annual Monitoring Network Plan which provides for the establishment and maintenance of an air quality surveillance system. This system is a network of State and Local Air Monitoring Stations (SLAMS) including Federal Reference Method (FRM) and Federal Equivalent Method (FEM) monitors that are part of SLAMS, National Core Monitoring Network (NCore) stations, Speciation Trends Network (STN) stations, and Special Purpose Monitor (SPM) monitoring stations. This plan is required to include a statement of purpose for each monitor and evidence that siting and operation of each monitor meets the requirements of 40 CFR 58, Appendices A, C, D and E.

The DHEC received one comment during the public comment period, which was held from May 21, 2018 through June 22, 2018. A complete package, including the Department's response to comments received is being sent to Gregg Worley of your office. Should you have any questions or need additional information regarding this matter, please contact Robert Brown of my staff at (803) 898-4105.

Sincerely,

Rhonda B. Thompson, PE. Chief

Bureau of Air Quality

SCDHEC

Gregg Worley, US EPA Region 4 (w/attachments) CC: Ryan Brown, US EPA Region 4 (w/attachments) ec:

Todd Rinck, USEPA Region 4 (w/o attachments) Robert J. Brown, Jr., BAQ (w/o attachments)

Renee' Shealy, BEHS (w/o attachments) Micheal Mattocks, BEHS (w/o attachments)

# State of South Carolina

# Annual Ambient Air Monitoring Network Plan

# Calendar Year 2019





#### **Certification**

This document contains the planned changes and final description of the sites and monitors of the South Carolina Ambient Air Monitoring Network (Monitoring Network) for criteria pollutants and related parameters for calendar year 2019. The South Carolina Department of Health and Environmental Control (Department) certifies that the network described herein meets or exceeds the minimum requirements needed to support the State Implementation Plan, national air quality assessments, and policy decisions as required in 40 Code of Federal Regulations (CFR) Part 58, Ambient Air Quality Surveillance, at the time of submittal to the United States Environmental Protection Agency (EPA), Region 4. Due to circumstances that may arise during the implementation of the plan in 2018 and during the 2019 monitoring year, some elements of the network may require modification. A notification of modifications will be posted on the Department website and provided to the EPA Region 4 office. Where necessary, a request for approval of deviations from this plan and supporting documentation will be submitted to the EPA Region 4 office.

Micheal Mattocks Director, Division of Air South Carolina Departi	Signature: Quality Analys ment of Health	sis, Bureau of Environmental Heal	Date: <u>7//0//</u> 8 th Services
Renee G. Shealy Bureau Chief, Bureau o South Carolina Departi	of Environment	Lewell Sheak, ral Health Services and Environmental Control	Date: <u>7/10//</u> 8
	Assessment &	Regulations, Bureau of Air Quality and Environmental Control	

Rhonda B. Thompson Signature: Bureau Chief, Bureau of Air Quality

South Carolina Department of Health and Environmental Control

Date: 07/10/18

#### **Acronyms**

AQI – Air Quality Index NCore – National Core Monitoring AQS – Air Quality System Network BAQ - Bureau of Air Quality NO - Nitric oxide CBSA - Core-Based Statistical Area NO<sub>2</sub> – Nitrogen Dioxide NO<sub>x</sub> – Nitrogen Oxides CFR – Code of Federal Regulation CO - Carbon Monoxide  $NO_y - NO_x$  and other oxidized species CSA – Combined Statistical Area NPAP - National Performance Audit CBSA - Core Based Statistical Area Program OMB - Office of Management and CSN – Chemical Speciation Network CMS - Continuous Monitoring Site Budget DAQA – Division of Air Quality Analysis PEP – Performance Evaluation Program Department – South Carolina Department PM<sub>2.5</sub> – Particulate Matter < 2.5 microns of Health and Environmental Control PM<sub>10</sub> – Particulate Matter < 10 microns PPB - Parts Per Billion DNPH - Analysis method using 2,4dinitrophenylhydrazine PPM – Parts Per Million EPA – Environmental Protection Agency PSD Prevention Significant of FEM - Federal Equivalent Method Deterioration FRM – Federal Reference Method PTFE - Polytetrafluoroethylene GC/MS - Gas Chromatography / Mass PUF – Polyurethane Foam QA – Quality Assurance Spectroscopy GFAA \_ Graphite QAPP – Quality Assurance Project Plan Furnace Atomic **Absorption Spectrometry** QC - Quality Control SLAMS - State and Local Air Monitoring HPLC High Performance Liquid Chromatography Station IC – Ion Chromatography SO<sub>2</sub> – Sulfur Dioxide IMPROVE - Interagency Monitoring of SPM – Special Purpose Monitor **Protected Visual Environments** STN – Speciation Trends Network ICP/MS - Inductively Coupled Plasma SVOC Semi-volatile Organic Mass Spectroscopy Compound ID – Site Identification TEOM - Tapered Element Oscillating MET – Meteorology Microbalance MOA – Memorandum of Agreement TPY - Tons Per Year MSA – Metropolitan Statistical Area TSP – Total Suspended Particulate mSA – Micropolitan Statistical Area UV – Ultraviolet μg/m<sup>3</sup> – Micrograms per cubic meter VOC - Volatile Organic Compound NAAQS - National Ambient Air Quality WGS84 - World Geodetic System of Standards 1984 revised in 2004 NATTS - National Air Toxics Trends Site

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#### Introduction

The Department or its predecessors have operated an air quality monitoring network in South Carolina since 1959. During that time, the network has continually evolved to meet the requirements and needs of the Department's Air Program and to comply with federal requirements. In 2019, the network will be comprised of 93 monitors and samplers at 30 sites.

In October, 2006, the EPA published revisions to the ambient monitoring regulations (71 FR 61236, October 17, 2006) requiring quality assurance (QA), monitor designations, minimum requirements for both number and distribution of monitors among metropolitan statistical areas (MSAs), and probe siting changes. The regulation also included the requirement for an annual monitoring network plan and periodic network assessments.

This South Carolina Annual Air Monitoring Network Plan (Network Plan) covers the eighteen-month period from July 1, 2018 through December 31, 2019. This period includes a six-month implementation period during which sites indicated as 'New' will be identified, secured, and prepared for the installation of monitoring equipment. It is expected that any monitoring indicated as 'New' or 'To be established' will be installed, calibrated, and operating in 2019, with the exception of some Ozone monitors, which may begin operation at the start of the South Carolina Ozone monitoring season (March 1-October 31). This Network Plan, as required and described in 40 CFR Part 58.10, and Periodic Network Assessment, must contain the following information for each monitoring station in the network:

- The Air Quality System (AQS) site identification number (ID) for existing stations,
- Location of each monitoring station, including street address and geographical coordinates,
- The sampling and analysis method used for each measured parameter,
- The operating schedule for each monitor,
- Any proposal to remove or relocate a monitoring station within a period of eighteen months following the network plan submittal,
- The monitoring objective and spatial scale of representativeness for each monitor.
- The identification of any sites that are suitable for comparison against the Particulate Matter < 2.5 microns (PM<sub>2.5</sub>) National Ambient Air Quality Standard (NAAQS), and
- The MSA, Core-Based Statistical Area (CBSA), Combined Statistical Area (CSA), or other area represented by the monitor.

This document constitutes the 2019 South Carolina Annual Ambient Air Monitoring Network Plan. The site pages are organized into two main parts:

- Network Summaries: A table which presents the total number of sites and monitors for the State, including a list of all proposed changes to the current network, and
- Air Monitoring Station Descriptions: An outline of the designations, parameters, monitoring methods, and the purpose for each monitor at the site.

The Monitoring Network is reviewed annually. Planned changes are described in this Network Plan and provided for public review and comment prior to submission to the EPA Region 4 Administrator.

#### **Public Participation Opportunities**

In response to public interest and the potential impact of the monitoring regulation changes, the Department's Air Program solicits involvement from both internal (to the Department) and external workgroups. Opportunities for public involvement include:

- A webpage maintained for publication and access to current and draft monitoring plan reference documents and announcements<sup>1</sup>.
- Availability of the proposed 2019 Network Plan for public review and comment ran from May 21, 2018 through June 21, 2018. All public comments received will be summarized and addressed in Appendix A before submitting the final network plan to the EPA. A complete set of comments will be submitted to the EPA with the 2019 Network Plan.

The Department is committed to continuing the opportunities for input and participation in the development of the annual revisions of the Network Plan and the periodic assessments of the air quality surveillance system.

#### **Network Operation**

The primary responsibility for the operation of the Monitoring Network is assigned to the Division of Air Quality Analysis (DAQA) in the Bureau of Environmental Health Services (Division). The Division establishes, maintains, and operates the sites and instruments that make up the network and performs the analysis of samples collected as part of routine monitoring or special projects. Data generated by the network for comparison to the NAAQS is verified to be accurate and reported by the Division to the national AQS database for storage and public access.

Criteria pollutant monitoring for the purpose of comparison to the NAAQS is performed using the EPA designated Federal Reference Methods (FRM) or Federal Equivalent Methods (FEM) to ensure the precision and accuracy of the measurements across the air quality surveillance system.

Regular calibration and audits of the measurement systems are performed to verify that the instruments are operating correctly and data being collected is accurate. All monitors and samplers are calibrated at least once a year. Calibration is also performed whenever the monitor/sampler fails a bi-weekly Quality Control (QC)/precision check or multi-point audit, when maintenance is performed that may affect the monitor response, or if the monitor is located away from the building in which it was calibrated. If possible, a QC/precision check or flow check should precede any maintenance that would affect monitor response.

The QA activities supporting the Monitoring Network meet or exceed the QA requirements defined in 40 CFR Part 58, Appendix A (Quality Assurance Requirements

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<sup>&</sup>lt;sup>1</sup>http://www.scdhec.gov/HomeAndEnvironment/Air/AmbientAir/

for SLAMS and SPM Air Monitoring). Raw data is collected hourly from sites across the state and provided to internal data users (forecasters and data analysts) and to the AIRNow database for presentation to the public. Ozone monitors provide hourly data during Ozone Season (March 1-October 31).

Before the data is submitted to AQS, it is verified to be accurate through review of the instrument QC and QA performance documentation. Instrument QA/QC alone is not sufficient to assure monitoring data quality. In addition to periodic site assessments, the Department conducts additional visits to monitoring sites to document comparisons with applicable siting criteria.

It is the Department's intent that all criteria pollutant monitors and samplers be sited and operated in accordance with the requirements of 40 CFR Part 58. As required in 40 CFR Part 58, Appendix A, the DAQA in the Division establishes, maintains, and operates the sites and instruments and performs the analysis of samples collected. Data generated by the network for comparison to the NAAQS is verified to be accurate and reported by the Division to the national AQS database for storage and public access. Regular calibration and audits are performed to verify that the instruments are operating correctly and data being collected is accurate. As required in 40 CFR Part 58. Appendix C, all criteria pollutant monitoring in the Monitoring Network for the purpose of comparison to the NAAQS is performed using the EPA designated FRM or FEM. Also, all criteria pollutant monitoring in the Monitoring Network meets the monitoring objectives, spatial scales, and design criteria as described in 40 CFR Part 58, Appendix D. Finally, in this document, each site page contains a statement addressing compliance to 40 CFR Part 58, Appendix E for SLAMS monitors. If the site is not in compliance, a plan is presented to address the deficiency. For SPM monitors, the 40 CFR Part 58.20 states that compliance is optional, but monitoring organizations are encouraged to meet as many of the Appendix E requirements as possible.

An element of the Quality System<sup>2</sup> employed by the Division is periodic assessments of systems and monitor performance. As the primary QA organization for ambient air monitoring activities, the Division operates under the approved Environmental Quality Control Quality Assurance Management Plan, the Ambient Air Quality Monitoring Quality Assurance Project Plan, and approved plans for specific projects. The EPA Region 4 office may conduct audits of any component of the operation of the network or quality management system. The Division also participates in the National Performance Audit Program (NPAP) and the Performance Evaluation Program (PEP) administered by the EPA to provide independent audits.

#### Station Description Content

Specific siting information for each site and monitor is stored in the EPA's AQS, the national ambient air database. The AQS Site Description includes the exact location of the site, local and regional population, and description of the site location, monitor types, and monitoring objectives. This site and monitor information is routinely updated

<sup>&</sup>lt;sup>2</sup> The Quality System is the means by which the Department implements the quality management process through the Quality Assurance Management Plan for SC DHEC, March, 2014.

whenever there is a change in site characteristics or pollutants monitored. Pictures for each monitoring site can be viewed at: https://gis.dhec.sc.gov/monitors/

The AQS is used as the primary repository for all South Carolina ambient air monitoring information, including site descriptions. All ambient air monitoring data is stored in AQS, including criteria pollutants, non-NAAQS parameters, ambient air toxics, total suspended particulate (TSP), and supporting QA data.

Each network station description contained in this document includes a Site Description and Monitor Details. An explanation of the information in each station description is presented below.

Site Description – The site description includes specific information about each ambient air monitoring site. The site description header includes the following:

- 1) Site Name The name that is given to the site.
- 2) CSA/MSA The area where the site is located as defined by the United States Census. (July, 2017).<sup>3</sup>
- 3) AQS Site ID The unique site ID used in AQS is in the form of 45-cc-ssss where:
  - a. 45 is the federal identification code for South Carolina,
  - b. ccc is the county identification code, and
  - c. ssss is the site identification code within the county.
- 4) Location Typically, the street address of the site, where available.
- 5) County County in which the site is located.
- 6) Coordinates Latitude (N), then Longitude (W) listed in decimal degrees using WGS84 projection.
- 7) Date Established The date when each existing monitoring station was established is shown in the description. For new stations proposed in this Monitoring Plan, a date is provided when it is expected for the station to be in operation. Individual monitors at a site may have differing start and stop dates.
- 8) Site Evaluation (most recent date visited) Each monitoring station in the network is periodically visited to determine whether all required probe exposure criteria for monitors are met. If necessary, corrective action is scheduled to address deficiencies. If a new monitoring site has not yet been evaluated, it will be denoted with the word "PENDING".

Monitor Details – Each station description has a table that lists the parameter(s) and the descriptive information associated with that particular parameter. An explanation of the information in the tables is presented below.

<sup>&</sup>lt;sup>3</sup> The US Census Bureau periodically adjusts CBSA names and boundaries. This plan uses the latest available revision.

- 1) Parameter Criteria (compounds for which a NAAQS has been established), non-criteria, and/or supporting parameters (primarily meteorological measurements) measured at the site are listed.
- 2) Scale Each monitor or sampler in the monitoring network is described in terms of the approximate physical dimensions of the air parcel nearest the monitoring station throughout which pollutant concentrations are expected to be reasonably similar. This is most often referred to as the "Scale" of the monitor. Different pollutants monitored at the same location may represent different scales depending on the characteristics of the pollutant. Area dimensions or scales of representativeness used in the network description are:
  - a. Microscale Air volumes associated with area dimensions ranging from several meters up to about 100 meters.
  - b. Middle scale Areas up to several city blocks in size with dimensions ranging from approximately 100 meters to 0.5 kilometers.
  - c. Neighborhood scale Extended areas of a city that have relatively uniform land use with dimensions ranging from 0.5 to 4.0 kilometers.
  - d. Urban scale Citywide or equivalent rural areas with dimensions ranging from 4 to 50 kilometers.
  - e. Regional scale Areas ranging from 50 to hundreds of kilometers in diameter.

The true representative area may best be described by an irregular shape of the approximate dimensions indicated above to account for local sources, topography, and differing land use.

The representative scale of a monitor is closely associated with the monitoring objective.

- 3) Objective The ambient air monitoring network is designed to meet three primary objectives:
  - a. Provide air pollution data to the public in a timely manner. Near real-time data is made available on the internet through AIRNow and Air Quality Index (AQI) reporting and forecasting in the major metropolitan areas.
  - b. Support compliance with ambient air quality standards and emissions strategy development. Monitors are operated to measure concentrations for comparison to NAAQS and to provide information to aid in the development of strategies to improve air quality.
  - c. Support air pollution research studies. Data from the monitoring network support greater understanding of the impacts and effects of ambient air pollution.

Individual monitors within a monitoring network that support these basic objectives generally serve one or more of the following purposes:

i. Determine highest concentrations of pollutants,

- ii. Determine representative concentrations in areas of high population density,
- iii. Determine impact on air quality of significant sources or source categories,
- iv. Determine general background concentrations,
- v. Determine extent of regional pollutant transport, and
- vi. Determine welfare-related impacts in more rural and remote areas (ex. visibility impairment and impacts to vegetation).

The design intent in siting stations is to correctly match the area represented by the sample of monitored air with the scale most appropriate to meet the monitoring objective of the monitor. The relationship of appropriate scale to the six basic purposes as follows:

Monitoring Purpose	Siting Scale
Highest concentration	Micro, Middle, Neighborhood
Population exposure	Neighborhood, Urban
Source impact	Micro, Middle, Neighborhood
General/background	Neighborhood, Urban, Regional
Regional transport	Urban, Regional
Welfare-related impacts	Urban, Regional

Monitor and sampler data is regularly reviewed to assure the assigned scale is correct and appropriate for the intended objective.

- 4) Designation Monitor designations that may be found in the tables include the State and Local Air Monitoring Station (SLAMS), special purpose monitor (SPM), National Core Monitoring Network (NCore), non-regulatory, QA collocated, and IMPROVE monitoring. Definitions of these designations are:
  - a. SLAMS Monitors for which NAAQS have been established. These stations must meet requirements that relate to four major areas: QA, monitoring methodology, sampling interval, and siting of instruments and instrument probes.
  - b. SPM Monitors which support investigations addressing complaints, areas and pollutants of concern, network refinement, modeling verification, and compliance. These monitors are committed to investigation and projects as described in the associated Quality Assurance Project Plan (QAPP). They may be located as separate monitoring stations or be included at existing monitoring locations. The SPM may also monitor for air toxics, particulate, criteria pollutants, precipitation, and meteorology.

Supplemental speciation is a type of SPM monitor that operates according to Chemical Speciation Network (CSN) protocols, but is not contained in the STN Network. This monitoring data will be reported to AQS where possible. Although siting and probe exposure will conform to all requirements for SLAMS monitors whenever possible, the 40 CFR Part 58.20 states that compliance for SPM monitors is optional.

- c. NCore NCore is a national multi-pollutant network that utilizes advanced measurement systems for particles, pollutant gases, and meteorology. It provides data for long-term trends of criteria and non-criteria pollutants, and supports air quality model evaluation, scientific studies, and ecosystem assessments. Most NCore monitors are SLAMS.
- d. Non-regulatory Monitor A monitor that measures data on a pollutant that will not be used for regulatory purposes.
- e. Collocated QA Sampler A particulate matter sampler that is paired with but operated independent of a similar sampler. It is used to indicate measurement accuracy.
- f. IMPROVE The Interagency Monitoring of Protected Visual Environments (IMPROVE) network collects visibility related data. These monitors are operated in the State of South Carolina in cooperation with the federal government, and are listed in the Site Description, but are not included in the Site Tables.

The SLAMS and SPM data may be used in the reporting of an area's AQI. The AQI is a method of reporting that converts concentration levels of pollution to a simple number scale of 0-500. Index reporting is required for all urban areas with a population exceeding 350,000. Intervals on the AQI scale are related to potential health effects of the daily measured concentration of the measured pollutants. All stations in a metropolitan area provide data for daily index reporting. Data collected from continuous Ozone and PM<sub>2.5</sub> monitors is collected hourly and reported as AQI maps on the EPA's AIRNow website. A daily AQI is provided for the areas in and around Aiken, Charleston, Columbia, Florence/Darlington, Greenville-Spartanburg, Myrtle Beach, and York/Chester/Lancaster.

- 5) Probe Height The monitor or sampler probe is the point where ambient air enters the analytical or sample collection system. Ideally, air would be sampled approximately at nose height, but due to operational, exposure, and security considerations, air may be sampled further from ground level. Proper probe height is specified in the monitoring regulations (typically between 2 and 15 meters) and is checked as part of the periodic site evaluations.
- 6) Analysis Methods All sampling and analytical procedures used to determine ambient concentrations of criteria pollutants for comparison to the NAAQS will use either Federal Reference or Equivalent Methods (FRM or FEM). For the reactive gases, borosilicate glass or FEP Teflon are used in the sampling train.

Where appropriate for specific monitoring objectives, well characterized, non-equivalent methods may be used. The analysis method for the parameters most commonly measured and listed in the station descriptions are described below.

a) Particulate Matter less than 10 microns (PM<sub>10</sub>) – PM<sub>10</sub> samplers operated by the Department are designated as either FRM or FEM and are operated consistent with the requirements in 40 CFR Part 50, Appendix J and 40 CFR Part 58. Intermittent samplers collect a 24-hour sample no less than every sixth day on a filter. The filter is conditioned and weighed before and after the sample run. The weight of material collected on the filter and the volume of air sampled is used to calculate the average concentration, expressed as micrograms per cubic meter (μg/m³) for the sample period. The filters are equilibrated before each weighing for a minimum of 24 hours at a mean temperature between 15 - 30°C and a mean relative humidity between 25 and 45 percent.

Continuous PM<sub>10</sub> samplers provide 24-hour concentration measurements every day. During sampling, ambient air passes through an inlet designed to pass only particles smaller than 10 microns in diameter. The flow rate, critical to precise particle size separation, is monitored and controlled constantly. Particulate in the sample stream is collected on a Teflon-coated glass fiber filter. The mass collected on the filter is also continuously monitored. The difference between the current filter weight and the previous weight gives the total mass of the collected particulate for that period. The mass concentration is calculated by dividing the mass gained by the flow through the filter for the period. The concentration measurements are averaged over 1-hour and 24-hour periods. Data is stored locally on redundant data acquisition systems and recovered hourly by a central office computer system (AirVision). Only 24-hour daily averages are used for comparison to the ambient standards.

b) Particulate Matter less than 2.5 microns (PM<sub>2.5</sub>) – All PM<sub>2.5</sub> samplers operated by the Department for comparison to the NAAQS are designated FRM samplers. Manual samplers are operated consistent with the requirements in 40 CFR Part 50, Appendix L. Samples are collected on 46.2-millimeter polytetrafluoroethylene (PTFE) filters over a 24-hour sampling period. Air flow through the filter is maintained at 16.7 liters per minute at local ambient temperature and pressure. The flow rate must be maintained within ±5 percent throughout the sample period. Sample filters are collected within 96 hours of the end of the sample run and are kept cooled during transit to minimize potential sample loss.

The PTFE filters are equilibrated before each weighing for a minimum of 24 hours at a mean temperature between 20°C and 23°C and 30 to 40 percent mean relative humidity. Filters are weighed before and after the sample period. Filters are used within thirty days of initial weighing. Collected samples are typically weighed within two weeks of sampling. If the samples are maintained below 4°C after collection, they can be held for up to thirty days from the end of the sample period. The mass collected and the volume sampled are used to calculate the concentration, expressed in  $\mu g/m^3$ .

Unless designated a FEM, continuous PM2.5 monitors do not provide concentration data suitable for comparison to the NAAQS. Non-FEM continuous monitors that provide reasonably comparable measurements may be used to provide data for calculation of an area Air Quality Index (AQI). Continuous PM<sub>2.5</sub> samplers provide 24-hour concentration measurements every day. During sampling, ambient air passes through an inlet system designed to pass only particles smaller than 2.5 microns in diameter. The flow rate, critical to precise particle size separation, is monitored and controlled constantly. Particulate in the sample stream is collected on a Teflon-coated glass fiber filter. The mass collected on the filter is also continuously monitored. The difference between the current filter weight and the previous weight gives the total mass of the collected particulate for that period. The mass concentration is calculated by dividing the mass gained by the flow through the filter for the period. The concentration measurements are averaged over 1-hour and 24-hour periods. Data is stored locally on redundant data acquisition systems and recovered hourly by a central office computer system (AirVision). Only 24-hour daily averages from FEM monitors are used for comparison to the ambient standards.

c) PM<sub>2.5</sub> Speciation sampling – In addition to operating PM<sub>2.5</sub> samplers that provide measurement of only the PM<sub>2.5</sub> mass concentration, the Department also operates PM<sub>2.5</sub> Speciation samplers to collect samples for analysis to determine the chemical makeup of the particulate. Speciation sample collections are part of the national CSN. Samples are collected on a set of two cartridges on the Met-One SASS sampler for nitrates, sulfates, and metals and on a single cartridge in the URG 3000N sampler for carbon containing material. The samples are collected over a 24-hour sampling period. The individual cartridges contain denuders and filters designed to efficiently capture the major components of PM<sub>2.5</sub>.

After collection, the samples are shipped cold to an EPA contract laboratory for analysis. At the laboratory, the samples are analyzed using thermal optical analysis (for carbon), ion chromatography (IC) for nitrates and sulfates, and x-ray fluorescence for metals to determine the presence and concentration of specific compounds. Sample results are available on the EPA website.

d) Sulfur Dioxide (SO<sub>2</sub>) – Instruments used to continuously monitor SO<sub>2</sub> concentrations in the atmosphere use the Ultraviolet (UV) Fluorescence Federal Reference Method. The continuous data output from the instrument is stored locally on redundant data acquisition systems and recovered hourly by central office computer system (AirVision).

Calibration of these instruments and audits of their performance are done using the EPA protocol gas mixtures containing a certified concentration of

SO<sub>2</sub> in nitrogen. This gas is diluted to provide known concentrations of SO<sub>2</sub>. These known concentrations are supplied to the instrument, which is adjusted so the instrument output corresponds with the specific concentrations. Calibration curves are prepared for each instrument and each measurement is automatically compared to this curve before entry into the data acquisition system.

