

APPENDIX D
System Modification Requests

SYSTEM MODIFICATION REQUEST

Azusa Monitoring Site AQS Site Codes 06-037-0002

The monitoring site in Azusa has been operational since January 1957 at 803 North Loren Ave, Azusa CA 91702. The site was initially established to monitor ozone (O₃) Nitrogen Dioxide (NO₂), and Carbon Monoxide (CO) along the foothills of the San Gabriel Valley to characterize air pollutants and ozone formation. In 1985 measurements were expanded to include integrated 24-hour coarse particulate matter (PM₁₀) measurements every sixth day, and in 1999 integrated 24-hour fine particulates (PM_{2.5}) measurements were added every third day.

Since the time the monitoring site was established, the surrounding area has changed significantly, which may impact data quality. The site was adjacent to an industrial facility and ownership of the site facility recently changed. In 2021, South Coast AQMD attempted to renegotiate the lease but were unable to reach an agreement. The property owner did not renew the lease and required the site to be vacated by September 30, 2022. In response, South Coast AQMD identified a site meeting 40 CFR 58 Appendix E. criteria at the nearby Army National Guard facility located at 1351 W Sierra Madre Ave Azusa, CA 91702 and is planning the relocation in collaboration with U.S. EPA. The planned location is shown in Figure 1.

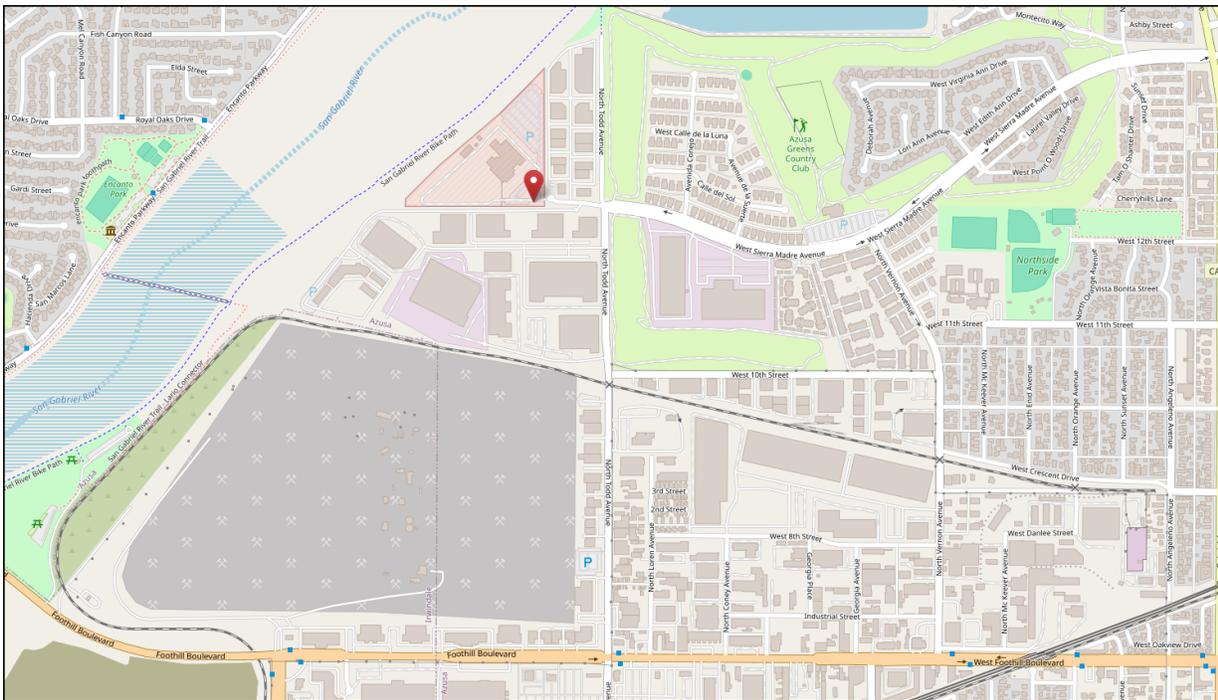


Figure 1 Azusa Army National Guard Monitoring Site Location

South Coast AQMD consulted with U.S. EPA Region 9 regarding the suitability of the Azusa National location and received preliminary confirmation of its suitability. The site is situated 0.5 miles from the Azusa North Loren Street monitoring location as depicted in Figure 2.



Figure 2 Distance Between California Army National Guard and Loren Street Monitoring Sites

The Azusa Army National Guard site features a 60' x 35' concrete platform enclosed with security fencing to accommodate a criteria pollutant shelter, particulate monitoring, and room for special project measurements as depicted in Figure 3. Additionally, space may be allocated for community sensor testing and future enhancements to particulate and toxics monitoring as needed. A 200-amp electrical service meter is planned to power a 30' monitoring platform and associated air monitoring instruments.

