



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

MARY FALLIN
Governor

July 15, 2014

Mr. Mark Hansen, Acting Associate Director
EPA Region 6 Air Programs (6PD)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Dear Mr. Hansen:

Please find enclosed our submittal of the DEQ FY 2015 Air Monitoring Network Plan as required in 40 CFR Part 58.10. The plan was posted on the DEQ web site for the required 30 day public comment period. You will find one comment from Devon Energy which is also enclosed.

I would call to your attention one minor change that was made to the final version of the plan. This change was made as a result of the comments received. In the chart titled Monitors Recommended to be Added on page 13, the Station Type was changed from 'SLAMs' to 'SPM' for the NO₂ monitor to be located at the Seiling Municipal Airport.

Please contact Kent Stafford of my staff at 405.702.4139 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eddie Terrill', is written over a horizontal line.

Eddie Terrill, Director
Air Quality Division

Enclosures

Cc: Maria Martinez, EPA
Bill Nally, EPA



**Oklahoma Department of Environmental Quality
Air Quality Division
Fiscal Year 2015
Air Monitoring Network Plan**



Oklahoma Department of Environmental Quality
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Introduction

This report is a review of the air monitoring network operated by the Oklahoma Department of Environmental Quality's Air Quality Division (AQD). It is submitted annually to the Environmental Protection Agency for providing the framework of establishing and maintaining an air quality surveillance system. AQD uses data collected by this network for comparison to the National Ambient Air Quality Standards (NAAQS). The Air Monitoring Network Plan is available for public inspection via the Oklahoma Department of Environmental Quality web site for at least 30 days prior to submission and contains proposed changes to the Oklahoma air monitoring network for Fiscal Year 2015 (FY15).

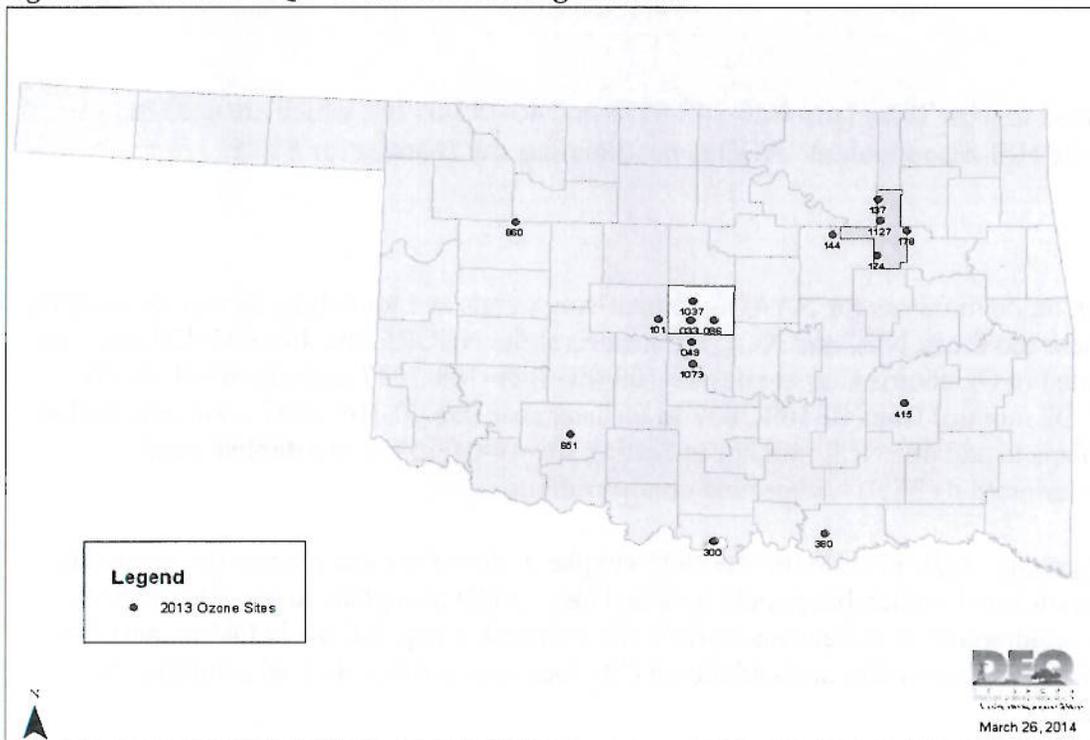
Table 1 is a list of all existing AQD ambient air monitoring sites that the agency currently operates and maintains as of January 1 2014. Table 2 is a list of proposed changes. "Air Quality System (AQS) Site ID#" in column one is a unique identification number assigned to each monitoring site in the state network. AQS is a national air monitoring database maintained by the EPA.

