

STATE OF COLORADO

John W. Hickenlooper, Governor
Christopher E. Urbina, MD, MPH
Executive Director and Chief Medical Officer

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S. Laboratory Services Division
Denver, Colorado 80246-1530 8100 Lowry Blvd.
Phone (303) 692-2000 Denver, Colorado 80230-6928
Located in Glendale, Colorado (303) 692-3090

<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

March 21, 2012

Joseph Delwiche
8P-AR
US Environmental Protection Agency Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

Dear Mr. Delwiche,

As required, the Colorado Department of Public Health and Environment's (CDPHE) Air Pollution Control Division (APCD) is submitting a network site modification request form for the proposed discontinuation of the Longmont - Main Street carbon monoxide monitor, AQS ID: 08-013-0009.

The Longmont – Main Street carbon monoxide air monitoring site is being terminated due to an alley reconstruction project that requires the removal of the current air monitoring shelter. The last valid sample collected at the site was December 31, 2011 at 23:00 hr. Construction in the alley began on March 5th, 2012 and the shelter was removed from the site on March 14, 2012. It is currently APCD's intention not to reinstall the shelter at the Main Street location.

The need for ambient carbon monoxide monitoring has diminished due to declining carbon monoxide levels across the nation. Carbon monoxide levels at the Longmont – Main Street site are less than 50% of the 1-Hour and 8-Hour NAAQS, and have less than a 10 percent chance of exceeding 80 percent of the applicable NAAQS during the next three years, as listed in 40 CFR 58.14 (c)(1) (see Attachment 1). APCD's primary reason for continued monitoring in the Longmont area is the inclusion of a monitoring requirement in the Longmont Carbon Monoxide Maintenance Plan. EPA has set a precedent allowing states to build contingency measures into their maintenance plans to give greater flexibility in network planning and design. One example is allowing surrogate monitoring locations for compliance monitoring. Contingency measures are further supported if they coincide with EPA's effort to disinvest in redundant sites so that resources can be reallocated to further enhance multi-pollutant sites where applicable and/or further expand the existing network as needed. The APCD has been in communication with EPA Region 8's Air Quality Planning – State Implementation Plan Group to discuss the possibility of allowing the Denver - CAMP carbon monoxide monitor to serve as a surrogate for the Longmont – Main Street monitor within the Longmont Carbon Monoxide Maintenance Plan.

Based upon these conversations, EPA concurs with CDPHE's intentions and indicated they would consider the modification, as the Denver - CAMP monitor is in an adjacent maintenance area, and typically records the highest carbon monoxide concentrations in the Denver/North Front Range area.

Enclosed is the associated Ambient Air Monitoring Network Modification Request Form (see Attachment 2). If you have any questions or need further information, you can reach me at (303) 692-3232.

Sincerely,

Gregory Harshfield
Scientist/Supervisor
Continuous Monitoring and Data Systems Support

cc: Gordon Pierce

Enclosures:

Attachment 1: Carbon Monoxide, 2nd Max by Year

Attachment 2: Longmont Carbon Monoxide Ambient Air Monitoring Network Modification Form.

Attachment 1 – Carbon Monoxide, 2nd Max by Year, 1 Hour Average and 8 Hour Average

Carbon Monoxide – 2nd Max of 1 Hour Averages

| | DMAS | CAMP | Welby | Longmont | Greeley Annex | Fort Collins - CSU |
|-------------|--------------------|--------------------|--------------------|--------------------|----------------------|---------------------------|
| | 08-031-0025 | 08-031-0002 | 08-001-3001 | 08-013-0009 | 08-123-0010 | 08-069-1004 |
| 2001 | - | 9.3 | 5.8 | 6.4 | - | 6.8 |
| 2002 | - | 7.4 | 4.8 | 4.8 | - | 5.5 |
| 2003 | - | 14.9 | 5.2 | 4.2 | 5.6 | 4.4 |
| 2004 | - | 8.7 | 4 | 4.3 | 6.4 | 5.3 |
| 2005 | - | 4.3 | 3.3 | 4.8 | 4.8 | 5.0 |
| 2006 | - | 4.6 | 3.8 | 2.8 | 5.6 | 3.9 |
| 2007 | - | 5.9 | 3.0 | 3.4 | 3.9 | 3.5 |
| 2008 | - | 7.0 | 3.1 | 3.3 | 3.2 | 4.6 |
| 2009 | - | 6.8 | 2.6 | 3.2 | 3.6 | 3.0 |
| 2010 | Insufficient Data | 4.0 | 2.3 | 4.4 | 3.9 | 2.9 |
| 2011 | 2.39 | 3.1 | 2.4 | 4.3 | 2.5 | 2.5 |

Carbon Monoxide – 2nd Max of 8 Hour Averages

| | DMAS | CAMP | Welby | Longmont | Greeley Annex | Fort Collins - CSU |
|-------------|--------------------|--------------------|--------------------|--------------------|----------------------|---------------------------|
| | 08-031-0025 | 08-031-0002 | 08-001-3001 | 08-013-0009 | 08-123-0010 | 08-069-1004 |
| 2001 | - | 4.1 | 3.3 | 3.5 | - | 3.0 |
| 2002 | - | 3.7 | 2.6 | 3.2 | - | 2.9 |
| 2003 | - | 4.5 | 3.0 | 3.3 | 3.3 | 2.5 |
| 2004 | - | 4.1 | 2.8 | 3.2 | 3.7 | 3.1 |
| 2005 | - | 2.5 | 2.2 | 2.4 | 2.8 | 2.4 |
| 2006 | - | 3.1 | 2.5 | 1.8 | 3.3 | 2.7 |
| 2007 | - | 2.8 | 2.1 | 1.9 | 2.4 | 2.4 |
| 2008 | - | 2.3 | 1.7 | 2.4 | 2.2 | 2.2 |
| 2009 | - | 2.4 | 2.0 | 1.8 | 2.2 | 1.8 |
| 2010 | Insufficient Data | 2.4 | 1.8 | 1.9 | 2.3 | 1.7 |
| 2011 | 1.50 | 1.8 | 1.6 | 2.1 | 1.5 | 1.3 |

Note: Highlighted site are within the Denver Metro Carbon Monoxide Maintenance Plan area.