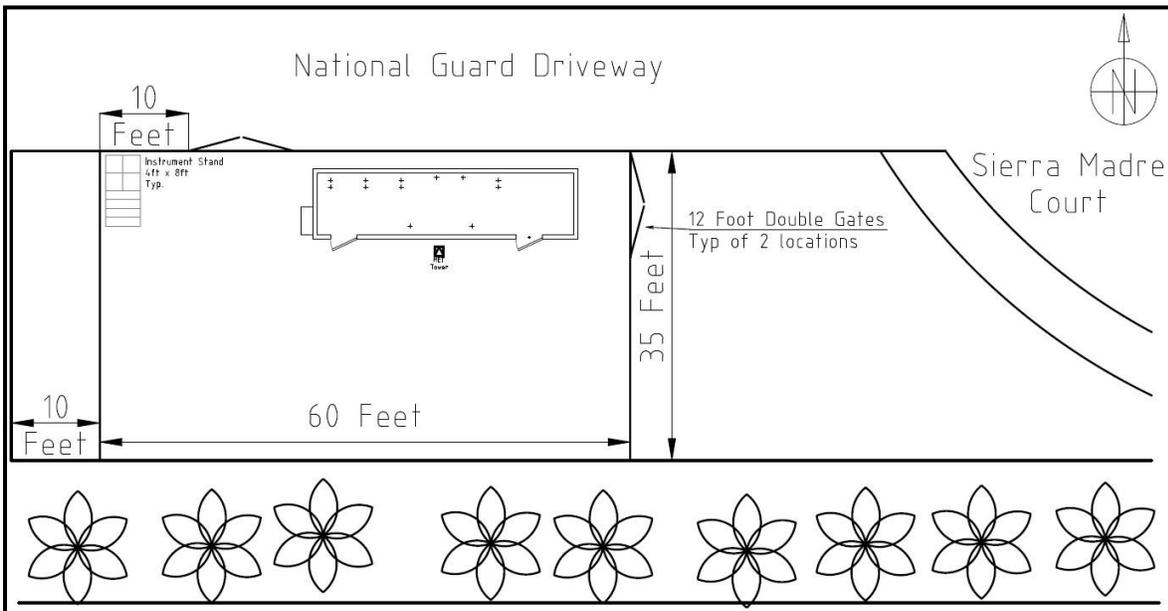


Figure 3 Azusa Army National Guard Monitoring Site Detail

The site details for the air monitoring location at Azusa Army National Guard confirm that it aligns with 40 CFR 58, Appendix E siting criteria requirements, as outlined in Table 1. Comprehensive site information is provided within the South Coast AQMD 2024, Annual Network Plan.

Table 1 Azusa Army National Guard Selected Site Information

Selected Probe and Monitoring Path Siting Criteria			
Criteria	Scale	Distance	Meets Minimum Requirement (yes/no)
Distance from Azusa Loren Street AMS	N/A	0.5 miles	N/A
Spacing From Obstructions	N/A	None	Yes
Spacing from Trees	N/A	33.2 feet, 10.1 meters	Yes
Sierra Madre Court Spacing from Roadway, AADT	Neighborhood	63 feet, 19 meters, AADT 2,758	Yes

After consultation with the EPA and receiving preliminary confirmation that the new monitoring site met the required siting criteria, South Coast AQMD established a five-year lease agreement with the California Army National Guard at 1351 W Sierra Madre Ave Azusa, CA 91702. The air monitoring site is in the planning stage and will monitor O₃, NO₂, CO, continuous PM₁₀, and PM_{2.5}, with monitoring objectives consistent with those of the previous Azusa Loren Street location.

Azusa System Modification Request Summary

Due to unforeseen logistical challenges beyond the control of South Coast AQMD, the Azusa Loren Street facility ceased operations on September 30, 2022. Consequently, South Coast formally requests the relocation of O₃, NO₂, CO, continuous PM₁₀, and PM_{2.5} measurement activities under 40 CFR Part 58.14(c) to the nearby California Army National Guard facility. Situated 0.5 miles from the former Azusa Loren Street site. The California Army National Guard location fully complies with all 40 CFR 58, Appendix E siting criteria. It offers a comparable scale of representativeness to the previous Azusa Loren Street site and measurements of O₃, PM₁₀, and PM_{2.5} are expected to be consistent with those observed at the former location, and accurately reflect the air quality for the area.

SYSTEM MODIFICATION REQUEST

Indio Jackson Street Monitoring Site AQS Site Codes 06-065-2002

The monitoring site at Indio Jackson Street has been in operation since January 1983. The site was located at the Indio Police and Fire Department premises, at 46990 Jackson Street, Indio, CA 92201. Initially established to monitor ozone (O_3) and coarse particulate matter (PM_{10}) levels to characterize the Indio and Coachella Valley region, measurements at this site were expanded in February 1999 when South Coast Air Quality Management District (South Coast AQMD) began measuring integrated 24-hour fine particulate matter ($PM_{2.5}$) concentrations on a 1-in-3-day schedule.

During 2021, the City of Indio advised South Coast AQMD, that the Jackson Street facility was undergoing renovation, and the City of Indio was unable to continue to host the air monitoring site, because of this, the site officially discontinued monitoring on April 20, 2022.

The City of Indio proposed several alternative locations; however, none met the sitting criteria outlined in 40 CFR 58, Appendix E. In response, South Coast AQMD collaborated with the Desert Sands Unified School District to explore additional options. Ultimately a site meeting 40 CFR 58 Appendix E. criteria was identified on the campus of Amistad High School, located at 83501 Dillon Ave, Indio, CA 92201, as depicted in Figure 1.

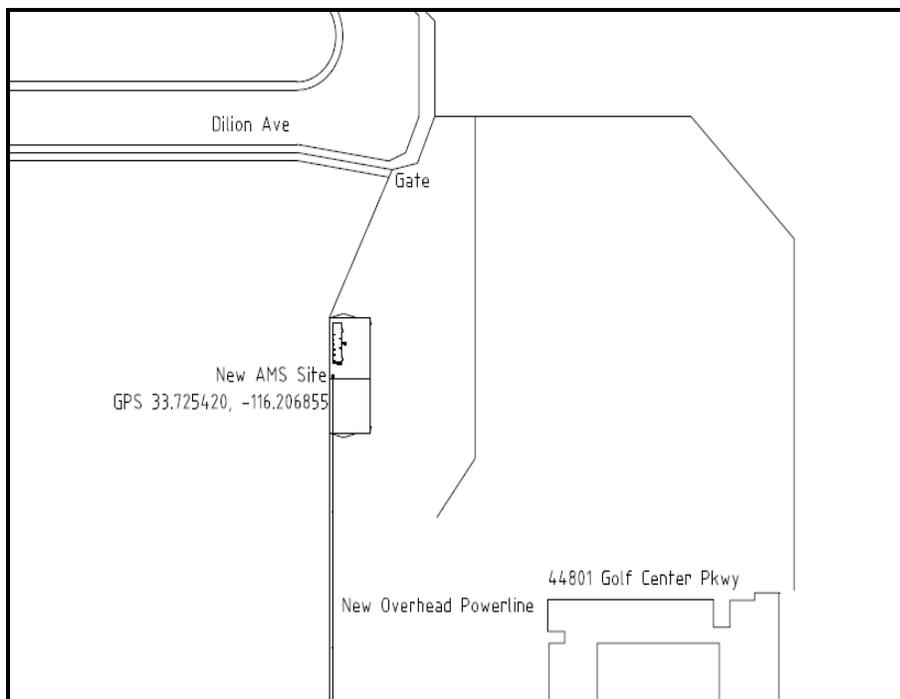


Figure 1 Indio Amistad Monitoring Site Location

South Coast AQMD consulted with U.S. EPA Region 9 regarding the suitability of the Indio Amistad High School location, receiving preliminary confirmation of its suitability. The site is situated 1.25 miles from the Indio Jackson Street monitoring location as depicted in Figure 2.



