



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

OCT 24 2014

Mr. Brad Poiriez
Air Pollution Control Officer
Imperial County Air Pollution Control District
150 South 9th Street
El Centro, California 92243-2801

Dear Mr. Poiriez:

Thank you for your submission of the Imperial County Air Pollution Control District's (ICAPCD) Ambient Air Monitoring Annual Network Plan in July 2014. We have reviewed the submitted document based on the requirements set forth under 40 CFR 58. Based on the information provided in the plan, the U.S. Environmental Protection Agency (EPA) approves all portions of the network plan except those specifically identified below.

Please note that we cannot approve portions of the annual network plan for which the information in the plan is insufficient to judge whether the requirement has been met, or for which the information, as described, does not meet the requirements as specified in 40 CFR 58.10 and the associated appendices. EPA Region 9 also cannot approve portions of the plan for which the EPA Administrator has not delegated approval authority to the regional offices. Accordingly, the first enclosure (*A. Annual Monitoring Network Plan Items where EPA is Not Taking Action*) provides a listing of specific items of your agency's annual monitoring network plan where EPA is not taking action. The second enclosure (*B. Additional Items Requiring Attention*) is a listing of additional items in the plan that EPA wishes to bring to your agency's attention.

The third enclosure (*C. Annual Monitoring Network Plan Checklist*) is the checklist EPA used to review your plan for overall items that are required to be included in the annual network plan along with our assessment of whether the plan submitted by your agency addresses those requirements.

The first two enclosures highlight a subset of the more extensive list of items reviewed in the third enclosure. All comments conveyed via this letter (and enclosures) should be addressed (through corrections within the plan, additional information being included, or discussion) in next year's annual monitoring network plan.

If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 947-4534 or Michael Flagg at (415) 972-3372.

Sincerely,

A handwritten signature in black ink, appearing to read "Meredith Kurpius". The signature is fluid and cursive, with a prominent loop at the end.

Meredith Kurpius, Manager
Air Quality Analysis Office

Enclosures:

- A. Annual Monitoring Network Plan Items where EPA is Not Taking Action
- B. Additional Items Requiring Attention
- C. Annual Monitoring Network Plan Checklist

cc (via email): Monica Soucier, ICAPCD
Gayle Sweigert, CARB
Pheng Lee, CARB

A. Annual Monitoring Network Plan Items where EPA is Not Taking Action

We are not acting on the portions of annual network plans where either EPA Region 9 lacks the authority to approve specific items of the plan, or EPA has determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met.

- System modifications (e.g., site closures or moves) are subject to approval per 40 CFR 58.14(c). Information provided in the plan was insufficient for EPA to approve the system modifications listed in the plan per the applicable requirement. Therefore, we are not acting on the following items as part of this year's annual network plan (see Checklist Row 3):
 - Relocation of Calxico Ethel
 - Shutdown of Westmorland ozone monitor

- EPA identified items in your agency's annual monitoring network plan where a requirement was not being met or information in the plan was insufficient to judge whether the requirement was being met based on 40 CFR 58.10 and the associated appendices. Therefore, we are not acting on the following items:

Item	Checklist Row	Issue
Distance from trees	76	Not meeting requirement in one instance
Modifications to SLAMS network	3	Insufficient information to judge
PM ₁₀ sampling schedule	34	Insufficient information to judge
Parameter Code	66	Not meeting requirement in some instances
Method code/description	67	Not meeting requirement in some instances
Designation of primary monitor	15	Insufficient information to judge
Identification of monitors suitable for comparison to annual PM _{2.5} NAAQS	23	Insufficient information to judge
Dates of PM _{2.5} semi-annual flow audits	31	Insufficient information to judge
Dates of PM ₁₀ semi-annual flow audits	37	Insufficient information to judge
Date of PE audit	47	Insufficient information to judge
Distance to furnace or incinerator flue	77	Insufficient information to judge
Frequency of manual PM _{2.5} flow rate verification	29	Insufficient information to judge
Frequency of automated PM _{2.5} flow rate verification	30	Insufficient information to judge
Document how agency will provide for the review of changes to PM _{2.5} network	17	Insufficient information to judge
PM _{2.5} collocation	21	Insufficient information to judge

Distance between collocated monitors	16	Insufficient information to judge
Data certification	11	Insufficient information to judge
Sampling start date	68	Not meeting requirement in some instances
Shared MSA monitoring responsibilities	14	Insufficient information to judge
Dates of Pb semi-annual flow audits	45	Insufficient information to judge
Designation of Pb monitors as source or non-source oriented	42	Insufficient information to judge

Additional information for each of these items may be found for the row listed in column 2, in the third enclosure (*C. Annual Monitoring Network Plan Checklist*).