Ozone

AQD currently has six ozone sites located in the Oklahoma City Metropolitan Statistical Area (MSA). Five sites are located in the Tulsa MSA. One site is located in the Lawton MSA. This more than meets the requirements for the number of State and Local Air Monitoring Sites (SLAMS) ozone monitors based on population and ozone concentration according to 40 CFR, Part 58, Appendix D, Table 2.

Figure 1 shows the locations of the current ozone monitoring sites. Special Purpose Monitoring (SPM) sites 671(Waurika) and 300(Burneyville) will continue to monitor for a two year period that began in March 2013. Site 380 (Durant), which started sampling August of 2013, will also begin its second year of sampling. 671, 300 and 380 will close at the end of ozone season 2014. AQD is not planning any changes.

Figure 1 – Current AQD Ozone Monitoring Network



AQD currently operates a lead sampler at NCore site (40-143-1127) which meets requirements of a Core Based Statistical Area (CBSA) population of 500,000 or greater. AQD wishes to re-propose the closure of Savanna (40-121-0416) and relocate the collocated lead monitor to the Tulsa NCore site (40-143-1127), which will meet the lead collocation requirement. Based on the most recent quality assured state emissions inventory, there are no lead sources in Oklahoma exceeding 0.5 tons per year. AQD can provide emissions data upon request.

Sulfur Dioxide

Because of federal rulemaking, AQD implemented new minimum monitoring requirements for Tulsa and Oklahoma City based on population and SO2 emissions. This Population Weighted Emissions Index (PWEI) required only one such site in the Tulsa CBSA and none in the Oklahoma City CBSA. Table 1 illustrates that AQD meets the minimum SO2 network requirements..

Table 1

Sulfur Dioxide Emissions and Site Requirements				
Area	SO2 Emissions in Tons	Population	PWEI	Required No. of Sites
TULSA	24,444	1,115,407	27,265	1
OKC	1798	1,346,038	2420	0

AQD operates three source oriented monitoring sites in west Tulsa to meet the SO₂ CBSA requirement (40-143-0175, 40-143-0179 and 40-143-0235).

AQD also maintains two source-oriented sites in Ponca City (40-071-0604) and Muskogee (40-101-0167) and one background site in Oklahoma City (40-109-1037) used for trends and modeling purposes. AQD is not planning any changes.

Hydrogen Sulfide

AQD operates two sites located in west Tulsa (site # 40-143-0235 and 40-143-0179), which are used to determine compliance with the H₂S state standard. AQD is not planning any changes for FY15.

Oxides of Nitrogen

AQD maintains five nitrogen oxide monitors for NAAQS comparison, trends and modeling, as well as studying effects on ozone. Two of these monitors, NO₂ and NO_y, are located at the NCore site 40-143-1127; the other three NO₂ monitors are located in Oklahoma City at sites 40-109-0033, 40-109-1037 and site 40-017-0101. AQD plans to relocate the NO₂ monitor from 40-109-1037 to the near road site 40-109-0097 upon completion of the site platform. AQD plans to add one NO₂ monitor at Seiling site 40-043-0860 to establish rural Prevention of Significant Deterioration (PSD) background concentrations.

Area Wide Sampling Requirement: AQD plans to use the NO₂ sampler at the NCore site to meet the area wide requirement to protect susceptible and vulnerable populations in Tulsa. AQD also plans to use site (40-109-0033) to meet the area wide requirement to protect susceptible and vulnerable populations in Oklahoma City. AQD believes siting of monitors in these Tulsa and Oklahoma City locations provide desired sampling in “Environmental Justice” areas.

Carbon Monoxide

AQD currently has three carbon monoxide monitoring locations. AQD operates one trace level CO in Tulsa at site 40-143-1127. AQD operates one CO in Oklahoma City at site 40-109-1037 and plans to operate another at the near road site 40-109-0097. AQD is not planning any changes for the CO monitoring network.

