

## APPENDIX D

### NETWORK WAIVER REQUESTS

#### **Burbank**

The Palm Avenue Burbank air monitoring site was decommissioned During June, 2014 at the request of the property owner by means of non-extension of lease. Currently SCAQMD is working with LADWP to relocate to a site within one mile of the former site. EPA was informed of this closure via email in prior to its closure.

At the time of closure, the Burbank was the DV location for the Los Angeles CBSA with a 24 hour value of 30.8 ug/m<sup>3</sup> and Mira Loma the basin DV at 36.6 ug/m<sup>3</sup>. This year the DV site for the Los Angeles is the Los Angeles Main site at 32.0 ug/m<sup>3</sup> and basin DV Mira Loma at 36.6 ug/m<sup>3</sup>. SCAQMD is working in consultation with EPA to establish a new site to represent Burbank in FY 2015-2016. It is requested a waiver be granted for suspension of monitoring until a suitable replacement site can be located. This request is per 40 CFR 58.14 (c)(6) which states

A SLAMS monitor not eligible for removal under any of the criteria in paragraphs (c)(1) through (c)(5) of this section may be moved to a nearby location with the same scale of representation if logistical problems beyond the State's control make it impossible to continue operation at its current site.

Even with the site closure, SCAQMD exceeds the minimum monitoring requirements for all criteria pollutants and monitoring programs.

#### **North Long Beach**

The North Long Beach air monitoring site was decommissioned during September, 2013 at the request of the property owner by means of non-extension of lease. Currently SCAQMD is working with Long Beach Public Health to locate a suitable site within one mile of the former site. EPA was informed of this closure via email prior to closure. In consultation with EPA Compton was designated as a RA-40 NO<sub>2</sub> site. A separate smaller site at the rear of the facility remains open measuring PM<sub>2.5</sub> FRM particulate only. It is requested a waiver be granted for suspension of monitoring until a suitable replacement site can be located. This request is per 40 CFR 58.14 (c)(6) which states

A SLAMS monitor not eligible for removal under any of the criteria in paragraphs (c)(1) through (c)(5) of this section may be moved to a nearby location with the same scale of representation if logistical problems beyond the State's control make it impossible to continue operation at its current site.

Even with the site closure, SCAQMD exceeds the minimum monitoring requirements for all criteria pollutants and monitoring programs. SCAQMD is working in consultation with EPA to establish a new site to represent Burbank in FY 2015-2016. It is requested a waiver be granted for suspension of monitoring and formal designation of Compton as a RA-40 NO<sub>2</sub> site until a suitable replacement site can be located.

### **Ontario**

The Ontario (Fire Station) air monitoring site was decommissioned during June, 2014 at the request of the property owner by means of non-extension of lease. Currently SCAQMD is working with San Bernardino County Public Health to consolidate measurements with nearby sites. EPA was informed of this closure via email prior to its closure. At the time of closure, Ontario was a collocated site for PM10. In order to meet the minimum collocation requirements a PM10 was relocated to the Mira Loma (Van Buren) site. It is requested a waiver be granted for suspension of monitoring until a suitable replacement site can be located under 40 CFR 58.14 (c)(6) which states

A SLAMS monitor not eligible for removal under any of the criteria in paragraphs (c)(1) through (c)(5) of this section may be moved to a nearby location with the same scale of representation if logistical problems beyond the State's control make it impossible to continue operation at its current site.

Even with the site closure, SCAQMD exceeds the minimum monitoring requirements for all criteria pollutants and monitoring programs. It is requested a waiver be granted to discontinue monitoring at Ontario.

### **Riverside Magnolia**

The Riverside Magnolia air monitoring site was decommissioned during March 2015 at the end of the lease due to safety issues. Specifically the monitoring site was assessed and determined the roof was inadequate to safely maintain the weight of the air monitoring equipment and platform. Additionally, the interior ceiling contained asbestos and side walls were in a state of deterioration. Currently SCAQMD is assessing relocation of the site and considering underrepresented areas identified in the 5 year network assessment. EPA was informed of this closure via email prior to its closure. It is requested a waiver be granted for suspension of monitoring until a suitable replacement site can be located under 40 CFR 58.14 (c)(6) which states

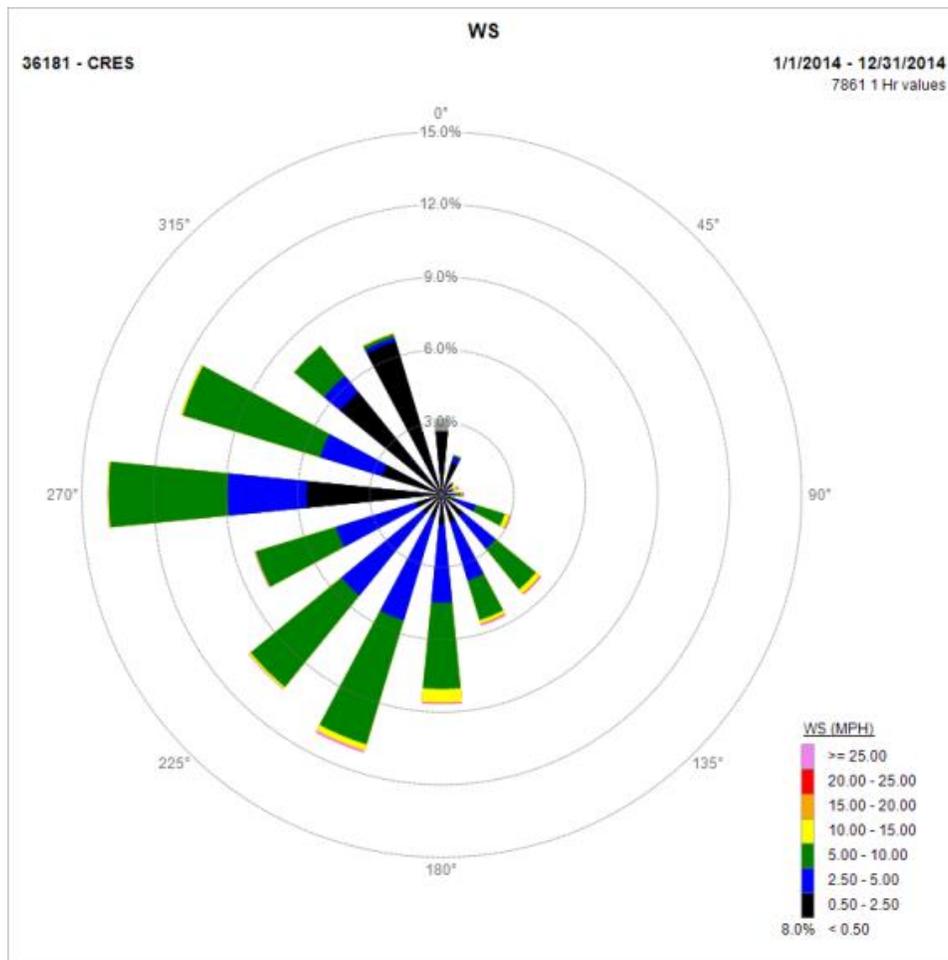
A SLAMS monitor not eligible for removal under any of the criteria in paragraphs (c)(1) through (c)(5) of this section may be moved to a nearby location with the same scale of representation if logistical problems beyond the State's control make it impossible to continue operation at its current site.

