



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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CERTIFIED MAIL

March 22, 2005

Mr. Douglas Neeley
Air Planning Branch
Air, Pesticides & Toxics Management Division
U.S. EPA, Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3104

Subject: Changes to Alabama's Particulate Monitoring Network Plan

Dear Mr. Neeley:

In July 2004, Alabama and Georgia jointly submitted a request to revise our respective Particulate Monitoring Plans to use spatial averaging in the Columbus, Georgia, Metropolitan Statistical Area (MSA). In your November 23, 2004 letter, you conveyed to us that EPA had determined that the case for spatial averaging was not made in our July 2004 submittal due to concerns with emission sources in the area not similarly impacting all three monitors. Enclosed is a revised plan to define a community monitoring zone (CMZ) encompassing the Columbus and Phenix City urban core. Two monitors are located within this CMZ, one in Phenix City, Alabama, and one in Columbus, Georgia, at the health department. Values from these two monitors would be spatially averaged for comparison with the annual fine particle (PM_{2.5}) NAAQS. We believe your concerns with our previous monitoring plan revision regarding the impact from emission sources are resolved by defining a CMZ consisting of the urban core with homogeneous emissions within this urban core. The Air Quality System (AQS) site identification number for our monitor is 011130001. Georgia's PM_{2.5} monitor AQS site identification number is 132150001. The attached document includes the data that supports this proposal and detailed information which describes the new monitoring planning area.

Further, in accordance with the spatial averaging rules, ADEM is requesting that the designation of the Russell County monitor be changed from SLAMS to Core-SLAMS. This monitor is being operated in accordance with the requirements for Core-SLAMS sites.

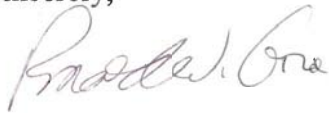


This monitoring plan revision was the subject of a public hearing held in Columbus Georgia on March 17, 2005. Also, the public comment period for the monitoring plan revision ended on March 21. No comments were received on this issue.

We therefore request that EPA approve this revision to our Particulate Monitoring Network Plan. We would appreciate your expedited review and approval of this revised plan in light of the deadlines in the recent PM2.5 designation rule signed by the Administrator.

If you have any questions or if we can provide further information regarding these issues, please do not hesitate to contact Ken Barrett at (334) 271-7870 or me at (334) 260-2747.

Sincerely,



Ronald W. Gore, Chief
Air Division

Attachments

cc: Richard Guillot
U. S. EPA

Dick Schutt
U. S. EPA

Ron Methier
Georgia DNR