Figure 2 Distance Between Indio Amistad and Jackson Street Monitoring Sites

The Indio Amistad High School site features an 85’ x 35’ concrete platform enclosed with security fencing to accommodate a criteria pollutant shelter, particulate monitoring, and room for special project measurements as depicted in Figure 3. Additionally, space is allocated for community sensor testing and future enhancements to particulate and toxics monitoring as necessary. A 200-amp electrical service meter has been installed to power a 30’ monitoring platform and associated air monitoring instruments with provision for future expansion of an additional monitoring platform.

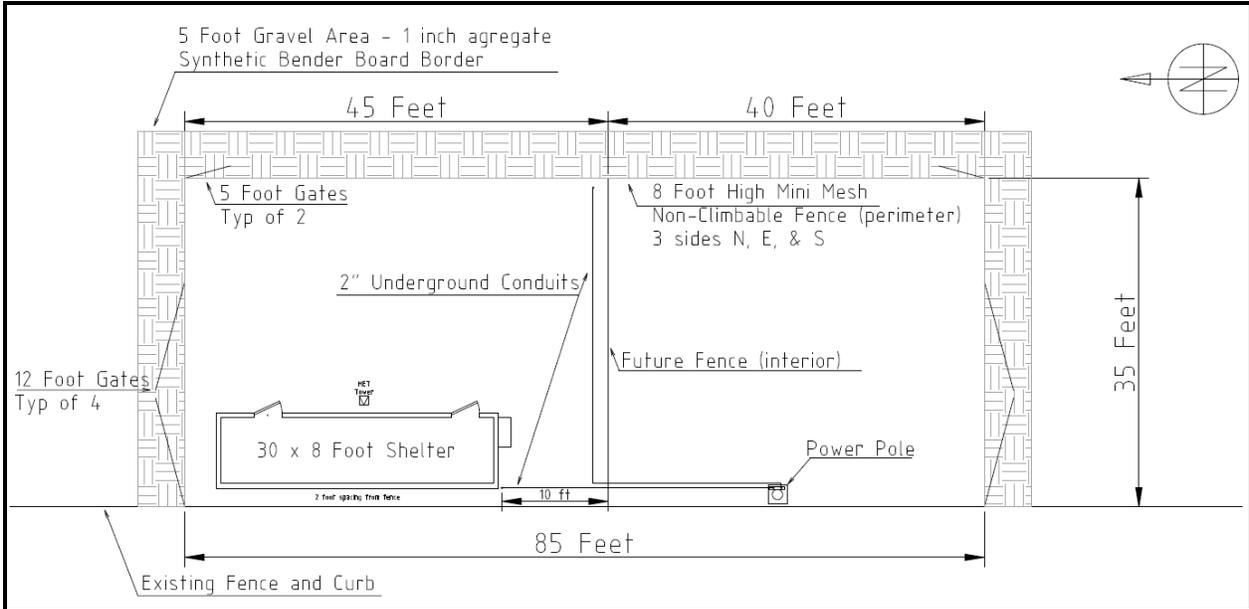


Figure 3 Indio Amistad Monitoring Site Detail

The site details for the air monitoring location at Indio Amistad High School confirm that it aligns with 40 CFR 58, Appendix E siting criteria requirements, as outlined in Table 1. Comprehensive site information is provided within the South Coast AQMD 2024, Annual Network Plan.

Table 1 Indio Amistad Selected Site Information

Selected Probe and Monitoring Path Siting Criteria			
Criteria	Scale	Distance	Meets minimum requirement (yes/no)
Distance from Indio Jackson Street AMS	N/A	1.25 miles	N/A
Spacing From Obstructions	N/A	None	Yes
Spacing from Trees	N/A	90 feet, 27 meters	Yes
I-10 Spacing from Roadway, AADT	Neighborhood	1208 feet, 368 meters, AADT 62,000	Yes
Dillon Ave Spacing from Roadway, AADT	Neighborhood	134 feet, 41 meters, AADT 405	Yes

After additional consultation with the EPA and receiving preliminary confirmation that the new monitoring site met the required siting criteria, South Coast AQMD proceeded with relocating the monitors and began monitoring on January 1, 2024. The air monitoring site at Amistad High School was assigned AQS ID 060652007 and is situated at 44801 Golf Center Parkway, Indio, CA 92201. The Indio Amistad High School monitors O₃, continuous PM₁₀, and PM_{2.5}, with monitoring objectives consistent with those of the previous Indio Jackson Street location.

Indio System Modification Request Summary

Due to unforeseen logistical challenges beyond the control of South Coast AQMD, the Indio Jackson Street facility ceased operations on April 20, 2022. Consequently, South Coast formally requests the relocation of O₃, PM₁₀ and PM_{2.5} measurement activities under 40 CFR Part 58.14(c) to the nearby Amistad High School monitoring site. Situated 1.25 miles from the former Indio Jackson Street facility, the Amistad High School location fully complies with all 40 CFR 58, Appendix E siting criteria. It offers a comparable scale of representativeness to the previous Jackson Street site and measurements of O₃, PM₁₀, and PM_{2.5} are expected to be consistent with those observed at the former location, and accurately reflect the air quality for the area.