Due to safety issues at the site, along with the owner's inability to resolve the issues, it is requested a waiver be granted to discontinue monitoring until a suitable replacement site is identified. Even with the site closure, SCAQMD exceeds the minimum monitoring requirements for all criteria pollutants and monitoring programs.

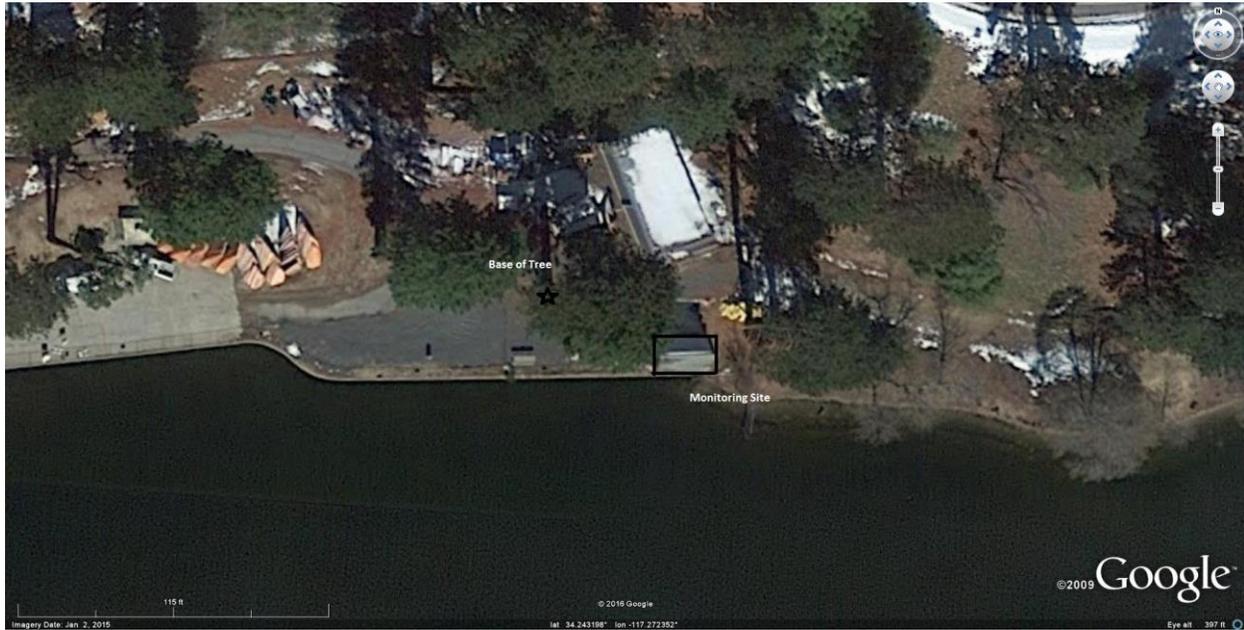
### **Crestline**

The Crestline air monitoring site is located on the grounds of the Lake Gregory, San Bernardino County Regional Park within the San Bernardino National Forest. The site began operation in October, 1973 and has at times been a design value site for ozone. Since the time of its

inception, trees adjacent to the facility have grown to a height greater than the inlet probe. Because these trees are parallel to the site a majority of the time they are not considered an obstruction per 40 CFR 58 Appendix E. Readings remain unaffected since the nearest tree is at 10 meters from the inlet probe and the predominant wind direction is from the west. A wind rose showing direction for 2014 is shown below. 40 CFR 58 Appendix E 10.1.1 states a waiver can be granted if, “The site can be demonstrated to be as representative of the monitoring area as it would be if the siting criteria were being met. Section 10.1.2 also states a waiver can be granted if, “The monitor or probe cannot reasonably be located so as to meet the siting criteria because of physical constraints (e.g., inability to locate the required type of site the necessary distance from roadways or obstructions).” Furthermore, the current site maintains a historical trend dating back to October, 1973 which adds support to the waiver request. It is requested a waiver be granted for siting at Crestline based on predominant wind direction, probe being in the optimal location for the site, along with the historical trend dating back to October 1973.



