



Capital Area Council of Governments

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Judge H. T. Wright
Caldwell County

Dear (TCEQ Executive Director):

On behalf of my colleagues in the Central Texas Clean Air Coalition, I am writing to thank you for your ongoing support of our region's air quality improvement initiatives implemented in the 8-Hour Ozone Flex Program, and to ask your assistance in insuring that ozone monitoring data used in determining the region's compliance with federal ozone standards is as accurate as measurement methods and quality assurance procedures will allow. Through our partnership in implementing emission reduction measures in the Early Action Compact and 8-O3 Flex programs we have seen ozone levels measured at TCEQ's regulatory monitors generally decline over the past several years, such that we have maintained our compliance with the standard. Now that EPA has proposed an even more stringent standard, we are becoming concerned that accuracy specifications for recorded ozone data from regulatory monitors may not be stringent enough to give a valid indication of attainment (or nonattainment) within a few parts per billion (ppb) of a revised standard between 60 to 70 ppb.

Our ozone design value for the 2006 – 2008 three-year period was 77 ppb and with a fourth-high value of 76 ppb measured for 2009, our design value has been reduced to 75 ppb, just in attainment of the 2008 ozone standard. This example demonstrates how important just two ppb can be in determining compliance with the standard. With the EPA standards for monitor calibration being only within 15% and the TCEQ standards within 10% it is apparent that the data recorded for the controlling monitor could be up to 7 ppb over an actual value of 70 ppb. This erroneous value could be recorded as a violation of the proposed 70 ppb standard even though the actual ozone measured at the monitor was 70 ppb, but had been adjusted upward by a calibrator which was still meeting the plus or minus 10% accuracy requirement.

To provide more assurance that any data used for determining the region's attainment with revised EPA ozone standards is accurate as possible, we would appreciate TCEQ reviewing their monitoring data quality assurance procedures and undertaking any reasonable efforts to improve calibration accuracy downward to a plus or minus five percent. We appreciate TCEQ's comment and assistance on this issue and look forward to your response.

Sincerely,

Judge Sam Biscoe
Chair, Central Texas Clean Air Coalition