SYSTEM MODIFICATION REQUEST

LAX - Hastings Monitoring Site AQS Site Codes 06-037-5005

The monitoring site at LAX - Hastings Street air monitoring site has been in operation since April 2004. The site was located on LAX property, near Hastings and West 91st street. The assigned address was 7201 W. Westchester Parkway, Los Angeles CA 90045. The site was initially established to monitor (O₃) Nitrogen Dioxide (NO₂), Carbon Monoxide (CO) and Sulfur Dioxide (SO₂), lead (Pb) and coarse particulate matter (PM₁₀) measurements to characterize background level concentration of criteria pollutants.

During 2021, Los Angeles World Airports (LAWA) advised South Coast AQMD, that the LAX Hastings location was undergoing development, and LAWA was unable to continue to host the air monitoring site, because of this, the site officially discontinued monitoring on September 30, 2021.

LAWA proposed several alternative locations and a site meeting 40 CFR 58 Appendix E. criteria was identified on the northwest area of the airport, located at 9111 Falmouth Ave, Playa del Rey, CA 90293, as depicted in Figure 1.

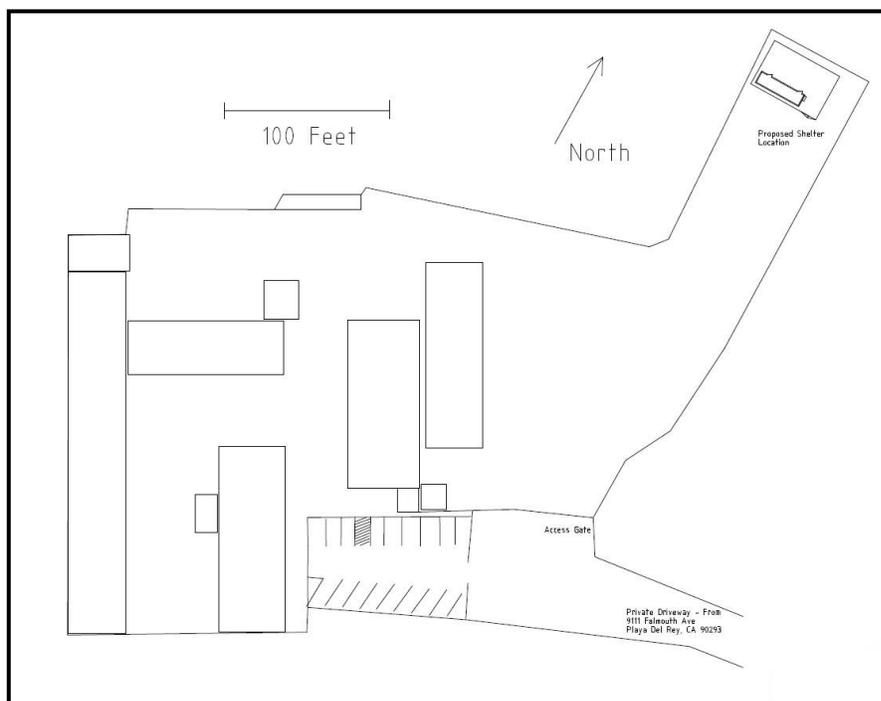


Figure 1 Jet Pets LAX-2 Monitoring Site Location

South Coast AQMD consulted with U.S. EPA Region 9 regarding the suitability of the Jet Pets LAX - 2 (LAX - 2) location, receiving preliminary confirmation of its suitability. The site is situated 0.47 miles from the LAX - Hastings Street monitoring location as depicted in Figure 2.

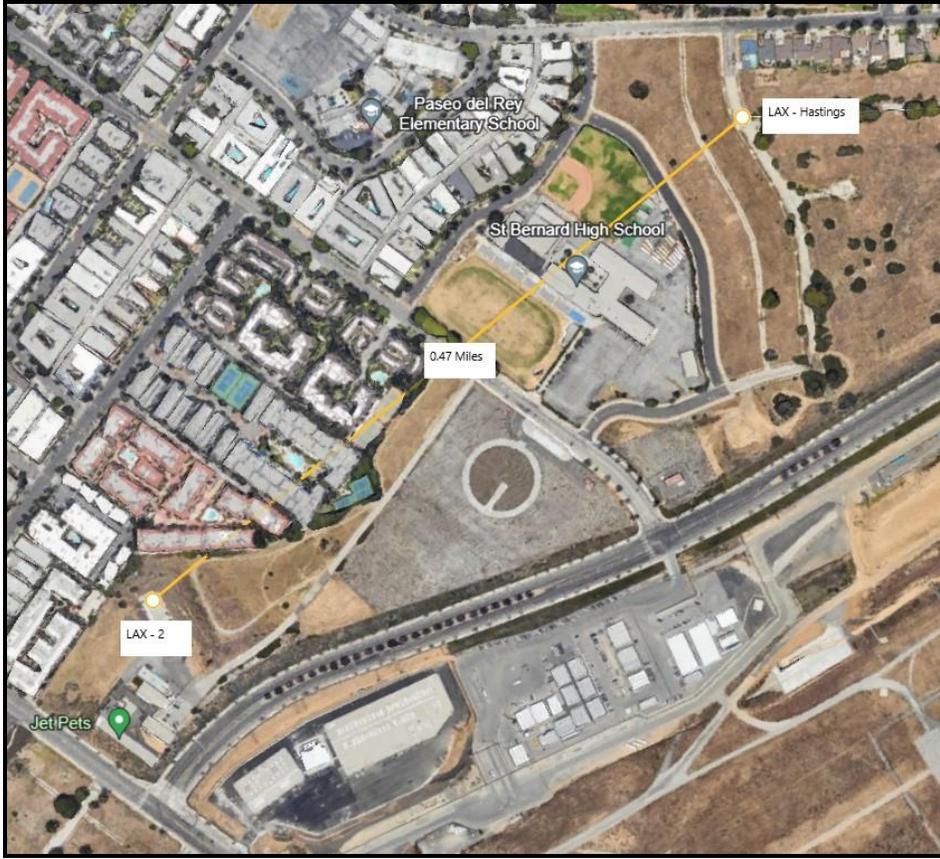


Figure 2 Distance Between LAX – Hastings Street and Jet Pets LAX - 2 Monitoring Sites

The LAX - 2 site features a 45' x 30' asphalt platform enclosed with security fencing to accommodate a criteria pollutant shelter and particulate monitors as depicted in Figure 3. A 200-amp electrical service meter is planned to power a 30' monitoring platform and associated air monitoring instruments.

