

**The Minutes of the
Air Improvement Resources Executive/Advisory Committee Meeting
Alamo Area Council of Governments
8700 Tesoro Drive, Suite 100, San Antonio, Texas
Wednesday, November 3, 2004, 9:00 a.m.**

Executive Committee Members

Chairman Jay Millikin, Comal County Commissioner
Judge Nelson Wolff, Bexar County
Mayor Adam Cork, City of New Braunfels
Walter Ague for Mayor Ed Garza, City of San Antonio
Judge Donald Schraub, Guadalupe County
Councilman Ernest Hernandez, City of Seguin

Technical Committee Members

Renee Green, Bexar County, Chair
Ana Sandoval, VIA, Vice-Chair
Daniel Cardenas, City of San Antonio
Mary Ann Elekes, MPO

Guests

Teri Landan, Guadalupe County
Rod Smith, Dole Engineers
Eva Urbahsch, CH2M
Manjiri Akalkotkar, VIA

Advisory Committee Members

Commissioner John Kight, Kendall County
Bill England, Harmony Hills Neighborhood Asso
Dan Titerle, SAWS
David Casteel, TXDOT
Pete Donahoe, Holt Co.
Stanley A. Dabney II, Alamo Cement Company
Forrest Mims, Guadalupe County
Gary Raba, S. A. Chamber of Commerce
Mike Riley, City of Seguin

AACOG Staff

Al Notzon, Executive Director
Dean Danos, Deputy Director
Steve Smeltzer, Environmental Manager
Berti Vaughan, Administrative Assistant
Alison Young, Commute Solutions/Pub. Ed. Prog.
Brenda Williams, Environmental Modeler
Isabel Chacon, Natural Resources Specialist
Peter Bella, Director Natural Resources

I. Roll Call

Commissioner Millikin called the meeting to order. He asked that the roll be called. Dean Danos called the roll and declared a quorum.

II. Approval of Minutes

Chairman Millikin asked the Committee for consideration of the August 25th, 2004 minutes. On recommendation by Ana Sandoval, Peter Bella offered an amendment to restate a motion on page six, paragraph three as follows:

Chairman Millikin concurred with Mayor Cork's friendly amendment and asked if there were any further questions on the motion. There were none. The motion passed unanimously.

Restatement of motion: return draft CAMS 23 letter to the AIR Technical Committee with directions that the letter reflect the consensus of the AIR Technical Committee and contain a narrative identifying changes that have occurred since the last discussion on this topic by the AIR Executive/Advisory Committees.

Forrest Mims asked that the spelling of Goddard and NASA be corrected on page nine.

Mayor Cork moved for approval of the minutes as amended. Judge Schraub seconded the motion. Chairman Millikin asked for a vote. The motion unanimously passed.

III. Citizens to be Heard

Chairman Millikin asked staff for the list of citizens signed up to speak. There was one. Mark Langford with Citizens Organized for Good Science addressed the committee. His verbatim comments can be found at the end of these minutes.

Judge Wolff asked for a list of his recommendations. Mr. Langford agreed to send them.

IV. Ozone and Particulate Matter Report

a. Action Item: Consideration and possible approval of letter regarding PM 2.5 exceedances

Peter Bella referred the committee to the ozone and particulate matter report handout. The report wrapped up the 2004 ozone season as of November 1st 2004 for the region and contained the final statistics reflecting the fourth-highest 8-hour values from 2000-2004 at the San Antonio Northwest C23 and Camp Bullis C58 monitoring sites. He pointed to the trend from 2002 through 2004 indicating an average of 85 and 89 averages. He noted that the readings were not in attainment and that 2005, 2006, and 2007 would determine the EPA's fresh look at the region with the completion and termination of the Early Action Compact process in 2007. Mr. Bella also provided the Particulate Matter Report indicating values remaining well below the federal standards.

Mr. Bella directed the committee to the handout pertaining to the proposed action item on PM 2.5 exceedances. Mr. Bella explained that the original letter text was reviewed by the Air Improvement Resources Executive/Advisory Committees on August 25, 2004. During that meeting the minutes reflected the motion made by Mayor Cork that the letter go out with what "we believe the answer should be" and then ask for clarification. In order to make that revision the letter was reviewed on October 11 by the AIR Technical Committee. The AIR Technical Committee reviewed the letter and made changes to the letter reflecting Mayor Cork's recommendations. Mr. Bella asked the committee to review the changes as reflected in the bold print of the draft letter. Mayor Cork recommended that the argument be reflected at the beginning of the letter as opposed to making the argument at the end so there would be a better understanding between both parties on their positions regarding the data provided.