PM₁₀

AQD maintains five low volume sequential PM₁₀ Federal Reference Method (FRM) samplers in its network. AQD operates two TEI 2025 samplers in Tulsa that are located at the NCore site 40-143-1127 and site 40-143-1110. AQD operates three TEI 2025 samplers in Oklahoma City, two (collocated) samplers at site 40-109-0035 and one sampler at site 40-109-1037.

AQD maintains a continuous source oriented Federal Equivalent Method (FEM) PM₁₀ located on the northeast side of Muskogee at site 40-101-0167. This site helps to monitor local source emissions. AQD plans to add a continuous FEM PM₁₀ sampler to Oklahoma City site 40-109-1037 and a continuous PM₁₀ sampler in western Oklahoma to aid in the tracking of dust events in conjunction with our health advisory program. Regarding the latter, AQD will evaluate the data after one year and make a decision on the utility and effectiveness of such sampling.

The SPM at Muskogee Site #40-101-0161 resumed a 1 in 6 day sampling schedule in early August of 2013. AQD has added a high volume TSP sampler to determine size fractions of source related particulate matter. This is operating as an SPM on a 1 in 6 day sampling schedule. AQD is not planning any other changes for the PM-10 network.

PM_{2.5}

Continuous Sampler Network – AQD maintains eight continuous FEM 2.5 samplers at sites 40-027-0049, 40-143-0174, 40-085-0300, 40-121-0415, 40-071-0604, 40-031-0651, 40-109-1037 and 40-143-1127 and plans to upgrade the continuous 2.5 sampler at site 40-043-0860 to a low volume FEM continuous PM_{2.5} sampler. All FEM continuous 2.5 samplers will be designated SPM for the first two years of operation. Because sites 40-121-0415 and 40-071-0604 now have 2+ years of data, AQD will re-designate them as SLAMS. AQD plans to designate the SHARP FEM at 40-121-0415 as the primary sampler and re-designate the FRM there as the collocated sampler. AQD is not requesting data exclusion for the FEM. Because AQD will have daily SLAMS FEM data at site 40-121-0415, AQD plans to operate the collocated FRM sampler on a 1 in 6 day sampling schedule beginning January 2015. This change will allow AQD to meet the network requirements of CFR part 58.

FRM/Manual Sampler Network – AQD maintains six manual method FRM PM_{2.5} samplers. Two are collocated at 40-143-1127, one at 40-109-1037, one at 40-121-0415, and one at 40-109-0035. One will soon be operational at the near road site 40-109-0097.

AQD operates a Synchronized Hybrid Ambient Real-time Particulate monitor or SHARP 5030 PM_{2.5} FEM monitor and a TEI 2025 FRM PM_{2.5} monitor at two sites, in addition to our required SHARP collocation at Site 40-121-0415. These sites are 40-109-1037 and 40-143-1127. Currently, AQD has not configured these two sites as collocated in AQS because the horizontal distance is greater than 4 meters. The horizontal distance at Site 1037 is 6 meters and at Site 1127 is 9 meters. (The vertical distance is 1 meter in both cases.) The horizontal distance for the sampler at site 1037 will change to meet co-location requirements but AQD is seeking a waiver at site 1127 for this requirement in accordance with 40CFR, Part 58, App. A:

This network review will be available for public comment at <http://www.deq.state.ok.us/aqdnew/monitoring/index.htm> for 30 days from the date of posting. Please send comments through postal service mail or through e-mail as listed below.

Kent Stafford
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Or email at: kent.stafford@deq.ok.gov