B. Additional Items Requiring Attention

- [Item 19] The design value in Table 22 is outdated. The most recent design value should be used to assess minimum monitoring requirements (i.e. 2011-2013 DV for the 2014 ANP). If this “most current” DV is not yet available when the ANP is put out for public comment, please include a footnote explaining why. Also, Table 22 should include the most recent annual design value in addition to the 24-hour design value, as the minimum monitoring requirements are a function of population and proximity to **any** of the PM_{2.5} NAAQS.
- [Item 20] Provide the number of continuous monitors that are required in Table 22 and identify how many continuous monitors are operating in the network that are intended to satisfy this requirement.
- [Item 28] While the Calexico Ethel monitoring site is now sampling at the appropriate sampling frequency, the analysis in Table 24 should be updated with the most recent design value information (i.e. 2011-2013). Also, sampling frequency information in Table 12 (p.18) does not match the Monitoring Station Details (p.45).
- [Item 32] The concentrations in Table 20 are outdated. The most recent design value should be used to assess minimum monitoring requirements (i.e. 2011-2013 DV for the 2014 ANP). If this “most current” DV is not yet available when the ANP is put out for public comment, please include a footnote explaining why
- [Item 36] The frequency of flow rate verification for the PM₁₀ BAM 1020 monitors at Niland and Brawley are different. Provide rationale for different schedules or update ANP.
- [Item 33 & 39] While the collocation requirements are applicable to the CARB PQAQO, relevant information should be included in the ICAPCD ANP for monitors operated within Imperial County, if needed. If there are any such collocated monitors operated within Imperial County, please provide this information in subsequent ANPs.
- [Item 46] The frequency of one-point QC checks for the gaseous monitors at Calexico Ethel are different than other monitors in the network. Provide rationale for different schedules or update ANP.
- [Item 48] The design values in Table 14 are outdated. The most recent design value should be used to assess minimum monitoring requirements (i.e. 2011-2013 DV for the 2014 ANP). If this “most current” DV is not yet available when the ANP is put out for public comment, please include a footnote explaining why.
- [Item 64] The information in Table 9 (p.17) for the Niland PM₁₀ BAM 1020 does not match the Niland Site Survey Report (p.32). Also, the tables on p.16-17 refer to monitor type as “monitor designation” and the Site Survey Reports have monitor type listed as “purpose”. Provide consistent nomenclature for monitor type throughout the ANP.
- [Item 65] Suggest changing the Niland spatial scale from middle to neighborhood scale to better match the site type of general background.

- [Item 72] The probe heights in the Monitoring Station Details do not match the information in the Site Survey Report for the following sites/monitors:
 - Niland: O₃, PM₁₀ (POC 3)
 - Calexico Ethel: PM_{2.5} (POC 1, 2, 3, & 4)

Also, it is EPA's understanding that the PM_{2.5} FRM monitors (POC 1 & 2) were moved onto the shelter roof at some period during 2013-2014, which makes the probe heights listed in both the Monitoring Station Details and Site Survey Reports appear to be incorrect.

- [Item 73] The distance from supporting structure in the Monitoring Station Details does not match the height above platform information in the Site Survey Report for the following sites/monitors:
 - Niland: O₃, PM₁₀ (POC 3)
 - Calexico Ethel: O₃, NO₂,
 - PM_{2.5} (POC 1, 2, 3, & 4), PM₁₀, TSP

C. ANNUAL MONITORING NETWORK PLAN CHECKLIST

(Updated March 11, 2014)

Year: 2014

Agency: ICAPCD

40 CFR 58.10(a)(1) requires that each Annual Network Plan (ANP) include information regarding the following types of monitors: SLAMS monitoring stations including FRM, FEM, and ARM monitors that are part of SLAMS, NCore stations, STN stations, State speciation stations, SPM stations, and/or, in serious, severe and extreme ozone nonattainment areas, PAMS stations, and SPM monitoring stations.

40 CFR 58.10(a)(1) further directs that, “The plan shall include a statement of purposes for each monitor and evidence that siting and operation of each monitor meets the requirements of appendices A, C, D, and E of this part, where applicable.” On this basis, review of the ANPs is based on the requirements listed in 58.10 along with those in Appendices A, C, D, and E.

EPA Region 9 will not take action to approve or disapprove any item for which Part 58 grants approval authority to the Administrator rather than the Regional Administrators, but we will do a check to see if the required information is included and correct. The items requiring approval by the Administrator are: PAMS, NCore, and Speciation (STN/CSN).