Renee Green asked if the AIR Executive Committee would approve the letter pending the redraft with their concurrences to how the change was restated so that they would not need to bring the letter back in draft to the committee another time.

Mayor Cork moved that the committee "go ahead and approve the letter with the final approval by the chair and co-chair to the revisions we've identified today." The motion was seconded by Councilman Hernandez. The motion unanimously passed.

V. Public Education Committee Report

Alison Young, Public Education Program Manager reported the following to the Committee:

- "It all adds up to cleaner air website" program sponsored by the Department of Transportation and EPA recognized AACOG during the month of November as Community Partner Champion. Ms. Young gave Dorothy Birch, her predecessor credit for the success of the work reflected in the award.

- Air Quality Health Alerts for the 2004 year total twenty-two. She reminded the committee that the previous year's Air Quality Health Alerts also totaled twenty-two. There were nine AQHA's in September and none in October.
- The total number of exceedance days under the 8-hr. average 85ppb standard noted through the TCEQ and EPA monitors was seven exceedance days. The total exceedance days for the AACOG monitors were nine. In comparison to last year, the TCEQ and EPA monitors reflected eight exceedance days. The AACOG's monitors recorded eleven.
- Outreach Events In August 2004: there were 4 remote events with KISS radio, Fill up in the Evening events, Judson ISD anti-idling program meeting, TERP Workshop
- Outreach Events in September 2004: Kindred Elementary and Zachary Elementary -School Pool Walking School Bus presentations, National Public Lands Day at Calaveras Lake, Clean Air Force Technical Advisory Committee to review Clean Air Partners Program in Austin
- Outreach Events in October 2004: Urban Heat Island Workshop, Air Quality Presentation to Women in Energy Meeting, Schertz Elementary, Glen Oaks Elementary, Scheh Elementary air quality presentations, San Antonio Manufacturers Association Environmental Seminar, Texas Society of Respiratory Care Seminar presentation, Commute Solutions Meeting at Lackland Air Force Base
- Outreach Events in November 2004: Texas Recycles Day at Eisenhower Park, Air Quality Lesson at Villarreal Elementary, GIS Day at Alamo Day,
- Communications Plan consisted of: July-Oct. WOAI, PAX and Telefutera ran Drive Clean Across Texas Ads, Aug-Nov. Commute Solutions Ads, and at KISS Remotes Car Care Sunshades were rewards for filling up after six, Aug-Sept. Outdoor billboard at I35 North and SBC Center Parkway for Poster Contest Winners from Gillette Elementary.
- Have begun distribution of Air Quality Transportation K-12 curriculum
- Air Public Education Committee Meeting needs more committee members

Chairman Millikin expressed concern that information be sent to school districts on the availability of Air Quality Health Alert flags during the early part of the year when schools were in session.

Mr. Riley asked Ms. Young if there was any program dedicated to idling for taxi cabs, VIA buses, banks, and different government agency vehicles. Ms. Young said that the existing idling program was dedicated to school buses through the Adopt a Bus program however, they were considering expanding the program on a broader basis.

VI. Business of the AIR Committee

AIR Advisory Committee Nomination

Action Item: Consideration and possible approval of nomination of Rod Smith for the Greater New Braunfels Chamber of Commerce

Chairman Millikin asked the committee to review the nomination letter sent by the Greater New Braunfels Chamber of Commerce recommending the nomination of Rod Smith to replace Ken Bercaw on the AIR Advisory Committee. Chairman Millikin motioned that Mr. Smith be accepted to serve on the AIR Advisory Committee. Mayor Cork seconded the motion. The motion passed unanimously.

a. By-Laws Amendments

Action Item: Consideration and possible approval of amendments

Chairman Millikin asked if there were any questions on the proposed changes explained in the handout. During the October 11, 2004 meeting of the AIR Technical Committee the following changes to the Bylaws of the AIR Committee were approved for consideration by the AIR Executive/Advisory Committees.

Amendment # 1

If the Chair can not be present, the Vice Chair shall preside at that meeting.