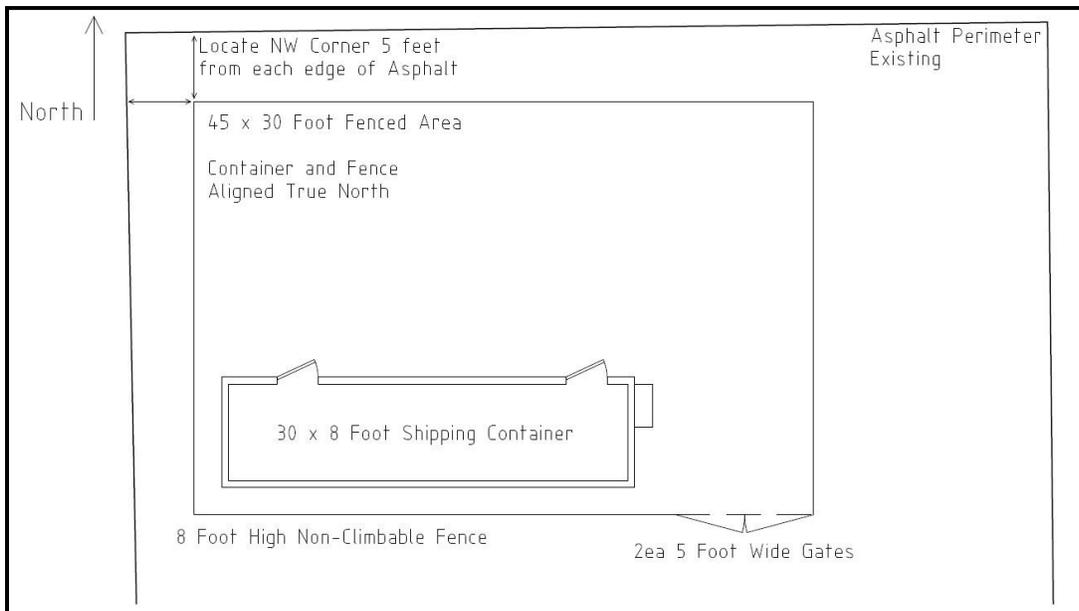


Figure 3 LAX - 2 Monitoring Site Detail

The site details for the air monitoring location at LAX - 2 confirm that it aligns with 40 CFR 58, Appendix E siting criteria requirements, as outlined in Table 1. Comprehensive site information is provided within the South Coast AQMD 2024, Annual Network Plan.

Table 1 LAX - 2 Selected Site Information

Selected Probe and Monitoring Path Siting Criteria			
Criteria	Scale	Distance	Meets minimum requirement (yes/no)
Distance from LAX Hastings Street AMS	N/A	0.47 miles	N/A
Spacing From Obstructions	N/A	None	Yes
Spacing from Trees	N/A	None	Yes
Pershing Spacing from Roadway, AADT	Neighborhood	516 feet, 157 meters, AADT 29,966	Yes

After consultation with the EPA and receiving preliminary confirmation that the new monitoring site met the required siting criteria, South Coast AQMD established a five-year lease agreement with LAWA at 9111 Falmouth Ave, Playa del Rey, CA 90293. The air monitoring site is in the planning stage and will monitor O₃, NO₂, CO, SO₂, Pb and PM₁₀, with monitoring objectives consistent with those of the previous LAX Hastings Street location.

Indio Request Summary

Due to unforeseen logistical challenges beyond the control of South Coast AQMD, the LAX Hastings Street facility ceased operations on September 30, 2021. Consequently, South Coast formally requests the relocation of O₃, NO₂, CO, SO₂, Pb and PM₁₀ measurement activities under 40 CFR Part 58.14(c) to the nearby LAX - 2 monitoring site. Situated 0.47 miles from the former Los Angeles Hastings Street facility, the LAX - 2 fully complies with all 40 CFR 58, Appendix E siting criteria. It offers a comparable scale of representativeness to the previous LAX Hastings Street site and measurements of O₃, NO₂, CO, SO₂, Pb and PM₁₀ are expected to be consistent with those observed at the former location, and accurately reflect the air quality for the area.

**SOUTH COAST AQMD
SYSTEM MODIFICATION REQUEST**

**Norco PM₁₀ Monitoring Site
AQS Site Codes 06-065-0003**

Background

South Coast Air Quality Management District (South Coast AQMD) has maintained a monitoring site in Norco since December 1980 to assess the impact of PM₁₀ on the local community. The monitor was situated within the grounds of the Naval Weapons Station Seal Beach – Detachment Norco. However, due to changes in security requirements, the Naval Weapons Station requested the discontinuation of monitoring at this site.

A recent network assessment conducted in 2020 identified the PM₁₀ monitor at Norco as a low-value criteria pollutant monitor, not essential or required for inclusion in an attainment or maintenance plan. Given its lower priority and in response to the Naval Weapons Station's request to close the site, monitoring was officially discontinued in March 2022.



Figure 1 Location of South Coast AQMD Norco PM₁₀ monitor.

In 2021, Mecca (Saul Martinez) recorded the highest PM₁₀ measurement at 334 $\mu\text{g}/\text{m}^3$, while Mira Loma registered the second-highest level at 232 $\mu\text{g}/\text{m}^3$. Conversely, Norco's maximum PM₁₀ measurement during the same period was 108 $\mu\text{g}/\text{m}^3$. Notably, there were no instances of PM₁₀ standard exceedances

observed for the Norco PM₁₀ monitor from 2019 to 2021. Additionally, it is worth noting that the South Coast AQMD surpassed the minimum monitoring requirements PM₁₀ monitoring, as detailed in Table 1.