Please note that this checklist summarizes many of the requirements of 40 CFR Part 58, but does not substitute for those requirements, nor do its contents provide a binding determination of compliance with those requirements. The checklist is subject to revision in the future and we welcome comments on its contents and structure.

Key:

White = meets the requirement.

Yellow = requirement is not met, or information is insufficient to make a determination. Action requested in next year’s plan or outside the ANP process. (items listed in Enclosure A)

Green = item requires attention in order to improve next year’s plan (items listed in Enclosure B)

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the requirement?⁴	Notes
GENERAL PLAN REQUIREMENTS					
1.	Submit plan by July 1 st	58.10 (a)(1)	Y	N	Plan submitted on July 2, 2014
2.	30-day public comment / inspection period ⁵	58.10 (a)(1), 58.10 (a)(2)	Y, p. 50, App. C	Y	
3.	Modifications to SLAMS network – case when we are not approving system modifications	58.10 (a)(2) 58.10 (b)(5) 58.10(e) 58.14	Y, p.25	Insufficient info	The plan discusses the following modifications: <ul style="list-style-type: none"> • Relocation of Calexico Ethel • Temporary shutdown of Westmorland EPA will not be approving the proposed modifications as part of the 2014 ANP review.
4.	Modifications to SLAMS network – case when we are approving system modifications per 58.14	58.10 (a)(2) 58.10 (b)(5) 58.10(e) 58.14	N/A	N/A	
5.	Does plan include documentation (e.g., attached approval letter) for system modifications that have been approved since last ANP approval?		Y, App. B	Y	
6.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)	Y, p.25	Y	
7.	A plan for establishing a near-road PM _{2.5} monitor (in CBSAs ≥ 2.5 million) by 1/1/2015	58.10(a)(8)(i)	N/A	N/A	
8.	A plan for establishing a near-road CO monitor (in CBSAs ≥ 2.5 million) by 1/1/2015	58.10(a)(7) 58.13(e)(1)	N/A	N/A	
9.	NO ₂ plan for establishment of 2 nd near-road monitor by 1/1/2015	58.10 (a)(5)(iv)	N/A	N/A	

¹ Response options: NA (Not Applicable), Yes, No, Incomplete, Incorrect. The responses “Incomplete” and “Incorrect” assume that some information has been provided.

² To the best of our knowledge.

³ Assuming the information is correct

⁴ Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge.

⁵ The affected state or local agency must document the process for obtaining public comment and include any comments received through the public notification process within their submitted plan.

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the requirement?⁴	Notes
10.	Precision/Accuracy reports submitted to AQS	58.16(a); App A, 1.3 and 5.1.1	Y, p.26	Y	
11.	Annual data certification submitted	58.15 App. A 1.3	N	Insufficient info	While the plan states that certified data are submitted to CARB (p.26), there is no description of the required data certification process for submitting the data to EPA. Provide discussion of EPA's required certification process. Specifically, describe which agency is responsible for annually certifying the data for monitoring sites within Imperial County. If CARB is responsible for data certification, please describe the process established between Imperial and CARB that facilitates accurate certification.
12.	SPMs operating an FRM/FEM/ARM that meet Appendix E also meet either Appendix A or an approved alternative.	58.11 (a) (2)	N/A	N/A	
13.	SPMs operating FRM/FEM/ARM monitors for over 24 months are listed as comparable to the NAAQS or the agency provided documentation that requirements from Appendices A, C, or E were not met. ⁶	58.20(c)	N/A	N/A	
14.	For agencies that share monitoring responsibilities in an MSA/CSA: this agency meets full monitoring requirements or an agreement between the affected agencies and the EPA Regional Administrator is in place	App D 2(e)	N	Insufficient info	Provide discussion of monitoring sites operated by ICAPCD and CARB within Imperial County with respect to minimum monitoring requirements.

⁶ This requirement only applies to monitors that are eligible for comparison to the NAAQS per 40 CFR §§58.11(e) and 58.30.