Table 2. Air Monitoring Site Information

AQS Site ID #	Address/ Location	Latitude	Longitude	Pollutants Measured	Sampling/ Analysis Method	Station Type	Operating Schedule	Monitoring Objective	Spatial Scale	NAAQS Comparable	MSA
40-027-0049	S.E. 19th St./Water Tower, Moore	35.320105	-97.484099	Ozone PM2.5	U.V. Photo-metric Low Volume FEM	SLAMS SPM	Continuous Continuous	Population Exposure AQI	Urban Urban	Yes Yes	OKC OKC
40-085-0300	Noble Foundation, Red River Research Farm	33.880812	-97.275896	Ozone PM 2.5	U.V. Photo-metric Low Volume FEM	SPM	Continuous Continuous	Regional Transport Regional Transport	Regional Regional	Yes Yes	Not in MSA Not in MSA
40-031-0651	Lawton	34.63298	-98.42879	Ozone PM2.5	U.V. Photo-metric Low Volume FEM	SLAMS SPM	Continuous Continuous	Population Exposure AQI	Urban Urban	Yes Yes	Lawton Lawton
40-043-0860	Municipal Airport, Seiling	36.158414	-98.931973	Ozone PM2.5	U.V. Photo-metric Low Volume	SLAMS SPM	Continuous Continuous	Regional Background AQI	Regional Regional	Yes No	Not in MSA Not in MSA
40-067-0671	Waurika	34.226639	-98.035444	Ozone	U.V. Photo-metric	SPM	Continuous	AQI & Regional Transport	Regional	No	Not in MSA
40-071-0604	306 E Otoe, Ponca City	36.697186	-97.08135	SO2 PM2.5	Pulsed Fluorescence Low Volume FEM	SLAMS SPM	Continuous Continuous	Population Exposure Population Exposure	Neighborhood Neighborhood	Yes Yes	Not in MSA Not in MSA
40-087-1073	310 E. Burr Oak Rd., Goldsby	35.159649	-97.473794	Ozone	U.V. Photometric	SLAMS	Continuous	Upwind Background	Regional	Yes	OKC
40-101-0161	Port of Muskogee	35.768333	-95.293889	PM10	Sequential Low Volume/ Micro-gravimetric filter weighing	SPM	(1 in 6)	Source Oriented	Middle	Yes	Not in MSA

40-101-0167	Water Treatment Plant, Muskogee	35.793134	-95.302235	SO2	Pulsed Fluorescence	SLAMS	Continuous	Source Oriented	Neighborhood	Yes	Not in MSA
				PM10	Low Volume FEM	SLAMS	Continuous	Source Oriented	Middle	Yes	Not in MSA
40-017-0101	12575 N.W. 10th, Yukon	35.479215	-97.751503	Ozone	U.V. Photometric	SLAMS	Continuous	Population Exposure	Urban	Yes	OKC
40-109-0096	12880A N.E. 10th, Choctaw	35.477801	-97.303044	Ozone	U.V. Photometric	SLAMS	Continuous	Population Exposure	Urban	Yes	OKC
40-109-0033	N.E. 10th and Stonewall, OKC	35.477036	-97.494309	Ozone	U.V. Photometric	SLAMS	Continuous	Population Exposure	Urban	Yes	OKC
				NO2	Chemiluminescence	SLAMS	Continuous	Population Exposure	Neighborhood	Yes	OKC
40-109-0035	N.W. 5th and Shartel, OKC	35.47292	-97.52709	PM2.5	Sequential FRM/ Micro-gravimetric filter weighing	SLAMS	(1 in 3)	Population Exposure	Neighborhood	Yes	OKC
				PM10	Sequential FRM/ Micro-gravimetric Filter Weighing	SLAMS	(1 in 6) Co-located	Population Exposure	Neighborhood	Yes	OKC
				NO2	Chemiluminescence	SLAMS	Continuous	Population Exposure	Urban/Near Road	Yes	OKC
40-109-0097	Will Rogers Park, Oklahoma City, OK 73112			PM2.5	Sequential FRM/ Micro-gravimetric filter weighing	SLAMS	(1 in 3)	Population Exposure	Urban/Near Road	Yes	OKC
				CO	Gas Filter Correlation	SLAMS	Continuous	Population Exposure	Urban/Near Road	Yes	OKC
				SO2	Pulsed Fluorescence	SLAMS	Continuous	General background	Urban	Yes	OKC
40-109-1037	Okla. Christian Univ., OKC	35.614131	-97.475083	Chemical Speciation	Low Volume/ Multiple by RTP	SPM	(1 in 6)	Population Exposure	Urban	No	OKC
				PM10	Sequential FRM/ Micro-gravimetric Filter Weighing	SLAMS	(1 in 6)	Population Exposure	Urban	Yes	OKC