This first amendment is suggested since the Bylaws, as they exist, do not specify that the Vice Chair has the authority to preside in such cases. Without this clause, the Bylaws could be interpreted such that only the Chair is so authorized.

Amendment #2

The meeting dates and times of each individual committee may be changed according to the consent of a majority of the voting members of each individual committee, respectively and the consent of said majority may be affirmed by electronic mail or during a regularly scheduled meeting of the committee. If a meeting time is changed, a final tally shall be reported to the committee membership when the final decision is confirmed and reported back to the committee.

This second amendment is suggested to allow greater flexibility in meeting times. While the Bylaws require a quorum—forty percent of the voting members of a committee—to establish a meeting, it might be prudent to require a simple majority to change the meeting times.

Judge Schraub asked what kind of a time differential existed on e-mail notification. After some discussion Mayor Cork provided an amendment to the proposed amendment that replaced the words "*by electronic mail*" with "*via electronic mail with read receipt.*"

Mayor Cork moved for approval of the amendment to the amendments. Judge Wolff seconded the motion. The motion unanimously passed.

b. Clean Air Plan Workshop of November 9, 2004

Mr. Bella presented information on a Clean Air Plan Workshop scheduled for November 9th 2004, from 6 p.m. to 8 p.m. in the AACOG Board Room. Mr. Bella explained that the workshop was being held to fulfill the obligations cited under the Clean Air Plan, due to the exceedances recorded this summer on local area monitors. He gave a power point presentation on the goals of the workshop as well as the workshop design and format. The workshop is intended to provide a solid basis for public education, process access and comment and was being publicized through various media.

VII. Clean Air Plan Update

a. Updates to Attainment Demonstration Photochemical Model

Steven Smeltzer provided a power point presentation containing updates on the final demonstration of attainment in the photochemical model. Mr. Smeltzer explained that TCEQ requested adding existing control strategies to the final control strategy run. The strategies included TERP, and some other voluntary strategies. He reported that after adhering to the addition of those control strategies the model is updated and has passed all the attainment demonstrations. Mr. Smeltzer remarked that the photochemical model still demonstrates attainment in 2007 and that this was the final attainment model run.

VIII. AIR Technical Committee Updates

a. Action Item: Consideration and possible approval of NAFTA Truck Traffic Letter and its distribution

Renee Green reminded the committee that during the August 25th AIR Executive/Advisory meeting the committee had considered a draft letter regarding NAFTA truck traffic and there had been considerable discussion on whom they should send the letter to. It was decided that the letter be sent to the Air Tech Committee for their recommendations. The Air Technical Committee had met and it was recommended that the letter be sent to Norman Minetta, US Transportation Secretary and that a cover letter be sent along with a copy of the Minetta letter to the listing of recipients recommended. The list included the names of the members of the state Senate Committee on International Relations and Trade, key positions in the United States Department of Transportation, the USDOT Federal Motor Carrier Safety Administration, the US Environmental Protection Agency and the Local Federal Delegation for Bexar, Comal, Wilson and Guadalupe Counties. The Air Tech committee had reviewed and approved the recommended listing of individuals who were to receive a copy of the Minetta letter.

Mayor Cork moved for approval of the letter as amended. Councilman Hernandez seconded the motion. The motion unanimously passed.

b. Update: Request to TCEQ to withdraw CAMS 23 measurements

Chairman Millikin called upon Forrest Mims who was signed up to speak on this item under citizens to be heard.

Mr. Mims comments made during his slide presentation can be found at the end of these minutes.

On the conclusion of Mr. Mims presentation, Mr. Bella explained that it was not at all uncommon that there would be differences in ozone levels at two different monitors. Mr. Bella pointed out that the chart used by Mr. Mims during the presentation takes a look at the two sites on a day by day basis and it was not the foundation for saying that one monitor has an error of the twenty percent order. Mr. Bella said it was a misconception and that he had mentioned the same to the AIR Technical Committee. Mr. Mims disagreed. He commented that two instruments have been corrected and now agree much more closely as one would expect from the geography and the terrain out there. He agreed that you couldn't use this difference in readings as a quantifiable difference in the two analyzers but it does show there's a significant difference.