	ANP requirement	Citation within 40 CFR 58	Was the information submitted? ¹ If yes, page #s. Flag if incorrect ² ?	Does the information provided ³ meet the requirement? ⁴	Notes
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GENERAL PARTICULATE MONITORING REQUIREMENTS (PM₁₀, PM_{2.5}, Pb-TSP, Pb-PM₁₀)

15.	Designation of a primary monitor if there is more than one monitor for a pollutant at a site.	Need to determine collocation	N	Insufficient info	Provide information concerning primary monitors in the "Site Survey Report" section of the plan.
16.	Distance between collocated monitors (Note: waiver request or the date of previous waiver approval must be included if the distance deviates from requirement.)	App. A 3.2.5.6 and 3.2.6.3	Y, 29-49	Y Insufficient info	While "sampler spacing" information is provided and meets the requirements for manual PM _{2.5} monitors at Calexico Ethel, the following monitors do not have this information provided in the Site Survey Report section of the plan: <ul style="list-style-type: none"> • Niland: PM₁₀ SSI, PM₁₀ BAM • Westmorland: PM₁₀ SSI • Brawley: PM₁₀ SSI, PM₁₀ BAM, PM_{2.5} • El Centro: PM₂₀ SSI, PM_{2.5} • Calexico Ethel: PM₁₀ SSI, TSP Provide sampler spacing distances for the monitors mentioned above in the Site Survey Reports.

PM_{2.5} –SPECIFIC MONITORING REQUIREMENTS

17.	Document how states and local agencies provide for the review of changes to a PM _{2.5} monitoring network that impact the location of a violating PM _{2.5} monitor.	58.10 (c)	N	Insufficient info	Provide discussion on how ICAPCD will provide review of changes to the PM _{2.5} monitoring network
18.	Identification of any PM _{2.5} FEMs and/or ARMs not eligible to be compared to the NAAQS due to poor comparability to FRM(s) (Note 1: must include required data assessment.) (Note 2: Required SLAMS must monitor PM _{2.5} with <u>NAAQS</u> -comparable monitor at the required sample frequency.)	58.10 (b)(13) 58.11 (e)	N/A	N/A	

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the requirement?⁴	Notes
19.	Minimum # of monitors for PM _{2.5} [Note 1: should be supported by MSA ID, MSA population, DV, # monitors, and # required monitors] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D, 4.7.1(a) and Table D-5	Y, p.23	Y, Incorrect info	The design value in Table 22 is outdated. The most recent design value should be used to assess minimum monitoring requirements (i.e. 2011-2013 DV for the 2014 ANP). If this “most current” DV is not yet available when the ANP is put out for public comment, include a footnote explaining why. Also, Table 22 should include the most recent annual design value in addition to the 24-hour design value, as the minimum monitoring requirements are a function of population and proximity to any of the PM _{2.5} NAAQS.
20.	Minimum monitoring requirements for continuous PM _{2.5}	App D 4.7.2	Y, p. 45-49	Y	Provide the number of continuous monitors that are required in Table 22 and identify how many continuous monitors are operating in the network that are intended to satisfy this requirement.
21.	PM _{2.5} collocation	App A 3.2.5	Y, p.18	Insufficient info N/A	While the collocation requirements are applicable to the CARB PQAQO, relevant information should be included in the ICAPCD ANP for monitors operated within Imperial County. Plan contains different information for the Calexico Ethel PM _{2.5} FRMs. Information pertaining to these monitors is provided in Table 12 (p.18) and generically referenced in the Monitoring Station Details (p.45) under “PM _{2.5} ”. The following information should be provided in a consistent manner for both POC 1 and POC 2 monitors at Calexico Ethel: <ul style="list-style-type: none"> • Method code • Primary monitor designation • Sampling schedule (i.e. frequency)
22.	PM _{2.5} Chemical Speciation requirements for official STN sites	App D 4.7.4	N/A	N/A	

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the requirement?⁴	Notes
23.	Identification of sites suitable and sites not suitable for comparison to the annual PM _{2.5} NAAQS as described in Part 58.30	58.10 (b)(7)	Y, p. 29-49	Insufficient info	Information pertaining to the PM _{2.5} monitors at Calexico Ethel is generically referenced in the Monitoring Station Details (p.45) and not specifically available for all four PM _{2.5} monitors at the site. Provide specific information for all PM _{2.5} monitors operating at Calexico Ethel.
24.	Required PM _{2.5} sites represent area-wide air quality	App D 4.7.1(b)	Y, p. 14, 17-18, 29-49	Y	
25.	For PM _{2.5} , at least one site at neighborhood or larger scale in an area of expected maximum concentration	App D 4.7.1(b)(1)	Y, p. 14, 17-18, 29-49	Y	
26.	If additional SLAMS PM _{2.5} is required, there is a site in an area of poor air quality	App D 4.7.1(b)(2)	N/A	N/A	Only one SLAMS PM _{2.5} site is required.
27.	States must have at least one PM _{2.5} regional background and one PM _{2.5} regional transport site.	App D 4.7.3	N/A	N/A	Requirement should be addressed on a statewide basis (i.e. within ARB's ANP)
28.	Sampling schedule for PM _{2.5} - applies to year-round and seasonal sampling schedules (note: date of waiver approval must be included if the sampling season deviates from requirement)	58.10 (b)(4) 58.12(d) App D 4.7 EPA flowchart	Y, p.17-18, p.24, p.29-49	Y, Incorrect info	While the Calexico Ethel monitoring site is now sampling at the appropriate sampling frequency, the analysis in Table 24 should be updated with the most recent design value information (i.e. 2011-2013). If this "most current" DV is not yet available when the ANP is put out for public comment, include a footnote explaining why Also, sampling frequency information in Table 12 (p.18) does not match the Monitoring Station Details (p.45). See Items 19 and 21 above.