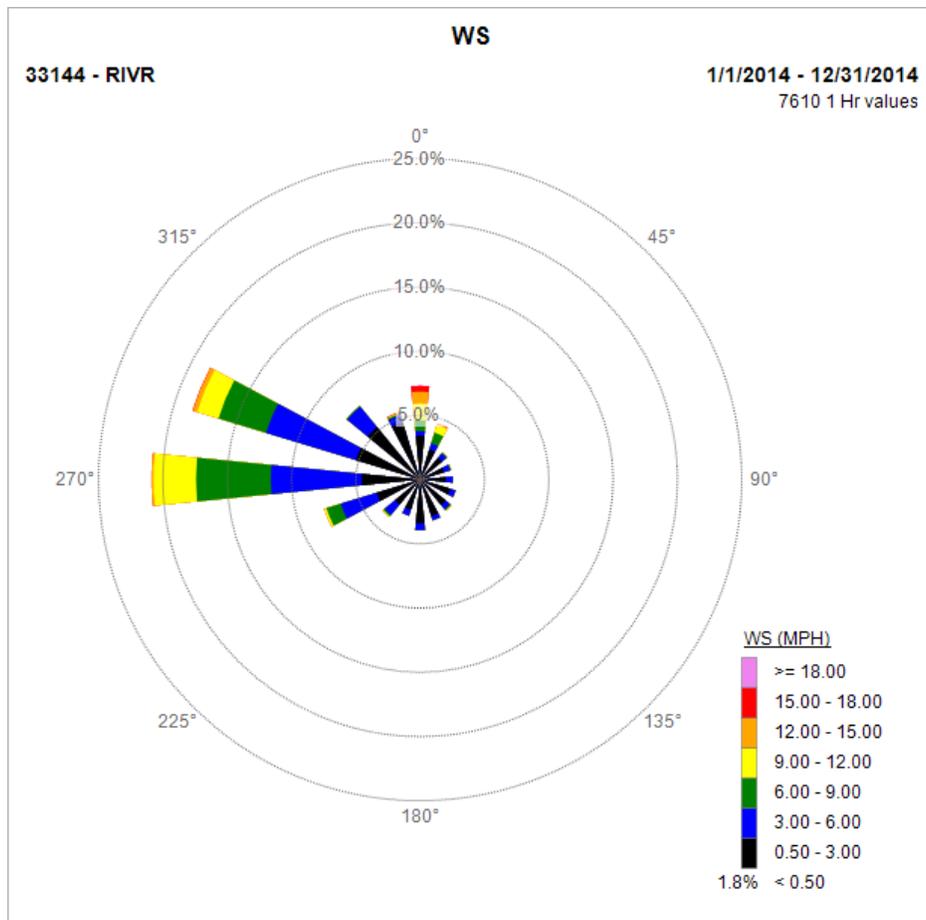
Crestline Wind Data 2014



Crestline Satellite View

**Rubidoux**

The Rubidoux air monitoring site is located on property owned by Southern California Edison. The site began operation in September, 1972. Since that time trees north east of the particulate samplers have grown to a height exceeding siting criteria; however measurements remain unaffected since the predominant wind direction is parallel to trees. Contract revisions with Southern California Edison are expected to be completed during December, 2016 which will allow for extra space to move the particulate samplers further from trees to meet EPA siting criteria. A waiver is requested based on 40 CFR 58 Appendix E 10.1.1 which states a waiver can be granted if, “The site can be demonstrated to be as representative of the monitoring area as it would be if the siting criteria were being met. Section 10.1.2 also states a waiver can be granted if, “The monitor or probe cannot reasonably be located so as to meet the siting criteria because of physical constraints (e.g., inability to locate the required type of site the necessary distance from roadways or obstructions).” Furthermore, the current site maintains a historical trend dating back to September, 1972 which adds support to the waiver request. It is requested a waiver be granted for siting at Rubidoux to continue monitoring until contract modifications are completed and monitors can be moved to meet EPA siting criteria.



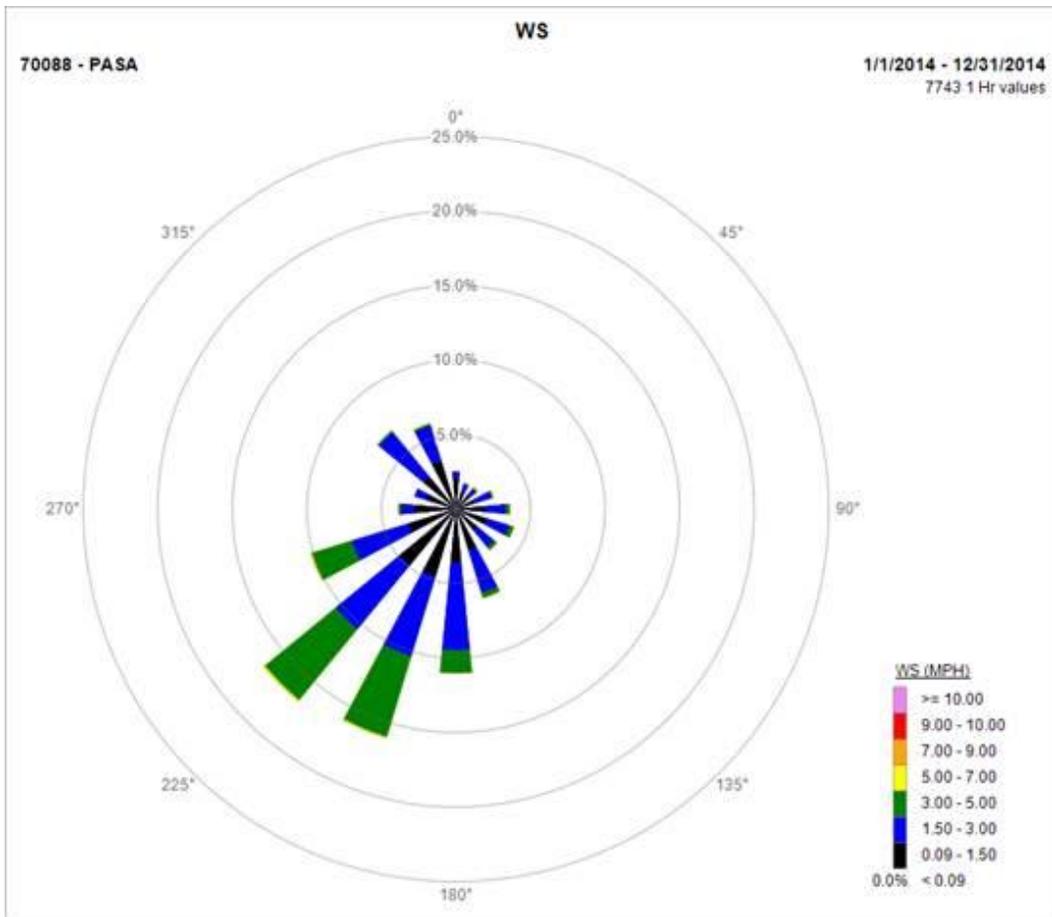
Rubidoux Wind Data 2014



Rubidoux Satellite View

**Pasadena**

The Pasadena air monitoring site is located on property owned by Caltech Pasadena. The site began operation in April, 1982. Since that time trees east and west of the particulate samplers have grown to a height exceeding siting criteria and while they can be considered an obstruction, it is requested a waiver be granted to continue morning based on population exposure. Longer term, the site was examined in the 5 year network assessment for consolidation with nearby sites. Decisions regarding site consolidation will be made in consultation with EPA Region IX representatives. Section 10.1.2 states a waiver can be granted if, “The monitor or probe cannot reasonably be located so as to meet the siting criteria because of physical constraints (e.g., inability to locate the required type of site the necessary distance from roadways or obstructions).” Furthermore, the current site maintains a historical trend dating back to April, 1982 which adds support to the waiver request. It is requested a waiver be granted for siting at Pasadena to continue monitoring until a suitable site, or location to consolidate can be secured.