Attachment 2

| EPA REGION 8 AMBIENT AIR MONITORING NETWORK MODIFICATION REQUEST FORM (VERSION 2, 4/1/04) | | | | | | |
|--|---|---|---|-------------------------------------|-------------------|------------------------|
| DATE: 4/2/2012 | | CITY: Longmont | | | STATE: Colorado | |
| AQS SITE ID: 08-013-0009 | | | SITE NAME: Longmont - Main Street CO | | | |
| PROPOSED MODIFICATION/REASON WHY: Removal: The Department believes the Longmont Carbon Monoxide Maintenance Plan can be adequately supported without the Longmont carbon monoxide monitor by using the Denver – CAMP carbon monoxide monitor as a surrogate to fulfill the monitoring requirements in the Longmont Carbon Monoxide Maintenance Plan. | | | | | | |
| AIR QUALITY PARAMETER (PM10, SO2, CO, NO2, ETC.) | MONITOR TYPE (NAMS, SLAMS, SPM, TRIBAL, etc.) | CHECK ONE OR MORE OF THE APPLICABLE CATEGORIES BELOW: | | | | LIST SAMPLER EQUIPMENT |
| | | MAX CONC | SOURCE IMPACT | POPULATION EXPOSURE | BACKGROUND | |
| CO | SLAMS | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | | Thermo 48C |
| | | | | | | |
| | | | | | | |
| PROPOSED SAMPLING START / REMOVAL DATE OR DATE STARTED / REMOVED: REMOVAL- 3/14/12 | | | | | | |
| ESTIMATED MEASUREMENTS FOR AIR QUALITY PARAMETERS: | | | | | | |
| LOCATION (LAT./LONG. OR UTM'S): | | | | | | |
| SITE ELEVATION (M. MSL): | | | | PROBE HEIGHT (M. AGL): | | |
| DISTANCE TO TREE DRIPLINE (M) | DIRECTION TO TREE | DISTANCE TO OBSTACLE (M) | DIRECTION TO OBSTACLE | OBSTACLE HEIGHT ABOVE PROBE (M) | OBSTACLE COMMENTS | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| UNRESTRICTED AIR FLOW: >270 DEG. >180 DEG. <CRITERIA_____DEG. | | | | | | |
| DISTANCE TO FLUES/INCINERATORS (M): | | | | | | |
| DISTANCE TO INTERSECTIONS (M): | | | DISTANCE FROM SUPPORTING STRUCTURES (M): VERT. _____ HORIZ. _____ | | | |
| DISTANCE TO EDGE OF NEAREST ROADWAY | NAME OF ROADWAY | DIRECTION | DAILY TRAFFIC ESTIMATES | YEAR OF TRAFFIC ESTIMATES | TYPE OF ROADWAY | COMMENTS |
| | | NORTH | | | | |
| | | EAST | | | | |
| | | SOUTH | | | | |
| | | WEST | | | | |
| DISTANCE TO NEAREST POINT SOURCES (MILES) | DIRECTION TO POINT SOURCES | DISTANCE TO NEAREST AREA SOURCES (MILES) | | DIRECTION TO AREA SOURCES | COMMENTS | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| CERTIFICATION: I certify the network modification proposed above meets all 40 CFR 58, Appendix E siting criteria, except as noted with submittal. | | | | | | |

Printed Name: _____ Signature: _____

FOR EPA USE ONLY: Received Date: _____ Follow-up Actions: _____ Approval Status
 Given: _____ Email Response Date: _____ Letter Response Date: _____

FOR METEOROLOGICAL PARAMETERS ONLY:

MONITORING PURPOSE/OBJECTIVES:

PROPOSED MONITORING SCHEDULE/DURATION:

PROPOSED START / REMOVAL DATE
 OR DATE STARTED / REMOVED:

| DATA ACQUISITION SYSTEM: | | | |
|-------------------------------------|----------------------|----------------------|----------------------------------|
| PRIMARY | | PARAMETERS: | APPLICABLE √ those that apply |
| BACKUP | | | SENSOR HT (M) |
| | | WIND SPEED/DIRECTION | |
| EQUIPMENT MANUFACTURER/MODEL: | | SOLAR RADIATION | |
| | | RELATIVE HUMIDITY | |
| WILL THE DATA BE USED FOR MODELING? | YES NO | PRESSURE | |
| IS SITE REQUIRED FOR SIP? | YES NO | SIGMA THETA | |
| UNRESTRICTED AIRFLOW? | YES NO | PRECIPITATION | |
| DISTANCE TO TREE DRIPLINE (M): | | TEMPERATURE | |
| NEARBY TERRAIN: | SMOOTH ROLLING ROUGH | OTHER (DESCRIBE) | |

TOPOGRAPHIC FEATURES (E.G HILLS, MOUNTAINS, VALLEYS, RIDGES, BODIES OF WATER):

COMMENTS:

FORM KEY:
PAGE 1:
 MONITOR TYPE: NAMS = 1, SLAMS = 2, SPM = 3, TRIBAL = A
 SITE ELEVATION = GROUND LEVEL ELEVATION
 PROBE HEIGHT (M. AGL) = PROBE HEIGHT METERS ABOVE GROUND LEVEL