Mayor Cork commented that if we were to expect the outcome of the two monitors to be the same we should only have one monitor. However, he understood that if there had been changes made and they are more similar then maybe they should have been closer together but we shouldn't expect them to be the same. Mayor Cork remarked that there were several items that raise concern but their timelines aren't clear enough in what Mr. Mims presented. For instance things like the lack of a thermostat on an air conditioner. Temperature and humidity control are obviously things that need to be maintained for testing equipment. Whether that has been fixed up since is something that we can find out with relative ease. He said what he would like to see was some outside communication with the agency. Perhaps if you would like to talk to the Technical Committee and share what information you have gotten back from the agency then look at those elements together and see what's the most current data. Mayor Cork said that it doesn't matter a lot in his mind that two years ago there was an air conditioning problem. It could have been

resolved a year and a half ago. He said he was looking at where we are heading not where we have been.

Renee Green said that the AIR Technical committee had set up a subcommittee made up of Ms. Sandoval, Mary Anne Elekes, Mr. Mims and Mr. Bella to discuss Mr. Mim's report. Ana Sandoval was chairing the subcommittee and addressed the committee.

Ana Sandoval, Vice Chair of the AIR Technical Committee, explained what had occurred at the last AIR Technical Committee Meeting regarding Mr. Mims' presentation. She said Mr. Mims had brought forth the same information he had just presented to the AIR Executive/Advisory Committees. The AIR Technical Committee had expressed interest over some of the findings and they knew it was something that needed their attention. However they were hesitant to send a letter forward based on the audit because only Mr. Mims had looked at the information and they wanted to make certain that more people were able to look through the information so they could arrive at the same conclusions. Then, they would be able to base a letter on those conclusions. She told them that they were meeting today after the AIR Executive meeting to discuss EPA regulations, the audit and would report their findings back to the AIR Technical Committee for further consideration.

Chairman Millikin asked Mr. Mims to leave a copy of his presentation. He reminded Mr. Mims that they had addressed the issue several times to TCEQ and EPA. Chairman Millikin supported Mayor Cork's comments about focusing on where they were heading as opposed to where they've been. Chairman Millikin said it was important to maintain communication with TCEQ and EPA to assure they were sending the most accurate data.

Mr. Mims commented that Mayor Cork had asked for new information which he had provided. He thought that "this interest would cause TCEQ to realize that we want to know that these instrument shelters and instruments they are in and the site operators are following the EPA rules clearly these audits show that they were not. I don't know if this is still happening today or not. I have no way of knowing that. But our committee will look into that. So that's all I'm just trying to do; make sure that the taxpayers are being judged properly and getting what they are paying for."

Chairman Millikin concurred with Ms. Sandoval that the AIR Technical Committee review the information and bring it back to the AIR Executive Advisory Committee for re-consideration.

c. 2002 National Emissions Trends (NET) Emission Inventory

Steven Smeltzer presented a power point presentation on the recently completed 2002 Emissions Inventory. He explained that they are required to do an Emission Inventory every three years by cataloguing all the emissions sources in the San Antonio area from oil wells to asphalt paving to power plants. Emission categories included On-Road, Area, Non-Road, Biogenic, and Point Sources emissions. He presented the final results of calculations that indicate that the region's VOC and NO₂ emissions have decreased over time. Renee Green pointed out that the emissions inventory was very important as the basis for the model and control strategies. She commented that it was wonderful they were able to demonstrate a reduction in the emissions.

d. Monitoring & TexAQS II

Steve Smeltzer presented information on future monitoring activities in the San Antonio region. His power point presentation featured the goals of these monitoring activities. They are to increase understanding of ozone formation and movement in the San Antonio region, improve the quality of data inputs for the photochemical model, increase/refine data for the 3rd photochemical modeling episode (Most likely a 2005 or 2006 episode), collect data in conjunction/coordination with TexAQS II studies (Monitoring for only 2005 and 2006) and a better understanding of ozone precursor monitoring: compare or "ground truth" the emission inventory estimations with the monitored data. In order to accomplish these goals staff would continue work/advisement with TCEQ & EPA monitoring network experts, continue work/advisement with TexAQS II team, list monitoring priorities because of limited funds and apply the monitoring for a two year period. Priority monitoring needs are a radar profiler and VOC monitoring.