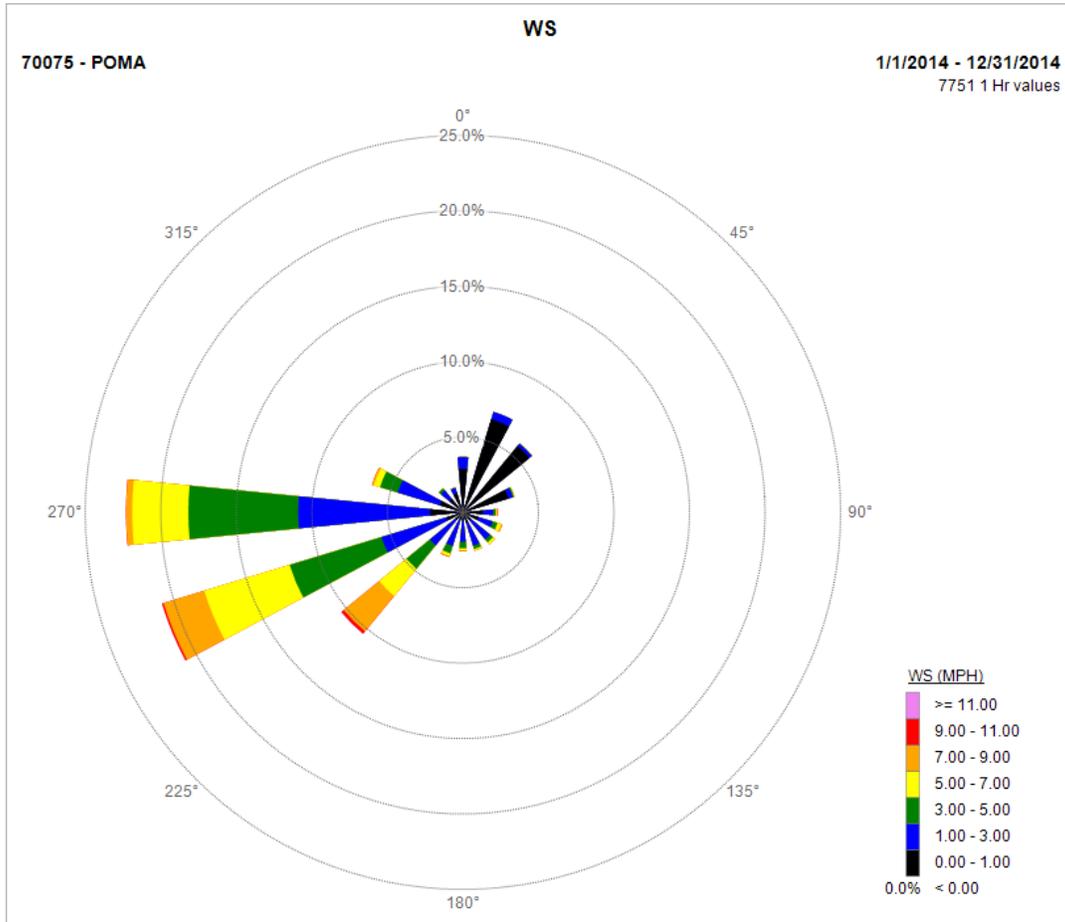
Pasadena Wind Data 2014



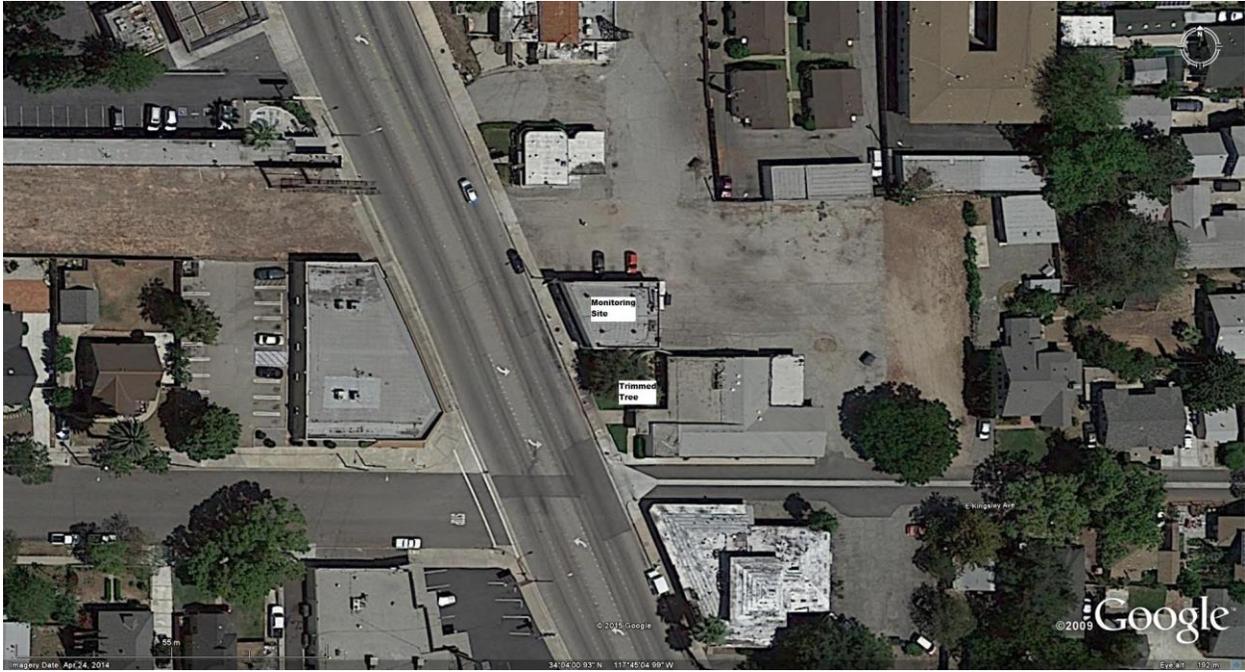
Pasadena Satellite View

**Pomona**

The Pomona air monitoring site has been in operation since June, 1965. The site was originally a microscale site for carbon monoxide. Since the time of inception it was noted trees south of the site grew to be an obstruction, however they were trimmed during December, 2014 to a height below the inlet. It is requested a waiver be granted for Pomona based on site maintenance completed and data continuity until the 5 year network assessment is complete and further discussions can take place to consolidate or close the site.