40-143-1127	3520 1/2 N. Peoria, Tulsa	36.204902	-95.976537	Ozone	U.V. Photometric	NCore	Continuous	Max. downwind	Urban	Yes	Tulsa
				NO2	Chemiluminescence	NCore	Continuous	Max precursor emissions impact	Urban	Yes	Tulsa
				Trace level NOy	Chemiluminescence	NCore	Continuous	Max precursor emissions impact	Urban	No	Tulsa
				Trace level CO	Gas Filter Correlation	NCore	Continuous	Population Exposure	Urban	Yes	Tulsa
				Trace level SO2	Pulsed Fluorescence	NCore	Continuous	General background	Urban	Yes	Tulsa
				PM2.5	Sequential FRM/ Micro-gravimetric filter weighing	NCore	Daily	Max. Downwind	Urban	Yes	Tulsa
				PM2.5	Low Volume FEM	SPM	Continuous	AQI	Urban	Yes	Tulsa
				PM10	Sequential FRM/ Gravimetric filter weighing	NCore	Daily	Population Exposure	Urban	Yes	Tulsa
				PM10-PM2.5	Low volume/ Subtraction method	NCore	Daily	Population Exposure	Urban	NO	Tulsa
				Chemical Speciation	Low Volume Gravimetric/ Micro-gravimetric filter weighing/XRF/	NCore/ Spec. Trends	(1 in 3)	Population Exposure	Urban	No	Tulsa
				Lead	Hi Volume TSP/ Hot Plate Acid Extraction	NCore	(1 in 6)	Population Exposure	Urban	Yes	Tulsa
40-143-1110	445 S Jamestown Ave, Tulsa			Pm10	Sequential FRM/ Micro-gravimetric filter weighing	SLAMS	Daily	Population exposure	Neighborhood	Yes	Tulsa

40-143-0137	900 S. Osage Dr., Skiatook	36.357438	-95.999247	Ozone	U.V. Photometric	SLAMS	Continuous	Extreme Downwind	Urban	Yes	Tulsa
40-037-0144	City Water Plant, Mannford	36.105481	-96.361196	Ozone	U.V. Photometric	SLAMS	Continuous	Population Exposure	Urban	Yes	Tulsa
40-143-0174	502 E. 144th Pl., Glenpool	35.953708	-96.004975	Ozone PM2.5	U.V. Photometric Low volume FEM	SLAMS SPM	Continuous	Upwind Background Population Exposure	Urban	Yes No	Tulsa
40-143-0178	Lynn Lane, Tulsa	36.133802	-95.764537	Ozone	U.V. Photometric	SLAMS	Continuous	Population Exposure	Urban	Yes	Tulsa
40-143-0175	1710 W. Charles Page Blvd., Tulsa	36.149877	-96.011664	SO2	Pulsed Fluorescence	SLAMS	Continuous	Source Oriented	Neighborhood	Yes	Tulsa
40-143-0179	124 N. Riverside Dr., Tulsa	36.154830	-96.015844	SO2, H2S	Pulsed Fluorescence PF with Converter	SLAMS SPM	Continuous	Source Oriented Source Oriented	Neighborhood Neighborhood	Yes No	Tulsa
40-143-0235	2443 S. Jackson Ave., Tulsa	36.126945	-95.998941	SO2 H2S	Pulsed Fluorescence PF with Converter	SLAMS SPM	Continuous	Source Oriented Source Oriented	Middle Middle	Yes No	Tulsa

All AQD sites and monitors conform to 40 CFR, Subchapter C, Part 58 appendix A, Appendix C (see methods in column 6 of table 2), and appendices D & E (see photos located @ <http://www.deq.state.ok.us/AQDnew/monitoring/cpdata.htm> by clicking on desired location of the site map).

Table 3. Changes to AQD Network Plan

Monitors Recommended to be Removed

AQS Site ID #	Address/ Location	Latitude	Longitude	Pollutants Measured	Sampling Method/ Analysis Method	Station Type	Operating Schedule	Monitoring Objective	Spatial Scale	NAAQS Comparable	MSA
40-121-0416	108 N Main St., Savanna	34.829396	-95.843642	Lead	Hi Volume TSP/ Hot Plate Acid Extraction	SLAMS	(1 in 6)	Source Oriented	Middle	Yes	Not in MSA
40-109-1037	Okla. Christian Univ., OKC	35.614131	-97.475083	NO2	Chemiluminescence	SLAMS	Continuous	Max. Precursor	Urban	Yes	OKC