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the requirement?⁴	Notes
29.	Frequency of flow rate verification for manual PM _{2.5} monitors audit	App A 3.3.2	Y, p.29-49	Insufficient info	The general information provided in the Monitoring Station Details (p.45) is not associated with a particular PM _{2.5} monitor for the Calexico Ethel monitoring site. Provide specific information for both POC 1 and POC 2 monitors.
30.	Frequency of flow rate verification for automated PM _{2.5} monitors audit	App A 3.2.3	Y, p.29-49	Insufficient info	The general information provided in the Monitoring Station Details (p.45) is not associated with a particular PM _{2.5} monitor for the Calexico Ethel monitoring site. Provide specific information for both POC 3 and POC 4 monitors.
31.	Dates of last two semi-annual flow rate audits for PM _{2.5} monitors	App A, 3.2.4 and 3.3.3	Y, p.29-49	Insufficient info	The general information provided in the Monitoring Station Details (p.45) is not associated with a particular PM _{2.5} monitor for the Calexico Ethel monitoring site. Provide specific information for POC 1, POC 2, POC 3 and POC 4 monitors. Also, the purpose of the 2014 ANP is to provide for an overview of data collected in calendar year 2013. The following sites/monitors included dates of the last semi-annual audit from 2014, therefore there is insufficient information to judge whether the requirement was met in 2013. <ul style="list-style-type: none"> • Brawley: 8/13/13 & 2/5/14 • El Centro 8/13/13 & 2/6/14 • Calexico Ethel: 8/13/13 & 2/6/14 Provide dates of semi-annual flow audits occurring in the applicable calendar year for all PM _{2.5} monitors in the network. Audits from additional years may be provided as well for informational purposes.

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?¹ If yes, page #s. Flag if incorrect?²	Does the information provided³ meet the requirement?⁴	Notes
PM₁₀ –SPECIFIC MONITORING REQUIREMENTS					
32.	Minimum # of monitors for PM ₁₀	App D, 4.6 (a) and Table D-4	Y, p.21-22	Y, Incorrect info	The concentrations in Table 20 are outdated. The most recent design value should be used to assess minimum monitoring requirements (i.e. 2011-2013 DV for the 2014 ANP). If this “most current” DV is not yet available when the ANP is put out for public comment, include a footnote explaining why.
33.	Manual PM ₁₀ method collocation (note: continuous PM ₁₀ does not have this requirement)	App A 3.3.1	N	N/A	While the collocation requirements are applicable to the CARB PQAO, relevant information should be included in the ICAPCD ANP for monitors operated within Imperial County, if needed. If there are any such collocated monitors operated within Imperial County, provide this information in subsequent ANPs.
34.	Sampling schedule for PM ₁₀	58.10 (b)(4) 58.12(e) App D 4.6	Y, p.17, 24, 29-49	Insufficient info	The analysis in Table 24 should be updated with the most recent design value information (i.e. 2011-2013). If this “most current” DV is not yet available when the ANP is put out for public comment, include a footnote explaining why. Without the most recent information the appropriate sampling frequency cannot be determined.
35.	Frequency of flow rate verification for manual PM ₁₀ monitors audit	App A 3.3.2	Y, p.29-49	Y	
36.	Frequency of flow rate verification for automated PM ₁₀ monitors audit	App A 3.2.3	Y, p.29-49	Y, Incorrect info	The frequency of flow rate verification for the PM ₁₀ BAM 1020 monitors at Niland and Brawley are different. Provide rationale for different schedules or update ANP.