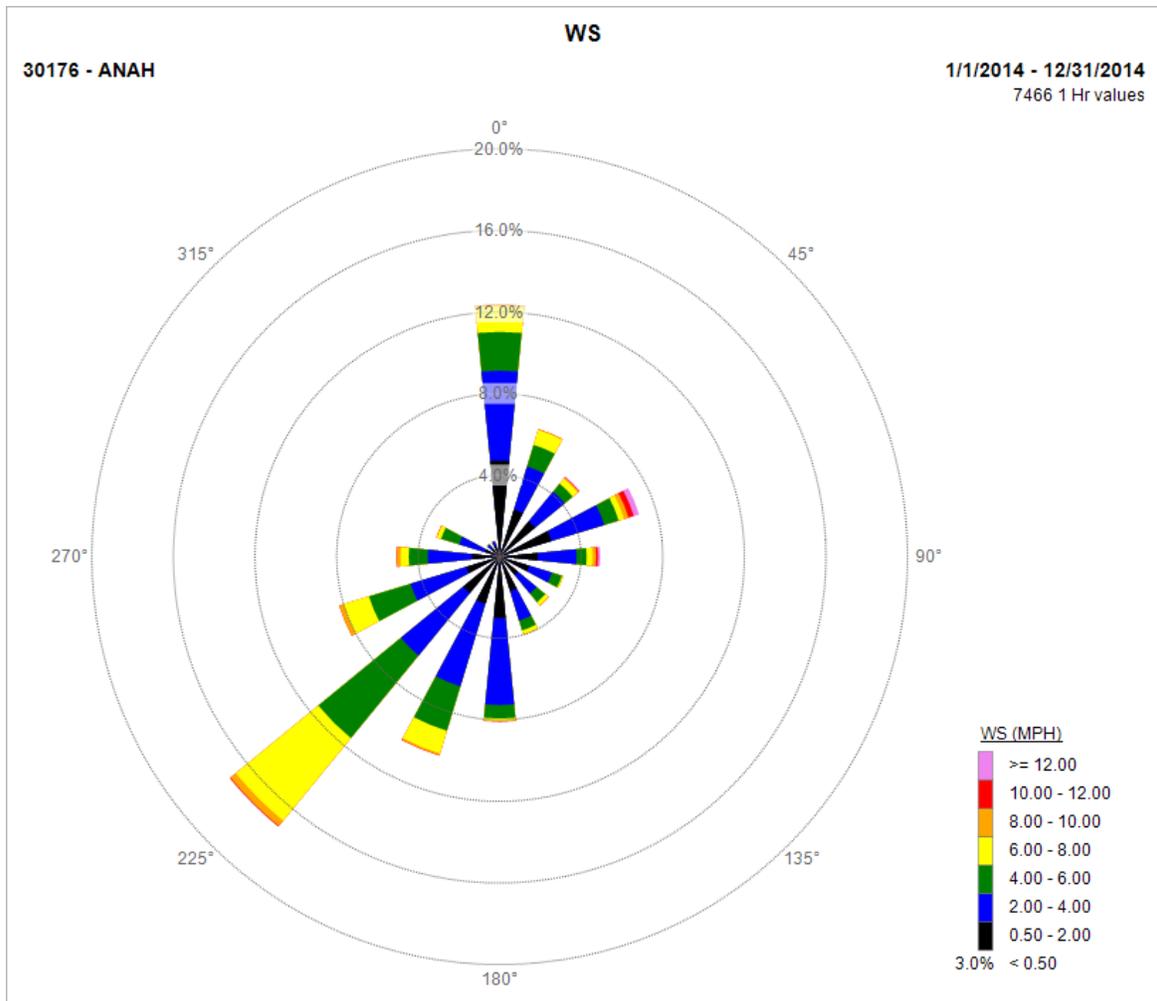
Pomona Wind Data 2014



Pomona Satellite View

**Anaheim**

The Anaheim air monitoring site is located on Anaheim City School District property. The site began operation in August, 2001. The site was originally anticipated as a temporary location however since then it has become permanent. Because of this there are siting issues including palm trees and proximity to the nearest traffic lane of the residential street (at 8m north from the inlet probes). Measurements remain unaffected due to predominant wind. The majority of the time the wind direction is from the south, the palm trees are minimal obstruction, and traffic is residential. A waiver is requested based on 40 CFR 58 Appendix E 10.1.1 which states a waiver can be granted if, “The site can be demonstrated to be as representative of the monitoring area as it would be if the siting criteria were being met.” Furthermore, the current site maintains a historical trend dating back to August, 2001 which adds support to the waiver request. Longer term the site is scheduled to be renovated placing the inlet probes at greater than 10m from the traffic lanes and trees.