Monitors Recommended to be Added

AQS Site ID #	Address/ Location	Latitude	Longitude	Pollutants Measured	Sampling Method/ Analysis Method	Station Type	Operating Schedule	Monitoring Objective	Spatial Scale	NAAQS Comparable	MSA
40-043-0860	Municipal Airport, Seiling	36.158414	-98.931973	NO2	Chemiluminescence	SPM	Continuous	Regional Background	Regional	Yes	Not in MSA
40-109-1037	Okla. Christian Univ., OKC	35.614131	-97.475083	PM10	Low Volume FEM	SPM	Continuous	AQI	Regional	No	Not in MSA
40-143-1127	3520 1/2 N. Peoria, Tulsa	36.204902	-95.976537	Lead	Hi Volume TSP/ Hot Plate Acid Extraction	NCore	(1 in 6)	Lead Collocation	Urban	Yes	Tulsa

Glossary:

- AQI (Air Quality Index): Index for reporting daily air quality that focuses on health effects calculated for five major air pollutants regulated by the Clean Air Act. These include ground-level ozone, particulate matter, carbon monoxide, sulfur dioxide, and nitrogen dioxide.
- AQS (Air Quality System): EPA's repository of ambient air quality data.
- CBSA (Core Based Statistical Area): A U.S. geographic area defined by the Office of Management and Budget (OMB) based around an urban center of at least 10,000 people and adjacent areas that are socioeconomically tied to the urban center by commuting.
- CO: Carbon Monoxide
- EQL (Equivalent Method): Additional methods that have been demonstrated to the satisfaction of the US-EPA to provide equivalent measurements and are treated the same way legally as the federal reference method (FRM).
- FEM (Federal equivalent method): A method for measuring the concentration of an air pollutant in the ambient air that has been designated as an equivalent method in accordance with 40 CFR 53.1
- FRM (Federal reference method): A method of sampling and analyzing the ambient air for an air pollutant that is specified as a reference method in an appendix to part 50 of 40 CFR 53.1, or a method that has been designated as a reference method in accordance with this 40 CFR 53.1
- MSA (Metropolitan Statistical Area): A geographical region with a relatively high population density at its core and close economic ties throughout the area. MSAs are defined by the Office of Management and Budget (OMB) and used by the Census Bureau and other federal government agencies for statistical purposes.
- NCore (National Core): A multi-pollutant monitoring station network that integrates several advanced measurement systems for particles, pollutant gases and meteorology.
- NAAQS (National Ambient Air Quality Standards): The National Ambient Air Quality Standards (NAAQS) define the maximum permissible concentration for criteria pollutants.
- NO₂: Nitrogen Dioxide
- NO_y: The sum of the nitrogen oxides NO and NO₂ (NO_x) plus the compounds produced from the oxidation of those oxides.
- OKC: Oklahoma City
- PM_{2.5}: A measure of particulate matter in the air less than 2.5 micrometers in diameter

- PM10: A measure of particulate matter in the air with a diameter of less than or equal to 10 micrometers
- PMc (PM Coarse): A measure of particles in the air between 2.5 and 10 micrometers in diameter; the difference between PM10 and PM2.5.
- POC: Parameter Occurrence Code
- PSD: Prevention of Significant Deterioration
- PWEI (Population Weighted Emissions Index): Sulfur Dioxide monitoring regulations require monitor placement in Core Based Statistical Areas (CBSAs) based on a population weighted emissions index for the area. The rule requires 3 monitors in CBSAs with index values of 1,000,000 or more; 2 monitors in CBSAs with index values less than 1,000,000 but greater than 100,000; and 1 monitor in CBSAs with index values greater than 5,000.
- RTP (Research Triangle Park): US EPA lab that analyzes chemical speciation PM 2.5 filters among other duties.
- SHARP: Synchronized Hybrid Ambient Real-time Particulate monitor; a product of TEI
- SLAMS (State and Local Air Monitoring Sites): Monitoring stations whose size and distribution are largely determined by the needs of State and local air pollution control agencies to meet their respective State implementation plan (SIP) requirements
- SO2: Sulfur Dioxide
- SPM (Special Purpose Monitoring): A monitor whose data are not to be used for NAAQS compliance determinations
- Source-Oriented Sites: Monitoring sites for which the primary monitoring objective would be to identify peak SO2 concentrations in the ambient air that are attributable to an identified emission source or group of sources.
- TEI: Thermo Environmental Instruments, Inc.
- TSP: (Total Suspended Particulates): a measure of total particulate matter in the air



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June 30, 2014

Mr. Kent Stafford
Air Quality Division
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73101-1677

RE: 2015 Air Monitoring Network Plan Posted for Public Review

Dear Mr. Stafford:

Devon Energy Production Company, L.P. (Devon) respectfully submits the following comments on the Fiscal Year 2015 Air Monitoring Network Plan, posted June 2 for a 30 day public review and comment period.