Table 1 Minimum Monitoring Requirements for PM₁₀

(Note: Refer to section 4.6 and Table D-4 of Appendix D of 40 CFR Part 58.)

MSA	Counties	Population & Census Year	2021 Max Concentration [µg/m ³]	Max Concentration Site	Required Monitors	Active Monitors	Additional Monitors Needed
40140	San Bernardino Riverside	4,653,105 2022	334	Mecca (Saul Martinez) 060658005	6-10 High Conc.	11	0

Table 2 PM₁₀ FRM Monitor Minimum Sampling Frequency

	Location	AQS No.	Expected Maximum concentration 24-hour	Required Sampling Frequency	Sampling Frequency	Monitor
1	Anaheim	060590007	115	1-in-6	1-in-1	FEM
2	Banning	060650012	48	1-in-6	1-in-6	FRM
3	Central San Bernardino Mountains	060710005	33	1-in-6	1-in-6	FRM
4	Fontana	060712002	73	1-in-6	1-in-6	FRM
5	Glendora	060370016	121	1-in-2	1-in-1	FEM
6	Indio	060652002	198	1-in-2	1-in-1	FEM
7	Lake Elsinore	060659001	89	1-in-6	1-in-1	FEM
8	Mecca (Saul Martinez)	060652005	334	1-in-6	1-in-6	FRM
9	Los Angeles (Main St.)	060371103	64	1-in-6	1-in-6	FRM
10	Mira Loma (Van Buren)	060658005	232	1-in-1	1-in-1	FEM
11	Norco	060650003	108	1-in-6	1-in-6	FRM
12	Palm Springs	060655001	100	1-in-6	1-in-1	FEM
13	Redlands	060714003	44	1-in-6	1-in-6	FRM
14	Rubidoux	060658001	75	1-in-6	1-in-1	FEM
15	San Bernardino	060719004	181	1-in-6	1-in-1	FEM
16	Santa Clarita	060376012	47	1-in-6	1-in-6	FRM
17	Upland	060711004	123	1-in-2	1-in-1	FEM

To support the system modification request, South Coast AQMD has presented a comprehensive data summary in accordance with the guidelines specified in 40 CFR Part 58.14 (c)(1). For years where no data is available in the provided links on the EPA's Air Trends webpage (<https://www.epa.gov/air-trends/air-quality-design-values#report>), South Coast AQMD has employed data sourced from the AQS AMP480 Design Value (DV) Report.

This report includes DV concentrations along with validity flag indicators (Y and N). The utilization of this data from the AQS AMP480 DV Report is essential for meeting the five-year requirement, ensuring the accuracy of the student t-test value in the calculation process. This meticulous approach ensures the integrity of the data used in evaluating the requested system modifications.

PM₁₀

PM₁₀ levels are monitored at eleven sites across the Ontario-Riverside-San Bernardino Metropolitan Statistical Area (MSA). It's noteworthy that the PM₁₀ monitor situated in Norco has not been designated as the DV location for the MSA. Over the past five years, this Norco monitoring station has consistently reported no instances of PM₁₀ concentrations exceeding the National Ambient Air Quality Standard (NAAQS).

The 5-year DV metric for the 24-hour PM₁₀ standard demonstrates the monitor has not surpassed the 80% threshold of the applicable NAAQS. Although the data meets the threshold for closure of the monitoring station, data in 2019 and 2021 did not meet the completeness requirement, therefore the monitor does not meet all criteria for closure under 40 CFR Part 58(c)(1).

Table 3 PM₁₀ FRM Monitor Student T Test and Exceedances

Norco AMS			
Year	PM10 24-Hour Maximum $\mu\text{g}/\text{m}^3$	DV Report Observed Exceedances	DV Report Estimated Exceedances
2017	85	0	0
2018	100	0	0
2019*	96	0	0
2020*	100	0	0
2021	108	0	0
5 Yr. Avg.	98		
40 CFR Part 58.14 (c) 1 Metric	106		
80% of 150 ppb NAAQS	120		
Test	PASS		

*Indicates N validity flag

Is also noteworthy that the Norco PM₁₀ monitor has consistently measured lower concentrations than the DV site each year in the non-desert portions of Riverside County.

Table 4 PM₁₀ FRM Riverside County Maximum Concentration vs Norco

Year	Maximum 24 Hr. Concentration $\mu\text{g}/\text{m}^3$	Norco Maximum 24 Hr. Concentration $\mu\text{g}/\text{m}^3$
2017	144	85
2018	148	100
2019*	143	96
2020	124	100
2021*	132	108

*Indicates N validity flag

The South Coast AQMD has confirmed the Norco PM₁₀ monitor has consistently remained below the 80% threshold of the applicable NAAQS based on available data. However, due to the “N” validity flag, the request for closure cannot be based on 58.14 (c)(1) alone. Therefore, South Coast AQMD is formally requesting a retroactive System Modification Request (SMR) to discontinue monitoring PM₁₀ monitoring at the Norco AMS in accordance with 40 CFR Part 58.14 which specifies that a discontinuation may also

be approved on a case-by-case basis if discontinuance does not compromise data collection needed for implementation of a NAAQS and if the requirements of appendix D to this part, if any, continue to be met.

Notably, the PM₁₀ monitor at Norco has consistently demonstrated attainment over the preceding five years, and there is a less than 10 percent probability of exceeding 80 percent of the applicable NAAQS in the next three years based on the available data. This probability is based on a thorough analysis of historical levels, trends, and variability. Additionally, the Norco AMS PM₁₀ monitor is not explicitly mandated by an attainment plan or maintenance plan. Situated in a maintenance area, the most recent maintenance plan endorsed by the State and approved by the EPA does not incorporate a contingency measure triggered by air quality concentrations. Additionally, it's important to emphasize that the Norco PM₁₀ monitor is not the only operational State and Local Air Monitoring Stations (SLAMS) monitor within the maintenance area; both Mira Loma and Rubidoux monitors are within 6.82 and 9.92 miles, respectively.