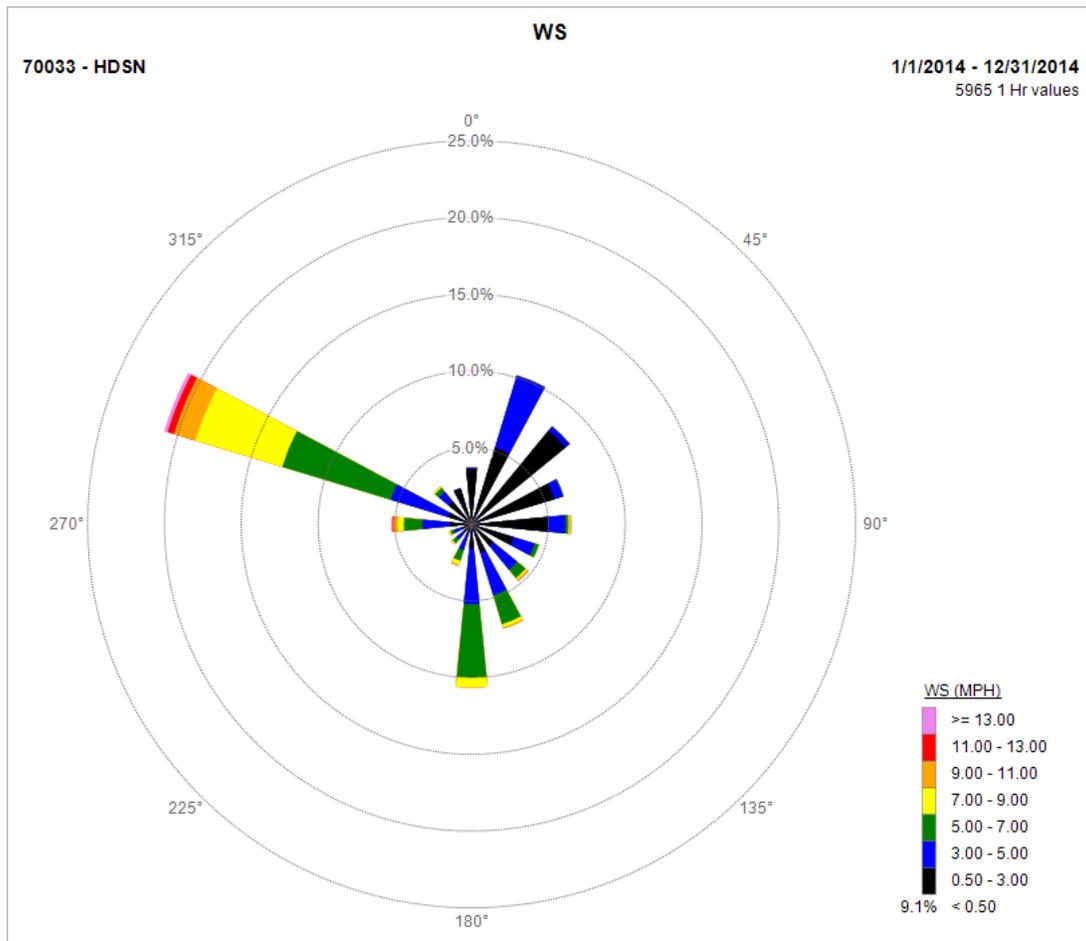
Anaheim Wind Data 2014



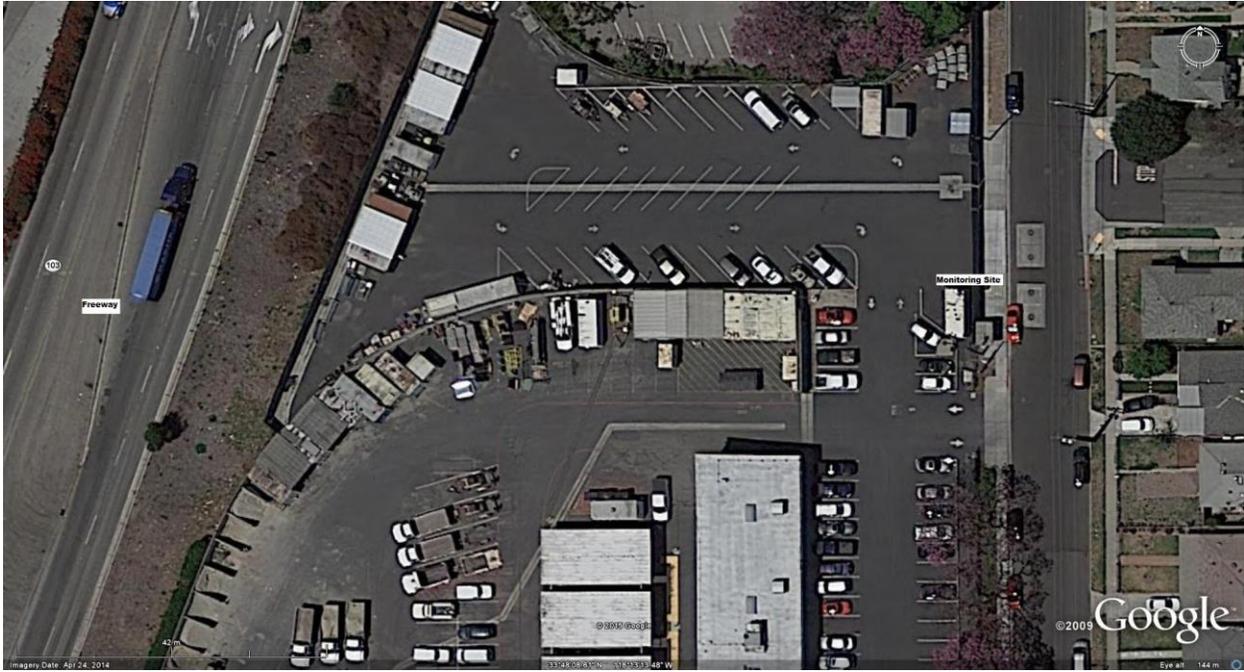
Anaheim Satellite View

**Hudson**

The Hudson air monitoring site is located on Long Beach Unified School District property. The site began operation as part of the MATES IV project. The site was originally anticipated as a temporary location however since then it has become permanent, monitoring potential emissions from the nearby the ports of Los Angeles, Long Beach and Terminal Island Freeway. Because of this there are siting issues including proximity to the nearest traffic lane. Measurements remain unaffected since the predominant wind direction is from the south west and the roadway is to the east. A waiver is requested based on 40 CFR 58 Appendix E 10.1.1 which states a waiver can be granted if, “The site can be demonstrated to be as representative of the monitoring area as it would be if the siting criteria were being met.” Longer term the site is being examined closely in the 5 year network assessment for consolidation with nearby sites.