- e) Carbon Monoxide (CO) Continuous monitoring for CO is performed using the FRM non-dispersive infrared correlation method. Data is stored locally on redundant data acquisition systems and recovered hourly by the DAQA central office computer system (AirVision).
  - Calibration of the instrument and audits of its performance are done using the EPA Protocol gas mixtures containing a certified concentration of CO in air. The gas is diluted to provide known concentrations of CO. Known concentrations are supplied to the instrument, which is adjusted so the instrument output corresponds with the specific concentrations. Calibration curves are prepared for each instrument which are used to calculate concentration measurements for storage in the data acquisition system.
- f) Ozone Ozone is monitored using the FEM UV photometry method. The continuous data output from the instrument is stored locally on redundant data acquisition systems and recovered hourly by the central office computer system (AirVision).
  - Monitors are routinely calibrated and their performance audited using portable ozone transfer standards. Calibration curves are prepared for each instrument which are used to calculate the concentration measurements stored in the data acquisition system.
- g) Nitrogen Dioxide (NO<sub>2</sub>) The FRM UV chemiluminescence method is used for measurement of NO<sub>2</sub> concentration in the ambient air. The continuous data output from the instrument is stored locally on redundant data acquisition systems and recovered hourly by a central office computer system (AirVision).
  - Calibration of the instrument and audits of their performance are done using the EPA protocol gas mixtures containing a known concentration of Nitric Oxide (NO) and Nitrogen Oxides (NO<sub>x</sub>) in nitrogen. The gas is diluted to present several known concentrations of the oxides. A converter is used to convert NO<sub>2</sub> to NO for reaction with internally generated ozone and measurement of the light produced by the reaction of NO and Ozone. Known concentrations are supplied to the instrument, which is adjusted so the instrument output corresponds with the supplied concentrations. Calibration curves are prepared for each instrument which are then used to provide concentration measurements for storage in the data acquisition system.
- h) Lead Lead concentrations are determined by the analysis of TSP collected using high volume particulate samplers as described in 40 CFR Part 50, Appendix G. Particulate samples are acid extracted from a portion of the filter

- to dissolve metals from the collected materials. The lead content is determined using Flameless (Graphite Furnace) Atomic Absorption Spectrometry or may be analyzed by an EPA national contract laboratory using Inductively Coupled Plasma Mass Spectroscopy (ICP/MS).
- Meteorology Meteorology consists of wind direction, wind speed, precipitation, temperature, and pressure. Collection and/or analysis methods are discussed below.
  - a. Wind Direction and Speed Wind data is collected using systems that incorporate high precision 'Air Quality' systems. The systems use separate or combined wind vanes and anemometers mounted 10 meters above ground. The systems provide supporting information about the local meteorology.
  - b. Precipitation Precipitation is measured by tipping bucket gauges that provide a signal indicating the occurrence, rate, and amount of precipitation. The gauges are not heated, so they may not accurately provide the time and rate for frozen precipitation events. The monitors are checked periodically for operation and accuracy using a known volume of water and compared with actual volumes of collected precipitation where there are collocated samplers.
  - c. Ambient Temperature and Pressure Ambient temperature is available from sensors that are part of the sampling systems for the FRM PM<sub>2.5</sub> samplers. Ambient temperature measurement is necessary for the systems to maintain the required flow rate used to reproducibly separate the desired particulate size fractions as conditions change. Although the primary use of the measurement is for sampler flow control, the sensors are accurate and regularly audited. Temperature and pressure sensors are compared to reference systems at least once per month.
- j) Volatile Organic Compounds Volatile organic compounds (VOCs) are collected into passivated or silica lined stainless steel canisters. The canisters are cleaned, tested, and evacuated at the laboratory prior to installation at the sampling site. At the sampling location, the canisters are filled and pressurized with ambient air throughout the sampling period (typically 24 hours). Measured portions of the captured air are concentrated at low temperature and analyzed using gas chromatography with a mass spectrometer detector (GC/MS) to identify and quantitate target compounds. The collection and analysis method is based on the EPA Method TO-15.
- k) Semi-volatile Organic Compounds Semi-volatile organic compounds (SVOCs) are collected using polyurethane foam (PUF) and a solid adsorbent to trap the compounds from air pulled through the material by a high-volume sampler. The SVOCs are extracted from the collection cartridge using a solvent, and the rinses are concentrated for analysis. Measured portions of the extract are analyzed using GC/MS to identify and quantitate the collected compounds. The collection and analysis method is based on the EPA Method TO-13.

- I) Carbonyls Carbonyls (including aldehydes and ketones) are extracted from ambient air by reaction with a compound that stabilizes them enough to capture and hold. The reaction of the target compounds with Dinitrophenyl hydrazine (DNPH) removes them from the sampled air and concentrates them in the sample cartridge. Solvent extraction of the DNPH derivatives from the cartridge is followed by analysis using High Pressure Liquid Chromatograph to identify and quantitate the collected Carbonyls. The collection and analysis method is based on the EPA Method TO-11.
- m) Metals Metals in particulate are collected on filters using the TSP or PM<sub>10</sub> High Volume samplers. Metals are extracted from a portion of the filter using sonication in an acid solution. Detection, identification, and quantitation of the target metals use Graphite Furnace AA or inductively coupled plasma with a mass spectrometer (ICP/MS). The collection and analysis method is based on the EPA Method IO-3.
- n) Precipitation Chemistry A portion of the precipitation sample collected each week is analyzed for pH and conductivity. To determine concentrations of dissolved material that contributes to acid rain, the collected material is analyzed for cations and anions using ion chromatography (IC).
- o) Sulfate Sulfate in particulate is measured by collecting samples on the species-specific denuders used in the CSN and are analyzed for anions (SO<sub>4</sub>= and NO<sub>3</sub>-) using ion chromatography for separation and quantification of the species. Samples are analyzed for anions at the DAQA lab. All other speciation analyses are performed by Amec-Forte-Wheeler.
- 7) Sampling frequency Sampling frequency indicates how often a measurement is made. Sampling typically involves collection of a sample over a period (typically 24 hours, midnight to midnight EST) and the delivery of the sample to the laboratory for preparation and analysis. Samples are collected every day (1:1), every third day (1:3), every sixth day (1:6), every twelfth day (1:12), or weekly, depending on the data quality objectives of the project. Results are reported as averages for the sample period. The EPA publishes the 1:3 and 1:6 day sampling schedules used by the South Carolina Ambient Air Monitoring Network and nationwide<sup>4</sup>.

Monitoring typically uses on-site analyzers that continuously sample the air and measure the pollutant of interest. Results of the analysis are reported as hourly averages. Five-minute averages are also reported for SO<sub>2</sub> concentrations. One-minute averages are collected from many of the continuously monitored parameters for use in verification and validation of the reported monitoring data.

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<sup>4</sup> http://www.epa.gov/ttn/amtic/calendar.html

### Changes for 2019

Any planned changes in parameters monitored, the configuration, or operations at the site planned for 2019 are described herein and summarized in the Summary of 2019 Network Changes. Unless otherwise indicated, changes at a site including the beginning of new monitoring activity will be effective January 1, 2019. Ozone monitoring for 2019 at new or special project sites may start at the beginning of the Ozone monitoring season (March 1-October 31).

# 2018 Network Summary

This summary table presents the elements of the South Carolina monitoring network as of May 1, 2018.

Network Summary: Calendar Year 2018 Air Monitoring Stations																
Region	Sites	PM <sub>2.5</sub>	PM <sub>2.5</sub> Cont.	Speciation	PM <sub>10</sub>	TSP/Lead	Ozone	$SO_2$	NO <sub>2</sub> /NO/NO <sub>y</sub>	CO	Carbonyls	SVOC	VOC	Precip. Chem.	Precipitation	*MET
Augusta-Richmond County, GA-SC MSA	2	1	1	0	0	0	2	0	0	0	0	0	0	0	0	0
Charleston-N. Charleston MSA	5	2	2	0	1	0	2	2	2	0	0	0	0	0	1	1
Charlotte-Concord-Gastonia, NC-SC MSA	1	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0
Columbia MSA	6	3	2	1	2	1	3	3	2	1	2	3	0	2	2	1
Florence MSA	5	1	1	0	0	**7	1	0	0	0	0	0	0	0	0	0
Greenville-Anderson-Mauldin MSA	5	3	1	0	1	0	4	1	1	0	0	0	0	0	0	1
Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0
Spartanburg MSA	2	2	1	0	0	0	1	0	0	0	0	0	0	0	0	0
Remainder of State	4	1	3	1	3	0	3	1	0	0	2	2	2	0	2	0
TOTALS	31	13	11	2	7	8	18	8	5	1	4	5	2	2	5	3

<sup>\*</sup>MET data includes wind speed and wind direction. \*\*There are identical samplers at each JCI site that run consecutively which allows better utilization of staff visits.

## 2019 Network Summary

This summary table presents the elements of the 2019 Monitoring Plan after implementation of changes described in this plan.

Network Summary: Calendar Year 2019 Air Monitoring Stations																
Region	Sites	PM <sub>2.5</sub>	PM <sub>2.5</sub> Cont.	Speciation	PM <sub>10</sub>	TSP/Lead	Ozone	SO <sub>2</sub>	NO <sub>2</sub> /NO/NO <sub>y</sub>	00	Carbonyls	SVOC	VOC	Precip. Chem.	Precipitation	*MET
Augusta-Richmond County, GA-SC MSA	2	1	1	0	0	0	2	0	0	0	0	0	0	0	0	0
Charleston-N. Charleston MSA	5	2	2	0	1	0	2	2	2	0	0	0	0	0	1	1
Charlotte-Concord-Gastonia, NC-SC MSA	1	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0
Columbia MSA	6	3	2	1	2	1	3	3	2	1	2	3	0	2	2	1
Florence MSA	5	1	1	0	0	**7	1	0	0	0	0	0	0	0	0	0
Greenville-Anderson-Mauldin MSA	4	3	1	0	1	0	3	1	1	0	0	0	0	0	0	1
Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0
Spartanburg MSA	2	2	1	0	0	0	1	0	0	0	0	0	0	0	0	0
Remainder of State	4	1	3	1	3	0	3	1	0	0	2	2	2	0	2	0
TOTALS	30	13	11	2	7	8	17	8	5	1	4	5	2	2	5	3

## 2017 Criteria Pollutant Design Values

This section presents the 2017 design values for the South Carolina criteria pollutant monitoring network.

Site ID	County	Site Name	Ozone (ppm)	PM <sub>2.5</sub> Annual (µg/m³)	PM <sub>2.5</sub> 24-hour (μg/m <sup>3</sup> )	PM <sub>10</sub> (# Expect- ed Exceed -ances)	SO <sub>2</sub> 1- hour (ppb)	NO <sub>2</sub> 1- hour (ppb	NO <sub>2</sub> Annual (ppb)	CO 8- hour (ppm )	CO 1- hour (ppm	Lead (µg/m³) (2017- NOT 3 yr. DV)
003- 0003	Aiken	Jackson Middle School	0.059									
007- 0005	Anderson	Big Creek	0.059									
015- 0002	Berkeley	Bushy Park	0.057									
019- 0003	Charleston	Jenkins Avenue				0	*11	*32	*7			
019- 0046	Charleston	Cape Romain	0.059				*4	*9	1			
019- 0048	Charleston	FAA		7.3	16							
019- 0049	Charleston	Charleston Public Works		7.1	15							
025- 0001	Chesterfield	Chester- field	0.060	7.2	15	0						
029- 0002	Colleton	Ashton	0.056									
031- 0003	Darlington	Pee Dee	0.061									
037- 0001	Edgefield	Trenton	0.061	8.3	18							
041- 0003	Florence	Williams		8.0	17							

Site ID	County	Site Name	Ozone (ppm)	PM <sub>2.5</sub> Annual (µg/m³)	PM <sub>2.5</sub> 24-hour (μg/m <sup>3</sup> )	PM <sub>10</sub> (# Expect- ed Exceed -ances)	SO <sub>2</sub> 1- hour (ppb)	NO <sub>2</sub> 1- hour (ppb	NO <sub>2</sub> Annual (ppb)	CO 8- hour (ppm )	CO 1- hour (ppm	Lead (µg/m³) (2017- NOT 3 yr. DV)
041- 8001	Florence	JCI Railroad										*0.04
041- 8002	Florence	JCI Entrance										*0.08
041- 8003	Florence	JCI River										*0.03
043- 0011	Georgetown	Howard High #3				0						
045- 0015	Greenville	Greenville ESC		9.1	23	0	*2	*42	8			
045- 0016	Greenville	Hillcrest	0.065	8.2	17							
063- 0008	Lexington	Irmo		8.8	19		*9					
063- 0010	Lexington	Cayce City Hall				0						
073- 0001	Oconee	Long Creek	0.063	5.7	14		*2					
077- 0002	Pickens	Clemson	0.063									
077- 0003	Pickens	Wolf Creek	0.061									
079- 0007	Richland	Parklane	0.060	8.1	17	*	*4			1	1	*0
079- 0019	Richland	Bates House		7.9	18	0						
079- 0021	Richland	Congaree Bluff	0.055				*4					
079-	Richland	Sandhill	0.064						4			

Site ID	County	Site Name	Ozone (ppm)	PM <sub>2.5</sub> Annual (µg/m³)	PM <sub>2.5</sub> 24-hour (µg/m³)	PM <sub>10</sub> (# Expect- ed Exceed -ances)	SO <sub>2</sub> 1- hour (ppb)	NO <sub>2</sub> 1- hour (ppb )	NO <sub>2</sub> Annual (ppb)	CO 8- hour (ppm )	CO 1- hour (ppm )	Lead (μg/m³) (2017- NOT 3 yr. DV)
1001												
083- 0009	Spartanburg	North Spartan- burg	0.066									
083- 0011	Spartanburg	T.K. Gregg		8.3	16							
* denot	es design values t	hat did not meet	data comp	leteness req	uirements.							

#### Required Monitoring

The EPA regulation 40 CFR Part 58, Appendix D requires that each State maintain a minimum number of monitors to properly characterize air quality and to meet any required objectives of the monitoring network<sup>5</sup>. In general, these minimum requirements are based on the MSA population and current ambient air monitoring design values. The following sections discuss the minimum monitoring criteria for each of the criteria pollutants (Ozone, Particulate Matter (PM<sub>2.5</sub> and PM<sub>10</sub>), Lead, SO<sub>2</sub>, NO<sub>2</sub>, and CO), the CBSAs, and the MSA population. The final section shows the current South Carolina minimum monitoring requirements.

*Minimum Monitoring for Ozone* – The Ozone minimum monitoring criteria has two requirements:

- 1) Required Ozone SLAMS sites A minimum number of required Ozone SLAMS sites for each CBSA that is determined by CBSA population and the peak Ozone concentrations.
- 2) NCore Requirement Each NCore site must include an Ozone monitor. The Parklane (45-079-0007) site in Columbia, South Carolina is the NCore site for South Carolina.

*Minimum Monitoring for PM\_{2.5} —* The  $PM_{2.5}$  minimum monitoring criteria has six requirements:

- 1) Required PM<sub>2.5</sub> SLAMS sites A minimum number of required PM<sub>2.5</sub> SLAMS sites for each CBSA.
- 2) Continuous Requirement A continuous PM<sub>2.5</sub> monitoring requirement which is equal to at least one-half (round up) the minimum required PM<sub>2.5</sub> SLAMS sites. Also, at least one required continuous analyzer in each CBSA must be collocated with one of the required FRM or FEM monitors, unless at least one of the required FRM/FEM monitors is itself a continuous FEM monitor, in which case, no collocation requirement applies.
- 3) Regional Background and Transport At least one PM<sub>2.5</sub> site must be established in each state to monitor for regional background and at least one PM<sub>2.5</sub> site to monitor regional transport. The Cape Romain (45-019-0046) site in Charleston County is the regional background site and the Chesterfield (45-025-0001) site in Chesterfield County is the regional transport site.
- 4) NCore Requirement Each state is required to operate at least one NCore site which measures PM<sub>2.5</sub> using both continuous and integrated/filter-based samplers. The Parklane (45-079-0007) site in Columbia, South Carolina is the NCore site for South Carolina.
- 5) Near-road PM<sub>2.5</sub> Monitoring The EPA required the collocation of one PM<sub>2.5</sub> monitor with a near-road NO<sub>2</sub> monitor in urban areas having populations of 1,000,000 or more by January 1, 2017. The Charlotte-Concord-Gastonia, NC-SC MSA is the only MSA in South Carolina that met the population requirement for a collocated PM<sub>2.5</sub> monitor. The near-road monitoring requirement for the Charlotte-Concord-Gastonia,

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<sup>&</sup>lt;sup>5</sup> 40 CFR Part 58.11 paragraph (a)(3)(c) and Appendix D to 40 CFR Part 58.

- NC-SC MSA is being fulfilled at the Remount Road (37-119-0045) site by the Mecklenburg County Air Quality Commission.
- 6) Speciation Monitoring Chemical speciation monitoring is conducted at the Parklane (45-079-0007) site and is funded as part of the PM<sub>2.5</sub> Speciation Trends Network (STN). Speciation Monitoring is also conducted at the Chesterfield (45-025-0001) site and is funded by South Carolina.

Minimum Monitoring for  $PM_{10}$  – The  $PM_{10}$  minimum monitoring criteria has one requirement that is based on the CBSA population, the number of exceedances of the NAAQS, and the percentage of  $PM_{10}$  concentrations over or under the NAAQS. Unlike other criteria pollutants, the minimum monitoring requirements for  $PM_{10}$  is given as a range of required monitoring sites for a CBSA.

Minimum Monitoring for Lead – The Lead minimum monitoring criteria has one requirement that any facility with annual Lead emissions exceeding 0.5 tpy will be required to have a Lead sampler. Based on the state-submitted 2014 National Emissions Inventory, there are no facilities in South Carolina with Lead emissions greater than 0.5 tpy.

On May 7, 2010, the Department issued an air synthetic minor construction permit to Johnson Controls Battery Group for the Florence Recycling Center (Permit No. 1040-0129-CA). Under a settlement agreement<sup>6</sup> with several petitioners, the Florence Recycling Center supports source-oriented ambient Lead monitoring being conducted by the Department at several sites around the facility. Additional details of the monitoring of this facility can be found in the Florence MSA section of this Monitoring Plan under the site name "Johnson Controls."

Minimum Monitoring for  $SO_2$  – The  $SO_2$  minimum monitoring criteria has three requirements:

1) Requirement for Monitoring by the Population Weighted Emissions Index – The population weighted emissions index (PWEI) is determined using the most current population of each CBSA and the most recent level of SO<sub>2</sub> emissions for each county within the CBSA. The emissions data is available from the National Emissions Inventory. For any CBSA with a calculated PWEI value equal to or greater than 1,000,000, a minimum of three SO<sub>2</sub> monitors are required. 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 SO<sub>2</sub> monitors are required. For any CBSA with a calculated PWEI value equal to or greater than 5,000, but less than 100,000, a minimum of one SO<sup>2</sup> monitor is required.

The following table presents each CBSA's 2017 population, 2014 SO<sub>2</sub> emissions, calculated index, and minimum monitoring requirements. The process for calculating the index can be found at the bottom of the table.

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 $<sup>^6\</sup> http://www.scdhec.gov/HomeandEnvironment/docs/JCI/JCI-Settlement\%20Agreement\_07142010.pdf$ 

CBSA	2017 CBSA Population	2014 CBSA SO <sub>2</sub> Emissions (Tons)	PWEI	SO <sub>2</sub> Minimum Monitors Required
*Charlotte- Concord- Gastonia, NC- SC MSA	2,525,305	7,624	19,253	1
Greenville- Anderson- Mauldin MSA	895,923	3,098	2,776	0
Columbia MSA	825,033	17,706	14,608	1
Charleston- North Charleston MSA	775,831	15,796	12,255	1
*Augusta- Richmond County, GA-SC MSA	600,151	3,353	2,012	0
*Myrtle Beach- Conway-North Myrtle Beach, SC-NC MSA	464,165	4,837	2,245	0
Spartanburg MSA	334,391	398	133	0
Florence MSA	205,831	3,797	782	0
Hilton Head Island-Bluffton- Beaufort MSA	215,302	908	195	0
Sumter MSA	106,847	182	19	0

The PWEI is calculated using US Census population data and state emission inventory data at the CBSA level. The population for each CBSA (based on the most recent US Census or Census estimate) is multiplied by the CBSA total SO<sub>2</sub> emissions (reported in tons using the latest National Emissions Inventory data). This product is divided by 1,000,000 to derive the index.

CBSA with index greater than 1,000,000 will require 3 monitors.

CBSA with index less than 1,000,000 but greater than 100,000 will require 2 monitors.

CBSA with index less than 100,000 but greater than 5,000 will require 1 monitor.

CBSA with index less than 5,000 will require no monitors.

\*Monitors may be operated in the non-South Carolina portion of the CBSA.

2) Regional Administrator Required Monitoring – The Regional Administrator may require additional SO<sub>2</sub> monitoring sites above the minimum number of monitors required by the PWEI in areas that have the potential to have high SO<sub>2</sub> concentrations, in areas impacted by sources which are not conducive to modeling, or in locations with susceptible and vulnerable populations that are not otherwise being monitored. South Carolina does not have any SO<sub>2</sub> Regional Administrator Required Monitoring.

3) NCore Requirement – Each NCore site must include a SO<sub>2</sub> monitor. The Parklane (45-079-0007) site in Columbia, South Carolina is the NCore site for South Carolina.

Minimum Monitoring for  $NO_2$  – The  $NO_2$  minimum monitoring criteria has four requirements:

- 1) Near-road NO<sub>2</sub> Monitors Each state must have one microscale near-road NO<sub>2</sub> monitoring site in each CBSA with a population of at least 1,000,000 or more persons. An additional near-road NO<sub>2</sub> monitoring site is required for any CBSA with a population of 2,500,000 or more, or in any CBSA with a population of 1,000,000 or more that has one or more roadway segments with 250,000 or greater Annual Average Daily Traffic (AADT) counts. The Charlotte-Gastonia-Concord NC-SC MSA meets the population requirement of at least 1,000,000 or more persons. The Remount Road site is located in Charlotte, North Carolina and has a near-road NO<sub>2</sub> monitor.
- 2) Requirements for Area-wide NO<sub>2</sub> Monitoring Each state must have one monitoring site in each CBSA with a population of 1,000,000 or more persons which will monitor a location of expected highest NO<sub>2</sub> concentrations representing the neighborhood or larger spatial scales. The Garinger High School (37-119-0041) site in Charlotte, North Carolina also operates an area-wide NO<sub>2</sub> monitor.
- 3) Regional Administrator Required Monitoring The Regional Administrators, in collaboration with states, require a minimum of forty additional NO<sub>2</sub> monitoring sites above the minimum monitoring requirements (nationwide) in any area, with a primary focus on siting these monitors in locations to protect susceptible and vulnerable populations. The Greenville ESC (45-045-0015) site is a Regional Administrator Required Monitoring site.
- 4) NCore Requirement (NO/NO<sub>y</sub> Monitoring) Each NCore site must include a NO/NO<sub>y</sub> monitor that will collect data to be used to produce conservative estimates for NO<sub>2</sub> and further Ozone research. The Parklane (45-079-0007) site in Columbia, South Carolina is the NCore site for South Carolina.

Minimum Monitoring for CO – The CO minimum monitoring criteria has two requirements:

- 1) Near-road CO Monitors Each state with CBSAs having a population of 1,000,000 or more people must have one CO monitor collocated with one required near-road NO<sub>2</sub> monitor to be operational by January 1, 2017. The Charlotte-Concord-Gastonia, NC-SC MSA is the only CBSA in South Carolina that meets the population requirement for a collocated CO monitor. The Mecklenburg County Air Quality office operates a CO monitor at the Remount Road (37-119-0045) near road site in Charlotte, North Carolina that became operational on January 1, 2017.
- 2) NCore Requirement Each NCore site in a CBSA with a population of 500,000 or more must include a CO monitor. The Parklane (45-079-0007) monitoring site in the Columbia, SC MSA is the NCore site for South Carolina and supports one

CO monitor. The Garinger (37-119-0041) monitoring site in Mecklenburg County is also an NCore site and supports a CO monitor.

Minimum Monitoring for the Photochemical Assessment Monitoring Stations (PAMS) – South Carolina is not subject to the PAMS requirement.

The CBSAs and the Minimum Monitoring Requirements – The term CBSA is a collective term for the defined MSAs and Micropolitan Statistical Areas (mSA). A MSA area contains a core urban area of 50,000 or more population, and a mSA contains an urban core of at least 10,000 but less than 50,000 population. Each metropolitan or micropolitan area consists of one or more counties and includes the counties containing the core urban area, as well as any adjacent counties that have a high degree of social and economic integration (as measured by commuting to work) with the urban core<sup>7</sup>.

A MSA or mSA geographic composition, or list of geographic components at a particular point in time, is referred to as its "delineation". The MSA or mSA are delineated by the U.S. Office of Management and Budget (OMB) and are the result of the application of published standards based on Census Bureau data. The standards for delineating the areas are reviewed and revised once every ten years, prior to each decennial census. Generally, the areas are delineated using the most recent set of standards following each decennial census. Between censuses, the delineations are updated annually to reflect the most recent Census Bureau population estimates. Areas based on the 2010 standards and Census Bureau data were delineated in July of 2017<sup>8,9</sup>.

While the Department understands the need for establishing minimum monitoring requirements, the EPA appropriately has mechanisms within the network plan approval and network assessment process to allow states the flexibility to implement a monitoring network that meets the three basic monitoring objectives and addresses National and State needs. The recent changes in the MSA definitions are an example of the reasons for the incorporation of flexibility in the regulations and illustrate the necessity that the EPA uses the discretion available in the monitoring regulations to afford states flexibility and regulatory certainty.

Per 40 CFR Part 58, Appendix D, paragraph 2 (e), minimum monitoring requirements in multi-state MSAs can be met through a cooperative agreement. In the absence of an agreement between states, the minimum monitoring requirements must be met independently in each portion of the MSA. South Carolina has established a memorandum of agreement (MOA) with the Georgia Department of Natural Resources, Environmental Protection Division<sup>10</sup>, North Carolina Department of Environmental and

<sup>&</sup>lt;sup>7</sup> https://www.census.gov/programs-surveys/metro-micro.html

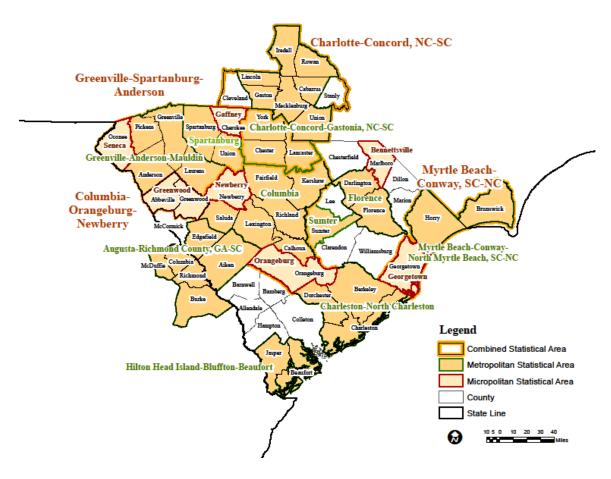
<sup>8</sup> https://www.census.gov/programs-surveys/metro-micro.html

<sup>&</sup>lt;sup>9</sup> OMB Bulletin No. 15-01-"Revised Delineations of Metropolitan Statistical Areas, Micropolitan Statistical Areas, and Combined Statistical Areas, and Guidance on Uses of the Delineations of These Areas", August 15, 2017.