Mr. Bella added that they were looking at coordinating with TCEQ a series of aircraft flights for upper air monitoring as well. The 18-month TexAQS II also uses aircraft to determine transport by following emission plumes. Mr. Bella said the ideal thing would be to operate in conjunction with the Mobile Van that would come down and monitor on the ground. They were working with TCEQ to coincide the mobile van with the aircraft. In conclusion if there was a photochemical model episode for 2005-2006 there would be a considerable amount of data to aide staff in the development of the next photochemical models.

IX. Other Issues

Renee Green reminded everyone that a new legislative session would commence in January 2005. She brought to their attention the existing appropriation bill for the TCEQ as Rider 17. It is the Rider that provides all the funding for the work that the committee and staff have been doing for the past two years. She said the funding of the rider was vital for the continuation of the planning effort and asked that those actively involved in their agency or local governments legislative agendas be aware of the need to support the rider. Ms. Green said she would bring the Texas Clean Air's Working Group legislative Agenda to the AIR Executive Committee meeting in December for their consideration.

Chairman Millikin asked the AIR Technical Committee to look into the implementation of lower emission vehicle ratings (LEVs) as provided by some car manufacturers and mandated by some states through legislation. He asked that the AIR Technical Committee review whether the State of Texas might be one of those states that wants to make tougher standards. Ms. Green said they could revisit the issue.

X. Adjourn

Having no further business to discuss Chairman Millikin adjourned the meeting.

Attachments: Comments/Statements Made or Submitted by Citizens to be Heard:

Citizen #1: Comments by Mark Langford, Citizens Organized for Good Science as presented to the committee verbatim.

Good Morning, I am Mark Langford with Citizens Organized for Good Science. I live in Bexar County. Now that the elections are over and 2005 is right around the corner. It's important that we all work together in protecting San Antonio from non attainment in the future.

As I have illustrated to you In the past no matter how low our emissions are in 2007 a summer of "Regional Transport Outbreaks" like this past year will easily take us out of attainment.

We need our elected leaders to meet with our congressmen and start making the necessary changes to the Clean Air Act to protect our area from federal penalties after 2007.

We need the following changes made before 2007:

1. Allow the ozone tolerances for a city to reflect the tolerances for the monitors. If the EPA allows plus or minus 20% then cities need to be allowed plus or minus 20% for attainment.
2. Allow cities to be excluded from non attainment if cities can prove that they are contributing less than 30% to monitored ozone levels during high ozone events. As you see from this past summer San Antonio really contributed more than 30% on high ozone days.
3. Install more rural monitors to establish background national ozone levels and that's another very important one as we also saw this summer. There was one day when Seguin came in at 85 parts per billion and that's when the winds were actually downwind of Seguin so their background levels were already at 85 parts per billion and San Antonio at that point I think we ended at like 87 or 88 parts per billion. So the rural monitors are very, very important not only for San Antonio but nationally.
4. Provide a strict maintenance and inspection of all monitors not only locally and regionally but nationally by EPA and independent contractors. According to some of the recent TCEQ audits it appears that ozone monitors may not be properly maintained in Texas. If this is happening here could this also be a problem nationally?
5. As we've asked many, many times we'd like to have your endorsement of HR1891 that's the start in getting this process going.

Finally I again would like to reiterate that I offer my services to become a member of the air advisory committee and I ask for your support in doing so. I've studied our ozone situation for many years and would like to assist your committee on these important issues.

Thank you.

Citizen #2: Comments by Forrest Mims recorded verbatim.

Forrest Mims: I prepared this response to Mayor Cork's comments at your last minutes. This is the lunar eclipse of the other night. You notice the change in the color of the moon. That reddish glow, that's the terminator glow from the twilights around the entire planet during the lunar eclipse. So it a picture of air pollution either natural or man made. That's how they can tell there are ancient volcanic eruptions by reading old lunar eclipses. I want to talk briefly about the deficiencies in the ozone monitor in CAMS 23 and Mayor Cork I appreciate your comments at the last when you said you wanted to see some new information. I reflected on that so two years ago when I requested new information from the TCEQ, they sent it to me in a FTP file which I was unable to open and so after your meeting, I went back to my office and I remembered that old file and I tried a new browser and I was able to open that browser. So briefly to review the history of this; at the last meeting you tabled a letter that the Air Tech committee had proposed about CAMS 23 and I received that new information on September 12th which had actually been sent two years earlier by TCEQ and I was unable to open it and then on the 20th of September we were going to discuss that at the AIR TECH meeting but that meeting was cancelled because the chair was absent. On the eleventh I presented to the AIR TECH committee the TCEQ audits some of which I recovered from that FTP file which do have the kind of significant information that I believe Mayor Cork was asking about. A subcommittee was appointed to study the relevant rules and the audits and then today that committee will hold its first meeting I believe after this meeting. While we do the audits, TCEQ did not disclose errors or ozone measurements until a private citizen found a ten percent error for the summer of 2002. AACOG simply must assure the citizens that their air quality is being measured accurately. Dust and Air Quality monitoring is required by the Clean Air Act. The EPA interprets this to mean ozone must be measured to within a plus or minus twenty percent. As you know and as I have pointed out in many public meetings school children can measure ozone more accurately than this. We