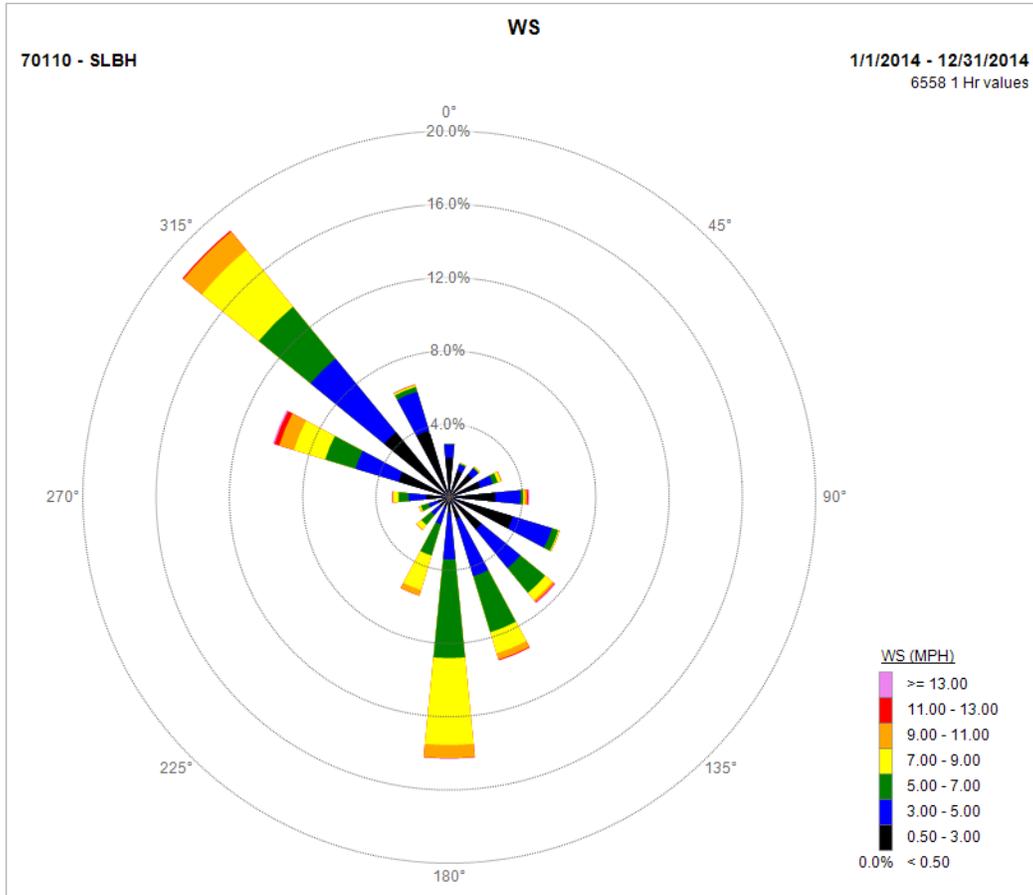
Hudson Wind Data 2014



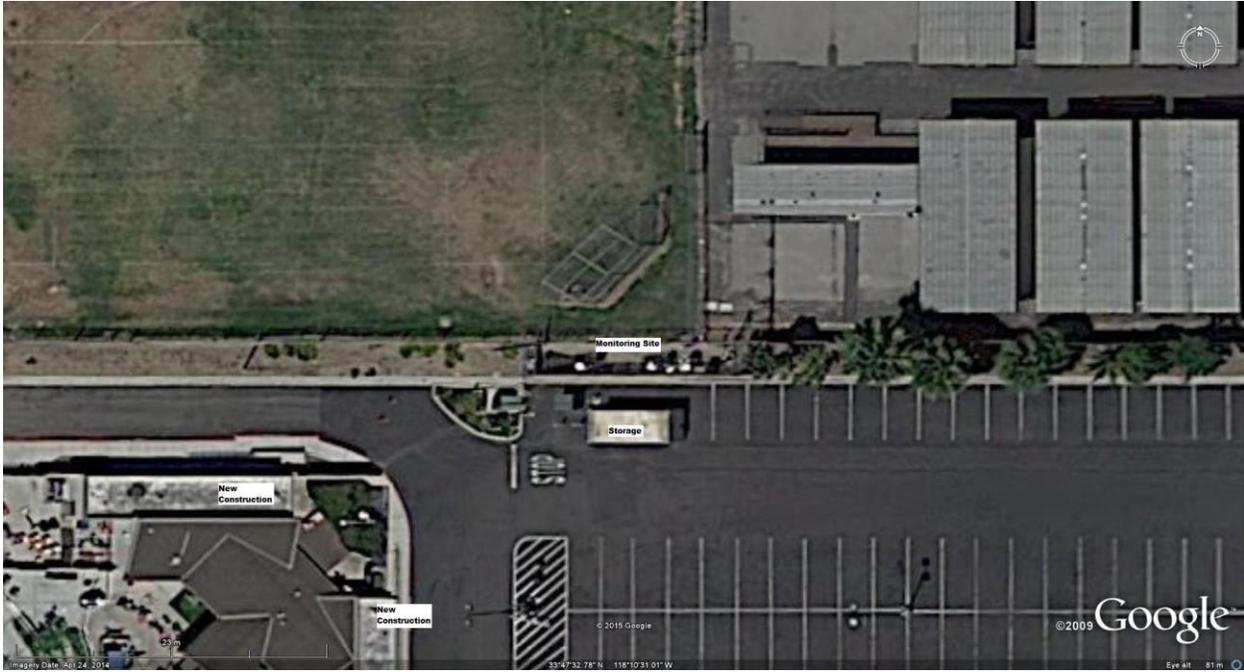
Hudson Satellite View

### South Long Beach

The South Long Beach air monitoring site is located on the Long Beach City College campus. The site was established to focus on particulate emissions from the Ports of Long Beach and Los Angeles. Since the inception of the site, the college has expanded, storing temporary containers nearby, constructing new buildings and expanding parking. Because of this there are potential siting issues. A waiver is requested based on 40 CFR 58 Appendix E 10.1.1 which states a waiver can be granted if, “The site can be demonstrated to be as representative of the monitoring area as it would be if the siting criteria were being met.” Longer term the site is being examined for consolidation with nearby sites.