<sup>&</sup>lt;sup>10</sup> The Memorandum of Agreement on Air Quality Monitoring for Criteria Pollutants for the Augusta-Richmond County Metropolitan Statistical Area (MSA) was signed on March 6, 2017 by the South Carolina DHEC Bureau of Air Quality and the Georgia Environmental Protection Division-Air Protection Branch.

Natural Resources Division of Air Quality, and Mecklenburg County, North Carolina<sup>11,12</sup> which specifies the responsibilities of each party to develop a monitoring network that meets the appropriate monitoring objectives for the MSA.

The map below presents South Carolina's CBSAs based on the latest available definitions published in July, 2017.



Population and the Minimum Monitoring Requirements – The minimum monitoring criteria only applies to MSAs. The table below presents the latest 2017\* population estimates for each MSA in South Carolina and the total population of MSAs shared with North Carolina and Georgia.

<sup>11</sup> The Memorandum of Agreement on Air Quality Monitoring for Criteria Pollutants for the Myrtle Beach-Conway-North Myrtle Beach, SC-NC Metropolitan Statistical Area (MSA) was signed on July 1, 2015 by the South Carolina DHEC Bureau of Air Quality and the North Carolina Department of Environmental and

Natural Resources-Division of Air Quality.

<sup>&</sup>lt;sup>12</sup> The Memorandum of Agreement on Air Quality Monitoring for Criteria Pollutants for the Charlotte-Gastonia-Concord Metropolitan Statistical Area (MSA) was signed on July 1, 2016 by the South Carolina DHEC Bureau of Air Quality, the North Carolina Department of Environmental and Natural Resources-Division of Air Quality and the Mecklenburg County, North Carolina Land Use and Environmental Service Agency-Air Quality.

MSA	2017 Population
Charlotte-Concord-Gastonia, NC-SC MSA	2,525,305
Greenville-Anderson-Mauldin MSA	895,923
Columbia MSA	825,033
Charleston-North Charleston MSA	775,831
Augusta-Richmond County, GA-SC MSA	600,151
Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA	464,165
Spartanburg MSA	334,391
Florence MSA	205,831
Hilton Head Island-Bluffton-Beaufort MSA	215,302
Sumter MSA	106,847
*United States Census Bureau and CFR 40 Part 58, Appendix D	

South Carolina Minimum Monitoring Requirements – Based on the \*latest available United States Census population estimates and the 2017 ambient air quality design values (page 16), the minimum monitoring requirements for each MSA are:

MSA	Ozone	PM <sub>2.5</sub>	PM <sub>2.5</sub> Cont.	<b>PM</b> <sub>10</sub>	Lead	SO <sub>2</sub>	NO/NO <sub>y</sub> / NO <sub>2</sub>	00
**Augusta-Richmond County, GA-SC MSA	2	1	1	1-2	0	0	0	0
Charleston-North Charleston, MSA	1	1	1	1-2	0	1	0	0
**Charlotte-Concord-Gastonia, NC-SC MSA	2	2	1	2-4	0	1	2	2
Columbia MSA (NCore)	2	1	1	1-2	0	1	2	1
Florence MSA	1	0	0	0	0	0	0	0
Greenville-Anderson-Mauldin MSA	2	1	1	1-2	0	0	1	0
Hilton Head Island-Bluffton-Beaufort MSA	0	0	0	0	0	0	0	0
Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA	1	0	0	0-1	0	0	0	0
Spartanburg MSA	1	0	0	0-1	0	0	0	0
Sumter MSA	0	0	0	0	0	0	0	0

<sup>\*</sup>United States Census Bureau http://www.census.gov/population/metro/data/def.html and CFR 40 Part 58, Appendix D.

<sup>\*\*</sup> Minimum ambient air monitoring requirements are met cooperatively with the States of Georgia and North Carolina.

#### Summary of 2019 Network Changes

# Augusta-Richmond County, GA-SC MSA (South Carolina portion includes Aiken and Edgefield Counties)

No changes planned for 2019.

#### **Charleston-North Charleston MSA**

No changes planned for 2019.

#### Charlotte-Concord-Gastonia, NC-SC MSA

No changes planned for 2019.

#### Columbia MSA

No changes planned for 2019.

#### Florence MSA

No changes planned for 2019.

#### **Greenville-Anderson-Mauldin MSA**

Garrison Arena (45-007-0006) Site – This Site will be established in 2019.

Big Creek (45-007-0005) Site – This Site will be terminated after the 2019 Ozone season.

#### Hilton Head Island-Bluffton-Beaufort MSA

No changes planned for 2019.

#### Myrtle Beach-Conway-North Myrtle Beach SC-NC MSA

No changes planned for 2019.

#### **Spartanburg MSA**

No changes planned for 2019.

#### **Sumter MSA**

No changes planned for 2019.

#### **Remainder of State**

No changes planned for 2019.

#### Summary of 2018 Network Changes

# Augusta-Richmond County, GA-SC MSA (South Carolina portion includes Aiken and Edgefield Counties)

No changes planned for 2018.

#### **Charleston-North Charleston MSA**

Moncks Corner National Guard (45-015-1002) Site – This Site will be established in 2018.

FAA (45-019-0048) Site – The PM<sub>2.5</sub> sampler was discontinued in May, 2018.

Bushy Park (45-015-0002) Site – This Site will be terminated at the end of the 2018 Ozone season.

Cape Romain (45-019-0046) Site – This site was designated as the required regional background for PM<sub>2.5</sub>. The PM<sub>2.5</sub> monitoring designation was changed from SPM to SLAMS.

#### Charlotte-Concord-Gastonia, NC-SC MSA

York Landfill (45-091-0008) Site – A SO<sub>2</sub> monitor will be added.

#### Columbia MSA

No changes planned for 2018.

#### Florence MSA

No changes planned for 2018.

#### Greenville-Anderson-Mauldin MSA

Clemson (45-077-0002) Site – This site will be terminated at the end of the 2018 Ozone season.

Wolf Creek (45-077-0003) Site – This site will be terminated at the end of the 2018 Ozone season.

#### Hilton Head Island-Bluffton-Beaufort MSA

No changes planned for 2018.

#### Myrtle Beach-Conway-North Myrtle Beach SC-NC MSA

No changes planned for 2018.

#### **Spartanburg MSA**

T. K. Gregg (45-083-0011) Site – This site had a collocated  $PM_{2.5}$  sampler added on May, 2018.

#### **Sumter MSA**

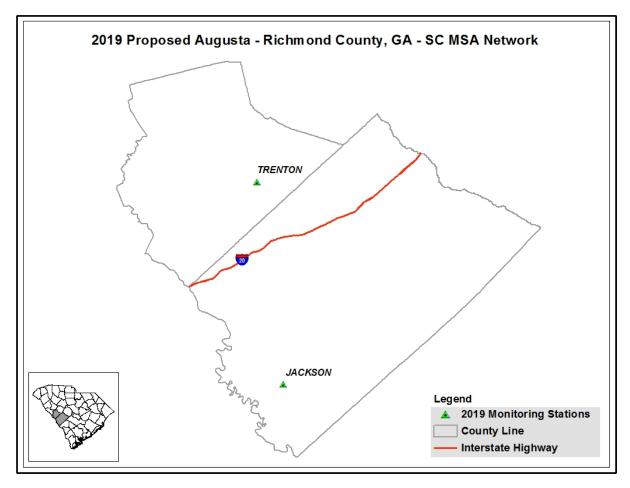
No changes planned for 2018.

#### Remainder of State

Ashton (45-029-0002) Site – The  $PM_{2.5}$  monitoring designation will be changed from SLAMS to SPM.

## **Site Descriptions**

## Augusta-Richmond County, GA-SC MSA (part)



# Classification of Monitoring Type by Site

Site ID	Site Name	PM <sub>2.5</sub>	PM <sub>2.5</sub> Cont.	Speciation	PM <sub>10</sub>	Lead	Ozone	SO <sub>2</sub>	NO <sub>2</sub>	CO
45-003-0003	Jackson Middle School						•			
45-037-0001	Trenton	0	0				•			
TOTAL		1	1	0	0	0	2	0	0	0
O SPM / Other ● SLAMS ●●/OO duplicate / QA monitors										

#### Jackson Middle School

CSA/MSA: none/Augusta-Richmond County MSA

**AQS Site ID:** 45-003-0003

Location: 8217 Atomic Road, Jackson

County: Aiken

Coordinates: +33.34219, -81.78872 Date Established: October 24, 1985 Site Evaluation: January 10, 2018

The Jackson Middle School site is located in southwestern Aiken County, within the town limits of Jackson at the Jackson Middle School. Jackson is located in a suburban setting to monitor concentrations upwind of the Augusta urbanized area. The Jackson site monitors for Ozone. The sample inlet is 128 meters from the nearest road.

This site meets siting criteria found in 40 CFR Part 58 Appendix E. The Northeast tree does not meet the requirements for tree height in the 40 CFR Part 58 Appendix E, Section 4 (Spacing from Obstructions), but there is still more than 270° unobstructed air flow around the probe.

#### Changes for 2019:

There are no changes planned for 2019.

#### Monitors:

Parameter	Scale	Objective	Designation	Probe Height (m)	Analysis & (Method Code)	Sampling Frequency
Ozone 44201-2	Urban	Upwind Background	SLAMS	3.4	Ultraviolet Absorption (087)	Continuous

#### **Trenton**

CSA/MSA: none/Augusta-Richmond County MSA

**AQS Site ID:** 45-037-0001

Location: 660 Woodyard Road (Hwy 121)

County: Edgefield

Coordinates: +33.73993, -81.85362 Date Established: March 28, 1980 Site Evaluation: January 10, 2018

The Trenton site is located in southeastern Edgefield County. Trenton was originally established to monitor for Ozone crossing into South Carolina from Georgia. The Trenton site monitors for Ozone, intermittent PM<sub>2.5</sub>, and continuous PM<sub>2.5</sub>. The sample inlets are 30 meters from the nearest road.

This site meets all 40 CFR Part 58, Appendix E requirements.

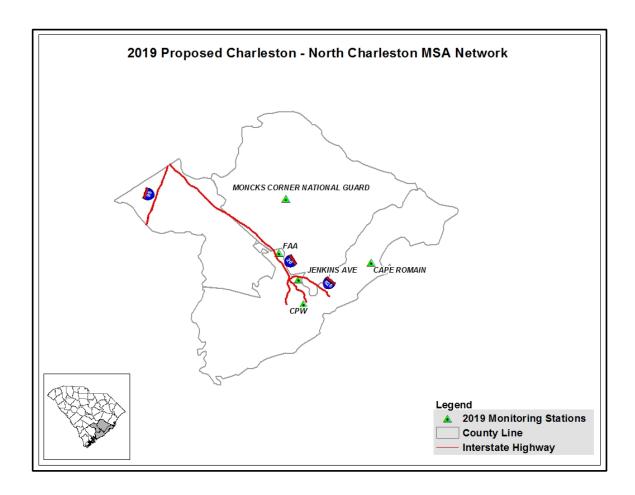
#### Changes for 2019:

There are no changes planned for 2019.

#### Monitors:

MOTILOIS.		1			1	
Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	,
PM <sub>2.5</sub>	Urban	Extreme	SPM	4.76	Gravimetric	1:3
88101-1		Downwind			(145)	
Continuous	Urban	Extreme	SPM	4.53	TEOM	Continuous
PM <sub>2.5</sub>		Downwind			Gravimetric	
88502-3					50°C	
					(702)	
Ozone	Urban	Maximum	SLAMS	3.45	Ultraviolet	Continuous
44201-1		Ozone			Absorption	
		Concentration/			(087)	
		Extreme				
		Downwind				

# Charleston-North Charleston MSA



# Classification of Monitoring Type by Site

Site ID	Site Name	PM <sub>2.5</sub>	PM <sub>2.5</sub> Cont.	Speciation	PM <sub>10</sub>	Lead	Ozone	SO <sub>2</sub>	NO <sub>2</sub>	CO	Precip.	MET
45-015-1002	Moncks Corner National Guard						•					
45-019-0003	Jenkins Ave. Fire Station				•			•	0			
45-019-0046	Cape Romain		•				•	0	0		0	•
45-019-0048	FAA	0										
45-019-0049	CPW	•	0									
TOTAL	TOTAL   2   2   0   1   0   2   2   2   0   1   1							1				
O SPM / Other ● SLAMS ●●/OO duplicate / QA monitors												

#### Moncks Corner National Guard

CSA/MSA: none/Charleston-North Charleston MSA

**AQS Site ID:** 45-015-1002

**Location**: Airport Drive and Wal Flo Lane

County: Berkeley

Coordinates: 33.18, -80.03 Date Established: PENDING Site Evaluation: PENDING

The Moncks Corner National Guard site is located in Moncks Corner downwind from the Charleston urban area. This site monitors for Ozone and the monitoring objective is maximum Ozone concentration. The sample inlet is XX meters from the nearest road.

This site will meet 40 CFR Part 58, Appendix E requirements.

#### Changes for 2019:

This site is expected to be established by the beginning of the 2019 Ozone season.

_		1	1	1		
Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	
Ozone	Urban	Max Ozone	SLAMS		Ultraviolet	Continuous
44201-1		Concentration			Absorption	
					(087)	

#### Jenkins Ave. Fire Station

CSA/MSA: none/Charleston-North Charleston MSA

**AQS Site ID:** 45-019-0003 **Location:** 4830 Jenkins Ave.

County: Charleston

Coordinates: +32.88228, -79.97755

Date Established: February 14, 1969

Site Evaluation: April 19, 2018

The Jenkins Ave. Fire Station site is located in the city of North Charleston behind a fire station in an urban and central city setting. The Jenkins Ave. Fire Station site supports monitors for  $PM_{10}$ ,  $SO_2$ , and  $NO_2$ . The sample inlets are 33.5 meters from the nearest road.

This site meets all 40 CFR Part 58, Appendix E requirements.

# Changes for 2019:

The Department is planning on consolidating several of the sites including the Jenkins Ave. Site into a single monitoring site in North Charleston.

Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	-
PM <sub>10</sub>	Neighbor-	Highest	SLAMS	4.15	TEOM-	Continuous
81102-3	hood	Concentration			Gravimetric	
					(079)	
Sulfur	Neighbor-	Population	SLAMS	4.66	Pulsed	Continuous
Dioxide	hood	Exposure			Fluorescent	
42401-1		-			(560)	
Nitrogen	Neighbor-	Highest	SPM	4.66	Chemilumi-	Continuous
Dioxide	hood	Concentration			nescence	
42602-2		Source			(599)	
		Oriented			,	

## Cape Romain

CSA/MSA: none/Charleston-North Charleston MSA

**AQS Site ID:** 45-019-0046

**Location:** 390 Bulls Island Road (Awendaw)

County: Charleston

Coordinates: +32.94101, -79.65719

Date Established: July 11, 1983

Site Evaluation: April 18, 2017

The Cape Romain site is located in Charleston County at the Cape Romain National Wildlife Refuge (NWR) near Moore's Landing. The Cape Romain NWR is a Class I area about 20 miles northeast of Charleston. The majority of the Refuge area is offshore, extending from Bull Island 20 miles northeast to Cape Romain. The Refuge is bordered on the west by the Intracoastal Waterway. Inland are large tracts of forests with scattered residences. Several miles inland, a primary coastal route, US Highway (Hwy) 17, parallels the coast, with some development along the section of highway that is closest to the Refuge.

The Cape Romain site has continuous monitors for  $SO_2$ ,  $NO_2$ , Ozone, Continuous  $PM_{2.5}$ , and meteorological parameters. This site also serves as a required regional background for  $PM_{2.5}$ . The sample inlets are 86 meters from the nearest road.

This site meets siting criteria found in 40 CFR Part 58 Appendix E. The East tree does not meet the requirements for tree height in the 40 CFR Part 58 Appendix E Section 4 (Spacing from Obstructions), but there is still more than 270° unobstructed air flow around the probe.

#### Changes for 2019:

There are no changes planned for 2019.

#### Monitors:

(Table continues on next page)

		<del>5,4, ps.gs/</del>	•		1	
Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	-
PM <sub>2.5</sub>	Regional	General /	SLAMS	4.75	FDMS	Continuous
88502-3		Background			(183)	
Ozone	Regional	General /	SLAMS	4.10	Ultraviolet	Continuous
44201-1		Background			(047)	
Sulfur	Regional	Source	SPM	4.10	Pulsed	Continuous
Dioxide	_	Oriented			Fluorescent	
42401-2					(560)	
Nitrogen	Regional	General /	SPM	4.10	Chemilumine	Continuous
Dioxide	_	Background			-scence	

Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	
42602-1					(599)	
Wind	Neighbor-	Local	SLAMS	10.0	Instruments	Continuous
Speed,	hood	Conditions			for wind	
Wind					speed,	
Direction					direction,	
and					and	
Precipita-					precipitation	
tion					(020)	

#### FAA Beacon

CSA/MSA: none/Charleston-North Charleston MSA

**AQS Site ID:** 45-019-0048

Location: 2670 Elms Plantation Blvd

County: Charleston

Coordinates: +32.98024, -80.06502 Date Established: April 9, 1999 Site Evaluation: April 26, 2017

The Charleston FAA Beacon site is located in Charleston County approximately five miles northwest of the Charleston International Airport near Charleston Southern University. This site has a SPM PM<sub>2.5</sub> sampler. The sample inlet is 160 meters from the nearest road.

Although the 40 CFR Part 58.20 states that compliance to the siting regulations is optional, it is the Department's intent to meet as many of the Appendix E requirements as possible.

#### Changes for 2019:

The Department is planning on consolidating several of the sites including the FAA Site into a single monitoring site in North Charleston. The collocated PM<sub>2.5</sub> was temporarily moved to the T. K. Gregg monitoring site. When the new monitoring site is established, the PM<sub>2.5</sub> sampler will be moved back to the Charleston-North Charleston MSA.

Parameter	Scale	Objective	Designation	Probe Height (m)	Analysis & (Method Code)	Sampling Frequency
PM <sub>2.5</sub> 88101-1	Neighbor- hood	Population Exposure	SPM	2.35	Gravimetric (145)	1:1

# Charleston Public Works (CPW)

CSA/MSA: none/Charleston-North Charleston MSA

AQS Site ID: 45-019-0049 Location: 360 Fishburne Street

**County:** Charleston

Coordinates: +32.79097, -79.95871 **Date Established:** November 20, 1998

Site Evaluation: April 26, 2017

The Charleston Public Works (CPW) site is located on the western side of the Charleston peninsula near downtown Charleston. The CPW site supports the required  $PM_{2.5}$  monitors for the MSA. The sample inlets are 24.8 meters from the nearest road.

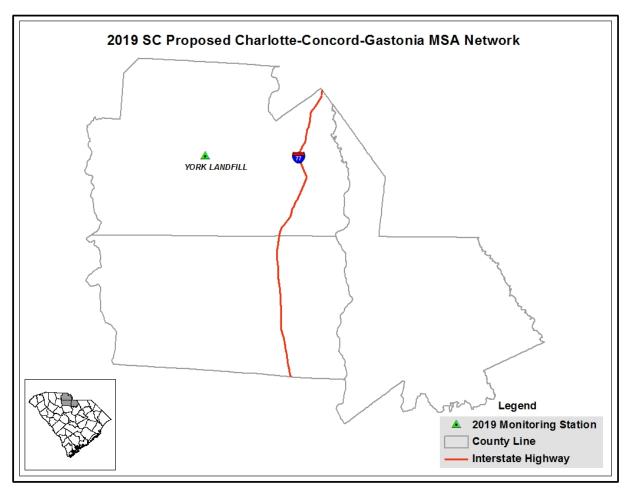
This site meets siting criteria found in 40 CFR Part 58 Appendix E. The Northeast tree does not meet the requirements for tree height or drip line in the 40 CFR Part 58 Appendix E, but there is still more than 270° unobstructed air flow around the probe. The Department is currently working with the land owners to have the trees obstructions removed or trimmed.

# Changes for 2019:

The Department is planning on consolidating several of the sites including the CPW Site into a single monitoring site in North Charleston.

Parameter	Scale	Objective	Designation	Probe	Analysis	Sampling
				Height	Method &	Frequency
				(m)	(Method	
					Code)	
PM <sub>2.5</sub>	Neighbor-	Population	SLAMS	2.25	Gravimetric	1:1
88101-1	hood	Exposure			(145)	
PM <sub>2.5</sub>	Neighbor-	Population	SPM	2.74	TEOM	Continuous
88502-3	hood	Exposure			Gravimetric	
		-			50°C	
					(702)	

# Charlotte-Concord-Gastonia MSA



Classification of Monitoring Type by Site

Site ID 45-091-0008	Site Name  York Landfill	PM <sub>2.5</sub>	PM <sub>2.5</sub> Cont.	Speciation	PM <sub>10</sub>	Lead	Ozone	O SO <sub>2</sub>	NO <sub>2</sub>	00	MET
TOTAL		0	0	0	0	0	1	1	0	0	0
O SPM / Other    SLAMS    O SPM / Other    SLAMS    O SPM / Other    SLAMS    O SPM / Other    O SPM / Other											

#### York Landfill

CSA/MSA: Charlotte-Concord CSA / Charlotte-Concord-Gastonia MSA

**AQS Site ID:** 45-091-0008

**Location:** 310 Langrum Branch Rd.

County: York

Coordinates: +34.9776, -81.2074 Date Established: February 27, 2017 Site Evaluation: February 27, 2018

The York Landfill site is located in south central York County in a rural setting. This site was established to replace the York Continuous Monitoring Site (45-091-0006) and represents background levels near the Charlotte urban area. The York Landfill Site currently operates monitors for Ozone and SO<sub>2</sub>. The sample inlets are 34.8 meters from the nearest road

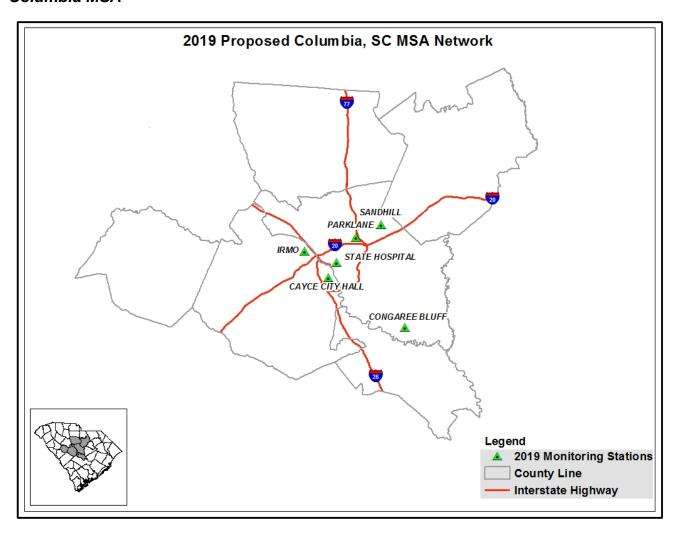
This site meets all 40 CFR Part 58, Appendix E requirements.

## Changes for 2019:

This site is a replacement for the York Continuous Monitoring Site (45-091-0006).

Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	
Ozone	Urban	Upwind	SLAMS	4.55	Ultraviolet	Continuous
44201-1		Background			Absorption	
					(087)	
Sulfur	Urban	Upwind	SPM	4.55	Pulsed	Continuous
Dioxide		Background			Fluorescence	
					(560)	

# Columbia MSA



# Classification of Monitoring Type by Site

Site ID	Site Name	PM <sub>2.5</sub>	PM <sub>2.5</sub> Cont.	Speciation	PM <sub>10</sub>	Lead	Ozone	SO <sub>2</sub>	NO <sub>2</sub> /NO/NO <sub>y</sub>	00	Carbonyls	SVOC	Precip. Chem.	Precip.	MET
45-063-0008	Irmo	•	0					0			0	0			
45-063-0010	Cayce City Hall				•										
45-079-0007	Parklane (NCore)	•	•	•	0	•	•	•	•	•		0	0	0	•
45-079-0020	State Hospital										0	0			
45-079-0021	Congaree Bluff						0	0					0	0	
45-079-1001	Sandhill						•		0						
TOTAL 3 2 1 2 1 3 3 2 1 2 3 2 1															
O SPM / Other ● SLAMS ●●/OO duplicate / QA monitors															

#### Irmo

**CSA/MSA:** Columbia-Orangeburg-Newberry CSA / Columbia MSA

**AQS Site ID:** 45-063-0008 **Location:** 200 Leisure Lane

County: Lexington

Coordinates: +34.051017, -81.15492 **Date Established:** April 7, 1989 **Site Evaluation:** November 28, 2017

The Irmo site is located in Lexington County near the Town of Irmo. This site has a sampler for PM<sub>2.5</sub> and continuous monitors for SO<sub>2</sub> and PM<sub>2.5</sub>. Additionally, this site has samplers collecting Carbonyl and SVOC samples on a 1:6 schedule. The sample inlets are 39 meters from the nearest road.

This site meets all 40 CFR Part 58, Appendix E requirements.

# Changes for 2019:

The landowner has requested that we relocate the site. We are working with the landowner to secure a new site on the same property. We will submit a request to the EPA to approve the site relocation once it has been identified.

#### Monitors:

(Table continues on next page)

Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	
PM <sub>2.5</sub>	Neighbor-	Population	SLAMS	4.9	Gravimetric	1:1
88101-1	hood	Exposure			(145)	
PM <sub>2.5</sub>	Neighbor-	Population	SPM	4.4	FDMS	Continuous
88101-3	hood	Exposure			Gravimetric	
		•			(581)	
Sulfur	Neighbor-	Source-	SPM	3.33	Pulsed	Continuous
Dioxide	hood	Oriented			Fluorescent	
42401-1					(560)	
Carbonyls	Neighbor-	Population	Non-	2.7	HPLC	1:6
	hood	Exposure/	regulatory		Ultraviolet	
		General /			Absorption	
		Background			(102)	
SVOC	Neighbor-	Population	Non-	2.7	TO-13-	1:6
	hood	Exposure/	regulatory		EPA610-	
		General /			EPA625	
		Background			(106)	

# Cayce City Hall

CSA/MSA: Columbia-Orangeburg-Newberry CSA / Columbia MSA

AQS Site ID: 45-063-0010 Location: 1 830 Morlaine Rd.

**County:** Lexington

Coordinates: +33.96914, -81.06629 Date Established: December 6, 2007 Site Evaluation: November 28, 2017

The Cayce City Hall site is located in the City of Cayce and measures  $PM_{10}$ . This site was established to measure  $PM_{10}$  concentrations in populated areas and to determine the potential impact of occasional high concentrations on neighborhoods surrounding the industrialized area. The sample inlet is 24 meters from the nearest road.