Our comments refer to the Oxides of Nitrogen discussion on page 4 where it states, "AQD plans to add one NO₂ monitor at Seiling site 40-043-0860 to establish rural Prevention of Significant Deterioration (PSD) background concentrations." Also in Table 3 on page 13, the Network Plan recommends addition of a NO₂ monitor to the Seiling site, to be designated as monitor type: SLAMS (State and Local Air Monitoring Site); monitoring objective: Regional Background, and to be NAAQS comparable. Devon is one of many industry stakeholders with an interest in the air quality of Oklahoma and particularly this northwest region surrounding Seiling, where Devon is one of many operators in the area.

Please consider the following comments:

1. Could the AQD elaborate further on the monitoring objective and intended use of data gathered from the proposed NO₂ monitor (measuring NO, NO₂, NO_x) at Seiling, either rural background or PSD? The Network Plan states the intent is to establish rural background levels. The document also implies that the data will be used for Prevention of Significant Deterioration (PSD) purposes. Monitoring for PSD is a specific use of data typically applied when planning for "new major sources or major modifications at existing sources for pollutants where the area the source is located is in attainment or unclassifiable with the National Ambient Air Quality Standards (NAAQS)."

(<http://www.epa.gov/NSR/psd.html>)

2. Devon respectfully asks the AQD to consider initial designation of this Seiling NO₂ monitor in both the Network Plan and the EPA AQ5 national database as a Special Purpose Monitor (SPM), rather than a SLAMS. An SPM designation would provide the AQD a flexible, conservative approach to collecting criteria pollutant NO₂ data in a western region of the state where 1)

there is no historical NO₂ data other than Enid and Lawton, 2) the potential for monitoring data to exceed the NAAQS for NO₂ is unknown, and 3) the region is currently in attainment or unclassifiable for the NO₂ NAAQS.

The benefits of initial SPM designation for the AQD and the state of Oklahoma, under EPA regulations in 40 CFR §58.20 Special purpose monitors (SPM) are as follows:

A. Prior approval from EPA is not required for discontinuance of an SPM monitor, per 40 CFR §58.20 (f). However, it is more difficult to discontinue a SLAMS designated monitor, especially if relatively high NO₂ readings were recorded. If the AQD operates the NO₂ SPM monitor for a year or two and decides another location would fit their needs, they could easily relocate. Alternately, if the AQD operates the monitor for two years and then determines it is a good location for a longer term, they can then change the status to a SLAMS monitor.

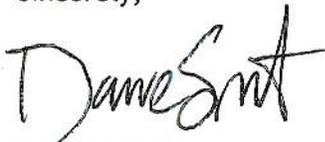
B. It is relatively easy to designate a new monitor as a SPM monitor, and get concurrence from EPA, per 40 CFR §58.20 (a). However, after January 1, 2007 it is difficult to startup a new monitor as a SLAMS monitor, then later retreat to SPM status, and get EPA approval.

C. Data collected under the SPM designation would still be submitted into the AQS database, and could be used for trends comparison with other state-wide NO₂ monitors, research, modeling, forecasting, and even PSD as long as the monitor uses Federal reference method (FRM), Federal equivalent method (FEM), or approved regional method (ARM) and meets requirements of §58.11, §58.12, and appendix A. See 40 CFR §58.20 (b)

D. To summarize, the AQD would receive all the benefits of good quality monitoring data, under SPM designation, without the obligation of establishing a non-attainment designation if high NO₂ readings were measured from a single monitor, as long as the monitor is operated for 24 months or less. If an SPM designated NO₂ monitor is discontinued within 24 months of start-up, the EPA will not designate an area as nonattainment for the NO₂ NAAQS solely on the basis of data from the SPM, per 40 CFR §58.20 (e).

If you should have any questions or wish to discuss, please contact me at (405) 228-8584.

Sincerely,



Darren Smith
Manager, EHS Policy & Regulatory Affairs