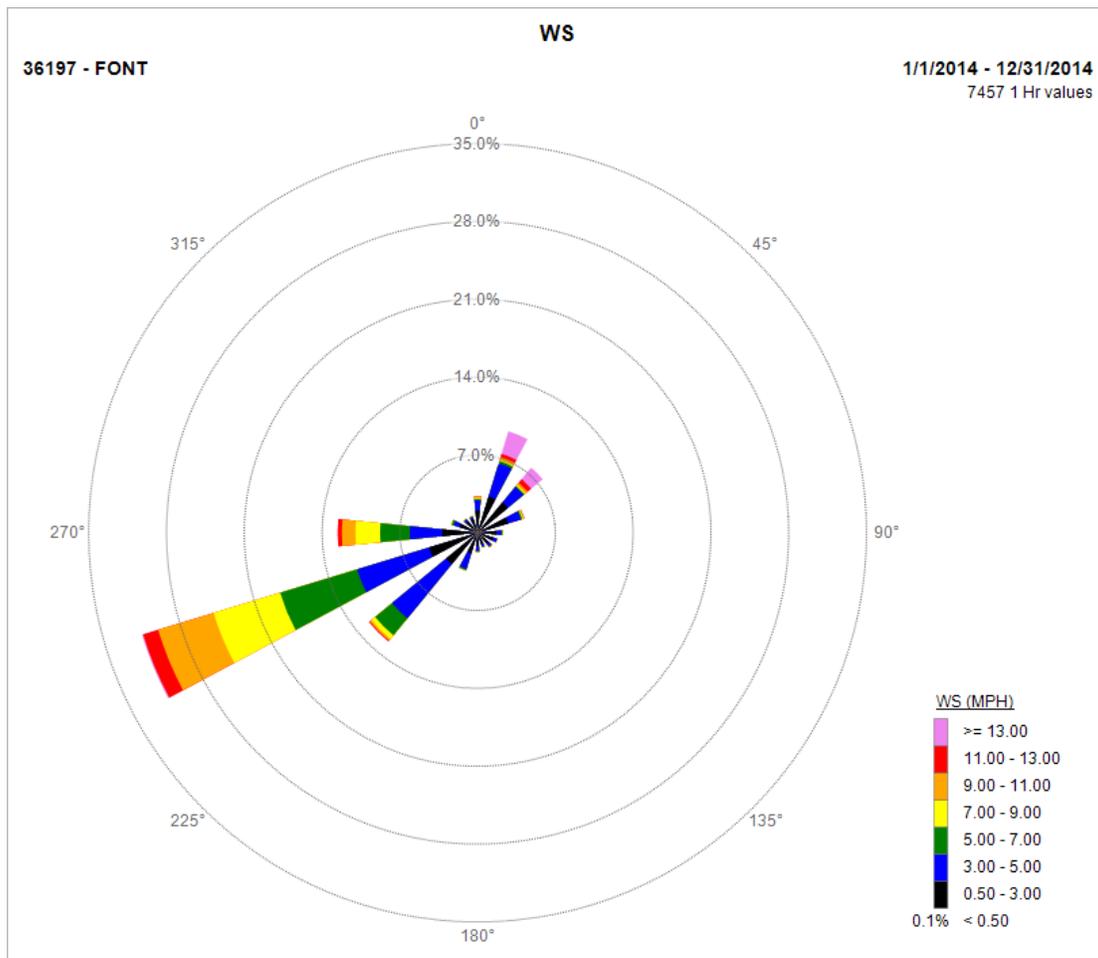
South Long Beach Wind Data 2014



South Long Beach Satellite View

**Fontana**

The Fontana air monitoring site has been in operation since August, 1981. Since the time of inception it was noted a wall downwind of the site exceeded the height of the inlet probes as did a nearby building. The adjacent wall and building are greater than the 2m minimum distance requirement and meet the, “twice the height that the obstacle protrudes above the probe, inlet, or monitoring path” requirement in 40 CFR 58 Appendix E. Measurements remain unaffected since the predominant wind direction is from the south west. A waiver is requested based on 40 CFR 58 Appendix E 10.1.1 which states a waiver can be granted if, “The site can be demonstrated to be as representative of the monitoring area as it would be if the siting criteria were being met.” Recently, the San Bernardino County Fire Department has relocated from the facility and City of Fontana has taken responsibility for the site. Future plans are uncertain at the site and the site could potentially be sold to a private owner.



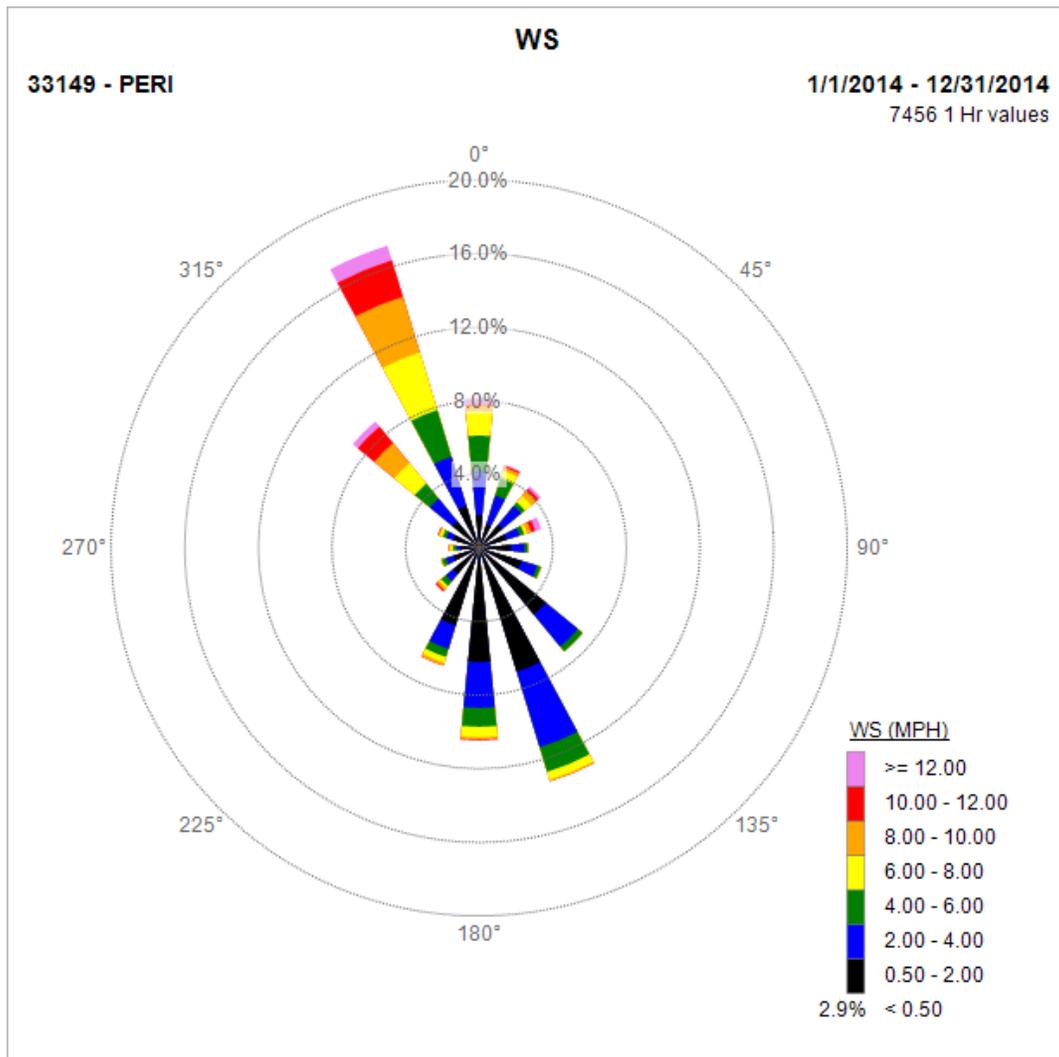
Fontana Wind Data 2014



Fontana Satellite View

**Perris**

The Perris air monitoring site has been in operation since August, 1981. Since the time of inception it was noted the nearby building and new fences have become an obstruction. While the nearby fences and building are an obstruction, A waiver is requested based on 40 CFR 58 Appendix E 10.1.2 which states a waiver can be granted if, “The monitor or probe cannot reasonably be located so as to meet the siting criteria because of physical constraints (e.g., inability to locate the required type of site the necessary distance from roadways or obstructions).” Furthermore, the current site maintains a historical trend dating back to August, 1981 which adds support to the waiver request. It is requested a waiver be granted for siting at Perris to continue monitoring until a new site is located to represent the Perris community which will be selected in consultation with EPA Region IX representatives.



Perris Wind Data 2014



Perris Satellite View