just heard that apparently Senator Kerry has conceded the election. For an elected official if your votes are counted to a tolerance of plus or minus twenty percent I don't think you would be very happy. You want every single vote to be counted and I feel that that's the same way that we want our ozone to be measured as accurately as the instrument will allow. Now here's an e-mail from Dave Sullivan as a reminder about the error in ozone measurements. I have considerable more information on this that is new Mayor Cork in other correspondent that the committee has not seen. I won't show that today but I'll be glad to provide it later. And when David Sullivan got my e-mail about the error, he then the same day, that morning wrote an e-mail to his staff about what to do he wanted to have a quick meeting and he predicted that a political storm would be brewing unless we act fast. And I have that letter with me today. Then he gave me some actions that could be taken, throw out all the data for that site, use best engineering judgment to adjust up data for a couple of years and down data from another year. There's some new information about this. Apparently TCEQ has been adjusting some of our ozone data. I think that's a brand new topic we need to look into that and find out the circumstances and how they adjust data and what kind of regression models they are using and if that's approved by the EPA. And then he suggested go with the data as is but co-locate another ozone system at CAMS 23 and then he says each of these actions has significant draw backs and the correspondence that came from this are fascinating letters from other TCEQ scientists pointing out that they themselves have created the error and they could solve the problem. This is the recommendation that I have always maintained. You just don't put bad data in your record period. Now moving on to the new material. TCEQ admits that its non standard method caused CAMS 23 ozone to be 9 to 10% too high during 2002. I believe the correct number would be 10.4 percent too high. TCEQ set considerable data from CAMS 23 that exceeded the plus or minus twenty percent rule of the EPA. Not just a few days. . . many days. I will show that to you. Therefore, the TCEQ should select Dr. Sullivan's first option and throw out those data. TCEQ provided CAMS 23 audit reports for 1999 through 2001 at this FTP site. This is the one I was unable to open until the 12th of September. These audits raise very significant questions about the stability of the instrument at CAMS 23, the conditions of the instrument shelter, improperly trained site operators, improper measurement procedures, erroneous data sent to the EPA. Mayor Cork all five of those are new. WE knew that some bad data had been sent to the EPA but we didn't know the magnitude or at least I didn't until I saw these audits. The first four issues here are completely new. Here is a typical audit for CAMS 23. These are done by TCEQ employees. This particular auditor is named Bordone? I don't know who this person is but they are very conscientious in their paper work. And they entered the barometric pressure or pressure factor I'm not quite sure that's correct but whatever and I think it's a default value. Then they get into the actual audit situation and this particular audit they found that there was a percent difference of 19.7 percent between CAMS 23 and a test instrument. And then another test just forty four minutes later I believe they found it was a difference of minus 4.2 percent. So when the ozone was seventy one parts per billion, CAMS 23 over a forty four minute period measured eighty five parts per billion at one point and sixty eight parts per billion at another point. They just barely squeezed in under the twenty percent tolerance. Folks that's not acceptable in science. That might be ok for regulators that is not good science. And here's the one that was 19.7 percent too high and then the one that was 4.2 percent too low, and then they analyze their data with check dates and so on. They also attach ___ under files where they look at the data and inspect it. Then they post this is a warning . . .but what they don't post here is that the instrument itself was providing data significantly below CAMS 59 or above CAMS 59 at the time of the audit. Here's another audit this is dated 2001 September 7th. This describes the condition of the instrument shelter. And first we have some very technical things here about the flow of the gas of the air which contains the ozone and doesn't meet the specs. But that may be minor we don't know yet we'll look into that. This is the one that really troubles me. The air conditioner has no thermostat. This makes it hard for the operator to control the inside station temperature. The operator uses a space heater to help regulate the temperature. Well the ozone monitor in use in this place is very temperature sensitive and high humidity causes condensation and moisture inside the lines which can cause serious errors in ozone measurement. The fact the operator had to use a space heater is just unbelievable. I don't know if this happened in other sites but I hope that problem's been fixed we'll have to look into that. It's also interesting that this audit points out the trees that are very close to the site that are still there today and to my knowledge have never been cut back or removed. Now the station's interior lights flicker when the zero air compressor starts. The voltage readings of the analyzer did not change. The EPA rules specifically address voltage regulation at these shelter sites. That's an unacceptable condition in my opinion and our committee will look into that I suppose. Improperly trained site operators. This is also very important. The operator received on the job training. That is acceptable to the EPA but there's no documentation of the training required in the QAPC and Ambient Air Quality Network Field Policy Control Manual i.e. also called the EPA Redbook. The operator has a good understanding of the daily operations station but further training and general assurance quality control terminology is needed. And then the log books are reviewed but are not properly documented by initials and dates. That helps me better understand why so much of the TCEQ data is considered provisional because they are not even signing