This site meets all 40 CFR Part 58, Appendix E requirements.

### Changes for 2019:

There are no changes planned for 2019.

Parameter	Scale	Objective	Designation	Probe Height	Analysis & (Method	Sampling Frequency
				(m)	Code)	
PM <sub>10</sub>	Neighbor-	Population	SLAMS	2.42	TEOM-	Continuous
81102-1	hood	Exposure			Gravimetric	
		-			(079)	

# Parklane (NCore)

**CSA/MSA:** Columbia-Orangeburg-Newberry CSA / Columbia MSA

**AQS Site ID:** 45-079-0007 **Location:** 8311 Parklane Road

**County:** Richland

Coordinates: +34.09398, -80.96230 Date Established: April 3, 1980 Site Evaluation: December 19, 2017

The Parklane site is located in north central Richland County within the city limits of Columbia. Parklane was originally sited to provide downwind population exposure measurements at the edge of the Columbia urban area population and has been expanded to support the full complement of NCore parameters. The suite of samplers measure PM<sub>2.5</sub>, speciated PM<sub>2.5</sub>, Lead, precipitation chemistry, precipitation, and SVOC. The suite of continuous monitors measure PM<sub>2.5</sub>, Ozone, SO<sub>2</sub>, CO, NO/NO<sub>y</sub>. The site also provides support for demonstration, training, and equipment evaluation convenient to the Department's Columbia air laboratory. The sample inlets are 131 meters from the nearest road.

This site meets all 40 CFR Part 58, Appendix E requirements.

In 2017, the Bates House (45-079-0019) site, which operated the required collocated  $PM_{2.5}$  sampling, was terminated. The collocated  $PM_{2.5}$  sampling was moved to Parklane to fulfill duplicate sampling requirements found in 40 CFR Part 58, Appendix A.

# Changes for 2019:

There are no changes planned for 2019.

#### Monitors:

\*Bolded parameters are an NCore requirement.

(Table continues on next page)

Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
*Required				Height	(Method	Frequency
				(m)	Code)	
PM <sub>2.5</sub>	Neighbor	Population	NCore	4.9	Gravimetric	1:3
88101-1	-hood	Exposure	SLAMS		(145)	
PM <sub>2.5</sub>	Neighbor	Population	SLAMS	4.72	FDMS	Continuous
88502-3	-hood	Exposure			Gravimetric	
					(183)	
Collocated	Neighbor	Population	QA	5.3	Gravimetric	1:3
PM <sub>2.5</sub>	-hood	Exposure	Collocated		(145)	
88101-2			SLAMS			
Speciated	Neighbor	Population	NCore	2.4	CSN	1:3
PM <sub>2.5</sub>	-hood	Exposure	SLAMS		Protocol	

Parameter *Required	Scale	Objective	Designation	Probe Height (m)	Analysis & (Method Code)	Sampling Frequency
					(811,812,82 6,838,839,84 1, 842)	
PM <sub>10</sub> 85101-1	Urban	Population Exposure	SPM	5.3	Gravimetric (127)	1:3
<b>PM</b> <sub>10-2.5</sub> 86101-1	Neighbor -hood	Population Exposure	NCore SLAMS	4.4	Gravimetric FRM Pair (176)	1:3
<b>Lead</b> 14129-2	Neighbor -hood	Population Exposure	NCore SLAMS	1.6	GFAA (191)	1:6
<b>Ozone</b> 44201-1	Urban	Max Ozone Concentra- tion	NCore SLAMS	4.45	Ultraviolet Absorption (087)	Continuous
Sulfur Dioxide 42401-1	Neighbor -hood	Population Exposure/ Other	NCore SLAMS	4.45	Pulsed Fluorescent (560)	Continuous
Nitric Oxide /NO <sub>y</sub> 42600-2 42601-2	Neighbor -hood	Population Exposure	NCore SLAMS	10.0	Chemi- luminesence (674)	Continuous
Carbon Monoxide 42101-1	Neighbor -hood	Population Exposure	NCore SLAMS	4.45	Gas filter Correlation (593)	Continuous
SVOC	Neighbor -hood	Population Exposure	SPM	1.4	PUF- GC/MS	1:6
Precipitation chemistry	Neighbor -hood	Regional Transport	Non- regulatory	1.4	Not applicable	Weekly- Tues-Tues
Precipitation	Neighbor -hood	General / Background	SPM	1.1	Tipping bucket (011)	Continuous and Sample
Wind Speed / Direction	Neighbor -hood	Local Conditions	SLAMS	10.0	Instruments for wind speed/wind direction (020)	Continuous

# State Hospital

**CSA/MSA:** Columbia-Orangeburg-Newberry CSA / Columbia MSA

**AQS Site ID:** 45-079-0020 **Location**: 2100 Bull Street

**County:** Richland

Coordinates: +34.01549, -81.03418 Date Established: January 7, 1999 Site Evaluation: November 28, 2017

The State Hospital site is located in Columbia near the intersection of Elmwood Avenue and Bull Street on the grounds of the South Carolina State Hospital. State Hospital has samplers for Carbonyls and SVOC. The sample inlets are 10 meters from the nearest road.

Access to this site may be lost due to recent sale and expected redevelopment of the property.

# Changes for 2019:

There are no changes planned for 2019.

Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	
Carbonyls	Middle	Highest	Non-	4.2	HPLC	1:6
		Concentration	regulatory		Ultraviolet	
					Absorption	
					(102)	
SVOC	Microscale	Highest	Non-	4.3	EPA610-	1:6
		Concentration	regulatory		EPA625	

## Congaree Bluff

**CSA/MSA:** Columbia-Orangeburg-Newberry CSA / Columbia MSA

**AQS Site ID:** 45-079-0021

Location: 1850 South Cedar Creek Road

County: Richland

Coordinates: +33.81467, -80.78113

Date Established: December 27, 1999

Site Evaluation: February 8, 2018

The Congaree Bluff site is located in southern Richland County. The site is located in a rural setting within the boundaries of the Congaree National Park. The Congaree Bluff monitoring continues a data record begun in 1981 with the establishment of the Congaree Swamp site (45-079-1006). The original site was established in cooperation with the Department of the Interior and the support of the General Assembly to provide long term monitoring in this unique area. The Congaree Swamp site was located in the flood plain and had to be relocated to the current Congaree Bluff site in 2001. Monitoring activities at this site are intended to represent conditions found in the National Park only. The Congaree Bluff site has monitors for Ozone, SO<sub>2</sub>, precipitation, and precipitation chemistry. The sample inlets are 188 meters from the nearest road.

On May 26, 2016, the EPA issued a waiver for 40 CFR Part 58, Appendix E, Section 4-Spacing from Obstructions and Section 11-Summary for tree obstructions. This site meets all other siting criteria found in CFR 40 Part 58, Appendix E. Furthermore, there is a dripline issue with a large long-leaf pine to the east of the monitoring site. The drip line is approximately 7 meters away from the probe inlet. However, the branches of the tree are approximately 80 feet above the probe inlet. Due to the height of the branches and the fact that it is a pine tree (with little surface area for pollutants to collect on the leaves and branches), the Department does not believe that it impacts measurements of ambient air pollutant concentrations.

# Changes for 2019:

There are no changes planned for 2019.

#### Monitors:

(Table continues on next page)

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Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	
Ozone	Neighbor-	General /	SPM	4.15	Ultraviolet	Continuous
44201-1	hood	Background			(047)	
Sulfur	Neighbor-	General /	SPM	4.15	Pulsed	Continuous
Dioxide	hood	Background			Fluorescent	

Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	
42401-1					(560)	
Precipita-	Regional	Regional	Non-	1.70	IC	Weekly-
tion		Transport	regulatory			Tue-Tue
Chemistry						
Precipita-	Neighbor-	General/	SPM	1.6	Tipping	Continuous
tion	hood	Background			Bucket	and
					(011)	Sample

# Sandhill Experimental Station

CSA/MSA: Columbia-Orangeburg-Newberry CSA / Columbia MSA

**AQS Site ID**: 45-079-1001 **Location**: 900 Clemson Road

**County:** Richland

Coordinates: +34.13126, -80.86832 **Date Established:** January 1, 1959 **Site Evaluation:** December 19, 2017

The Sandhill Experimental Station site is located in northeastern Richland County, downwind from the Columbia metropolitan area. This site is located in a rapidly urbanizing portion of the city of Columbia. The Sandhill site measures Ozone and NO<sub>2</sub>. The sample inlets are 31 meters from the nearest road.

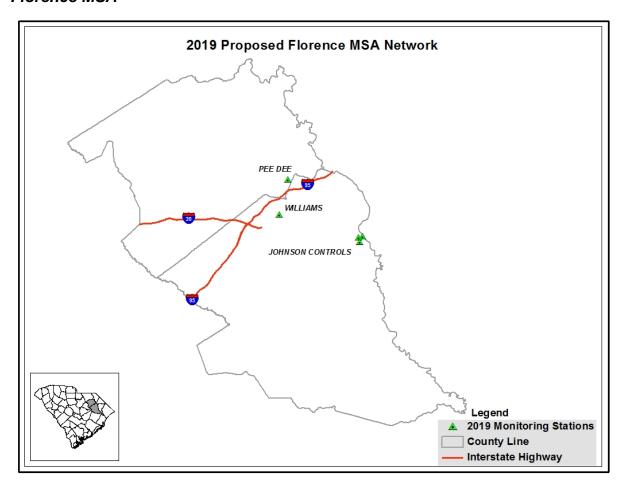
This site meets all 40 CFR Part 58, Appendix E requirements.

# Changes for 2019:

There are no changes planned for 2019.

	_	_	ı		_	_
Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
		-	_	Height	(Method	Frequency
				(m)	Code)	-
Ozone	Urban	Max Ozone	SLAMS	4.12	Ultraviolet	Continuous
44201-1		Concentration			Absorption	
					(087)	
Nitrogen	Urban	General /	SPM	4.12	Chemi-	Continuous
Dioxide		Background			luminesence	
42602-1		Max Precursor			(599)	
		Emissions				

# Florence MSA



# Classification of Monitoring Type by Site

Site ID	Site Name	PM <sub>2.5</sub>	PM <sub>2.5</sub> Cont.	Speciation	PM <sub>10</sub>	Lead	Ozone	$SO_2$	$NO_2$	CO
45-031-0003	Pee Dee Exp. Station						•			
45-041-0003	Williams Middle School	•	•							
45-041-8001, 8002, 8003	Johnson Controls					0				
TOTAL		1	1	0	0	*7	1	0	0	0
O SPM / Other ● SLAMS ●●/OO duplicate / QA monitors * See details on site page for number of samplers										

#### Pee Dee Experimental Station

CSA/MSA: none/Florence MSA AQS Site ID: 45-031-0003

**Location:** 2200 Pocket Road (Darlington)

**County:** Darlington

Coordinates: +34.28569, -79.74485 **Date Established:** February 25, 1993

Site Evaluation: April 4, 2017

The Pee Dee Experimental Station site is located in northeastern Darlington County. This site serves as the required Ozone monitor in the Florence MSA. The sample inlets are 215.8 meters from the nearest road.

This site meets all 40 CFR Part 58, Appendix E requirements.

### Changes for 2019:

There are no changes planned for 2019.

Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	-
Ozone	Urban	Max Ozone	SLAMS	4.14	Ultraviolet	Continuous
44201-1		Concentration/			Absorption	
		General /			(087)	
		Background				

#### Williams Middle School

CSA/MSA: none/Florence MSA AQS Site ID: 45-041-0003 Location: 1119 N. Irby Street

County: Florence

Coordinates: +34.21427, -79.76735 Date Established: August 4, 2008 Site Evaluation: April 4, 2017

The Williams Middle School site is located in Florence County. The Department established the Williams site to meet the 40 CFR Part 58 Appendix D requirements for objective, collocated continuous monitoring, and reporting. The Florence MSA has one  $PM_{2.5}$  sampler. A collocated continuous monitor is also required to provide timely reporting of concentrations to the public. The sample inlets are 110 meters from the nearest road.

This site meets all 40 CFR Part 58, Appendix E requirements.

#### Changes for 2019:

There are no changes planned for 2019.

Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
	0.000			Height	(Method	Frequency
				(m)	`Code)	,
PM <sub>2.5</sub>	Neighbor-	Population	SLAMS	2.65	Gravimetric	1:3
88101-1	hood	Exposure/			(145)	
		Highest				
		Concentration				
PM <sub>2.5</sub>	Neighbor-	Population	SLAMS	2.43	TEOM	Continuous
88502-3	hood	Exposure			Gravimetric	
		-			30° C	
					(704)	

# **Johnson Controls** (3 Sites-JCI Railroad, JCI Entrance, JCI Woods)

**CSA/MSA:** none/Florence MSA

**AQS Site ID:** 45-041-8001, 8002, 8003

Location: Liberty Chapel @ Bethel Rd., Liberty Chapel @ Paper Mill Rd., Liberty

Chapel @ Paper Mill Rd.

County: Florence

**Coordinates:** +34.15567, -79.56981; +34.16413, -79.572330; +34.16747, -79.56266

Dates Established: January 4-10, 2012

Site Evaluation: June 1, 2017

Johnson Controls Incorporated (JCI) is located in Florence County. On May 7, 2010, the Department issued an air synthetic minor construction permit to Johnson Controls Battery Group for the Florence Recycling Center (Permit No. 1040-0129-CA). Under a settlement agreement with several petitioners<sup>13</sup>, the Florence Recycling Center will conduct source-oriented ambient Lead monitoring at three locations around the facility. \* The JCI samplers are set on a 1:6 sampling schedule. In order to reduce the amount of time that staff must collect the filters, additional samplers have been added to each site. Sampling frequency may be increased if needed for special investigations.

The 40 CFR Part 58.20 states that compliance to the siting regulations is optional, but it is the Department's intent to meet as many of the Appendix E requirements as possible. The JCI Railroad (45-041-8001) site has one sampler. There is also a second sampler that runs consecutively. The JCI Railroad (45-041-8001) site meets 40 CFR Part 58, Appendix E requirements.

The JCI Entrance (45-041-8002) site has two samplers. There is also a third sampler that runs consecutively. The JCI Entrance (45-041-8002) site meets all 40 CFR Part 58, Appendix E requirements.

The JCI Woods (45-041-8003) site has one sampler. There is also a second sampler that runs consecutively. The JCI Woods (45-041-8003) site meets 40 CFR Part 58. Appendix E requirements except Section 4-Spacing from Obstructions and Section 11-Summary siting requirements due to tree obstructions. However, the tree obstructions in the predominant wind direction toward the source have been removed.

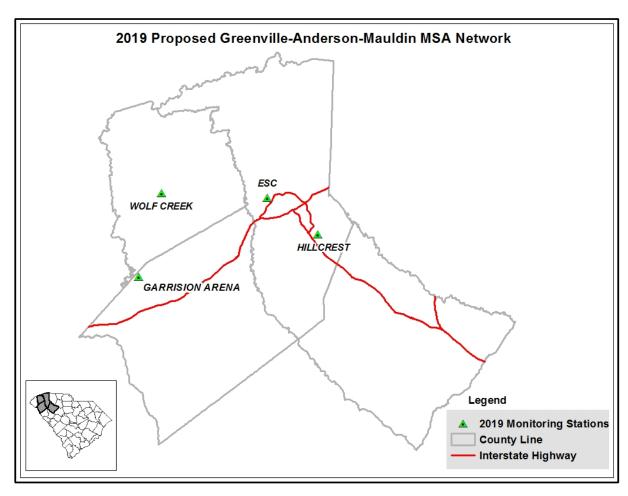
<sup>&</sup>lt;sup>13</sup> Coastal Conservation League and League of Women Voters of South Carolina vs South Carolina Department of Health and Environmental Control and Johnson Controls Battery Group, Inc., (State of SC, 2010).

Changes for 2019: There are no changes planned for 2019.

Site ID	Parameter	Scale	Objective	Desig-	Probe	Analysis	Sampling
				nation	Height	&	Frequency
					(m)	(Method	
						Code)	
041-8001	Lead	Middle	Source	SPM	2.42	ICP/MS	1:6
	14129		oriented			(193)	
*041-8001	Lead	Middle	Source	SPM	2.62	ICP/MS	1:6
	14129		oriented			(193)	
041-8002	Lead	Middle	Source	SPM	2.3	ICP/MS	1:6
	14129		oriented			(193)	
041-8002	Lead	Middle	Source	SPM	2.3	ICP/MS	1:6
	14129		oriented			(193)	
*041-8002	Lead	Middle	Source	SPM	2.6	ICP/MS	1:6
	14129		oriented			(193)	
041-8003	Lead	Middle	Source	SPM	2.42	ICP/MS	1:6
	14129		oriented			(193)	
*041-8003	Lead	Middle	Source	SPM	2.74	ICP/MS	1:6
	14129		oriented			(193)	

<sup>\*</sup>duplicate samplers for better staff utilization

# Greenville-Anderson-Mauldin MSA



# Classification of Monitoring Type by Site

Site ID	Site Name	PM <sub>2.5</sub>	PM <sub>2.5</sub> Cont.	Speciation	PM <sub>10</sub>	Lead	Ozone	SO <sub>2</sub>	NO <sub>2</sub>	CO	Met
45-007-0005	Big Creek						•				
45-007-0006	Garrison Arena						•				
45-045-0015	Greenville ESC	•	0		•			•	•		
45-045-0016	Hillcrest	••					•				•
TOTAL		3	1	0	1	0	3	1	1	0	1
O SPM / Other ● SLAMS ●●/OO duplicate / QA monitors											

# Big Creek

CSA/MSA: Greenville-Spartanburg-Anderson CSA / Greenville-Anderson-Mauldin MSA

AQS Site ID: 45-007-0005 Location: 215 McAlister Road

County: Anderson

Coordinates: +34.62324, -82.53206 Date Established: June 4, 2008 Site Evaluation: February 15, 2018

The Big Creek site is located northeast of the City of Anderson. The site was established to represent maximum Ozone concentrations in the Anderson MSA, downwind of Anderson and upwind background for the Greenville MSA. In February 2013, the MSA definitions were changed, and this site is now contained within the Greenville-Anderson-Mauldin MSA. The sample inlet is 43.9 feet from the nearest road.

This site meets all 40 CFR Part 58, Appendix E requirements.

## Changes for 2019:

In 2019, this site will run concurrently with the Garrison Arena Site and will be terminated after the Ozone season.

Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	
Ozone	Urban	Max Ozone	SLAMS	4.1	Ultraviolet	Continuous
44201-1		Concentration /			Absorption	
		Upwind			(087)	
		Background			,	

#### Garrison Arena

CSA/MSA: Greenville-Spartanburg-Anderson CSA / Greenville-Anderson-Mauldin MSA

**AQS Site ID:** 45-007-0006

Location: Woodburn Road, Pendleton

County: Anderson

Coordinates: 34.63, -82.81 Date Established: PENDING Site Evaluation: PENDING

The Garrison Arena site is located on the grounds of Clemson University at the T. Ed Garrison Arena near the northern border of Anderson County. This monitor measures Ozone concentrations upwind of the Greenville-Spartanburg urbanized area.

This site is XX.X meters from the nearest road.

This site will meet siting criteria found in 40 CFR Part 58 Appendix E.

# Changes for 2019:

There are no changes planned for 2019.

Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	
Ozone	Urban	General /	SLAMS		Ultraviolet	Continuous
44201-1		Background			Absorption	
					(087)	

# **Employment Security Commission (ESC)**

**CSA/MSA:** Greenville-Spartanburg-Anderson CSA / Greenville-Anderson-Mauldin MSA

**AQS Site ID:** 45-045-0015 **Location:** 133 Perry Avenue

County: Greenville

Coordinates: +34.84389, -82.41458 Date Established: April 11, 2008 Site Evaluation: November 14, 2017

The Greenville ESC site is located in the city of Greenville and was established on April 11, 2008. This site supports a PM<sub>2.5</sub> sampler and continuous monitoring for PM<sub>2.5</sub>. It also supports PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, and measurements for wind speed and wind direction. The sample inlets are 15. meters from the nearest road. The EPA Region 4 has selected this site as one of the locations for a Regional Administrator required NO<sub>2</sub> monitor to help protect susceptible and vulnerable populations, as required by 40 CFR, Part 58, Appendix D, Section 4.3.4.

This site meets siting criteria found in 40 CFR Part 58 Appendix E except Section 4-Spacing from Obstructions. The site has a Site Waiver from the EPA for trees located to the Southeast and Southwest of the site. There is still 270° of airflow around the probes.

# Changes for 2019:

There are no changes planned for 2019.

#### Monitors:

(Table continues on next page)

Parameter	Scale	Objective	Designation	Probe Height (m)	Analysis & (Method Code)	Sampling Frequency
PM <sub>2.5</sub> 88101-1	Neighbor- hood	Population Exposure / Welfare Related Impacts/ Collocated	SLAMS	3.5	Gravimetric (145)	1:1
PM <sub>2.5</sub> 88101-3	Neighbor- hood	Population Exposure/ Welfare Related Impacts	SPM	4.55	FDMS Gravimetric (581)	Continuous
PM <sub>10</sub> 81102-1	Neighbor- hood	Population Exposure	SLAMS	4.26	TEOM Gravimetric (079)	Continuous
Sulfur	Neighbor-	Population	SLAMS	4.54	Pulsed	Continuous

Parameter	Scale	Objective	Designation	Probe Height	Analysis & (Method	Sampling Frequency
				(m)	Code)	
Dioxide 42401-1	hood	Exposure			fluorescent (560)	
Nitrogen Dioxide 42602-1	Neighbor- hood	Population Exposure	SLAMS	4.54	Chemilumin escence (599)	Continuous

#### Hillcrest Middle School

**CSA/MSA:** Greenville-Spartanburg-Anderson CSA / Greenville-Anderson-Mauldin MSA

AQS Site ID: 45-045-0016 Location: 510 Garrison Road

County: Greenville

Coordinates: +34.75185, -82.25670 **Date Established:** February 17, 2009 **Site Evaluation:** November 14, 2017

The Hillcrest Middle School site represents suburban areas near the interstate corridors in the Greenville MSA. Initiated in 2008, this site was selected as a monitoring location based on results of the Greenville MSA Ozone study. This site supports an Ozone monitor, a  $PM_{2.5}$  sampler, and a collocated  $PM_{2.5}$  sampler. The sample inlets are 54 meters from the nearest road.

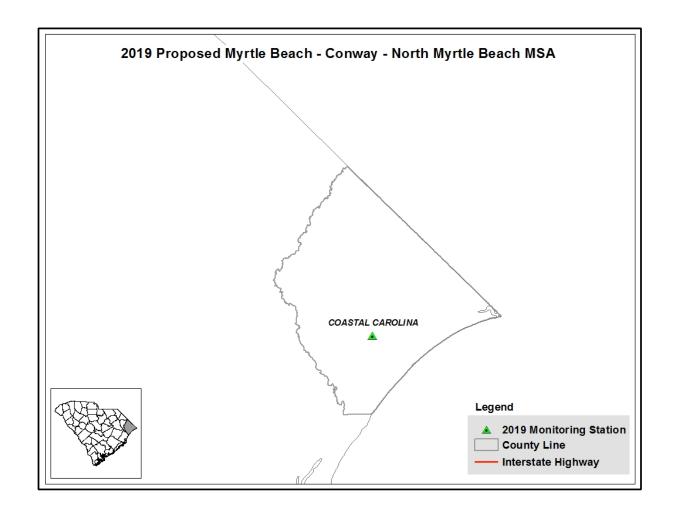
This site meets all 40 CFR Part 58, Appendix E requirements.

# Changes for 2019:

There are no changes planned for 2019.

MOTITO 3.						
Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method Code)	Frequency
				(m)		
PM <sub>2.5</sub>	Urban	Population	SLAMS	3.41	Gravimetric	1:3
88101-1		Exposure			(145)	
Collocated	Urban	Population	QA	3.5	Gravimetric	1:3
PM <sub>2.5</sub>		Exposure	Collocated		(145)	
88101-2		-	SLAMS			
Ozone	Urban	Population	SLAMS	3.83	Ultraviolet	Continuous
44201-1		Exposure			Adsorption	
					(087)	
Wind	Neigh	Local	SLAMS	10.0	Instruments for	Continuous
Speed /	bor-	Conditions			wind	
Direction	hood				speed/wind	
					direction	
					(020)	

# Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA



# Classification of Monitoring Type by Site

Site ID	Site Name	PM <sub>2.5</sub>	PM <sub>2.5</sub> Cont.	Speciation	PM <sub>10</sub>	Lead	Ozone	SO <sub>2</sub>	NO <sub>2</sub>	00	MET
45-051-0008	Coastal Carolina										
TOTAL			0	0	0	0	1	0	0	0	0
O SPM / Other	TOTAL           0   0   0   0   0   1   0   0   0           O SPM / Other         ● SLAMS         ● ●/OO duplicate / QA monitors										

#### Coastal Carolina

CSA/MSA: Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA

**AQS Site ID:** 45-051-0008 **Location:** Century Circle

County: Horry

Coordinates: 33.8007, -78.9939 Date Established: June 27, 2016 Site Evaluation: February 22, 2018

In February 2013, OMB combined Horry County with Brunswick County, NC to establish the Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA. In order to meet the minimum monitoring criteria in 40 CFR Part 58, Appendix D, at least one Ozone monitor is required in the MSA. In conjunction with the State of North Carolina, local government, and stakeholders, Department established the Coastal Carolina monitoring site to be representative of expected maximum Ozone concentrations in northeast South Carolina. The sample inlet is 18.3 meters from the nearest road.

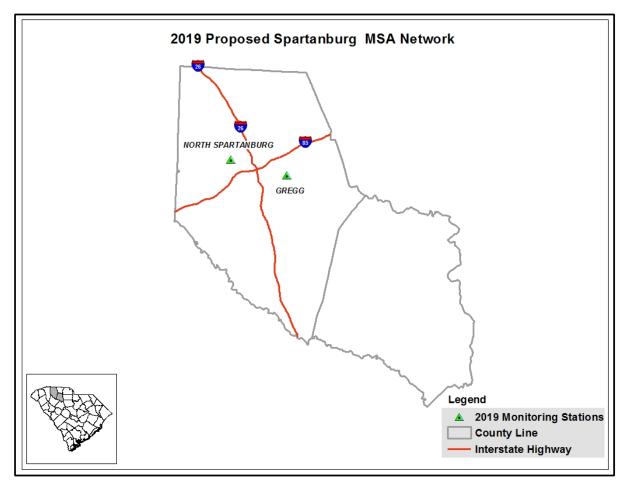
This site meets all 40 CFR Part 58, Appendix E requirements.