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the requirement?⁴	Notes
37.	Dates of last two semi-annual flow rate audits for PM ₁₀ monitors	App A, 3.2.4 and 3.3.3	Y, p.29-49	Insufficient info	<p>The purpose of the 2014 ANP is to provide for an overview of data collected in 2013. The following sites/monitors included dates of the last semi-annual audit from 2014, therefore there is insufficient information to judge whether the requirement was met in 2013.</p> <ul style="list-style-type: none"> • Niland: 8/12/13 & 2/5/14 • Westmorland: 8/12/13 & 2/5/14 • Brawley: 8/13/13 & 2/5/14 • El Centro: 8/12/13 & 2/6/14 • Calexico Ethel: 8/12/13 & 2/6/14 <p>Provide dates of semi-annual flow audits occurring in applicable calendar year for all PM₁₀ monitors in the network. Audits from additional years may be provided as well for informational purposes.</p>

Pb –SPECIFIC MONITORING REQUIREMENTS

38.	Minimum # of monitors for non-NCORE Pb [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.5 58.13(a)	Y, p.18	N/A	Non-NCORE Pb monitors are not required.
39.	Pb collocation: for non-NCORE sites	App A 3.3.4.3	N	N/A	While the collocation requirements are applicable to the CARB PQAQ, relevant information should be included in the ICAPCD ANP for monitors operated within Imperial County, if needed. If there are any such collocated monitors operated within Imperial County, provide this information in subsequent ANPs.
40.	Any source-oriented Pb site for which a waiver has been granted by EPA Regional Administrator	58.10 (b)(10)	N/A	N/A	
41.	Any Pb monitor for which a waiver has been requested or granted by EPA Regional Administrator for use of Pb-PM ₁₀ in lieu of Pb-TSP	58.10 (b)(11)	N/A	N/A	

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the requirement?⁴	Notes
42.	Designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)	N	Insufficient info	
43.	Sampling schedule for Pb	58.10 (b)(4) 58.12(b) App D 4.5	Y, p.45	Y	
44.	Frequency of one-point flow rate verification for Pb monitors audit	App A 3.3.4.1	Y, p.45	Y	
45.	Dates of last two semi-annual flow rate audits for Pb monitors	App A 3.3.4.1	Y, p.45	Insufficient info	<p>The purpose of the 2014 ANP is to provide for an overview of data collected in 2013. The following sites/monitors included dates of the last semi-annual audit from 2014, therefore there is insufficient information to judge whether the requirement was met in 2013.</p> <ul style="list-style-type: none"> • Calexico Ethel: 8/12/13 & 2/6/14 <p>Provide dates of semi-annual flow audits occurring in the applicable calendar year for all Pb monitors in the network. Audits from additional years may be provided as well for informational purposes.</p>

GENERAL GASEOUS MONITORING REQUIREMENTS

46.	Frequency of one-point QC check (gaseous)	App. A 3.2.1	Y, p.29-49	Y, Incorrect info	The frequency of one-point QC checks for the gaseous monitors at Calexico Ethel are different than other monitors in the network. Provide rationale for different schedules or update ANP.
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	ANP requirement	Citation within 40 CFR 58	Was the information submitted?¹ If yes, page #s. Flag if incorrect?²	Does the information provided³ meet the requirement?⁴	Notes
47.	Date of last Annual Performance Evaluation (gaseous)	App. A 3.2.2	Y, p.29-49	Insufficient info	<p>The purpose of the 2014 ANP is to provide for an overview of data collected in 2013. The following sites/monitors only had dates of the last PE audit from 2014, therefore there is insufficient information to judge whether the requirement was met in 2013:</p> <ul style="list-style-type: none"> • Niland: O₃ • El Centro: all gaseous monitors • Calexico Ethel: all gaseous monitors <p>Provide dates of PE audits occurring in 2013 for all gaseous monitors in the network. Audits from additional years may be provided as well for informational purposes.</p>

O₃ –SPECIFIC MONITORING REQUIREMENTS

48.	Minimum # of monitors for O ₃ [Note: should be supported by MSA ID, MSA population, DV, # monitors, and # required monitors] (see footnote) ⁷	App D, 4.1(a) and Table D-2	Y, p.19-20	Y, Incorrect info	The design values in Table 14 are outdated. The most recent design value should be used to assess minimum monitoring requirements (i.e. 2011-2013 DV for the 2014 ANP). If this “most current” DV is not yet available when the ANP is put out for public comment, include a footnote explaining why.
49.	Identification of maximum concentration O ₃ monitor(s)	App D 4.1 (b)	Y, p.10, 12-13	Y	
50.	Sampling season for O ₃ (Note: date of waiver approval must be included if the sampling season deviates from requirement)	58.10 (b)(4) App D, 4.1(i)	Y, p.29-49	Y	

⁷ Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements. In addition, ozone monitors that do not meet traffic count/distance requirements to be neighborhood scale (40 CFR 58 Appendix E, Table E-1) cannot be counted towards minimum monitoring requirements.