Importantly, South Coast AQMD continues to surpass the minimum monitoring requirements, as outlined in the Minimum Monitoring requirement for PM₁₀ shown in Table 1.

Norco PM₁₀ Summary Request

In accordance with the conditions specified in 40 CFR 58.14, South Coast AQMD is formally requesting a retroactive SMR to cease monitoring at the Norco site for PM₁₀, as delineated in 40 CFR Part 58.14 on a case-by-case basis. The retroactive closure of Norco does not compromise data collection needed for implementation of a NAAQS and the requirements of appendix D continue to be met.

SYSTEM MODIFICATION REQUEST

Uddeholm Pb Monitoring Site AQS Site Codes 06-037-1403

Background

The Uddeholm (UDDH) source lead (Pb) site has been in continuous operation since November 1992 at Bohler-Uddeholm Corporation facility. The site was originally located to measure source Pb from Trojan Battery when U.S. EPA issued revisions to the National Ambient Air Quality Standards (NAAQS) during 2008 that required source oriented Pb monitoring at facilities which emit more than 1.0 tons per year (TPY) Pb or airports that emit greater than 0.5 TPY of Pb as listed in the National Emissions Inventory (NEI). When the revisions were implemented in 2010, Trojan Battery did not meet the U.S. EPA minimum threshold that required source oriented Pb monitoring, however the UDDH site remained in operation.

During 2021, the location where the Pb monitor is situated, downwind of Bohler Uddeholm, was sold and the new owner, Energy Metals Inc., opted to terminate the lease agreement with South Coast AQMD. Consequently, the UDDH Pb monitor ceased its operations on April 1, 2022, as per the request of Energy Metals Inc.

In light of the terminated lease agreement and the absence of an ongoing need for Pb monitoring, South Coast Air Quality Management District (South Coast AQMD) requests retroactive approval through the established U.S. EPA system modification process to formally cease Pb measurement at the UDDH facility.

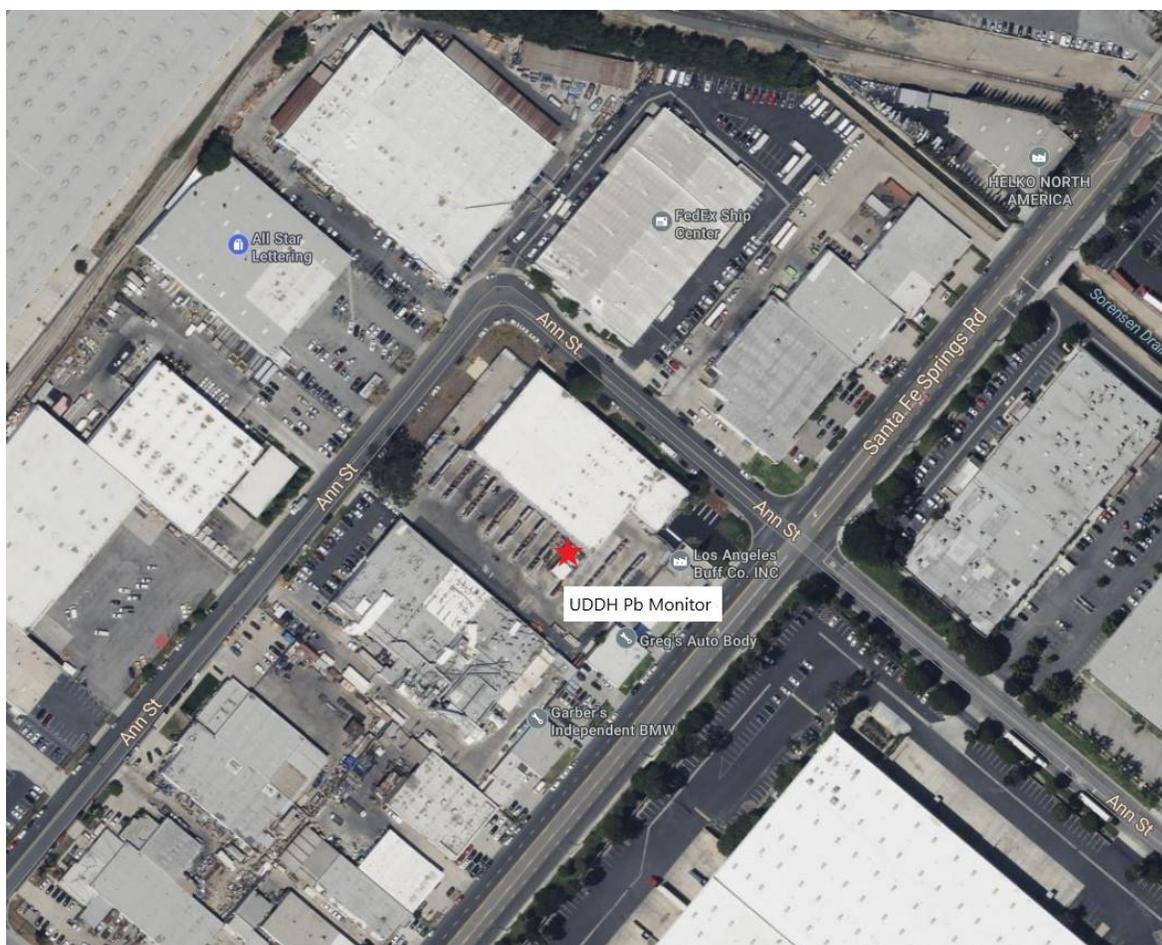


Figure 1 Location of South Coast AQMD UDDH Pb monitor.