#### Changes for 2019:

There are no changes planned for 2019.

Parameter	Scale	Objective	Designation	Probe Height (m)	Analysis & (Method Code)	Sampling Frequency
Ozone 44201-1	Urban	Population Exposure	SLAMS	4.1	Ultraviolet (047)	Continuous

# Spartanburg MSA



Classification of Monitoring Type by Site

Site ID	Site Name	PM <sub>2.5</sub>	PM <sub>2.5</sub> Cont.	Speciation	PM <sub>10</sub>	Lead	Ozone	SO <sub>2</sub>	NO <sub>2</sub>	00
45-083-0009	North Spartanburg Fire Station #2						•			
45-083-0011	T.K. Gregg	••	0							
TOTAL		2	1	0	0	0	1	0	0	0
O SPM / Othe	●●/OO duplicate / QA monitors									

#### North Spartanburg Fire Station #2

CSA/MSA: Greenville-Spartanburg-Anderson CSA / Spartanburg MSA

**AQS Site ID:** 45-083-0009

Location: 1556 John Dodd Road

County: Spartanburg

Coordinates: +34.98874, -82.07573 Date Established: April 4, 1990 Site Evaluation: November 4, 2017

The North Spartanburg Fire Station #2 site is located in rural Spartanburg County, northwest of the City of Spartanburg. This site supports an Ozone monitor and was established as a maximum Ozone concentration monitor for the Greenville-Spartanburg-Anderson urban area on April 4, 1990. This monitor is designated SLAMS and fulfills the requirement for a maximum concentration site for the Spartanburg MSA. The sample inlet is 92.5 meters from the nearest road.

This site meets siting criteria found in 40 CFR Part 58 Appendix E except Section 4-Spacing from Obstructions. There is a Northwest tree that does not meet the requirements for tree height but there is still more than 270° unobstructed air flow around the probe.

#### Changes for 2019:

There are no changes planned for 2019.

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Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	
Ozone	Urban	Max Ozone	SLAMS	4.2	Ultraviolet	Continuous
44201-1		Concentration			Absorption	
					(047)	

# T.K. Gregg Recreation Center

**CSA/MSA:** Greenville-Spartanburg-Anderson CSA / Spartanburg MSA

AQS Site ID: 45-083-0011

**Location:** 267 Northview Street

**County**: Spartanburg

Coordinates: +34.95557, -81.92480 Date Established: December 29, 2008 Site Evaluation: November 4, 2017

The T. K Gregg Recreation Center site is located in Spartanburg County. With the cooperation of local government and stakeholders, the Department established this PM<sub>2.5</sub> site in the downtown Spartanburg area to meet the 40 CFR Part 58, Appendix D requirements for monitoring objective, collocated continuous monitoring, and reporting. This site also supports a collocated PM<sub>2.5</sub> continuous monitor for the Spartanburg MSA. The sample inlets are 48.2 meters from the nearest road.

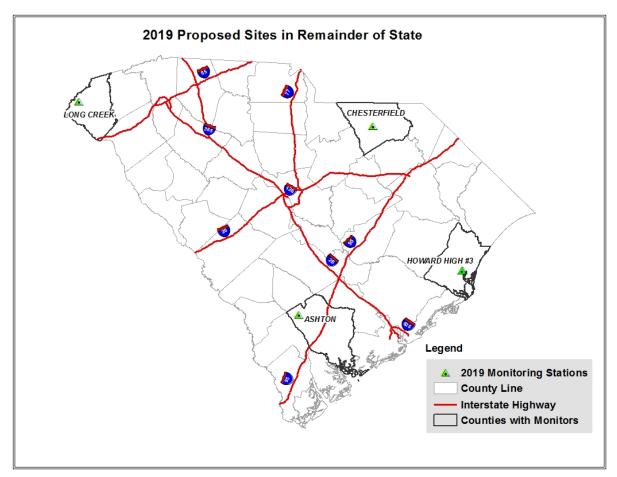
This site meets all 40 CFR Part 58, Appendix E requirements.

#### Changes for 2019:

There are no changes planned for 2019. The PM2.5 sampler was moved temporarily to this site to fulfill the collocation requirements. Once the new monitoring site is established in the Charleston-North Charleston MSA, this monitor will be moved back to that MSA.

Parameter	Scale	Objective	Designa-	Probe	Analysis &	Sampling
			tion	Height	(Method	Frequency
				(m)	Code)	
PM <sub>2.5</sub>	Neighbor	Highest	SLAMS	2.4	Gravimetric	1:1
88101-1	-hood	Concentration			(145)	
PM <sub>2.5</sub>	Neighbor	Highest	SPM	2.5	TEOM	Continuous
88502-3	-hood	Concentration			Gravimetric	
					50°C	
					(702)	
Collocated	Neighbor	Population	QA	2.5	Gravimetric	1:6
PM <sub>2.5</sub>	-hood	Exposure	Collocated		(145)	
88101-2		-	SLAMS			

# Remainder of State



Classification of Monitoring Type by Site

Site ID	Site Name	PM <sub>2.5</sub>	PM <sub>2.5</sub> Cont.	Speciation	PM <sub>10</sub>	Lead	Ozone	SO <sub>2</sub>	NO <sub>2</sub>	00	Carbonyls	SVOC	VOCs	Precipitation
45-025- 0001	Chesterfield	•	•	•	00		0				00	00	00	0
45-029- 0002	Ashton		0				0							
45-043- 0011	Howard High School #3				0									
45-073- 0001	Long Creek		0				0	0						0
TOTAL		1	3	1	3	0	3	1	0	0	2	2	2	2
O SPM /	O SPM / Other SLAMS SLAM													

### Chesterfield (NATTS)

CSA/MSA: none/none AQS Site ID: 45-025-0001

**Location:** SC Hwy 145, McBee (Route 2 Box 100)

**County:** Chesterfield

Coordinates: +34.61538, -80.19878 Date Established: January 6, 2000 Site Evaluation: March 22, 2018

The Chesterfield site is located in central Chesterfield County. The Chesterfield site has continuous monitors for  $PM_{2.5}$ , Ozone, and meteorological parameters. Sampling is done for  $PM_{2.5}$  and  $PM_{10}$ . This site also serves as the required regional transport site for  $PM_{2.5}$ . In addition to the CSN protocol  $PM_{2.5}$  speciation sampling, this site is a precision site with collocated samplers for  $PM_{10}$ . The sample inlets are 43.9 meters from the nearest road.

The Chesterfield site is also a rural National Air Toxics Trends Site (NATTS) which includes Carbonyls, VOC, SVOC, and metals sampling. Federal funding for speciation sampling at this site was eliminated in 2015. Speciation sampling will continue as long as state resources are available. Also, there was a correction in the designation of Continuous PM<sub>2.5</sub> from SPM to SLAMS.

This site meets all 40 CFR Part 58, Appendix E requirements.

# Changes for 2019:

There are no changes planned for 2019.

#### Monitors:

(Table continues on next page)

Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
		-	_	Height	(Method	Frequency
				(m)	Code)	
PM <sub>2.5</sub>	Regional	Regional	SLAMS	2.9	Gravimetric	1:3
88101-1		Transport			(145)	
PM <sub>2.5</sub>	Regional	Population	SLAMS	4.8	FDMS	Continuous
88502-3		Exposure			Gravimetric	
					(183)	
Speciated	Regional	Regional	SLAMS	2.0	CSN	1:6
PM <sub>2.5</sub>		Transport			Protocol	
PM10	Regional	General /	SPM	2.4	Gravimetric	1:6
81102-1		Background			(063)	
Collocated	Regional	General /	QA	2.4	Gravimetric	1:6
PM <sub>10</sub>		Background	Collocated		(063)	
81102-2			SPM			

Parameter	Scale	Objective	Designation	Probe Height (m)	Analysis & (Method Code)	Sampling Frequency
Ozone 44201-1	Regional	General / Background	SPM	4.8	Ultraviolet Absorption (087)	Continuous
Carbonyls	Urban	NATTS	SPM	4.78	DNPH/IC	1:6
Carbonyls	Urban	NATTS	SPM	4.78	DNPH/IC	1:6
SVOC	Urban	NATTS	SPM	1.9	PUF/GCMS	1:6
SVOC	Urban	NATTS	SPM	1.9	PUF/GCMS	1:6
Volatile	Urban	NATTS	Non-	3.23	Canister/	1:6
Organic			regulatory		GCMS	
Compounds						
Volatile	Urban	NATTS	Non-	3.28	Canister/	1:6
Organic Compounds			regulatory		GCMS	
Wind speed / direction	Neighbor- hood	Local Conditions	Non- regulatory	10.0	Instruments for wind speed/wind direction (020)	Continuous
Precipita- tion	Neighbor- hood	General/ Background	SPM	1.73	Tipping Bucket (011)	Continuous and Sample

#### Ashton

CSA/MSA: none/none AQS Site ID: 45-029-0002

**Location:** Ashton Road (S-13-18) Islandton

County: Colleton

Coordinates: +33.00784 -80.96504 Date Established: March 7, 1990 Site Evaluation: March 13, 2018

The Ashton site is located in northwestern Colleton County and was established on March 7, 1990. It monitors for concentrations of PM<sub>2.5</sub> and Ozone. The sample inlets are 8.4 meters from the nearest road.

The 40 CFR Part 58.20 states that compliance to the siting regulations is optional, but it is the Department's intent to meet as many of the Appendix E requirements as possible. This site does not meet 40 CFR Part 58, Appendix E, Section 4-Spacing from Obstructions, Section 5-Spacing from Trees, and Section 11-Summary requirements due to tree obstructions and drip line requirements.

## Changes for 2019:

There are no changes planned for 2019.

### Monitors:

monitoro.		1				
Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	
PM <sub>2.5</sub>	Regional	General /	SPM	4.3	TEOM	Continuous
88502-3		Background			Gravimetric	
		_			50°C	
					(702)	
Ozone	Urban	General /	SPM	4.7	Ultraviolet	Continuous
44201-2		Background			(047)	

## **Howard High School #3**

CSA/MSA: Myrtle Beach-Conway SC, NC CSA/none

**AQS Site ID:** 45-043-0011 **Location:** 594 Gilbert Street

**County:** Georgetown

Coordinates: +33.36892, -79.29662 Date Established: July 15, 2008 Site Evaluation: March 29, 2018

The Howard High #3 site is located in Georgetown County on the grounds of Howard High School and supports a  $PM_{10}$  monitor.  $PM_{10}$  monitoring in this area of Georgetown has been ongoing since 1970, when the original Howard High site was established. The sample inlet is 49.7 meters from the nearest road.

This site meets all 40 CFR Part 58, Appendix E requirements.

# Changes for 2019:

There are no changes planned for 2019.

#### Monitors:

Mornitors.						
Parameter	Scale	Objective	Designation	Probe	Analysis &	Sampling
				Height	(Method	Frequency
				(m)	Code)	-
PM <sub>10</sub>	Neighbor-	Population	SPM	2.22	TEOM	Continuous
81102-1	hood	Exposure/			Gravimetric	
		Highest			(079)	
		Concentration				

# Long Creek

**CSA/MSA:** Greenville-Spartanburg-Anderson CSA/ none

**AQS Site ID:** 45-073-0001

**Location:** Round Mountain Tower Rd.

County: Oconee

Coordinates: +34.805333, -83.23777

Date Established: August 1, 1983

Site Evaluation: May 2, 2017

The Long Creek site is located on Round Mountain in northwest Oconee County. The Long Creek site was also established as part of the Southern Oxidant Study. It provides a unique vantage point for monitoring the impacts of transported pollutants. Long Creek has continuous monitors for Ozone, SO<sub>2</sub>, and PM<sub>2.5</sub>. The sample inlets are 30 meters from the nearest road.

Due to the importance of measuring region-wide SO<sub>2</sub>, PM<sub>2.5</sub>, and Ozone concentrations, the unique location, and collocated monitoring activity, the Department has determined that current monitoring at this site should be continued.

The 40 CFR Part 58.20 states that compliance to the siting regulations is optional, but it is the Department's intent to meet as many of the Appendix E requirements as possible. This site does not meet the 40 CFR Part 58, Appendix E requirements. Tree cutting has occurred since the last monitoring plan, improving site exposure. However, there are still trees that the Department needs to evaluate for distance from probe relative to height.

# Changes for 2019:

There are no changes planned for 2019.

#### Monitors:

Parameter	Scale	Objective	Designa-	Probe	Analysis &	Sampling
		-	tion	Height	(Method	Frequency
				(m)	Code)	
PM <sub>2.5</sub>	Urban	General /	SPM	4.0	FDMS	Continuous
88101-3		Background			Gravimetric	
					(581)	
Ozone	Regional	General /	SPM	4.18	Ultraviolet	Continuous
44201-1		Background			(047)	
Sulfur	Regional	Regional	SPM	4.18	Pulsed	Continuous
Dioxide	_	Transport			Fluorescent	
42401-1					(560)	
Precipita-	Neighbor-	General/	SPM	1.73	Tipping	Continuous
tion	hood	Background			Bucket	and

Parameter	Scale	Objective	Designa-	Probe	Analysis &	Sampling
		-	tion	Height	(Method	Frequency
				(m)	Code)	
					(011)	Sample

### **Network Development**

The Monitoring Network provides data to support an array of decisions ranging from development of emissions strategies to protect and improve air quality to the level of activity appropriate for individuals in sensitive populations. To support these varied data users, the network must provide both stable, long-term measures to document trends and rapid reporting of conditions to the public. In response to land use, population, and urban areas growth, the network must be evaluated and adjusted to meet the changing conditions and needs.

The Monitoring Network described in this plan continues to build upon a significant transition from the network that has evolved over the last thirty-five years. It reflects the successes in reducing ambient concentrations of TSP, Lead, CO, NO<sub>2</sub>, and SO<sub>2</sub>, and the increasing concern about the impact of fine particles and Ozone on public health and the environment.

A series of studies are planned for the major urban areas, as resources permit, to gain better understanding of the air quality, and provide information to improve the monitoring network. In addition to the intensive studies that provide a detailed 'snapshot,' it is intended that SPM sites be established and monitored in rotation to provide regular checks and long term tracking of the trends in air quality in all areas of the state including smaller cities, towns, and rural areas. The implementation of this long term strategy is contingent on sufficient federal funding to support the core-required monitoring and will be developed and evaluated as resources become available. Project plans will be developed for the monitoring and data analysis activity to better define the scope of these strategies prior to implementation. These studies are long term needs the Department has identified and are important tools for evaluating and improving the representativeness of the ambient air monitoring network and our knowledge of air quality in the State.

Areas where long term strategies are being considered include:

- Irmo Monitoring Site the owner has requested that the Irmo Monitoring Site be moved to another location on the property.
- Charleston Port Monitoring the Charleston Port Expansion project has a projected completion date now delayed to 2020-2021. The Department will work with local stakeholders to identify and establish an appropriate PM<sub>2.5</sub> monitoring site to measure ambient pollutant levels before and after port activities commence.

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# **APPENDIX A: Summary of Public Comments Received**

Below is a summary of the comments received and the Department's response. A copy of the actual comments (emails and mail) received will be submitted to the EPA Region 4 staff along with the final 2019 Monitoring Plan.

Comments from EPA Region 4: EPA Region 4 stated that the Department needs to provide more site information before EPA would be able to fully evaluate the requested network modifications for Garrison Arena (45-007-0006), Moncks Corner National Guard (45-015-1002), Big Creek (45-007-0005), Clemson (45-077-0002), and Wolf Creek (45-077-0003) monitoring sites. They also recommended that site photos for each monitoring site be available on the Department's web page. Finally, EPA requested to review the site evaluations for each monitoring site.

DHEC Response: The Department will submit to EPA Region 4 an addendum to the 2019 Network Plan that addresses the requested information. Site data from each Site Evaluation is provided in <u>Appendix D: Site Evaluations Summary for CFR 40 Part 58</u>, <u>Appendix E Table</u> and the Site Evaluations will be forwarded to EPA. Also, the Department is currently working to provide site photos of all monitoring sites on the DHEC web page at: <a href="https://gis.dhec.sc.gov/monitors/">https://gis.dhec.sc.gov/monitors/</a>

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# **APPENDIX B: Termination Requests**

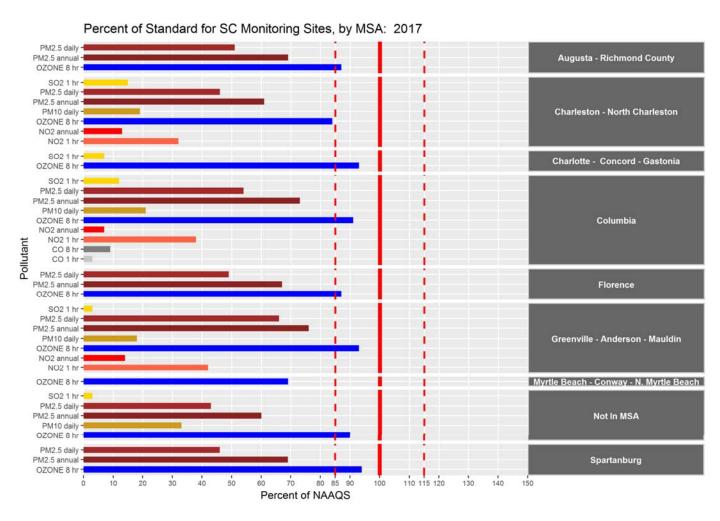
The Table below contains information on the monitoring sites the Department has scheduled for discontinuance.

Site	ID	Date Established	Notes
Clemson	45-077-0002	July 14, 1979	The Department has determined that the Ozone monitoring at this site is duplicative and will be discontinued immediately.
Wolf Creek	45-077-0003	August 10, 2010	The Department has determined that the SPM Ozone monitoring at this site is duplicative. The Department is notifying EPA of the termination of this site at the end of the 2018 Ozone season.

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# **APPENDIX C: Design Value Graphs**

The following graph demonstrates the highest design value for each criteria pollutant in each MSA in comparison with its NAAQS. The MSAs are listed on the far right. Each individual criteria pollutant and averaging time are listed on the far left. The colored bar after the criteria pollutant's name shows the highest 2017 design value. The solid red vertical line is the NAAQS standard. The red dash lines show 15 percent of the Standard (85% and 115%).



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# APPENDIX D: Site Evaluations Summary for CFR 40 Part 58, Appendix E Table

Site Evaluations are conducted yearly on each monitoring site to ensure compliance to requirements found in CFR 40 Part 58, Appendix E. After appropriate administrative review, the Site Evaluations are sent to the EPA Region 4. The following tables summarize information about the latest Site Evaluations for each monitoring site.

The first table gives the column number and the shortened Column Name listed in the columns of the second table. It also gives the Section number and the regulatory requirement it represents from the CFR 40, Part 58, Appendix E. The second table lists each monitoring site, their individual criteria pollutant monitors, and the fulfillment and/or measurements of the CFR 40 Part 58, Appendix E requirements. For brevity, the column titles in the second table have been shortened as follows:

Column	Column Name	CFR 40 Part 58, Appendix E Requirements
Column 1:	Site ID, Site Name	Site Identification information and date the Site Evaluation was conducted.
	and Date Visited	
Column 2:	Parameter	Criteria Pollutant
Column 3:	Sampling Train	Section 9. For reactive gases, is sampling train made of borosilicate glass, FEP Teflon® or their equivalent?
Column 4:	Sampling Time*	Section 9. For reactive gases, is sampling time <20 seconds?
Column 5:	Probe Height	Section 2. Horizontal and Vertical Placement: Height from ground to probe must be 2-15 meters
Column 6:	Support Structure	Section 2. Horizontal and Vertical Placement: Is Horizontal and vertical distance from supporting structure >1 meter.
Column 7:	Collocation Placement	Section 11. Horizontal and Vertical Placement: Collocated monitors must be within 4 meters of each other.
Column 8:	Flow Rates	Section 11. Horizontal and Vertical Placement: For PM collocation, flow rates greater than 200 liters/min must be at least 2 meters apart or at least 1 meter flow rates for less than 200 liters/min.
Column 9:	Minor Sources	Section 3. Spacing from Minor Sources: Probe should be away from minor sources.
Column 10:	Obstructions**	Section 4. Spacing from Obstructions: Distance from probe to obstacle must be at least twice the height the obstacle protrudes above the probe.
Column 11:	Airflow	Section 4. Spacing from Obstructions: Must have unrestricted airflow 270 degrees

		around probe.
Column 12:	Dripline	Section 5. Spacing from Trees: Distance from dripline of trees to probe must be <10 meters.
Column 13:	Roadway	Section 6. Spacing from Roadways: Does it meet distance from roadway to probe?

<sup>\*</sup>Sampling Residence Time for all monitors is currently being tested. Only the tests that have been completed as of June 26, 2018 are reported here.

<sup>\*\*</sup>The monitor is still considered in compliance if the distance from probe to obstacle is not at least twice the height the obstacle protrudes above the probe but there is still 270° of airflow around probe.

Site ID, Site Name and Date Visited	Param- eter	Samp- ling Train	Samp- ling Time		obe nt (m)	Support Structure	Colle tion F men	lace-	Flow Rate	Minor Sources	**Obstru ctions	Air- flow	-	oline m)	Road	way (m)
003-0003	Ozone	Yes	Yes	Yes	3.4	Yes	N/A		N/A	Yes	**No	Yes	Yes	11.5	Yes	128.0
Jackson 1/10/2018																
037-0001 Trenton 1/10/2018	PM <sub>2.5</sub>	N/A	N/A	Yes	4.76	Yes	Yes	1.9	Yes	Yes	Yes	Yes	Yes	No trees	Yes	30.3
037-0001 Trenton 1/10/2018	PM <sub>2.5</sub> C	N/A	N/A	Yes	4.53	Yes	Yes	1.9	Yes	Yes	Yes	Yes	Yes	No trees	Yes	30.3
037-0001 Trenton 1/10/2018	Ozone	Yes	Yes	Yes	3.45	Yes	N/A		N/A	Yes	Yes	Yes	Yes	No trees	Yes	30.3
015-0002 Bushy Park 6/21/2018	Ozone	Yes	Yes	Yes	3.15	Yes	N/A		N/A	Yes	No	No	No	4.34	Yes	15.2
019-0003 Jenkins Ave. 4/19/2018	PM <sub>10</sub>	N/A	N/A	Yes	4.15	Yes	N/A		Yes	Yes	Yes	Yes	Yes	16.0	Yes	33.5
019-0003 Jenkins Ave.	SO <sub>2</sub>	Yes	Yes	Yes	4.66	Yes	N/A		N/A	Yes	Yes	Yes	Yes	16.0	Yes	33.5

Site ID, Site Name and Date Visited	Param- eter	Samp- ling Train	Samp- ling Time		obe ht (m)	Support Structure	Colle tion F men	lace-	Flow Rate	Minor Sources	**Obstru ctions	Air- flow		pline m)	Road	way (m)
4/19/2018 019-0003	NO <sub>2</sub>	Yes	Yes	Yes	4.66	Yes	N/A		N/A	Yes	Yes	Yes	Yes	16.0	Yes	33.5
Jenkins Ave. 4/19/2018																
019-0046 Cape Romain 6/21/2018	PM <sub>2.5</sub>	N/A	N/A	Yes	4.75	Yes	N/A		Yes	Yes	**No	Yes	Yes	11.0	Yes	86.0
019-0046 Cape Romain 6/21/2018	Ozone	Yes	Not compl eted	Yes	4.1	Yes	N/A		N/A	Yes	**No	Yes	Yes	11.4	Yes	86.0
019-0046 Cape Romain 6/21/2018	SO <sub>2</sub>	Yes	Yes	Yes	4.1	Yes	N/A		N/A	Yes	**No	Yes	Yes	11.4	Yes	86.0
019-0046 Cape Romain 6/21/2018	NO <sub>2</sub>	Yes	Not compl eted	Yes	4.1	Yes	N/A		N/A	Yes	**No	Yes	Yes	11.4	Yes	86.0
019-0048 FAA 6/7/2018	PM <sub>2.5</sub>	N/A	N/A	Yes	2.35	Yes	Yes	1.7	Yes	Yes	**No	Yes	No	5.9	Yes	160.0
019-0048 FAA 6/7/2018	PM <sub>2.5</sub>	N/A	N/A	Yes	2.35	Yes	Yes	1.7	Yes	Yes	**No	Yes	No	5.8	Yes	160.0
019-0049 CPW 6/7/2018	PM <sub>2.5</sub>	N/A	N/A	Yes	2.25	Yes	Yes	1.2	Yes	Yes	**No	Yes	No	4.43	Yes	24.8
019-0049 CPW	PM <sub>2.5</sub> C	N/A	N/A	Yes	2.74	Yes	Yes	1.2	Yes	Yes	**No	Yes	No	5.63	Yes	24.8

Site ID, Site Name and Date Visited	Param- eter	Samp- ling Train	Samp- ling Time		obe ht (m)	Support Structure		oca- Place- t (m)	Flow Rate	Minor Sources	**Obstru ctions	Air- flow		pline m)	Road	way (m)
6/7/2018 091-0008 York Landfill	Ozone	Yes	Not compl eted	Yes	4.55	Yes	N/A		N/A	Yes	Yes	Yes	Yes	27.4 0	Yes	34.8
6/14/2018 091-0008 York Landfi6/14/ 2018	SO <sub>2</sub>	Yes	Not compl eted	Yes	4.55	Yes	N/A		N/A	Yes	Yes	Yes	Yes	27.4	Yes	34.8
063-0008 Irmo 11/27/2017	PM <sub>2.5</sub> C	N/A	N/A	Yes	4.4	Yes	Yes	1.6	Yes	Yes	Yes	Yes	Yes	14.4	Yes	39.0
063-0008 Irmo 11/27/2017	PM <sub>2.5</sub>	N/A	N/A	Yes	4.9	Yes	Yes	1.6	Yes	Yes	Yes	Yes	Yes	14.4	Yes	39.0
063-0008 Irmo 11/27/2017	SO <sub>2</sub>	Yes	Not compl eted	Yes	3.33	Yes	N/A		N/A	Yes	Yes	Yes	Yes	14.4	Yes	39.0
063-0010 Cayce CH 11/27/2017	PM <sub>10</sub>	N/A	N/A	Yes	2.42	Yes	N/A		Yes	Yes	Yes	Yes	Yes	10.8	Yes	24.0
079-0007 Parklane 12/19/2017	PM <sub>2.5</sub>	N/A	N/A	Yes	4.9	Yes	Yes	2.4	Yes	Yes	Yes	Yes	Yes	16.7	Yes	131.0
079-0007 Parklane 12/19/2017	PM <sub>2.5</sub>	N/A	N/A	Yes	5.3	Yes	Yes	2.4	Yes	Yes	Yes	Yes	Yes	16.7	Yes	131.0
079-0007 Parklane 12/19/2017	PM <sub>2.5</sub> C	N/A	N/A	Yes	4.72	Yes	N/A		Yes	Yes	Yes	Yes	Yes	22.9	Yes	131.0
079-0007 Parklane	Speciate d PM <sub>2.5</sub>	N/A	N/A	Yes	2.4	Yes	N/A		N/A	Yes	Yes	Yes	Yes	15.3	Yes	145.8

Site ID, Site Name and Date Visited	Param- eter	Samp- ling Train	Samp- ling Time		obe ht (m)	Support Structure	Colloc tion Pla ment (	ace-	Flow Rate	Minor Sources	**Obstru ctions	Air- flow		pline m)	Road	way (m)
12/19/2017 079-0007	PM <sub>10</sub> C	N/A	N/A	Yes	5.3	Yes	N/A		Yes	Yes	Yes	Yes	Yes	17.9	Yes	131.0
Parklane 12/19/2017	FIVI <sub>10</sub> C	IN/A	IN/A	165	5.5	165	IN/A		165	165	165	165	165	17.9	165	131.0
079-0007 Parklane 12/19/2017	Ozone	Yes	Yes	Yes	4.45	Yes	N/A		N/A	Yes	Yes	Yes	Yes	22.3	Yes	131.0
079-0007 Parklane 12/19/2017	SO <sub>2</sub>	Yes	Not compl eted	Yes	4.45	Yes	N/A		N/A	Yes	Yes	Yes	Yes	22.3	Yes	131.0
079-0007 Parklane 12/19/2017	СО	Yes	Yes	Yes	4.45	Yes	N/A		N/A	Yes	Yes	Yes	Yes	22.3	Yes	131.0
079-0007 Parklane 12/19/2017	NO/NO <sub>y</sub>	Yes	Not compl eted	Yes	10.0	Yes	N/A		N/A	Yes	Yes	Yes	Yes	22.3	Yes	131.0
079-0007 Parklane 12/19/2017	Lead	N/A	N/A	Yes	1.6	Yes	N/A		N/A	Yes	Yes	Yes	Yes	15.3	Yes	145.8
079-0021 Congaree Bluff 02/08/2018	Ozone	Yes	Yes	Yes	4.15	Yes	N/A		N/A	Yes	No	Yes	No	7.4	Yes	187.5
079-0021 Congaree Bluff 02/08/2018	SO <sub>2</sub>	Yes	Yes	Yes	4.15	Yes	N/A		N/A	Yes	No	Yes	No	7.4	Yes	187.5
079-1001 Sandhill 12/19/2017	Ozone	Yes	Yes	Yes	4.12	Yes	N/A		N/A	Yes	Yes	Yes	Yes	16.4	Yes	31.1
079-1001 Sandhill	NO <sub>2</sub>	Yes	Yes	Yes	4.12	Yes	N/A		N/A	Yes	Yes	Yes	Yes	16.4	Yes	31.1

Site ID, Site Name and Date Visited	Param- eter	Samp- ling Train	Samp- ling Time		obe ht (m)	Support Structure	Colletion F		Flow Rate	Minor Sources	**Obstru ctions	Air- flow		oline m)	Road	way (m)
12/19/2017 031-0003 Pee Dee 6/5/2018	Ozone	Yes	Yes	Yes	4.14	Yes	N/A		N/A	Yes	Yes	Yes	Yes	No trees	Yes	193.3
041-0003 Williams MS 4/4/2017	PM <sub>2.5</sub> C	N/A	N/A	Yes	2.43	Yes	Yes	1.6	Yes	Yes	Yes	Yes	Yes	19.4	Yes	110.0
041-0003 Williams MS 4/4/2017	PM <sub>2.5</sub>	N/A	N/A	Yes	2.65	Yes	Yes	1.6	Yes	Yes	Yes	Yes	Yes	20.4	Yes	110.0
041-8001 JCI Railroad 7/11/2018	Lead POC 1	N/A	N/A	Yes	2.4	Yes	Yes	3.0	N/A	Yes	Yes	Yes	Yes	17.4	Yes	99.0
041-8001 JCI Railroad 7/11/2018	Lead POC 2	N/A	N/A	Yes	2.62	Yes	Yes	3.1	N/A	Yes	Yes	Yes	Yes	17.4	Yes	99.0
041-8002 JCI Entrance 7/11/2018	Lead POC 1	N/A	N/A	Yes	254	Yes	Yes	3.0	N/A	Yes	Yes	Yes	Yes	17.2	Yes	37.0
041-8002 JCI Entrance 7/11/2018	Lead POC 2	N/A	N/A	Yes	2.32	Yes	Yes	3.0	N/A	Yes	Yes	Yes	Yes	19.3	Yes	37.0
041-8002 JCI Entrance 7/11/2018	Lead POC 3	N/A	N/A	Yes	2.3	Yes	Yes	3.0	N/A	Yes	Yes	Yes	Yes	19.3	Yes	37.0

Site ID, Site Name and Date Visited	Param- eter	Samp- ling Train	Samp- ling Time		obe ht (m)	Support Structure	tion F	oca- Place- t (m)	Flow Rate	Minor Sources	**Obstru ctions	Air- flow		pline m)	Road	way (m)
041-8003 JCI Woods 7/11/2018	Lead POC 1	N/A	N/A	Yes	2.42	Yes		3.0	N/A	Yes	**No	Yes	Yes	20.4	Yes	1030. 0
041-8003 JCI Woods 7/11/2018	Lead POC 2	N/A	N/A	Yes	2.4	Yes			N/A	Yes	**No	Yes	Yes	20.4	Yes	1030. 0
041-8003 JCI Woods 7/11/2018	Lead #3	N/A	N/A	Yes	2.42	Yes			N/A	Yes	**No	Yes	Yes	21.4	Yes	1030. 0
007-0005 Big Creek 2/15/2018	Ozone	Yes	Yes	Yes	4.10	Yes	N/A		N/A	Yes	Yes	Yes	Yes	No trees	Yes	43.9
045-0015 ESC 11/14/2017	PM <sub>2.5</sub>	N/A	N/A	Yes	3.5	Yes	Yes	2.8	Yes	Yes	**No	Yes	Yes	19.5	Yes	15.9
045-0015 ESC 11/14/2017	PM <sub>2.5</sub> C	N/A	N/A	Yes	4.55	Yes	Yes	2.8	Yes	Yes	Yes	Yes	Yes	16.5	Yes	13.8
045-0015 ESC 11/14/2017	PM <sub>10</sub>	N/A	N/A	Yes	4.26	Yes	N/A		Yes	Yes	Yes	Yes	Yes	20.8	Yes	12.4
045-0015 ESC 11/14/2017	SO <sub>2</sub>	Yes	Not compl eted	Yes	4.54	Yes	N/A		N/A	Yes	Yes	Yes	Yes	16.0	Yes	13.0
045-0015 ESC 11/14/2017	NO <sub>2</sub>	Yes	Not compl eted	Yes	4.54	Yes	N/A		N/A	Yes	Yes	Yes	Yes	16.0	Yes	13.0
045-0016 Hillcrest 11/14/2017	PM <sub>2.5</sub>	N/A	N/A	Yes	2.05	Yes	Yes	1.7	Yes	Yes	Yes	Yes	Yes	67.0	Yes	54.0
045-0016 Hillcrest	PM <sub>2.5</sub>	N/A	N/A	Yes	2.05	Yes	Yes	1.7	Yes	Yes	Yes	Yes	Yes	67.0	Yes	54.0

Site ID, Site Name and Date Visited	Param- eter	Samp- ling Train	Samp- ling Time		obe ht (m)	Support Structure	Colletion F		Flow Rate	Minor Sources	**Obstru ctions	Air- flow		pline m)	Road	way (m)
11/14/2017 045-0016 Hillcrest 11/14/2017	Ozone	Yes	Yes	Yes	3.83	Yes	N/A		N/A	Yes	Yes	Yes	Yes	67.0	Yes	54.0
077-0002 Clemson 11/21/2017	Ozone	Yes	Yes	Yes	4.57	Yes	N/A		N/A	Yes	**No	Yes	Yes	12.3	Yes	33.9
077-0003 Wolf Creek 11/21/2017	Ozone	Yes	Yes	Yes	4.13	Yes	N/A		N/A	Yes	Yes	Yes	Yes	26.3	Yes	56.4
051-0008 Coastal Carolina 2/21/2018	Ozone	Yes	Yes	Yes	4.1	Yes	N/A		N/A	Yes	Yes	Yes	Yes	10.6	Yes	18.3
083-0009 NSFS#2 11/07/2017	Ozone	Yes	Yes	Yes	4.2	Yes	N/A		N/A	Yes	Yes	No	Yes	25.4	Yes	92.5
083-0011 TK Gregg 11/14/2017	PM <sub>2.5</sub>	N/A	N/A	Yes	2.5	Yes	Yes	1.6	Yes	Yes	Yes	Yes	Yes	37.0	Yes	48.2
083-0011 TK Gregg 11/14/2017	PM <sub>2.5</sub> C	N/A	N/A	Yes	2.5	Yes	Yes	1.6	Yes	Yes	Yes	Yes	Yes	27.7	Yes	48.2
025-0001 Chesterfiel d 3/21/2017	PM <sub>2.5</sub>	N/A	N/A	Yes	2.9	Yes	N/A		Yes	Yes	Yes	Yes	Yes	23.0	Yes	43.9
025-0001 Chesterfiel d 3/28/2018	PM <sub>2.5</sub> C	N/A	N/A	Yes	4.9	Yes	N/A		Yes	Yes	Yes	Yes	Yes	25.8	Yes	33.1
025-0001	Speciate	N/A	N/A	Yes	2.0	Yes	N/A		N/A	Yes	Yes	Yes	Yes	32.8	Yes	43.9

Site ID, Site Name and Date Visited	Param- eter	Samp- ling Train	Samp- ling Time		obe ht (m)	Support Structure	Colle tion F men		Flow Rate	Minor Sources	**Obstru ctions	Air- flow		pline m)	Road	way (m)
Chesterfiel d 3/28/2018	d PM <sub>2.5</sub>															
025-0001 Chesterfiel d 3/28/2018	PM <sub>10</sub>	N/A	N/A	Yes	2.4	Yes	Yes	2.3	Yes	Yes	Yes	Yes	Yes	27.7	Yes	43.9
025-0001 Chesterfiel d 3/28/2018	PM <sub>10</sub>	N/A	N/A	Yes	2.4	Yes	Yes	2.3	Yes	Yes	Yes	Yes	Yes	25.4	Yes	43.9
025-0001 Chesterfiel d 3/28/2018	Ozone	Yes	Yes	Yes	4.8	Yes	N/A		N/A	Yes	Yes	Yes	Yes	25.0	Yes	33.1
029-0002 Ashton 3/13/2018	PM <sub>2.5</sub> C	N/A	N/A	Yes	4.3	Yes	N/A		Yes	Yes	**No	Yes	No	7.8	No	*8.4
029-0002 Ashton 3/13/2018	Ozone	Yes	Yes	Yes	4.7	Yes	N/A		N/A	Yes	**No	Yes	No	9.2	No	*8.4
043-0011 Howard High #3 3/29/2018	PM <sub>10</sub>	N/A	N/A	Yes	2.22	Yes	N/A		Yes	Yes	Yes	Yes	Yes	No trees	Yes	49.7
073-0001 Long Creek 6/18/2018	PM <sub>2.5</sub> C	N/A	N/A	Yes	4.25	Yes	N/A		Yes	Yes	Yes	No	No	7.48	Yes	30.0
073-0001 Long Creek 6/18/2018	Ozone	Yes	Yes	Yes	4.18	Yes	N/A		N/A	Yes	Yes	No	No	9.08	Yes	30.0
073-0001	SO <sub>2</sub>	Yes	Yes	Yes	4.18	Yes	N/A		N/A	Yes	Yes	No	No	9.08	Yes	30.0

Site ID, Site Name and Date Visited	Param- eter	Samp- ling Train	Samp- ling Time	Pro Heigh	obe nt (m)	Support Structure	Collo tion P ment	lace-	Flow Rate	Minor Sources	**Obstru ctions	Air- flow	pline m)	Roady	way (m)
Long Creek															
6/18/2018															

<sup>\*</sup>Road is in very rural area with less than 100 AADT.

# Appendix E: The EPA Correspondence for Addendums to Previous Monitoring Plans

Reserved

# **Appendix F: Alphabetical Order of Monitoring Sites**

Monitoring Site Name	MSA/County	Page
Ashton	Colleton County	69
Big Creek	Greenville-Anderson-Mauldin MSA	56
Cape Romain	Charleston-North Charleston MSA	34
Cayce City Hall	Columbia MSA	43
Charleston Public Works (CPW)	Charleston-North Charleston MSA	37
Chesterfield	Chesterfield County	67
Coastal Carolina	Myrtle Beach-Conway-North Myrtle Beach SC-NC MSA	62
Congaree Bluff	Columbia MSA	47
FAA	Charleston-North Charleston MSA	36
Greenville Employment Secu Commission (ESC)	rity Greenville-Anderson-Mauldin MSA	58
Hillcrest Middle School	Greenville-Anderson-Mauldin MSA	60
Howard High School #3	Georgetown County	70
Irmo	Columbia MSA	42
Jackson Middle School	Augusta-Richmond County, GA-SC MSA (part)	29
Jenkins Ave. Fire Station	Charleston-North Charleston MSA	33
Johnson Controls-JCI Railroad	Florence MSA	53
Johnson Controls-JCI Entrance	Florence MSA	53
Johnson Controls-JCI Woods	Florence MSA	53
Long Creek	Oconee County	71
North Spartanburg Fire Station #2	Spartanburg MSA	64
Parklane (NCore)	Columbia MSA	44
Pee Dee Experimental Station	Florence MSA	51
Sandhill Experimental Station	Columbia MSA	49
State Hospital	Columbia MSA	46
Garrison Arena	Greenville-Anderson-Mauldin MSA	57
T.K. Gregg Recreational Center	Spartanburg MSA	65
Trenton	Augusta-Richmond County, GA-SC MSA (part)	30
Williams Middle School	Florence MSA	52
York Landfill	Charlotte-Concord-Gastonia MSA	39

# **APPENDIX G: Memorandum of Agreements and Waivers**





MEMORANDUM OF AGREEMENT

# ON AIR QUALITY MONITORING FOR CRITERIA POLLUTANTS FOR

### THE AUGUSTA - RICHMOND COUNTY

# METROPOLITAN STATISTICAL AREA (MSA)

January 2017

Participating Agencies:

Georgia
Georgia Department of Natural Resources
Environmental Protection Division
Air Protection Branch (GA EPD)

South Carolina
Department of Health and Environmental Control (SCDHEC)
Bureau of Air Quality

#### I. PURPOSE/OBJECTIVES/GOALS

The purpose of this Memorandum of Agreement (MOA) is to renew the Augusta-Richmond County Metropolitan Statistical Area (MSA) Criteria Pollutant Air Quality Monitoring Agreement between SCDHEC and GA EPD (collectively referred to as the "affected agencies") to collectively meet United States Environmental Protection Agency (EPA) minimum monitoring requirements for particles of an aerodynamic diameter of 10 micrometers and less (PM10), particles of an aerodynamic diameter of 2.5 micrometers and less (PM2.5), and ozone; as well as any other criteria pollutant air quality monitoring deemed necessary to meet the needs of the MSA as determined reasonable by all parties. This MOA will establish the terms and conditions of this collective agreement to provide adequate criteria pollutant monitoring for the Augusta - Richmond County MSA as required by 40 CFR 58 Appendix D, Section 2(e).

#### II. BACKGROUND

The Augusta - Richmond County MSA consists of the following counties: Burke, Columbia, McDuffie, Lincoln, Richmond, Aiken and Edgefield. GA EPD has jurisdiction over Burke, Columbia, McDuffie, Lincoln, and Richmond Counties in Georgia and SCDHEC has jurisdiction over Aiken and Edgefield Counties, South Carolina. The SCDHEC and GA EPD are required by the Clean Air Act to measure for certain criteria pollutants in the ambient air in the Augusta - Richmond County Metropolitan Statistical Area (MSA). The EPA has established minimum monitoring requirements based on the size of the MSA and the quality of the air in the MSA for PM10, PM2.5, and ozone.

40 CFR 58 Appendix D, Section 2(e) states (in part):

"...The EPA recognizes that there may be situations where the EPA Regional Administrator and the affected State or local agencies may need to augment or to divide the overall MSA/CSA monitoring responsibilities and requirements among these various agencies to achieve an effective network design. Full monitoring requirements apply separately to each affected State or local agency in the absence of an agreement between the affected agencies and the EPA Regional Administrator."

Currently each air pollution control agency (affected agency) conducts monitoring in its respective jurisdiction and coordinates its monitoring with the other air pollution control agency within the MSA.

#### III. ROLES AND RESPONSIBILITIES

The parties agree to the following terms and conditions:

- SCDHEC, and GA EPD (the "affected agencies") commit to conducting appropriate monitoring in their respective jurisdictions of the MSA; as needed, to collectively meet EPA minimum monitoring requirements for the entire MSA for PM10, PM2.5, and ozone, as well as any other criteria air pollutant monitoring deemed necessary to meet the needs of the MSA as determined reasonable by all affected agencies. The minimum air quality monitoring requirements (for PM10, PM2.5, and ozone described in 40 CFR 58) for the MSA shall apply to the MSA in its entirety and shall not apply to any sole affected agency within the MSA unless agreed upon by all affected agencies.
- The affected agencies commit to coordinating monitoring "responsibilities and requirements...to achieve an effective network design" regarding criteria air pollutant monitoring conducted in the MSA and commit to communicate unexpected or unplanned changes in monitoring activities within their jurisdictions to the other affected agency. As conditions warrant, the affected agencies may conduct telephone conference calls, meetings, or other

communications to discuss monitoring activities for the MSA. Each affected agency shall inform the other affected agency via telephone or e-mail of any monitoring changes occurring in its jurisdiction of the MSA at its earliest convenience after learning of the need for the change or making the changes. Such unforeseen changes may include evictions from monitoring sites, destruction of monitoring sites due to natural disasters, or similar occurrences that result in an extended (greater than 1 quarter) or permanent change in the monitoring network. At least once a year in the second quarter of the year or before June 15th, each affected agency shall make available to the other affected agency, a copy of its proposed monitoring plan for its jurisdiction within the MSA for the next year.

• Each party reserves the right to revoke or terminate this MOA at any time and for any reason by giving thirty (30) days written notice prior to the date of termination.

#### IV. LIMITATIONS

- **A.** All commitments made in this MOA are subject to the availability of appropriated funds and each party's budget priorities. Nothing in this MOA, in and of itself, obligates SCDHEC or GA EPD to expend appropriations or to enter into any contract, assistance agreement, interagency agreement or other financial obligation.
- **B.** This MOA is neither a fiscal nor a funds obligation document. Any endeavor involving reimbursement or contribution of funds between parties to this MOA will be handled in accordance with applicable laws, regulations, and procedures, and will be subject to separate subsidiary agreements that will be effected in writing by representatives of the parties.
- C. Except as provided in Section III, this MOA does not create any right or benefit, substantive or procedural, enforceable by law or equity against SCDHEC or GA EPD, their officers or employees, or any other person. This MOA does not direct or apply to any person outside SCDHEC or GA EPD.

### V. PROPRIETARY INFORMATION AND INTELLECTUAL PROPERTY

No proprietary information or intellectual property is anticipated to arise out of this MOA.

#### VI. POINTS OF CONTACT

The following individuals are designated points of contact for the MOA:

GA EPD: DeAnna Oser

GA EPD Ambient Monitoring Program 4244 International Parkway, Suite 120

Atlanta, GA 30354

DeAnna.Oser@dnr.ga.gov Voice: (404) 363-7004 FAX: (404) 363-7100

SCDHEC: Micheal Mattocks

SCDHEC Bureau of Environmental Services

8231 Parklane Road Columbia, SC 29223

mattocm@dhec.sc.gov Voice: (803) 896-0902 FAX: (803) 896-0980

In the event that a point of contact needs to be changed, notification may be made via email to the other parties.

#### VII. MODIFICATION/DURATION/TERMINATION

This MOA will be effective when signed by all parties. This MOA may be amended at any time by the mutual written consent of the parties. The parties will review this MOA at least once every 10 years to determine whether it should be revised, renewed, or cancelled. This MOA may be revoked or terminated by an affected agency at any time and for any reason by giving thirty (30) days written notice prior to the date of termination.

#### VIII. REFERENCE

United States Environmental Protection Agency, Title 40 Code of Federal Regulations, Part 58, Appendix D, "Network Design Criteria for Ambient Air Quality Monitoring", Section 2 (e), "General Monitoring Requirements."

# IX. APPROVALS

Georgia Department of Natural Resources, Environmental Protection Division (GA EPD)
BY: ZUZ
TITLE: Dinecton
DATE: 2/21(1)
South Carolina Department of Health and Environmental Control (SCDHEC) Bureau of Air Quality BY:
TITLE: Bureau Chief
DATE: 03/01/17
THIS AGREEMENT IS NOT OFFICIAL AND BINDING UNTIL SIGNED BY THE DHEC CONTRACTS MANAGER.
Juni J. Main
Francine Miller DHEC Contracts Manager
DATE:

#### MEMORANDUM OF AGREEMENT

# ON AIR QUALITY MONITORING FOR CRITERIA POLLUTANTS FOR

#### THE CHARLOTTE-CONCORD-GASTONIA

#### **METROPOLITAN STATISTICAL AREA (MSA)**

July 1, 2016

Participating Agencies:

North Carolina
Department of Environmental Quality (NCDEQ)
Division of Air Quality (NCDAQ)

South Carolina
Department of Health and Environmental Control (SCDHEC)
Bureau of Air Quality

Mecklenburg County, North Carolina Land Use and Environmental Services Agency Air Quality (MCAQ)

#### I. PURPOSE/OBJECTIVES/GOALS

The purpose of this Memorandum of Agreement (MOA) is to establish the Charlotte-Concord-Gastonia Metropolitan Statistical Area (MSA) Criteria Pollutant Air Quality Monitoring Agreement among NCDAQ, SCDHEC, and the MCAQ (collectively referred to as the "affected agencies") to collectively meet United States Environmental Protection Agency (EPA) minimum monitoring requirements for criteria pollutants deemed necessary to meet the needs of the MSA as determined reasonable by all parties. This MOA will renew the terms and conditions of this collective agreement to provide adequate criteria pollutant monitoring for the Charlotte-Concord-Gastonia MSA as required by 40 CFR 58 Appendix D, Section 2(e).

#### II. BACKGROUND

The Charlotte-Concord-Gastonia MSA consists of

Cabarrus County, NC
Gaston County, NC
Iredell County, NC
Lincoln County, NC
Mecklenburg County, NC
Rowan County, NC
Union County, NC
Chester County, SC
Lancaster County, SC



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#### York County, SC

NCDAQ has jurisdiction over Cabarrus, Gaston, Iredell, Lincoln, Rowan, and Union Counties; SCDHEC has jurisdiction over Chester, Lancaster, and York Counties; MCAQ has jurisdiction over Mecklenburg County.

The NCDAQ, SCDHEC, and MCAQ are required by the Clean Air Act to measure for certain criteria pollutants in the ambient air in the Charlotte-Concord-Gastonia MSA. The EPA has established minimum monitoring requirements based on the size of the MSA and the quality of the air in the MSA.

40 CFR 58 Appendix D, Section 2 (e) states (in part):

"... The EPA recognizes that State or local agencies must consider MSA/CSA boundaries and their own political boundaries and geographical characteristics in designing their air monitoring networks. The EPA recognizes that there may be situations where the EPA Regional Administrator and the affected State or local agencies may need to augment or to divide the overall MSA/CSA monitoring responsibilities and requirements among these various agencies to achieve an effective network design. Full monitoring requirements apply separately to each affected State or local agency in the absence of an agreement between the affected agencies and the EPA Regional Administrator."

Currently each air pollution control agency (affected agency) conducts monitoring in its respective jurisdiction and coordinates monitoring with the other air pollution control agencies within the MSA.

#### III. ROLES AND RESPONSIBILITIES

The parties agree to the following terms and conditions:

- NCDAQ, SCDHEC, and MCAQ (the "affected agencies") commit to conducting appropriate
  monitoring in their respective jurisdictions of the MSA; as needed, to collectively meet EPA
  minimum monitoring requirements for the entire MSA for criteria air pollutant monitoring
  deemed necessary to meet the needs of the MSA as determined reasonable by all affected
  agencies. The minimum air quality monitoring requirements for the MSA shall apply to the
  MSA in its entirety and shall not apply to any sole affected agency within the MSA unless
  agreed upon by all affected agencies.
- The affected agencies commit to coordinating monitoring responsibilities and requirements to achieve an effective network design regarding criteria air pollutant monitoring conducted in the MSA and commit to communicate unexpected or unplanned changes in monitoring activities within their jurisdictions to the other affected agencies. As conditions warrant, the affected agencies may conduct telephone conference calls, meetings, or other communications to discuss monitoring activities for the MSA. Each affected party shall inform the others via telephone or e-mail of any monitoring changes occurring in its jurisdiction of the MSA at its earliest convenience after learning of the need for the change or making the changes. Such unforeseen changes may include evictions from monitoring sites, destruction of monitoring sites due to

natural disaster, or similar occurrences that result in extended change (greater than one quarter) or permanent change in the monitoring network. At least once a year in the second quarter or before June 15<sup>th</sup>, each agency shall make available to the other agency a copy of its proposed monitoring plan for its jurisdiction with the MSA for the next year.

• Each party reserves the right to revoke or terminate this MOA at any time for any reason by giving thirty (30) days written notice prior to the date of termination.

#### IV. LIMITATIONS

- A. All commitments made in this MOA are subject to the availability of funds and each party's budget priorities. Nothing in this MOA, in and of itself, obligates NCDAQ, SCDHEC, or MCAQ to expend funds or to enter into any contract, assistance agreement, interagency agreement, or other financial obligation.
- B. This MOA is neither a fiscal nor a funds obligation document. Any endeavor involving reimbursement or contribution of funds between parties to this MOA will be handled in accordance with applicable laws, regulations, and procedures, and will be subject to separate subsidiary agreements what will be effected in writing by representatives of the parties.
- C. Except as provided in Section III, this MOA does not create any right or benefit, substantive or procedural, enforceable by law or equity against NCDAQ, SCDHEC, or MCAQ, their officers or employees, or any other person. This MOA does not direct or apply to any person outside NCDAQ, SCDHEC, or MCAQ.
- V. PROPRIETARY INFORMATION AND INTELLUCTUAL PROPERTY

No proprietary information or intellectual property is anticipated to arise out of this MOA.

#### VI. POINTS OF CONTACT

The following individuals are designated points of contact for the MOA:

NCDEQ DAQ: Joette Steger

NC DENR Division of Air Quality

1641 Mail Service Center Raleigh, NC 27699-1641

joette.steger@ncdenr.gov Voice/fax: 919-707-8449

SCDHEC: Scott Reynolds

SCDHEC Bureau of Environmental Health Services

2600 Bull Street Columbia, SC 29201 reynolds@dhec.sc.gov

Voice: 803-896-0902

MCAQ: Jeff Francis

Mecklenburg County Land Use and Environmental Services Agency –

Air Quality

2145 Suttle Avenue

Charlotte, NC 28208-5237

Jeff.Francis@mecklenburgcountync.gov

Phone 704-336-5430 Fax 704-336-4391

In the event that a point of contact needs to be changed, notification may be made via email to the other parties.

#### VII. MODIFICATION/DURATION/TERMINATION

This MOA will be effective when signed by all parties. This MOA may be amended at any time by the mutual written consent of all parties. The parties will review this MOA at least once every 10 years to determine whether it should be revised, renewed, or cancelled. This MOA may be revoked or terminated by an affected party at any time and for any reason by giving thirty (30) days written notice prior to the date of termination.

#### VIII. REFERENCE

United States Environmental Protection Agency, Title 40 Code of Federal Regulations, Part 58, Appendix D, "Network Design Criteria for Ambient Air Quality Monitoring", Section 2 (e), "General Monitoring Requirements"

IX. APPROVALS
North Carolina Department of Environmental Quality Division of Air Quality (NCDAQ)
BY: Shule ( - Holman
TITLE: Director Division of Ar Quality
DATE: 6 27 2016
South Carolina Department of Health and Environmental Control (SCDHEC)
Bureau of Air Quality
BY: Kladolynu
TITLE: Chief Bureau of Air Quality

DATE: 07/05/2016
Mecklenburg County Land Use and Environmental Services Agency – Air Quality (MCAQ) Mecklenburg County Air Quality
BY: Alberia H Rhodn
TITLE: Winter, air Quality
DATE: 6/29/2014



#### Catherine E. Heigel, Director Promoting and protecting the health of the public and the environment

#### MEMORANDUM

July 5, 2016

Subject:

Change of Point of Contact for South Carolina

Memorandum of Agreement on Air Quality Monitoring for Criteria Pollutants for the Charlotte-Concord-Gastonia Metropolitan Statistical

Area (MSA)

From:

Rhonda B. Thompson, SC DHEC Chief, Bureau of Air Quality

As of July 5, 2016, the Point of Contact for South Carolina will be Micheal Mattocks, instead of Scott Reynolds.

Micheal's contact information is below:

Micheal Mattocks SC DHEC – Bureau of Environmental Health Services 2600 Bull Street Columbia, SC 29201 (803)896-0856 mattock@dhec.sc.gov



JU 15 2010

#### STATE OF SOUTH CAROLINA ADMINISTRATIVE LAWCOURT

_	DHEC
OFFICE	OF GENERAL COUNSEL

of Women Voters of South Carolina,	)	Docket No. 10-ALJ-07-0477-CC
Petitioners,	)	
Totalonois,	)	SETTLEMENT AGREEMENT AND
VS.	)	<u>ORDER</u>
South Carolina Department of Health and	)	
Environmental Control and Johnson	)	
Controls Battery Group, Inc.,	)	
Respondents.	)	
	)	

#### <u>SETTLEMENT AGREEMENT AND ORDER</u>

This final Settlement Agreement and Order (the "Agreement"), made and entered into by and among Permittee Johnson Controls Battery Group, Inc. ("JCI"), and the League of Women Voters of South Carolina, the Coastal Conservation League ("Petitioners"), and the South Carolina Department of Health and Environmental Control ("DHEC") (each a "Party," and collectively, the "Parties"), is effective upon execution by all of the Parties and approval by the Administrative Law Court (the "Effective Date").

#### **PREAMBLE**

- 1. The DHEC staff issued to JCI a permit known as Air Synthetic Minor Construction Permit No. 1040-0129-CA in order to construct a battery recycling facility in Florence, South Carolina (the "Florence Recycling Center" or "Recycling Center");
- 2. The Petitioners filed timely requests for final review of DHEC's staff decision to issue the above-referenced permit and a review conference before the DHEC Board was held on April 8, 2010 under Board Docket No. IO-RFR-17;
- 3. The DHEC Board affirmed DHEC's staff decision to issue the above-referenced permit and issued a written Final Agency Decision in that regard on May 7, 2010;
- 4. Pursuant to S.c. Code Ann. § 44-1-60, Petitioners have requested a review of the Board's Final Agency Decision with the South Carolina Administrative Law Court as provided therein within thirty days after the receipt of the Final Agency Decision and;



5. The Parties wish to settle this matter and resolve all permitting issues and potential challenges concerning the issuance of Air Synthetic Minor Construction Permit No. 1040-0129-CA without further litigation and the attendant costs of the same.

#### TERMS AND CONDITIONS

NOW THEREFORE, for and in consideration of the mutual covenants, conditions, promises contained herein, and other valuable consideration, the receipt and sufficiency of which is expressly acknowledged, the Parties agree as follows:

- 1. <u>Petitioners Will Not Pursue Appeal.</u> As consideration for the covenants provided by ICI and DHEC (as set forth below), Petitioners hereby acknowledge and agree that they will, with consent of this Court, dismiss with prejudice the present action and will not pursue any further challenges of the Final Agency Decision issued by the DHEC Board on May 7, 2010 to the South Carolina Administrative Law Court for the issuance of Air Synthetic Minor Construction Permit No. 1040-0129-CA.
- 2. <u>Covenants by ICI and DHEC.</u> As consideration for the covenants provided by Petitioners (as set forth above), 1eI and DHEC hereby acknowledge and agree;
  - a. that ICI will support the installation and maintenance of three (3) ambient air quality monitors ("Monitors") for lead located as identified in Attachment A with approximate coordinates provided as follows:

Coordinate System (Datnm)	Longitnde and Latitnde (WGS84)		UTM zone 17 North (NAD83)		
Location	Longitude (Degrees West)	Latitude (Degrees North)	x_proj (meters)	y_proj (meters)	
Entrance	-79.572611	34.164083	631567	3781270	
Southwest	-79.569833	34.155639	631837	3780337	
Northeast	-79.562169	34.167414	632525	3781653	

The Monitors will be operated as part of the South Carolina network and consistent with the provisions of 40 CFR Part 58.

- b. that ICI will perform all the items identified at Attachment B and will incorporate, at a minimum, the items identified at Attachment B for the control of fugitive and/or dust emissions, in the standard operating procedures manual (SOP) required by condition 28 of Air Synthetic Minor Construction Permit No. 1040-0129-CA.
- c. that ICI will provide Petitioners a copy of the standard operating procedures manual required by condition 28 of the Synthetic Minor Construction Permit No. 1040-0129-CA at the time the proposed SOP is

submitted to DHEC for approval. Petitioners may submit comments to DHEC on the SOP. The Department may consider those comments and mayor may not respond to the comments. However, submission of any comments will not trigger any new or additional obligations or permitting requirements for DHEC.

- d. that DHEC will establish a web address where monitoring data, stack test protocols and stack test reports as well as DHEC contacts for the ICI Florence Recycling Center will be maintained. DHEC will post monitoring data from the Monitors for the Florence Recycling Center on its web address for the Recycling Center in an expeditious manner after verification of ambient concentration data, a period which should not exceed two weeks from the calculation and verification of ambient concentration data. DHEC will also provide a web link from its web address to a web address maintained by ICI for the Florence Recycling Center. ICI will also maintain monitoring data from the Monitors on its web address for the Recycling Center and will continue to post and maintain verified monitoring data for the most recent twelve month operating period for the life of the operation of the Recycling Center. DHEC and/or ICI will send a notice, in writing and/or electronically, of the existence of the above-web sites to those individuals that submitted written comments on Air Synthetic Minor Construction Permit No. 1040-0129-CA during the formal public comment period.
- e. ICI will commence operation of the Recycling Center as follows:
  - 1. Operations will begin at up to and including 1/2 of the permitted production capacity over the initial 3 months of operation during which time the Monitors will be sampled every three days.
  - ii. After the initial three months of operation, if the three month average lead value for each Monitor is at or below 0.075 ug/m<sup>3</sup>, production may increase up to full permitted production capacity. ICI shall maintain daily records of mass of lead ingots produced. This information along with monitoring data for the Monitors shall be provided to DHEC and Petitioners at the end of the initial three month period of operation for the initial three months of operation. ICI identifies production data as confidential business information. Nothing in this Agreement shall be interpreted to obligate ICI, or constitute a waiver by ICI, to provide information to DHEC, Petitioners, or to any other parties, any information beyond the agreement to provide the specific information identified in this Agreement to DHEC and Petitioners for the specific time periods addressed. Likewise, nothing in this Agreement shall be interpreted as in any way limiting the rights of DHEC or Petitioners to otherwise request or demand

- information from JCI as might be otherwise provided for under applicable permits or otherwise provided for by applicable law.
- iii. If after the initial 3 months of operation, the three month average lead value from any Monitor is above 0.075 ug/m³, JCI will investigate the reason why monitored lead values are higher than projected modeled values. JCI will not increase production rates above 1/2 of permitted production capacity until there is a three month rolling period in which average lead values for all the Monitors are at or below 0.075 ug/m¹. If JCI makes a demonstration under the provisions of this subsection (iii), JCI will provide monitoring data to DHEC and Petitioners for the Monitors as well as production data for mass of lead ingots produced for any months relied upon by JCI to demonstrate that its operations satisfy the conditions of this subsection (iii), subject to the same confidentiality reservations identified in (e)(ii) above.
- iv. After the facility begins operation at full production capacity as specified above, measurements from Monitors will occur every six days. The Monitors will be operated as part of the South Carolina network and consistent with the provisions of 40 CFR Part 58.
- f. that after beginning operation at full production values as specified in paragraph 2(e) above, if any three month rolling average values for lead for any Monitor exceeds the 0.15 ug/m' National Ambient Air Quality Standard (NAAQS) for lead, DHEC will collect samples from that Monitor every three days until such time as there is a three month period in which the average lead value for that Monitor is at or below 0.15 ug/m', at which time sampling will revert to once every 6 days.
- 3. <u>Enforcement by Parties.</u> Any failure to comply with the conditions of the covenants as stated herein shall be enforceable by any Party to this Agreement.
- 4. <u>Compromise Agreement.</u> This Agreement is the compromise of disputed claims regarding the appropriateness of the permit issued to JCI. The Parties agree that all statements made in connection with the negotiation or execution of this Agreement shall be subject to Rule 408 of the South Carolina Rules of Evidence.
- 5. <u>Binding Effect of Agreement.</u> This Agreement shall be binding upon and inure to the benefit of the Parties and each of their respective agents, employees, representatives, officers, directors, principals, attorneys, shareholders, parent and/or subsidiary corporations, affiliates, successors, and predecessors in interest.
- 6. <u>Assignment.</u> This Agreement shall not be assigned or transferred without the express written consent of all Parties.

- 7. Entire Agreement. This Agreement embodies the entire agreement of the Parties and supersedes all prior written or oral agreements or understandings between the Parties on the subject matter of this Agreement. Notwithstanding, nothing in this Agreement is intended to alter or reduce the obligations of Permittee under Air Synthetic Minor Construction Permit No. 1040-0129-CA, nor to relieve Permittee of its duty to comply with all applicable laws.
- 8. <u>Amendments.</u> No amendment, modification, or other variation of any of the terms of this Agreement will be effective unless it is made in a writing signed by the Parties expressly stating that such instrument is intended to amend, modify, or otherwise supplement the Agreement, and then subsequently approved by this Court.
- 9. <u>Severability.</u> Whenever possible, each provision of this Agreement shall be interpreted so as to be valid under existing law. A finding of invalidity as to any provision of this Agreement or any portion thereof shall void only that provision or portion and no other, and this Agreement shall be interpreted as if it did not contain the invalid provision or portion.
- 10. Reliance on the Advice of Counsel. Each Party represents that, in the negotiating and drafting of this Agreement, it has been represented by counsel of its choice. Each Party affirms that its counsel has had a substantial role in the drafting and/or negotiating of this Agreement. Therefore, each Party agrees that no rule of construction to the effect that any ambiguities are to be resolved against the drafter shall be employed in the interpretation of the Agreement.
- 11. <u>Warranty of Authority.</u> The individuals executing this Agreement personally represent and warrant that they have the necessary power and authority to execute this Agreement on behalf of each Party identified as being represented, and that their signatures are sufficient to make this Agreement the binding and enforceable obligation of each Party identified.
- 12. <u>Choice of Law.</u> This Agreement shall be construed, interpreted, and enforced in accordance with the laws of the State of South Carolina. Any dispute, action, or proceeding arising out of or relating to this Agreement shall be within the exclusive jurisdiction of the South Carolina Administrative Law Court and, if an appeal of a decision of the Administrative Law Court is sought, the State courts of South Carolina. The Parties agree and consent to personal jurisdiction in the foregoing tribunals with respect to any dispute, action, or proceeding arising out of or relating to this Agreement.
- 13. <u>Counterparts.</u> This Agreement may be executed in any number of counterparts, each of which shall be deemed an original but all of which shall constitute one and the same document. Signatures provided by facsimile or portable document format ("PDF") shall have the same effect as original signatures.
- 14. <u>Communications.</u> Any written communications required under this Agreement shall be made by mailing a copy of the document to the following addresses:

- a. Johnson Controls Battery Group, Inc. Bernard F. Hawkins, Jr. Nelson Mullins Riley & Scarborough Meridian, 17h Floor 1320 Main Street Columbia, SC 29201
- b. Petitioners Robert Guild 314 Pall Mall St. Columbia SC 29201
- c. The South Carolina Department of Health and Environmental Control Office of General Counsel Sara Bazemore 2600 Bull Street Columbia, SC 29201

Finding the Agreement fair and reasonable, this Court approves the Agreement.

AND IT IS SO ORDERED.

July <u>14</u>, 2010

The Honorable S. Phillip Lenski

WE CONSENT:

July 8 , 2010

**NELSON MULLINS RILEY & SCARBOR** 

Bernard F. Hawkins, Jr. Meridian, 17th Floor

1320 Main Street Columbia, SC 29201

for Johnson Controls Battery Group, Inc. Atto

July <u>\$\lambda\$</u> ,2010

Robe Guild

314 Pa: Mall St Columbia, SC 29201

Attorney for the League of Women Voters of South Carolina and the Coastal Conservation League

Sara Bazemore

S.C. Department of Health and Environmental Control

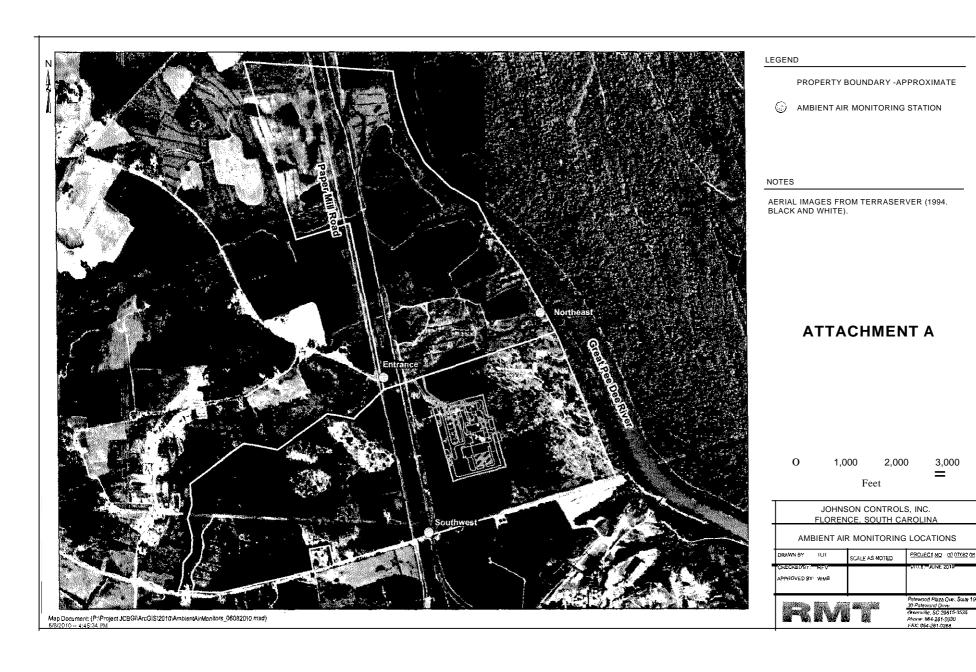
Sargmore)

Office of General Counsel

2600 Bull Street

Columbia, SC 29201

Attorney for SC DREC



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#### Attachment B

# Standard Operating Procedures (SOP) Manual -- Minimal Elements for Control of Fugitive and Dust Emission Sources

JCI will perform all the items identified in this Attachment B and will incorporate, at a minimum, the items identified in this Attachment for the control of fugitive and/or dust emissions, in the standard operating procedures manual required by Condition 28 of Air Synthetic Minor Construction Permit No. 1040-0129-CA.

- 1) Where records are generated under this Attachment, these records will be maintained for at least five years.
- 2) Processes will be designed with hoods that have face velocities noted below. There will be an initial verification that the hoods meet these face velocities and there will be subsequent verification every two years that the hoods continue to meet these face velocities according to the specifications of 40 CFR 63.547(d). Documentation of the verifications will be kept on file; deviations, if any, will be reported to SCDHEC semiannually. Face velocities will be as follows:
  - a) furnace and dryer charging hoppers, chutes, and skip hoists (300 fpm face velocity)
  - b) furnace lead taps, and molds during tapping (300 fpm face velocity)
  - c) furnace slag taps and molds during tapping (300 fpm face velocity)
  - d) refining kettles (250 fpm face velocity)

- e) dryer transition pieces (350 fpm face velocity). Pressurized dryer breaching seals at each transition piece allowed as alternative
- f) agglomerating furnace product taps (300 fpm face velocity)
- 3) The battery breaking area will be totally enclosed with initial and subsequent annual verifications that total enclosure criteria are met. Documentation of the verifications will be kept on file and deviations, if any, will be reported to SCDHEC semiannually.
- 4) The furnace area will be totally enclosed and ventilated to control devices with an initial and subsequent annual verification that total enclosure criteria are met. Documentation of the verifications will be kept on file and deviations, if any, will be reported to SCDHEC semiannually.
- 5) The refining and casting area will be totally enclosed and ventilated to control devices with an initial and subsequent annual verifications thattotal enclosure criteria are met. Documentation of the verifications will be kept on file and deviations, if any, will be reported to SCDHEC semiannually.
- 6) The materials storage and handling areas will be totally enclosed and ventilated to control devices. There will be a vehicle wash at each exit with initial and subsequent annual verifications that total enclosure criteria are met. JCI will conduct monthly inspections of vehicle wash equipment to verify proper operation. Documentation of the verifications and inspections will be kept on file and deviations, if any, will be reported to SCDHEC semiannually.
- 7) No source/plant shall use any method of materials handling which will generate fugitive particulate matter that is not fully described in the permit

- application. Monthly inspections will be conducted to identify unpermitted material handling operations. Documentation of the inspections will be kept on file and deviations, if any, will be reported to SCDHEC semiannually.
- 8) Volatile organic compounds shall not be used for dust control purposes. Oil treatment is also prohibited. JCI will implement a new material MSDS review process to confirm that VOC-containing dust suppressants are not brought onsite. Records will be kept on file; deviations, if any, will be reported to SCDHEC semiannually.
- 9) Hoods, scrubbers, fabric filters or other dust cleaning devices will be installed and used where feasible and effective to capture and contain fugitive particulate matter while handling dusty materials.
- 10) A water slurry will be used to hydraulically transport materials collected by baghouses.
- 11) Wet vacuum sweeping will occur at plant roadways, twice per day, except on days of natural precipitation.
- 12) Speed limits will be imposed of not greater than 15 miles per hour for vehicular traffic on plant property.
- 13) Plant roadways used to deliver raw materials to or remove products from the facility will be paved and earth or other materials deposited by vehicular traffic, earth moving equipment, water erosion or other means, will be promptly removed from paved road surfaces.
- 14) Daily records will be maintained to verify pavement cleaning. Records of natural precipitation will also be maintained if the natural precipitation

- exception (11 above) is used (see attachments). Records will be kept on file and deviations, if any, will be reported to SCDHEC semiannually.
- operated during maintenance activities where dust generation potential exists. Daily records will be maintained to document operation of the building negative pressure ventilation systems to demonstrate consistent negative pressure. Records will be kept on file; deviations, if any, will be reported to SCDHEC semiannually.
- of capture and control systems at all lead emission points (e.g., baghouses, HEPA filters, capture hoods, and ductwork). Records will be maintained to document inspections and maintenance and kept on file, and deviations, if any, will be reported to SCDHEC semiannually.
- 17) Rain caps will be prohibited on any stack that is a lead emissions source and there will be an initial and subsequent annual verification that rain caps are not being used on such stacks. Documentation of the verifications will be kept on file and deviations, if any, will be reported to SCDHEC semiannually.
- 18) Materials capable of generating fugitive lead-dust will be stored in sealed containers. Examples of such materials include spent filters used in lead control devices and lead-containing waste generated from housekeeping requirements. Monthly inspections will be conducted to identify use of containers that are not sealed. Documentation of the inspections will be kept on file; deviations, if any, will be reported to SCDHEC semiannually.

- 19) JCI will immediately respond to any identified spills of toxic or hazardous materials. Plant personnel shall walk around the perimeter of the developed facility on a daily basis to inspect for any indication of environmental problems such as spills of any toxic or hazardous materials. Records of inspections will be maintained on file and deviations, if any, will be reported to SCDHEC semiannually.
- 20) Plant personnel shall inspect on a daily basis, and as necessary, empty and clean out all drums containing Personal Protective Equipment (PPE).

  Records of inspections will be maintained on file and deviations, if any, will be reported to SCDHEC semiannually.
- 21) Equipment shall be decontaminated or containerized prior to leaving a ventilated building. Records of inspections will be maintained on file and deviations, if any, will be reported to SCDHEC semiannually.
- 22) During any structural demolition operations, the material being demolished shall be adequately wetted down to suppress dust generation. Procedures for structural demolition activities will be developed, implemented, and documented.
- 23) JCI will keep adequate records to verify the following:
  - a) that housekeeping activities are completed, and that inspection and maintenance of emission collection system(s) and control device(s) are performed, including the name of the person performing the activity, and the dates on which specific activities were completed.
  - b) that readings are being taken as required from the ambient air lead monitoring stations.

- 24) Charge preparation furnace hoppers, chutes, and conveyors will be designed with enclosures and/or capture hoods to route the emissions to control devices. There will be an initial verification that the enclosures and/or hoods meet these design criteria and there will be a verification every two years that the enclosures and/or hoods continue to meet these design criteria. Documentation of the verifications will be kept on file and deviations, if any, will be reported to SCDHEC semiannually.
- 25) Rotary furnaces will be constructed with receiving hoods at charge doors, slagging points, tapping points and flue connections to route emissions to control devices. There will be an initial verification that the hoods meet these criteria and verification every two years that the hoods continue to meet these design criteria. Documentation of the verifications will be kept on file and deviations, if any, will be reported to SCDHEC semiannually.
- 26) Emissions from receiving hoods for all refining kettles will be routed to a control device. There will be an initial verification that the hoods meet this design and verification every two years that the hoods continue to meet this design. Documentation of the verifications will be kept on file; deviations, if any, will be reported to SCDHEC semiannually. The following practices will be included in the design of the facility:
  - a) All building exterior access doors used for truck traffic will be designed with wind protection. Personnel doors normally used for entrance/exit will be equipped with automatic closure mechanisms and an audible alarm that will sound if the door is open for more than one continuous

minute. Emergency exits will be equipped with an audible alarm that will sound immediately upon opening of the door. Windows will either be of a design that does not allow opening or will be maintained in a closed position at all times. Monthly integrity inspections will be conducted and records will be maintained to verify proper operation of automatic closure mechanisms, alarms, and window position.

- b) Floor surfaces within process areas will be paved and there will be an initial verification that the floors are paved.
- c) There will be proper staging and disposal of collected materials from vacuuming and wet sweeping equipment. There will be monthly inspections of vacuuming and wet sweeping equipment for proper operation and records of these inspections will be maintained.
- d) Raw materials will be moved to charge preparation and finished goods will be handled with use of indoor vehicles only.
- e) A central vacuum system will be provided for housekeeping.
- f) The storm water management system will be designed to assist in removing lead that may fall on impervious surfaces at the facility.
- g) The Recycling Center will be designed to minimize impervious surfaces and to maximize the use of vegetative cover where appropriate.
- h) JCI recognizes the benefit of maintaining tree cover on the land adjacent to the plant as a buffer, and JCI will maintain tree cover on land adjacent to the plant consistent with good forestry practices and will remove and/or trim trees only as needed for good forestry management or as needed for current or future development of the property (examples,

including but not limited to, site clearing for buildings, parking lots, loading and unloading areas, entrance and exit ways, roads, monitoring locations and access ways, utility and utility rights of way (such as for power, gas, sewer, communication, etc.), stormwater management systems, rail spurs, etc.). JCI has no intent to clear-cut trees adjacent to the plant or harvest these trees beyond that needed to accomplish the purposes addressed above, and will minimize removal of trees with respect to accomplishing these purposes.

- 27) The buildings will be constructed with zone ventilation concepts that promote directing any air exchanged between buildings towards the foundry emission control equipment. There will be an initial verification that the building was designed with zone ventilation. Documentation of the verification will be kept on file and deviations, if any, will be reported to SCDHEC in the first semiannual report.
- All truck openings will be equipped with an interlock system to prevent simultaneous opening of air lock doors. The doors will also be eqUipped with an audible alarm that will sound if a door remains open for more than 5 continuous minutes. Monthly observation of air lock operation and seals will be documented and kept on file; deviations, if any, will be reported to SCDHEC in the first semiannual report.
- 29) The following provisions will be incorporated into operating procedures and employee training.

- a) vehicles and personnel flow patterns will be directed in a manner to minimize the potential for lead being carried from one area of the building to another.
- b) entry/exit points will be established so that there are specific areas designated for the distribution, inspection and maintenance of personal protective equipment.
- c) Uniforms will be collected at a centralized location and laundered at the facility.
- d) There will be vacuum cleaning stations in the facility to facilitate dust removal and good housekeeping.
- e) There will be designated changing areas for employees to remove uniforms and/or personal protective equipment prior to leaving the facility.
- £) There will be hand wash stations to facilitate employee hygiene.
- g) There will be showers to facilitate employee hygiene.
- h) There will be a cafeteria to allow employees to eat within the building and minimize exit and entry into the building.
- i) There will be footwear wash stations to minimize materials being transported from process areas into other areas of the facility.
- 30) There will be physical isolation of lead processing areas from adjacent non-lead processing areas. There will be initial verification that the lead isolation is used. Documentation of the verification will be kept on file and deviations, if any, will be reported to SCDHEC in the first semiannual report.

# SOP Checklist for Plant Roadway Wet Vacuum Sweeping

Date of Wet Sweeping:.		
Time of First Wet Sweeping Completion:	_	
Name and Initials of Individual(s)		
Performing the wet sweeping:	-	
Time of Second Wet Sweeping Completion:		
Name and initials of Individual(s)		
Performing the wet sweeping:		
If cleaning was unnecessary, check the reason below:		
DRain		
O Snow		
DIce		
O Sand of other material was applied to roadways to provide traction on ice,	snow,	or frozei
precipitation.		
Comrnents::	<u></u>	_

## **SOP** Checklist for Vehicle Washing

(For vehicles exiting building areas where lead dust may be present!

Truck Wash Location / Description:	_
Date and Time of Truck Wash:	-
Name and Initials of Person	
Conducting or Responsible for the Cleaning:	_
Comments:	

#### MEMORANDUM OF AGREEMENT

# ON AIR QUALITY MONITORING FOR CRITERIA POLLUTANTS FOR THE MYRTLE BEACH-CONWAY-NORTH MYRTLE BEACH

#### METROPOLITAN STATISTICAL AREA (MSA)

July 1, 2015

Participating Agencies:

North Carolina
Department of Environment and Natural Resources (NCDENR)
Division of Air Quality (NCDAQ)

South Carolina
Department of Health and Environmental Control (SCDHEC)
Bureau of Air Quality

#### I. PURPOSE/OBJECTIVES/GOALS

The purpose of this Memorandum of Agreement (MOA) is to establish the Myrtle Beach-Conway-North Myrtle Beach Metropolitan Statistical Area (MSA) Criteria Pollutant Air Quality Monitoring Agreement between NCDAQ and SCDHEC (collectively referred to as the "affected agencies") to collectively meet United States Environmental Protection Agency (EPA) minimum monitoring requirements for ozone, as well as other criteria pollutants air quality monitoring deemed necessary to meet the needs of the MSA as determined reasonable by all parties. This MOA will establish the terms and conditions of this collective agreement to provide adequate criteria pollutant monitoring for the Myrtle Beach-Conway-North Myrtle Beach MSA as required by 40 CFR 58 Appendix D, Section 2(e).

#### II. BACKGROUND

The Myrtle Beach-Conway-North Myrtle Beach MSA consists of Horry County and Brunswick County. NCDAQ has jurisdiction over Brunswick County and SCDHEC has jurisdiction over Horry County. Brunswick County was previously included in the Wilmington (NC) MSA with New Hanover and Pender Counties. However, the United States Office of Management and Budget revised the geographic delineation in February 2013 to include Brunswick County in the Myrtle Beach-Conway-North Myrtle Beach MSA instead.

The NCDAQ and SCDHEC are required by the Clean Air Act to measure for certain criteria pollutants in the ambient air in the Myrtle Beach-Conway-North Myrtle Beach MSA. The EPA has established minimum monitoring requirements based on the size of the MSA and the quality of the air in the MSA for ozone.

40 CFR 58 Appendix D, Section 2 (e) states (in part):

"... The EPA recognizes that State or local agencies must consider MSA/CSA boundaries and their own political boundaries and geographical characteristics in designing their air monitoring networks. The EPA recognizes that there may be situations where the EPA Regional Administrator and the affected State or local agencies may need to augment or to

divide the overall MSA/CSA monitoring responsibilities and requirements among these various agencies to achieve an effective network design. Full monitoring requirements apply separately to each affected State or local agency in the absence of an agreement between the affected agencies and the EPA Regional Administrator."

Currently each air pollution control agency (affected agency) conducts monitoring in its respective jurisdiction and coordinates monitoring with the other air pollution control agencies with the MSA.

#### III. ROLES AND RESPONSIBILITIES

The parties agree to the following terms and conditions:

- NCDAQ and SCDHEC (the "affected agencies") commit to conducting appropriate monitoring in their respective jurisdictions of the MSA; as needed, to collectively meet EPA minimum monitoring requirements for the entire MSA for ozone, as well as other criteria air pollutant monitoring deemed necessary to meet the needs of the MSA as determined reasonable by both affected agencies. The minimum air quality monitoring requirements for the MSA shall apply to the MSA in its entirety and shall not apply to any sole affected agency within the MSA unless agreed upon by all affected agencies.
- The affected agencies commit to coordinating monitoring responsibilities and requirements to achieve an effective network design regarding criteria air pollutant monitoring conducted in the MSA and commit to communicate unexpected or unplanned changes in monitoring activities within their jurisdictions to the other affected agency. As conditions warrant, the affected agencies may conduct telephone conference calls, meetings, or other communications to discuss monitoring activities for the MSA. Each affected party shall inform the other via telephone or e-mail of any monitoring changes occurring in its jurisdiction of the MSA at its earliest convenience after learning of the need for the change or making the changes. Such unforeseen changes may include evictions from monitoring sites, destruction of monitoring sites due to natural disaster, or similar occurrences that result in extend (greater than one quarter) or permanent change in the monitoring network. At least once a year in the second quarter or before June 15<sup>th</sup>, each agency shall deliver to the other agency a copy of its proposed monitoring plan for its jurisdiction with the MSA for the next year.
- Each party reserves the right to revoke or terminate this MOA at any time for any reason by giving thirty (30) days written notice prior to the date of termination.

#### IV. LIMITATIONS

- A. All commitments made in this MOA are subject to the availability of funds and each party's budget priorities. Nothing in this MOA, in and of itself, obligates NCDAQ or SCDHEC to expend funds or to enter into any contract, assistance agreement, interagency agreement, or other financial obligation.
- B. This MOA is neither a fiscal nor a funds obligation document. Any endeavor involving reimbursement or contribution of funds between parties to this MOA will be handled in accordance

with applicable laws, regulations, and procedures, and will be subject to separate subsidiary agreements what will be effected in writing by representatives of the parties.

C. Except as provided in Section III, this MOA does not create any right or benefit, substantive or procedural, enforceable by law or equity against NCDAQ or SCDHEC, their officers or employees, or any other person. This MOA does not direct or apply to any person outside NCDAQ or SCDHEC.

#### V. PROPRIETARY INFORMATION AND INTELLUCTUAL PROPERTY

No proprietary information or intellectual property is anticipated to arise out of this MOA.

#### VI. POINTS OF CONTACT

The following individuals are designated points of contact for the MOA:

NC DENR DAO:

Donnie Redmond

NC DENR Division of Air Quality

1641 Mail Service Center Raleigh, NC 27699-1641

donnie.redmond@ncdenr.gov Voice/fax: 919-707-8468

SCDHEC:

Scott Reynolds

SCDHEC Bureau of Air Quality

2600 Bull Street Columbia, SC 29201

reynolds@dhec.sc.gov Voice: 803-896-0902

#### VII. MODIFICATION/DURATION/TERMINATION

This MOA will be effective when signed by all parties. This MOA may be amended at any time by the mutual written consent of all parties. The parties will review this MOA at least once every 10 years to determine whether it should be revised, renewed, or cancelled. This MOA may be revoked or terminated by an affected party at any time and for any reason by giving thirty (30) days written notice prior to the date of termination.

#### VIII. REFERENCE

United States Environmental Protection Agency, Title 40 Code of Federal Regulations, Part 58, Appendix D, "Network Design Criteria for Ambient Air Quality Monitoring", Section 2 (e), "General Monitoring Requirements"

#### IX. APPROVALS

Division of Air Quality (NCDAQ)
BY: Shila (. Holmen
TITLE: Director, Porision of Ar acality
DATE: 6 12 2015
• 1
South Carolina Department of Health and Environmental Control (SCDHEC)  Bureau of Air Quality
BY: Mura 2 Rua
TITLE: Bureau Chief Air Quality Bureau
DATE: 6/22/15
· / · · / -

North Carolina Department of Environment and Natural Resources

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#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAY 2 6 2016

Ms. Rhonda Banks Thompson Chief Bureau of Air Quality Control South Carolina Department of Health and Environmental Control 2600 Bull Street Columbia, South Carolina 29201

Dear Ms. Thompson:

On March 16, 2016, the South Carolina Department of Health and Environmental Control (SC DHEC) notified the U.S. Environmental Protection Agency Region 4 that the comment period had ended for the Network Plan Addendum to the state of South Carolina's 2015 annual ambient air monitoring network plan (Network Plan Addendum). The Network Plan Addendum provided further information and proposed changes to the 2015 annual ambient air monitoring network plan (Network Plan), which was approved with three exceptions by the EPA on November 19, 2015. The Network Plan Addendum was received as two separate documents. One document proposed changes to the SC DHEC monitoring network and the other document requested waivers for monitoring siting requirements.

The EPA understands that the SC DHEC provided the public a 30-day review period for its draft Network Plan Addendum and that no comments were received.

The Network Plan Addendum proposes a number of changes to the SC DHEC's ambient air monitoring network, including:

- shutdown of four ozone (O<sub>3</sub>) monitoring sites,
- relocation of one O<sub>3</sub> monitoring site,
- startup of one O<sub>3</sub> monitoring site,
- shutdown of one multipollutant (PM<sub>2.5</sub> and PM<sub>10</sub>) site,
- a waiver of siting requirements at an O<sub>3</sub> and SO<sub>2</sub> site, and
- renewal of an existing waiver at a multi-pollutant site.

The EPA approves the requests in the Network Plan Addendum, with the following exceptions:

- The EPA is deferring making a decision on the proposed shut down of the Clemson O<sub>3</sub> site (AQS ID 45-072-0002) in order to allow more time for consideration and discussion with the SC DHEC.
- The EPA does not approve the discontinuation of O<sub>3</sub> monitoring at the Bushy Park Pump Station site (AQS ID 45-015-0002), since this site is required for the Charleston area to meet the O<sub>3</sub> minimum monitoring requirements found in 40 CFR Part 58, Appendix D. The EPA understands that the SC DHEC is currently looking for nearby property to move this monitor to. Once a suitable replacement site is found, the SC DHEC should request a relocation of the Bushy Park Pump Station O<sub>3</sub> monitor.

- The EPA conditionally approves the establishment of the Coastal Carolina O<sub>3</sub> monitoring site, once the SC DHEC has resolved any monitor siting issues. This site will meet the requirements for O<sub>3</sub> monitoring in the Myrtle Beach-Conway-North Myrtle Beach, SC-NC Metropolitan Statistical Area. The SC DHEC should include in the next ambient air monitoring network plan evidence that the Coastal Carolina site meets air monitoring siting requirements found in 40 CFR Part 58, Appendix E.
- The EPA supports the proposed relocation for the York CMS O<sub>3</sub> monitoring site (AQS ID 45-091-0006) to the proposed York O<sub>3</sub> site (AQS ID 45-091-0007). However, the Network Plan Addendum does not provide sufficient information to approve the new location at the proposed York O<sub>3</sub> site. In addition to the information provided in the Network Plan Addendum, the SC DHEC should submit to the EPA information to demonstrate that monitoring siting criteria are met, including: zoomed in aerial photo or a site location map; site photo(s) facing from the site in each direction (N, S, E, W); applicable measurements to any obstructions, trees or roadways; and the proposed probe height for the site.

All of the approved ambient air monitoring network changes, requested in the Network Plan Addendum should also be documented in the next annual ambient air monitoring network plan, due July 1, 2016.

Details regarding the EPA's review of the Network Plan Addendum are provided in the enclosed comments.

Thank you for working with us to monitor air pollution and promote healthy air quality in South Carolina. If you have any questions or concerns, please contact Gregg Worley at (404) 562-9141 or Ryan Brown at (404) 562-9147.

Sincerely,

Carol L. Kemker Acting Director

Air, Pesticides and Toxics Management Division

tchell for

Enclosure

cc: Mr. Robert Brown

Division Director, Air Planning Development SC DHEC

Mr. Scott Reynolds

Director, Division of Air Quality Analysis, SC DHEC

The Honorable William Harris Chief of the Catawba Indian Nation

Mr. Darin Steen

Director, Environmental Services, Catawba Indian Nation

Ms. Sheila Holman, Director, Division of Air Quality, NCDEQ

## 2015 State of South Carolina Ambient Air Monitoring Network Plan Addendum The U. S. EPA Region 4 Comments and Recommendations

This document contains the U.S. Environmental Protection Agency Region 4 comments and recommendations on the state of South Carolina's 2015 ambient air monitoring network plan addendum (Network Plan Addendum). Ambient air monitoring rules, which include regulatory requirements that address network plans, data certification, and minimum monitoring requirements, among other requirements, are found in 40 CFR Part 58.

#### **Proposed Monitoring Discontinuations**

The Network Plan Addendum proposes to discontinue five monitoring sites. The EPA is deferring the decision for the proposed shut down of the Clemson O<sub>3</sub> site (AQS ID 45-072-0002), in order to allow more time for consideration and discussion with the SC DHEC on this issue. The EPA acknowledges the discontinuation of O<sub>3</sub> monitoring at the Cowpens (AQS ID 45-021-0002) site, and approves the discontinuation of O<sub>3</sub> monitoring at the Famoda Farms (AQS ID 45-045-1003) site, as well as the discontinuation of PM<sub>2.5</sub> and PM<sub>10</sub> monitoring at the Bates House site (AQS ID 45-079-0019). See Table 1 for a summary of these requests with the EPA's comments.

The O<sub>3</sub> minimum monitoring requirements are found in 40 CFR Part 58, Appendix D, Table D-2. These minimum requirements are based on metropolitan statistical area (MSA) boundaries as defined by the U.S. Office of Management and Budget, population estimates from the U.S. Census Bureau for these MSAs, and historical ambient air monitoring data.

**Table 1: Monitors Proposed for Discontinuation** 

AQS ID	Site Name	MSA	Pollutant	Type	Comments
45-072- 0002	Clemson	Greenville- Anderson- Mauldin, SC	O <sub>3</sub>	SLAMS	Deferred for further discussion with the SC DHEC.
45-021- 0002	Cowpens National Battlefield	Gaffney, SC	$O_3$	SPM	Approval not required for SPM - shutdown acknowledged. <sup>1</sup>
45-015- 0002	Bushy Park Pump Station	Charleston-North Charleston- Summerville, SC	O <sub>3</sub>	SLAMS	Not Approved. A suitable replacement site should be found in the MSA.
45-045- 1003	Famoda Farms	Greenville- Anderson- Mauldin, SC	O <sub>3</sub>	SLAMS	Approved
45-079- 0019	Bates House	Columbia, SC	PM <sub>2.5</sub> , PM <sub>10</sub>	SLAMS	Approved. The SC DHEC will lose site access. Collocated PM <sub>2.5</sub> sampler will be moved to Parklane site (AQS ID 45-079-0007) to meet PM <sub>2.5</sub> collocation requirements.

 $<sup>^1</sup>$  The Cowpens National Battlefield  $O_3$  site is in a MSA that meets minimum  $O_3$  monitoring requirements and is classified as a special purpose monitor (SPM). The SC DHEC does not require EPA approval to shut down this monitor since it is a SPM. The EPA acknowledges the discontinuation of this monitor and that the monitoring requirements for  $O_3$  in Appendix D to 40 CFR Part 58 will continue to be met after this monitor is shutdown.

The SC DHEC requested to discontinue O<sub>3</sub> monitoring at the Famoda Farms monitoring site (AQS ID 45-045-1003). The EPA approves the shutdown of this site. The Famoda Farms monitor is one of four O<sub>3</sub> monitors operating in the Greenville-Anderson-Mauldin, SC MSA. This area is required at a minimum to have two O<sub>3</sub> monitors. Additionally, Famoda Farms has consistently recorded lower O<sub>3</sub> concentrations than the Clemson and Hillcrest Middle School monitoring sites, which are also in the Greenville area. The monitoring requirements in Appendix D to 40 CFR Part 58 will continue to be met in the Greenville area after the Famoda Farms monitor is shutdown.

At this time, the EPA does not approve the shutdown of the O<sub>3</sub> monitor at Bushy Park Pump Station. The Charleston MSA would not meet minimum O<sub>3</sub> monitoring requirements if O<sub>3</sub> monitoring at this site were discontinued. At a minimum, the Charleston MSA is required to have two regulatory O<sub>3</sub> monitors and would only have one regulatory O<sub>3</sub> monitor if monitoring at Bushy Park Pump Station were discontinued. The EPA recommends that the SC DHEC find a suitable replacement monitoring location for Bushy Park. In the meantime, the SC DHEC should continue to flag in the Air Quality System (AQS) the Bushy Park Pump Station O<sub>3</sub> data as not meeting siting requirements.

The SC DHEC expects to lose access to the property where the Bates House PM<sub>2.5</sub> and PM<sub>10</sub> monitoring site (AQS ID 45-079-0019) is located. For PM<sub>2.5</sub>, the Bates House monitoring has recorded daily and annual PM<sub>2.5</sub> design values below the national ambient air quality standards (NAAQS) for the last five years. Additionally, PM<sub>2.5</sub> concentrations recorded at the Irmo site (AQS ID 45-063-0008), which is also in the Columbia, SC MSA, have been typically higher than Bates House. Over the last five years, Irmo has had annual design values higher than Bates House, as well. The PM<sub>10</sub> levels recorded at Bates House have been well below the applicable standard for more than ten years. The EPA understands that the SC DHEC will move the collocated PM<sub>2.5</sub> sampler from Bates House to the Parklane site (AQS ID 45-079-0007) to still meet the PM<sub>2.5</sub> collocation requirements. After the Bates House monitoring site is shutdown and the PM<sub>2.5</sub> collocation requirements are met by establishing a collocated PM<sub>2.5</sub> sampler at the Parklane site, the Columbia, SC MSA will still meet monitoring requirements in Appendix D to 40 CFR Part 58 for PM<sub>10</sub> and PM<sub>2.5</sub>. Thus, EPA approves the discontinuation of monitoring at Bates House.

#### **Proposed Monitor Startups or Relocations**

The Network Plan Addendum also proposes to relocate one O<sub>3</sub> monitor and startup one O<sub>3</sub> monitor. See Table 2 for a summary of these requests.

Table 2: Monitors Proposed for Startup or Relocation

AQS ID	Site Name	MSA	Pollutant	Type	Comments
45-091-0006	York	Charlotte- Gastonia- Concord NC-SC	O <sub>3</sub>	SLAMS	The EPA supports this relocation to the new site, but requests additional information in the next network plan.
45-051-0008	Coastal Carolina	Myrtle Beach- Conway-North Myrtle Beach, SC-NC	O <sub>3</sub>	SLAMS	EPA Conditionally approves site startup. The Myrtle Beac MSA will the meet minimum monitoring requirements once this site is established. Site must meet siting criteria.

In its response to the 2015, Network Plan EPA approved a temporary shutdown of the York CMS monitoring site (AQS ID 45-091-0006). The SC DHEC stated in the Network Plan that it expects to lose access to the site and was looking for a replacement location. The Network Plan Addendum proposes to restart O<sub>3</sub> monitoring at a new site, York (AQS ID 45-091-0007), which is 3.5 miles northeast of the York CMS site. The EPA understands that the York CMS site is currently still operational even though the temporary shutdown was approved, and that The SC DHEC hopes to operate O<sub>3</sub> monitors concurrently at both the York CMS and York sites before discontinuing monitoring at York CMS. The York CMS monitor is an upwind location for the Charlotte-Concord-Gastonia NC-SC Core Based Statistical Area (CBSA) and typically reads lower than the other O<sub>3</sub> monitors in the CBSA. The EPA believes that the proposed York location would be representative of the same air shed as the previous York CMS monitoring site. The EPA supports the proposed location for the York O<sub>3</sub> monitoring site. However, the Network Plan Addendum does not provide sufficient information to fully approve the proposed York O<sub>3</sub> site. In addition to the information provided in the Network Plan Addendum, the SC DHEC should submit to the EPA information to demonstrate that monitoring siting criteria are met including: zoomed in aerial photo or a site location map; site photo(s) facing from the site in each direction (N, S, E, W); applicable measurements to any obstructions, trees or roadways; and the proposed probe height for the site. This information should be included in the next ambient air monitoring network plan.

The Network Plan Addendum proposes to establish a new O<sub>3</sub> monitoring site, Coastal Carolina (AQS ID 45-051-0008), in the Myrtle Beach-Conway-North Myrtle Beach, SC-NC CBSA to meet O<sub>3</sub> minimum monitoring requirements for this area. The SC DHEC provided 2011 Community Multiscale Air Quality (CMAQ) modeling output for this area in the Network Plan Addendum. The CMAQ model output indicates that the proposed Coastal Carolina site is in the area of the maximum predicted O<sub>3</sub> for the CBSA.

During the 2015 EPA technical systems audit (TSA), the EPA staff visited the proposed location for the Coastal Carolina site. The EPA noted that there was a tree dripline within ten meters of the expected monitoring probe location. This configuration would not meet the monitoring siting criteria found in 40 CFR Part 58, Appendix E, Section 5 siting requirements, "Spacing from Trees." The EPA conditionally approves the Coastal Carolina site; however, full approval is withheld until the monitoring siting criteria issue has been resolved. The SC DHEC should provide evidence that the Coastal Carolina site meets the monitoring siting criteria requirements found in Appendix E to 40 CFR Part 58 in the next ambient air monitoring network plan.

#### **Proposed Waivers of Monitor Siting Criteria**

The Network Plan Addendum requests one waiver of 40 CFR Part 58, Appendix E siting requirements and the extension of an existing waiver of siting requirements. Table 3 summarizes these requests.

Under 40 CFR Part 58, Appendix E, Section 10, waivers of siting criteria for existing sites can be granted if either of the following criteria are met:

10.1.1 The site can be demonstrated to be as representative of the monitoring area as it would be if the siting criteria were being met.

10.1.2 The monitor or probe cannot reasonably be located to meet the siting criteria because of physical constraints (e.g., inability to locate the required type of site the necessary distance from roadways or obstructions).

Table 3: Waivers of Siting Criteria

AQS ID	Site Name	MSA	Pollutant	Type	Comments
45-079-0021	Congaree Bluff	Columbia, SC	O <sub>3</sub> , SO <sub>2</sub>	SPM	Waiver of siting criteria approved for the identified trees obstructing the monitor. Waiver through 2020.
45-045-0015	Greenville ESC	Greenville- Anderson- Mauldin, SC	SO <sub>2</sub> , NO <sub>2</sub> , PM <sub>2.5</sub> , PM <sub>10</sub> , O <sub>3</sub>	SLAMS	Existing waiver of siting requirements extended through 2018.

The Network Plan Addendum requests a waiver of monitoring siting requirements for the Congaree Bluff monitoring site (AQS ID 45-079-0021). The objective of the Congaree Bluff site is to measure O<sub>3</sub> and SO<sub>2</sub> within the Congaree National Park boundaries. Within the national park boundaries, this monitor cannot be reasonably located to meet the siting criteria because of physical constraints. The EPA staff visited the Congaree Bluff site on January 25, 2016, and agree that this is the best monitoring location within the park boundaries. However, there are over forty trees surrounding the probe that do not meet the spacing from obstructions discussed in 40 CFR Part 58, Appendix E, Section 4 (a)"... The distance from the obstacle to the probe, inlet, or monitoring path must be at least twice the height that the obstacle protrudes above the probe, inlet, or monitoring path..."

The configuration of obstructing trees is such that the monitor probe siting does not meet Table E-4 of 40 CFR Part 58, Appendix E, Section 11, which states that monitor location "must have unrestricted airflow 270 degrees around the probe or sampler." The Congaree Bluff monitors have 180 degrees of unobstructed airflow due to the obstructing trees.

However, the EPA understands that the SC DHEC has trimmed the dripline of trees so that all tree driplines are no closer than ten meters from the monitoring probes, in order to comply with 40 CFR Part 58, Appendix E, Section 5 siting requirements, "Spacing from Trees." The SC DHEC has taken reasonable steps to meet many of the siting monitoring requirements, and the EPA believes that removing over 40 trees from a national park to meet all of the siting requirements is not necessary.

The EPA waives the requirements of 40 CFR Part 58, Appendix E, Section 4 (a) and Table E-4 to 40 CFR Part 58, Appendix E, Section 11 in regards to the trees identified by The SC DHEC in the Network Plan Addendum for the Congaree Bluff site. This site must still meet all other siting requirements found in Appendix E to 40 CFR Part 58. The EPA waives these specific requirements for a period of five years. This waiver should be re-evaluated in the 2020 South Carolina network assessment.

Similarly, the Network Plan Addendum requests to renew a waiver of siting criteria for the Greenville ESC monitoring site (AQS ID 45-045-0015). In 2009, the EPA granted a waiver of siting requirements for this site based on concurrent monitoring with the previous site. The Network Plan Addendum identifies two trees that are closer than twice the distance between the top of the tree and the height of the monitoring probe. At this time, the tree configuration and spacing at the site is close to meeting siting criteria such that the EPA believes that the monitoring data is representative of data if the siting criteria were met. Also, restrictions at the location prevent a reconfiguration of equipment or removal of trees.

The EPA waives the requirements of 40 CFR Part 58, Appendix E, Section 4 (a) and Section 11 (Table E-4) in regards to the trees identified by the SC DHEC in the Network Plan Addendum for the Greenville ESC site. The EPA waives these specific requirements for a period of two years. The EPA and the SC DHEC will continue to reevaluate the waiver of these requirements and alternative solutions in upcoming ambient air monitoring network plans. The Greenville ESC site must still meet all of the other siting requirements found in Appendix E to 40 CFR Part 58.