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the requirement?⁴	Notes
NO₂ –SPECIFIC MONITORING REQUIREMENTS					
51.	Minimum monitoring requirement for single near-road NO ₂ monitor (in CBSA ≥ 1 million) by 1/1/2014	App D 4.3.2	N/A	N/A	
52.	Minimum monitoring requirements for area-wide NO ₂ monitor in location of expected highest NO ₂ concentrations representing neighborhood or larger scale (operation required by January 1, 2013)	App D 4.3.3	Y, p.20-21	N/A	
53.	Minimum monitoring requirements for susceptible and vulnerable populations monitoring (aka RA40) NO ₂ (operation required by January 1, 2013)	App D 4.3.4	N/A	N/A	
54.	Identification of required NO ₂ monitors as either near-road, area-wide, or vulnerable and susceptible population (aka RA40)	58.10 (b)(12)	Y, p. 12-18, 29-49	Y	
SO₂ –SPECIFIC MONITORING REQUIREMENTS					
55.	Minimum monitoring requirements for SO ₂ [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.4	Y, p.21	Y	
NCORE –SPECIFIC MONITORING REQUIREMENTS					
56.	NCore site and all required parameters operational	58.10 (a)(3); Pb collocation App. A 3.3.4.3; PM _{10-2.5} minimum monitoring App. D 4.8; PM _{10-2.5} sampling schedule 58.10 (b)(4) 58.12(f) App D 4.8; PM _{10-2.5} collocation App. A 3.3.6	N/A	N/A	

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the requirement?⁴	Notes
SITE OR MONITOR - SPECIFIC REQUIREMENTS (OFTEN INCLUDED IN DETAILED SITE INFORMATION TABLES)					
57.	AQS site identification number for each site	58.10 (b)(1)	Y, 29-49	Y	
58.	Location of each site: street address and geographic coordinates	58.10 (b)(2)	Y, 29-49	Y	
59.	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)	Y, 29-49	Y	
60.	Parameter occurrence code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, 29-49	Y	
61.	Statement of purpose for each monitor	58.10 (a)(1)	Y, p. 8-9	Y	
62.	Basic monitoring objective for each monitor	App D 1.1 58.10 (b)(6)	Y, p. 9-10, 17-18	Y	
63.	Site type for each monitor	App D 1.1.1	Y, p. 10-14	Y	
64.	Monitor type for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, p. 16-18, 29-49	Y, Incorrect info	The information in Table 9 (p.17) for the Niland PM ₁₀ BAM 1020 does not match the Niland Site Survey Report (p.32). Also, the tables on p.16-17 refer to monitor type as "monitor designation" and the Site Survey Reports have monitor type listed as "purpose". Provide consistent nomenclature for monitor type throughout the ANP.
65.	Scale of representativeness for each monitor as defined in Appendix D	58.10(b)(6); App D	Y, p. 12-18, 29-49	Y	Suggest changing the Niland spatial scale from middle to neighborhood scale to better match the site type of general background.

	ANP requirement	Citation within 40 CFR 58	Was the information submitted? ¹ If yes, page #s. Flag if incorrect? ²	Does the information provided ³ meet the requirement? ⁴	Notes
66.	Parameter code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, p. 16-18, 29-49	N	<p>The PM₁₀ FEM BAM-1020 SLAMS monitors at both Niland (POC 3) and Brawley (POC 3) are reporting data under an incorrect parameter code of 85101. The BAM-1020 is an approved FEM for PM₁₀ and are designated in Table 9 as SLAMS and should be reported under the regulatory parameter code of 81102. EPA notes that this has been a repeated comment in both the 2012 and 2013 ANPs and has not been resolved. Reporting data from FEM monitors under a non-regulatory parameter code effectually removes otherwise regulatory data from being reported to AQS correctly and compared to the applicable NAAQS, which may influence EPA's ability to determine whether the area has attained the PM₁₀ NAAQS.</p> <p>The PM_{2.5} FEM BAM-1020 SPM monitors at Calexico Ethel (POC 3 & POC 4) are reporting data under an incorrect parameter code of 88501. The BAM-1020 is an approved FEM for PM_{2.5} and should be reported under the regulatory parameter code of 88101 for PM_{2.5}. Since the monitors have been operating for less than 24 months a "NAAQS Exclusion" designation may be appropriate with EPA approval.</p> <p>The current reporting of these data under incorrect parameter codes also affects whether ICAPCD and CARB are meeting the data submittal requirements of 40 CFR 50.16.</p> <p>Change PM₁₀ parameter codes to 81102 and PM_{2.5} parameter codes to 88101 for the monitors discussed above.</p>