In 2022, the maximum 3-month rolling average for area wide Pb concentrations was recorded as 0.08 $\mu\text{g}/\text{m}^3$ at the San Bernardino and Compton area wide, air monitoring sites (AMS). In contrast, UDDH, a source-oriented monitoring site, registered a maximum 3-month rolling average of 0.01 $\mu\text{g}/\text{m}^3$ during the same period. Notably, there were no instances of exceeding the Pb standard observed for the UDDH Pb monitor from 2018 to 2022. Additionally, it is important to highlight that the South Coast AQMD consistently surpasses the minimum monitoring requirements for source Pb monitoring, as outlined in Table 1 and Table 2.

Table 1 NEI Pb Sources

	Location	Data Source	Emissions (lb.)	Type	Meet Threshold for Pb Monitoring
1	Long Beach Daugherty	NEI	1135	Airport	No
2	Van Nuys	NEI	933	Airport	No
3	John Wayne	NEI	859	Airport	No
4	Chino	NEI	793	Airport	No
5	Riverside	NEI	511	Airport	No
6	Zamperini Field	NEI	503	Airport	No
7	Desert Resorts Regional	NEI	491	Airport	No
8	Whiteman Airport	NEI	438	Airport	No

¹ 2020 NEI Data most recent available at <https://www.epa.gov/air-emissions-inventories/national-emissions-inventory>

Table 2 Source Oriented Pb Monitoring

Source	Address	Pb Emissions (lbs. per year)	Meet Threshold	Emission Inventory Source & Year ¹	Max 3-Month DV [$\mu\text{g}/\text{m}^3$]	DV Date (third month, year)
Exide Technologies	4010 E. 26th Street Vernon, CA 90058	9.5	No	AER 2020	0.06	5; 2021
Trojan Battery	9440 Ann Street Santa Fe Springs, CA 90670	10.1	No	AER 2020	0.01	1; 2021
Quemetco Inc.	720 S 7th Avenue City of Industry, CA 91746	6.4	No	AER 2020	0.01	1; 2021
Exide Technologies	Railroad Yard – Washington Blvd.	9.5	No	AER 2020	0.01	1; 2021

¹Using latest South Coast AQMD AER data 2020.

To support the system modification request, South Coast AQMD has presented a comprehensive data summary in accordance with the guidelines specified in 40 CFR Part 58.14 (c)(1). For years where no data is available in the provided links on the EPA's Air Trends webpage (<https://www.epa.gov/air-trends/air-quality-design-values#report>), South Coast AQMD has employed data sourced from the AQS AMP480 Design Value (DV) Report.

This report includes DV concentrations along with validity flag indicators (Y and N). The utilization of this data from the AQS AMP480 DV Report is essential for meeting the five-year requirement, ensuring the accuracy of the student t-test value in the calculation process. This meticulous approach ensures the integrity of the data used in evaluating the requested system modifications.

Pb

Source Pb levels are currently monitored at three sites within the South Coast AQMD jurisdiction, and none of these sites presently meet the minimum threshold required for monitoring, as indicated in Table 1. Notably, the Pb monitor located at UDDH records lower Pb concentrations compared to the broader area's Pb network. It is important to highlight that UDDH has not been designated as the DV location for the Metropolitan Statistical Area (MSA).

Over the past five years, the monitoring site at UDDH has consistently reported zero instances of Pb concentrations surpassing the NAAQS.

The 5-year DV metric for the 24-hour Pb standard demonstrates compliance and has not surpassed the 80% threshold of the applicable NAAQS. This meets the criteria for closure of the monitoring site, as stipulated in 40 CFR Part 58(c)(1).

Table Pb FRM Monitor Student T Test

UDDH AMS	
Year	Pb 3-month rolling average 24-Hour DV $\mu\text{g}/\text{m}^3$
2018	0.09*
2019	0.09*
2020	0.06*
2021	0.01
2022	0.01*
5 Yr. DV Avg.	0.05
40 CFR Part 58.14 (c) 1 Metric	0.1
80% of 0.15 $\mu\text{g}/\text{m}^3$	0.12
Test	PASS

*Indicates N validity flag

South Coast AQMD has confirmed the UDDH Pb monitor has consistently remained below the 80% threshold of the applicable NAAQS based on the available data. However, due to the “N” validity flag, the request for closure cannot be based on 58.14 (c)(1) alone. Therefore, South Coast AQMD is formally requesting a retroactive System Modification Request (SMR) to discontinue monitoring Pb at the UDDH AMS in accordance with 40 CFR Part 58.14 which specifies that a discontinuation may also be approved on a case-by-case basis if discontinuance does not compromise data collection needed for implementation of a NAAQS and if the requirements of appendix D to this part, if any, continue to be met. The preceding data shows the request for discontinuance of the monitor does not compromise data collection needed for implementation of source Pb monitoring, or NAAQS, and requirements of appendix D continue to be met.

Notably, the Pb monitor at UDDH has consistently demonstrated attainment over the preceding five years, and there is a less than 10 percent probability of exceeding 80 percent of the applicable NAAQS, in the next three years based on the available data. This probability is based on a thorough analysis of historical levels, trends, and variability. Additionally, the UDDH AMS Pb monitor is not explicitly mandated by an attainment plan or maintenance plan and does not exceed the threshold requirement for source Pb monitoring. Although situated in a non-attainment area, the most recent attainment plan endorsed by the State and approved by the EPA does not incorporate a contingency measure triggered by air quality concentrations. Additionally, it's important to highlight that the UDDH Pb monitor is not the sole State and Local Air Monitoring Stations (SLAMS) monitor operational within the non-attainment area.

Importantly, South Coast AQMD continues to meet the minimum monitoring requirements, as outlined in the Minimum Monitoring threshold for Source Pb, Table 1.

UDDH Pb Summary Request

In accordance with the conditions specified in 40 CFR 58.14, South Coast AQMD is formally requesting a retroactive SMR to cease monitoring at the UDDH site for Pb, as delineated in 40 CFR Part 58.14 on a case-by-case basis. The retroactive closure of UDDH does not compromise data collection needed for implementation of a NAAQS and the requirements of appendix D continue to be met.