



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

March 11, 2021

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

Dear Ms. Thompson,

Thank you for submitting the state of South Carolina's five-year ambient air monitoring network assessment (Network Assessment) on July 21, 2020. The Network Assessment is required by 40 Code of Federal Regulations (CFR) § 58.10(d). The regulation, 40 CFR § 58.10(d), requires that the Network Assessment must, at a minimum, determine:

“if the network meets the monitoring objectives defined in appendix D to this part, whether new sites are needed, whether existing sites are no longer needed and can be terminated, and whether new technologies are appropriate for incorporation into the ambient air monitoring network. The network assessment must consider the ability of existing and proposed sites to support air quality characterization for areas with relatively high populations of susceptible individuals (e.g., children with asthma), and, for any sites that are being proposed for discontinuance, the effect on data users other than the agency itself, such as nearby states and tribes or health effects studies.”

The EPA evaluated how the Network Assessment addressed these requirements and is providing feedback on your network assessment. Enclosed is a table that documents the EPA's comments on your network assessment.

Thank you for your work to monitor air pollution and promote healthy air quality in South Carolina. If you have any questions, please contact me at (404) 562-9141 or Adam Friedman at (404) 562-9033.

Sincerely

Gregg Worley, Chief
Air Analysis and Support Branch

Enclosure

Network Assessment Requirement	How the network assessment addresses this requirement	EPA comments
The monitoring objectives defined in Appendix D are comprised of many factors, including, but not limited to, minimum monitoring requirements. All monitoring objectives should be evaluated in order to determine if the current network is adequate.	The Network Assessment determined whether minimum requirements were being met for each pollutant based on all minimum monitoring requirement criteria. For each network, the SC DHEC identified which objective and scale each monitor was addressing.	
The Network Assessment is required to include the determination of whether new monitoring sites should be established over the next five years.	<p>The MCAQ is in the process of establishing a second near-road NO₂ monitor in the Charlotte-Concord-Gastonia MSA.</p> <p>The Myrtle Beach-Conway-North Myrtle Beach MSA is approaching the population requirements for both PM₁₀ and PM_{2.5} monitoring and has passed the requirements for a second ozone monitor. The SC DHEC is in discussion with EPA and North Carolina about a second ozone monitor.</p>	EPA commends the SC DHEC for its in-depth discussion of anticipated new monitoring sites.
Whether existing sites are no longer needed and can be terminated	The network assessment identifies the CPW (AQS ID: 45-019-0049) and FAA (AQS ID: 45-019-0048) sites as being appropriate for termination after the establishment of the North Charleston Fire Station (AQS ID: 45-019-0020) site. The SC DHEC indicated that it plans to assess the Big Creek (AQS ID: 45-007-0005) ozone monitoring site to determine if its data is redundant.	The SC DHEC currently runs several rotating SO ₂ sites – York (AQS ID: 45-091-0008), Cape Romain (AQS ID: 45-019-0046), and Congaree Bluff (AQS ID: 45-079-0021) – but does not identify their monitoring objectives. EPA recommends that the SC DHEC evaluate the purpose and value of each of these sites and determine if they should be kept or terminated.
Whether new technologies are appropriate for incorporation into the air monitoring network.	The SC DHEC updated all continuous monitoring sites with broadband connections.	EPA appreciates the investment in broadband improvements across its network. EPA encourages the SC DHEC to also extend its investments in QC support equipment to enhance data reliability across its ozone sites.
Whether the network sufficiently supports characterization of air quality in areas with	The SC DHEC’s ozone and PM _{2.5} monitoring networks are in the major MSAs, which include most of the EJ communities and areas	

large populations of susceptible individuals	where the state is experiencing increases in senior and child populations.	
Whether discontinuance of a monitoring site would have an adverse impact on other data users or health studies.	For all sites being suggested for possible future termination, they would be replaced by new sites to ensure fullness of data. The SC DHEC performed gap analyses for PM _{2.5} and ozone networks.	EPA commends and supports the SC DHEC's efforts to reduce redundancy in its ozone network.
If monitoring is required near any additional lead (Pb) sources according to the most recent National Emissions Inventory. (Monitoring is required near sources with Pb emissions greater than 0.5 tons per year.)	There are currently no Pb monitors required in SC by CFR guidelines.	
Any waiver of 40 CFR Parts 50 and/or 58 regulatory requirements must be renewed during each five-year assessment unless otherwise specified to be renewed annually during the network plan process. This includes waivers of: a. Pb source monitoring b. Continuous PM _{2.5} FEM comparability (NAAQS exclusion). c. Siting criteria d. Any additional waiver of Part 50 and/or 58 regulatory requirements.	The SC DHEC proposed waiving various Appendix E siting requirements at the JCI Woods (AQS ID: 45-041-8003) and Congaree Bluff (45-079-0021) sites.	The JCI Woods waiver was approved in April 2020; the Congaree Bluff waiver was approved in May 2016 and approved for renewal in March 2021. Both waivers will need to be renewed in 2025.