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?¹ If yes, page #s. Flag if incorrect?²	Does the information provided³ meet the requirement?⁴	Notes
67.	Method code and description (e.g., manufacturer & model) for each monitor	58.10 (b)(3); App C 2.4.1.2	Y, p, 16-18, 29-49	Insufficient info	<p>The general information provided in the Monitoring Station Details (p.45) is not associated with a particular PM_{2.5} monitor for the Calexico Ethel monitoring site. Provide specific information for POC 1, POC 2, POC 3 and POC 4 monitors.</p> <p>The descriptions for Calexico Ethel PM_{2.5} monitors in the Monitoring Station Details (p.45) are inconsistent with descriptions provided in Table 12 (p.18). Also, the method code of 731 should not be associated with the FEM BAM-1020 monitors (POC 3 & 4) at Calexico Ethel.</p> <p>Change the method code for FEM BAM-1020 monitors to 122.</p>
68.	Sampling start date for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, p.29-49	Insufficient info	<p>The Monitoring Station Details only provide the site start date for each pollutant. While this may be OK for pollutants with a single monitor at a site, for pollutants with multiple monitors (i.e. PM₁₀ & PM_{2.5} at Calexico Ethel), the general information provided is not associated with a particular monitor at the site.</p> <p>Provide start dates for each individual monitor.</p>
69.	Distance of monitor from nearest road	App E 6	Y, p.29-49	Y	
70.	Traffic count of nearest road	App E	Y, p.29-49	Y	
71.	Groundcover	App E 3(a)	Y, p.29-49	Y	

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?¹ If yes, page #s. Flag if incorrect²?	Does the information provided³ meet the requirement?⁴	Notes
72.	Probe height	App E 2	Y, p.29-49	Y, Incorrect info	The probe heights in the Monitoring Station Details do not match the information in the Site Survey Report for the following sites/monitors: <ul style="list-style-type: none"> • Niland: O₃, PM₁₀ (POC 3) • Calexico Ethel: PM_{2.5} (POC 1, 2, 3, & 4) Also, it is EPA's understanding that the PM _{2.5} FRM monitors (POC 1 & 2) were moved onto the shelter roof at some period during 2013-2014, which makes the probe heights listed in both the Monitoring Station Details and Site Survey Reports appear to be incorrect.
73.	Distance from supporting structure	App E 2	Y, p.29-49	Y, Incorrect info	The distance from supporting structure in the Monitoring Station Details does not match the height above platform information in the Site Survey Report for the following sites/monitors: <ul style="list-style-type: none"> • Niland: O₃, PM₁₀ (POC 3) • Calexico Ethel: O₃, NO₂, PM_{2.5} (POC 1, 2, 3, & 4), PM₁₀, TSP
74.	Distance from obstructions on roof	App E 4(b)	Y, p.29-49	Y	
75.	Distance from obstructions not on roof	App E 4(a)	Y, p.29-49	Y	
76.	Distance from trees	App E 5	Y, p.29-49	N	The following sites are not meeting this requirement <ul style="list-style-type: none"> • Calexico Ethel: all pollutants EPA notes that CARB and ICAPCD are working to relocate this site to a nearby location not affected by siting issues.
77.	Distance to furnace or incinerator flue	App E 3(b)	N	Insufficient info	Information not available. Provide distances to furnace or incinerator flue for all monitors in the network.
78.	Unrestricted airflow	App E, 4(a) and 4(b)	Y, p.29-49	Y	
79.	Probe material (NO _x , SO ₂ , O ₃)	App E 9	Y, p.29-49	Y	
80.	Residence time (NO _x , SO ₂ , O ₃)	App E 9	Y, p.29-49	Y	

Public Comments on Annual Network Plan

Were comments submitted to the S/L/T agency during the public comment period? **NO**

If no, skip the remaining questions.

If yes:

- Were any of the comments substantive?
 - If yes, which ones?
 - Explain basis for determination if any comments were considered not substantive:
- Did the agency respond to the substantive comments?
 - If yes, was the response adequate?
- Do the substantive comments require separate EPA response (i.e., agency response wasn't adequate)?
- Are the sections of the annual network plan that received substantive comments approvable after consideration of comments?
 - If yes, provide rationale: