



Eckert Seamans Cherin & Mellott, LLC
U.S. Steel Tower
600 Grant Street, 44th Floor
Pittsburgh, PA 15219

TEL: 412 566 6000
FAX: 412 566 6099

Jessica Sharrow Thompson
412.566.5941
jsharrow@eckertseamans.com

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Gary Engler
David Ambrose
Ohio EPA, Air Monitoring Section
Division of Air Pollution Control
50 West Town St.
Columbus, Ohio 43215

Re: Comments on the 2016-2017 Ohio Air Monitoring Network Plan

Mr. Engler and Mr. Ambrose:

Thank you for the opportunity to comment on Ohio's Annual Air Monitoring Network Plan that was developed under 40 CFR § 58.10 (the "Ohio AMNP"). Our comments relate to only one monitoring site, AQ # 39-029-0020, located in East Liverpool, Columbiana County, because based on recently developed information we do not believe that it adequately meets U.S. EPA siting criteria and is otherwise not producing representative and/or reliable data. Due to these concerns, we request that Ohio EPA relocate this monitoring site to a more suitable location.

Monitoring site AQ # 39-029-0020 is located at 2220 Michigan Avenue in East Liverpool, Columbiana County and is referred to as the "ELPOOL WTP" in the Ohio AMNP. The ELPOOL WTP monitoring site consists of a Hi-Vol TSP sampler, a Hi-Vol PM10 sampler, and a co-located meteorological station. By way of background, the ELPOOL WTP monitoring site is located approximately only 16 feet to one of the buildings at the East Liverpool Water Plant and also immediately adjacent to a high-voltage electrical substation that is approximately only 65 feet away. *See* Exhibit A. In fact, the electrical substation can easily be viewed in the picture of the ELPOOL WTP monitoring site that is included Ohio AMNP.

We request that Ohio EPA relocate the ELPOOL WTP monitoring site to a more suitable location due to siting, interference, and bias concerns that may lead to collection of non-representative and/or unreliable data. In regards to siting, both the Hi-Vol TSP sampler and the Hi-Vol PM10 sampler are located too close to the adjacent building at the East Liverpool Water Plant and the high-voltage electrical substation to produce consistently reliable data. Specifically, the building at the East Liverpool Water Plant that is adjacent to the ELPOOL WTP monitoring site is likely causing interference due to building downwash effects. The ELPOOL WTP monitoring site is not located far enough away from or high enough above this building to avoid interference to the Hi-Vol TSP sampler and the a Hi-Vol PM10 sampler.

The immediate adjacency of the high-voltage electrical substation to the ELPOOL WTP monitoring site also raises significant bias concerns. We have recently learned new information that this particular high-voltage substation is likely biasing the Hi-Vol TSP and Hi-Vol PM10 samplers' collected material in a cumulative manner by concentrating ferromagnetic and paramagnetic particles due to electromagnetic attraction. Accordingly, it is questionable due to both the building interference and bias from high-voltage electrical substation that the ELPOOL WTP monitoring site meets the Probe and Monitoring Path Siting Criteria for Ambient Air Quality Monitoring at 40 CFR Part 58, Appendix E and/or U.S. EPA's Quality Assurance Handbook for Air Pollution Measurement Systems, Volume II, May 2013.

Additionally, the co-located meteorological station ("met station") at the ELPOOL WTP monitoring site does not meet U.S. EPA siting criteria due to its proximity to the adjacent building at the East Liverpool Water Plant. Specifically, the wind sensors are not located a great enough distance away or at a sufficient height to avoid building interference as required by U.S. EPA's Meteorological Monitoring Guidance for Regulatory Modeling Applications. Due to these siting issues, this met station is (not surprisingly) producing unreliable and non-representative data with respect to wind patterns. For example, this met station produces wind data that suggests the prevailing winds are from the East when it is well documented that the prevailing winds are from the West in the East Liverpool area.

In sum, due to these siting, interference, and bias concerns, including new information about likely bias from the immediately adjacent high-voltage electrical substation that suggest that the ELPOOL WTP monitoring site is not producing representative and/or reliable data, we request that Ohio EPA relocate this monitoring site to a more suitable location.

Thank you again for the opportunity to provide these comments to the Ohio AMNP. If you would like additional information about the comments provided herein, please do not hesitate to contact us.

Sincerely,

/s/ Jessica Sharrow Thompson

Jessica Sharrow Thompson