off of on the data at least at CAMS 23. And here's some examples of that. This discusses the wind direction at CAMS 23 and the errors there in that lower box are enormous. The one I can read is 116. 1 degrees the error in the wind direction. These wind directions are very important for those of us looking at air flow over these monitors during ozone events and if the wind direction is that far off you can't tell where the wind was coming from at ground level. This is dated January 8, 2003. This is one of the more recent ones I have and this one has some very important findings. It talks about the traditional method of measuring ozone at that site was correct. That's in the correspondence also sent by the TCEQ but the data processing method that they use is called APM or alternate processing method for this site prior to October 1, 2002 should be reviewed by data validation personnel. I don't know if that's been done but there's another confirmation that the method was wrong and I have correspondence here that also states the method was wrong. There are currently no written standard operating procedures or SOPs for the environmental data operation conducted at this monitoring station. This observation is project wide and is associated with all the monitoring networks. There are draft SOPs in progress. The EPA has four words in their regulations, words like must, and there are words like should. If the regulation says must you have to do it, if it says should they want you to do it but it is not mandatory. I found both examples on SOPs. One of which says you must have SOPs. The state of Texas has no SOPs not just CAMS 23. I asked the TCEQ representative at a public meeting in Seguin last Thursday if the state had such SOPs and he said they had been developed but he didn't give me a date. Erroneous data sent to EPA and this is. . . I only have one or two more slides, TCEQ says CAMS 23 ozone concentration may greatly exceed the plus or minus twenty percent rule and TCEQ has defended this practice by citing the disclaimers on their web page. This is all I have from them and the audit file that they sent me and this goes up to the end of 2001. This is the ozone measurements at CAMS 23 at Marshall High School and CAMS 58 at Camp Bullis and this shows the plus or minus twenty percent range of these measurements and what you are trying to do is compare these two instruments with one another. It's not an approved method but it's the method they chose and see if these two instruments differ statistically during this comparison period during 1999 and continues into 2003. Well you can already see that there are quite a few measurements well outside the twenty percent error range of those instruments. Here we have a positive bias and here's some examples of data that are well above the twenty percent limit, if indeed the ozone concentrations were the same at the two instruments. Doing the and we see the negative bias here and we see errors that are as great as 80 percent and we see numerous other errors to many to circle and then we see the day the audit was conducted six September and the instrument was still significantly different in other words greater than 20 percent difference with CAMS 58. The bottom line is if indeed these data were that far off they should never have been sent to the EPA. And so in summary the audits in CAMS 23 data provided by TCEQ disclosed serious deficiencies at CAMS 23 and other Texas CAMS sites. The Air Tech Committee should promptly request all audits of Bexar County CAMS sites since 1999 and present its findings to the Air Executive Committee on 15 December 2004. And so I thank Mayor Cork for making his request. If he had not made his request I would not have looked into this, I would not have found any of this so I appreciate his suggestion. I'll be glad to take any questions.